COMMENTS AND RESPONSES
VOLUME 1: CHAPTERS 1-5

California Pacific Medical Center (CPMC) Long Range Development Plan

PLANNING DEPARTMENT CASE NO. 2005.0555E

STATE CLEARINGHOUSE NO. 2006062157

SAN FRANCISCO PLANNING DEPARTMENT

Draft EIR Publication Date:	**JULY 21, 2010**
Draft EIR Public Hearing Date:	**SEPTEMBER 23, 2010**
Draft EIR Public Comment Period:	**JULY 21, 2010 – OCTOBER 19, 2010**
Comments and Responses Publication Date	**MARCH 29, 2012**
Final EIR Public Certification Date:	**APRIL 26, 2012**

3.7 TRANSPORTATION

3.7.1 SETTING

3.7.1.1 STUDY AREA

Comment

(Margaret Kettunen Zegart, October 20, 2010) [97-16 TR]

"• Adverse impact of "cut through" and alternative streets used for drivers through residential neighborhoods, such as Little Saigon, Tenderloin, the 20 residential high rise senior care facilities on Post and Sutter including the Towers (noise - sirens and increased traffic) and pedestrian safety."

Response TR-1

The comment expresses concern about potential effects on traffic and pedestrian safety in the nearby Little Saigon area, in the Tenderloin, and along Post and Sutter Streets that would be associated with the proposed Cathedral Hill project, in particular "cut through" traffic or vehicles using alternate streets. Draft EIR Section 4.5, "Transportation and Circulation," identifies several cumulative traffic impacts on and near Post Street and Sutter Street that would be associated with proposed development of the Cathedral Hill Hospital and Cathedral Hill Medical Office Building (MOB): Impacts TR-101, TR-104, TR-108, TR-113, and TR-117 (pages 4.5-219, 4.5-221, 4.5-223, 4.5-226, and 4.5-228, respectively).

A supplemental analysis (C&R Appendix E) was prepared for intersections in the Tenderloin and Civic Center areas, as documented in the technical memorandum *Supplemental-Sensitivity Transportation Impact Analyses for the California Pacific Medical Center Cathedral Hill Campus in San Francisco, CA* (Fehr & Peers 2011). The purpose of this analysis was twofold: (1) to determine if implementation of the proposed CPMC LRDP at the Cathedral Hill Campus would result in any significant impacts to traffic, pedestrians, or bicycles in the Tenderloin/Little Saigon neighborhood that were not identified in the Draft EIR; and (2) to determine if an increase in the number of project-generated trips through the neighborhood beyond what was assumed in the Draft EIR would create additional transportation impacts. No additional impacts were identified, and the findings of the supplemental sensitivity analysis are summarized in Response TR-124 (C&R 3.7-207). For information on siren noise in the Tenderloin/Little Saigon neighborhood please also see Response NO-59 (page C&R 3.8-64). Potential impacts related to traffic-generated noise are addressed in Response NO-36 (page C&R 3.8-45).

3.7.1.2 GOLDEN GATE TRANSIT ROUTES

Comment

(Ron Downing—Golden Gate Bridge Highway & Transportation District, September 14, 2010) [11-1 TR]

"Golden Gate Bridge, Highway and Transportation District (District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the California Pacific Medical Center (CPMC) Long Range Development Plan (Case No. 2005.0555E) and offers the following comments:

- The District requests that the description of Golden Gate Transit (GGT) bus service located on Page 4.5-30 be corrected to state that Route 92 operates in the vicinity of the California Campus. Also, a sixth bus route, Route 80, serves the Cathedral Hill Campus but is not included in Tables 4.5-6 and 4.5-7 because it operates only during evening and weekend hours. While the route listing is correct at the time of publication of the DEIR, please note that Route 73 will be discontinued effective September 12."

Response TR-2

The comment requests that revisions be made to the description of Golden Gate Transit (GGT) bus service contained in the Transportation section of the Draft EIR. Including these additional GGT lines on Page 4.5-30 of the Draft EIR does not affect the results of the transit analysis presented in the Draft EIR. The analysis of the California Campus, where medical services would be reduced, did not assume any future changes to transit ridership on Golden Gate Transit related to the project, and including Route 92 in the transit description for California Campus would only provide additional details about lines that existing transit commuters from the North Bay might use to access the campus and would not alter the transit analysis for California Campus. The transit analysis for the Cathedral Hill Campus considers weekday peak-hour ridership; therefore, Route 80 would not be operating during the hour for which transit to and from Cathedral Hill Campus was analyzed. Discontinuation of Route 73, which occurred after the release of the Notice of Preparation, would reduce total transit capacity to and from the North Bay during the peak hour; however, the remaining GGT lines are expected to have sufficient remaining capacity to absorb additional ridership.

The following row and footnote has been added to Table 4.5-6 on page 4.5-30 of the Draft EIR:

Route 80[2]	Southbound	5:43 p.m.–9:56 p.m.	–	50-60
	Northbound	7:31 p.m.–11:31 p.m.	–	30-60

> "Note 3: Since the issuance of the NOP, service on Route 73 has been discontinued, effective September 2010."

In addition, on page 4.5-30 of the Draft EIR, the last sentence in the first full paragraph is revised to read:

> **"**Golden Gate Transit is operated by the Golden Gate Bridge, Highway and Transportation District. GGT provides bus and ferry service between the North Bay (Marin and Sonoma Counties) and San Francisco. GGT operates 22 commuter bus routes, nine basic bus routes, and 16 ferry feeder bus routes into San Francisco. Basic bus routes operate at regular intervals of 15–90 minutes, depending on time and day of week. GGT also operates ferry service between Larkspur and Sausalito in the North Bay and the Ferry Building in San Francisco during the morning and evening commute periods. GGT operates five lines near the Cathedral Hill Campus. The closest stop is located at Van Ness Avenue and Geary Street. GGT Routes 10 and 92 also operate~~s~~ in the vicinity of the California Campus~~, and has~~; both routes have a stop at the intersection of Geary and Arguello Boulevards**."**

3.7.1.3 MUNI ROUTES 3-JACKSON AND 4-SUTTER

Comment

(Unitarian Universalist CPMC Task Force, October 5, 2010) [44-5 TR]

"Traffic impacts, public transportation. Volume 3, Chapter 4.5, Page 4.5-62: Regarding the 3-Jackson, the information printed is erroneous. The 3-Jackson is still in service and there are no plans to remove it from service. Regarding the 4-Sutter, this line is out of service but the report says it is in service."

Response TR-3

The comment references text on page 4.5-61 of the Draft EIR that describes the *potential changes* to various transit lines within the CPMC study area as part of the San Francisco Municipal Transportation Agency's (SFMTA's) Transit Effectiveness Project (TEP). The text is not intended to describe existing transit services or conditions, which are described in the Draft EIR beginning on pages 4.5-16. According to the SFMTA's TEP recommendations, the 3-Jackson would be discontinued and replaced by service on the 2-Clement and 4-Sutter lines. The 4-Sutter was discontinued as part of the fiscal emergency plan implemented by SFMTA/San Francisco Municipal Railway (Muni) on December 9, 2010. Changes to service on the 4-Sutter as a result of the fiscal emergency are considered temporary, and service on the 4-Sutter could be reinstated before implementation of the TEP. Regardless, the results of the transit impact analysis would not be affected by this service change, because the 3-Jackson and 4-Sutter provide similar service and capacity along similar routes and the screenline analysis assumed that the 4-Sutter was discontinued into the future (Draft EIR Tables 4.5-1, 4.5-2, and 4.5-21, pages 4.5-23, 4.5-24, and 4.5-25, respectively).

3.7.1.4 Davies Campus and St. Luke's Campus Analyses

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-15 TR, duplicate comment provided in 30-15 TR]

"Although I concern myself mainly with the Cathedral Hill and Pacific campuses and although the California Campus proposal does not have a detailed analysis because it may be sold off, I believe after briefly reading the Davies and St. Luke's campus proposals that the same problems will occur for the new Davies and St. Luke's Campuses in regards to traffic congestion, diversion and parking; and should the California Campus proposal for remodeling be done by CPMC due to construction workers parking issues and related congestion, there will be similar traffic congestion and parking issues for those trying to shop at the Laurel Village Shopping Center near the California Campus."

Response TR-4

The comment states concerns about traffic congestion, diversion, and parking that could result from the CPMC LRDP proposals for the Davies and St. Luke's Campuses. The comment also states similar concerns for the California Campus. At the Davies Campus, one cumulative traffic impact at the intersection of Church Street-14th Street/Market Street was identified, Impact TR-127 on page 4.5-233, which would be associated with the proposed development of the Neuroscience Institute and the 14th Street/Castro MOB. At the St. Luke's Campus, the Draft EIR found that the proposed LRDP impacts to traffic, transit, bicyclists, pedestrians, loading, emergency access, and construction would be less-than-significant; however, two improvement measures, I-TR-87 and I-TR-88, were identified to address pedestrian and bicycle circulation around the campus.

Regarding the California Campus, it is not clear whether the comment is referring to use of the California Campus under an alternative addressed in the Draft EIR, or use of the campus after the property is sold by CPMC. As noted on page 4.5-178 of the Draft EIR, as part of the CPMC LRDP, the facilities and operations of the California Campus would remain unchanged until 2015-2020, when the majority of existing activities would be relocated to the proposed Cathedral Hill Campus (hospital uses and inpatient care) and the Pacific Campus (medical offices and outpatient care). By 2020, the remaining CPMC services at the California Campus would consist of outpatient imaging and the lab site that supports the medical office building at 3838 California Street. These two remaining CPMC services would continue indefinitely, along with all or a portion of the skilled nursing facility (SNF) beds that are currently located at the California Campus; see Major Response HC-6, "Skilled Nursing Facilities (SNF)" (page C&R 3.23-25). Once the California Campus is sold and the majority of services are transferred to the proposed Cathedral Hill Campus and the Pacific Campus, the California Campus would no longer be considered a part of CPMC. Analysis of any potential reuse or future redevelopment of the site would be speculative. Any future proposals at the site would require separate environmental review.

It should be noted that the Draft EIR conservatively assumed that in the future, the California Campus would operate in a manner similar to current campus operations. It is reasonable to assume that as activities on the California Campus are reduced or relocated to other campuses, any traffic, transit, or parking issues associated with the current California Campus and Laurel Village would be reduced.

Alternative 2, as described in Chapter 6 of the Draft EIR, would result in continued and expanded operations at the California Campus. Transportation impacts near the California Campus that would result from implementing Alternative 2 are addressed on page 6-231 of the Draft EIR. As stated on Draft EIR page 6-231, under 2030 Cumulative plus Alternative 2 conditions, vehicle trips associated with the California Campus would cause the level of service (LOS) to deteriorate from LOS D to LOS F at four intersections in the California Campus vicinity during the weekday p.m. hour: Arguello Boulevard/Geary Boulevard, Arguello Boulevard/California Street, Cherry Street/California Street, and Maple Street/California Street. It is anticipated that under Alternative 2, CPMC would implement the Construction Worker Transportation Program, which would require construction contractors to encourage construction workers to carpool and take transit, and would discourage the use of private automobiles, thereby minimizing the impacts of construction activities on the adjacent neighborhoods.

3.7.2 METHODOLOGY

3.7.2.1 LEVEL OF SERVICE—TRAFFIC ANALYSIS SOFTWARE

Comment

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-21 TR]

"4) Traffic Inconsistencies with January 2008 CPMC Transportation Study - Appendix B to the 2008 CPMC Institutional Master Plan is the "California Pacific Medical Center Institutional Master Plan 2008 Transportation Study" prepared by CHS Consulting Group. Both the 2008 Transportation Study and the Draft EIR utilize the same traffic count data collected in 2006. With the same traffic count data in both evaluations and under the same 'intersection geometry, calculations of delay and Level of Service would yield identical results for each intersection; but they do not match each other.

In my review, I compared Table 2 on Page 12 of the Transportation Study to Table 4.5-17 on Page 4.5-94 in the AM Peak and to Table 4.5-18 on Page 4.5-95 in the PM Peak in the Draft EIR. In most of the comparisons set forth below, delay and Level of Service are significantly better in the Draft EIR than calculated in the 2008 Transportation Study using the same data. While the comparisons below only involve the Cathedral Hill Campus, I also found other significant differences in calculated delay and Level of Service for each campus when comparing the two documents. These inconsistencies must be eliminated to develop proper traffic analyses of baseline conditions as well as for forecast conditions in 2015 and in 2030, together with appropriate traffic mitigation measures for the Project. The City must perform an accurate analysis and include all feasible alternatives and measures to mitigate traffic congestion impacts.

Cathedral Hill - AM Peak - Significant Delay/LOS Differences

2008 Study Intersection	Draft EIR Delay/LOS	Delay/LOS
Gough/Geary	67.7/E	>80/F
Gough/Post	24.8/C	10.7/B
Gough/Sutter	25.2/C	9.5/A
Franklin/Geary	21.0/C	8.7/A
Franklin/Post	29.3/C	15.2/B
Franklin/Sutter	48.5/D	17.0/B
Van Ness/Geary	36.2/D	22.7/C

Van Ness/Bush	38.0/D	23.6/C
Polk/O'Farrell	30.4/C	18.6/B
Polk/Geary	22.0/B	47.9/D
Polk/Post	38.5/D	18.3/B
Polk/Sutter	69.4/E	27.5/C

Cathedral Hill - PM Peak - Significant Delay/LOS Differences

2008 Study Intersection	Draft EIR Delay/LOS	Delay/LOS
Gough/Geary	49.0/D	29.9/C
Gough/Post	23.5/C	8.8/A
Gough/Sutter	26.2/C	15.0/B
Franklin/O'Farrell	58.8/E	30.7/C
Franklin/Geary	47.2/D	22.1/C
Franklin/Sutter	39.1/D	65.5/E
Franklin/Bush	28.3/C	9.7/A
Van Ness/O'Farrell	40.6/D	26.3/C
Van Ness/Geary	42.8/D	26.3/C
Van Ness/Post	20.3/C	14.4/B
Van Ness/Sutter	22.2/C	16.9/B
Van Ness/Bush	46.6/D	26.6/C
Polk/O'Farrell	41.8/D	18.3/B
Polk/Post	20.6/C	15.9/B”

Response TR-5

The comment states that there are inconsistencies in the delay and level of service results between the 2008 CPMC Institutional Master Plan 2008 Transportation Study prepared by CHS Consulting Group and the 2010 CPMC LRDP *Cathedral Hill Campus Transportation Impact Study* prepared by Fehr & Peers (on file with the San Francisco Planning Department and available for public review), the second of which was prepared for use in the Draft EIR analysis. Both the intersection analysis for the IMP and Draft EIR were prepared using TRAFFIX software, which is the software commonly used by the Planning Department in preparing EIRs, such as the recently approved *Candlestick Point–Hunters Point Shipyard Phase II Development Plan*. The TRAFFIX software platform applies the methodologies described in Chapter 16, “Signalized Intersections,” and Chapter 17, “Unsignalized Intersections,” from the Institute of Transportation Engineers (ITE) *Highway Capacity Manual (HCM), 2000 Edition* (Transportation Research Board). Although the software calculates intersection delay, and thus level of service (LOS), consistent with HCM methodology, it allows for a high degree of user adjustment to better calibrate the model to observed field conditions.

The LOS results from the two studies vary because of different intersection parameter adjustments made within the software, specifically:

- Signal progression factors were not used in the IMP analysis. The signal progression factor accounts for the fact that traffic signal timings are often set to promote the efficient and relatively continuous movement of traffic along a corridor (such as Franklin Street);

- Adjustments for additional intersection capacity created by peak period tow-away lanes. The methodology varies as to how best to account for tow-away lanes during peak periods and other factors that affect capacity at intersections. For the Draft EIR analysis, observations were made at intersections to ensure that the existing condition was appropriately modeled.

The intersection delay results contained in the 2008 IMP were not reviewed by the Planning Department staff before its publication, and thus the direction to revise intersection parameters to be consistent with Planning Department protocol was not given. Before initiating the intersection analysis for the Draft EIR transportation studies, Planning Department staff communicated the proper user adjustments to make, so that the Draft EIR intersection analysis would be performed consistent with standard protocol and better represent existing intersection operating conditions.

When compared to the LOS results contained in the IMP traffic study (the IMP and Draft EIR share 17 common intersections), approximately 80–85 percent of the intersection LOS in the Draft EIR are improved. For example, at the intersection of Gough/Post during the p.m. peak hour, once the proper signal progression factor was input, the reported average delay per vehicle was reduced from 23.5 seconds (as reported in the IMP) to 8.8 seconds (as reported in the Draft EIR). It is important to note that properly reflecting the signal progression factor and peak period tow-away lanes does not always result in the reduction of delay and LOS. As an example, at the intersection of Gough/Geary, the reported average delay per vehicle during the a.m. peak hour increased from 67.7 seconds (as reported in the IMP) to > 80 seconds (as reported in the Draft EIR).

3.7.2.2 Economic/Seasonal Effects on Traffic Volumes

Comment

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-20C TR]

“3) Traffic studies need to comprehend the impact of the current economic downturn, which has temporarily reduced traffic levels. It is unreasonable to expect reduced traffic intensity to continue. Similarly, past traffic, studies by CPMC apparently failed to comprehend seasonal variations (e.g. school vacations) and so underestimated community impact in the Pacific site area. Any traffic measurements intended to establish a current baseline must comprehend these issues. It is worth noting that most data gathered for the traffic studies is several years old. The DEIR does not adequately explain how data study period and age (and hence dependence on economic conditions, interactions with school holidays, etc.) is managed in reaching conclusions.”

Response TR-6

The comment states that the current economic downturn has temporarily reduced traffic in many areas. Although it is correct that traffic volumes may have decreased in some areas of San Francisco over the last few years, the existing conditions for the transportation impact study reports were established in 2006, when the economy was substantially better than the last few years. To ensure that the 2006 data set was not outdated, supplemental traffic data was collected in 2009 during the economic downturn years. Control traffic counts from 2009 were compared to older counts to ensure that traffic volumes had not substantially changed since 2006. The 2006 traffic volumes were determined to be within 10 percent of the more recently collected control counts, and therefore appropriate for use in the transportation analysis. This comparison is summarized in *2006 and 2009 Traffic Count Comparisons for Select Intersections & Weekday/Weekend Peak-Hour Count Comparison for the California Pacific Medical Center (CPMC) Master Plan EIR* (Fehr & Peers 2009), which is on file with the San Francisco Planning Department and available for public review.

The transportation/traffic data for the analyses contained in the Draft EIR was collected in May, June, and August 2006; June 2008; May and June 2009; and on days when most schools were in session (the spring semester for public schools usually ends between the first and third week of June), there were no holidays, and during the spring/summer months to account for a higher number of people in San Francisco during the tourist season. Consistent with Planning Department protocol, counts were collected at midweek (Tuesday, Wednesday, or Thursday) and summarized in 15-minute intervals. The data summaries for the traffic counts are included in Appendix C of the *CPMC LRDP Transportation Impact Study Master Appendix* for each campus. Dates on which intersection turning movement counts were collected are shown in the tables below.

Cathedral Hill Campus Existing Conditions
Data Collection Days

Intersection	Date		Intersection	Date	
	AM Peak Hour	PM Peak Hour		AM Peak Hour	PM Peak Hour
Gough/Geary	5/23/06	5/24/06	Van Ness/Geary	5/18/06	5/18/06
Gough/Post	5/24/06	5/24/06	Van Ness/Post	5/18/06	5/18/06
Gough/Sutter	5/24/06	5/24/06	Van Ness/Sutter	5/18/06	5/18/06
Franklin/O'Farrell	5/23/06	5/23/06	Van Ness/Bush	5/18/06	5/18/06
Franklin/Geary	5/23/06	5/23/06	Van Ness/Pine	5/18/06	5/18/06
Franklin/Post	5/31/06	5/31/06	Van Ness/Broadway	5/23/06	5/23/06
Franklin/Sutter	5/31/06	5/31/06	Polk/O'Farrell	5/25/06	5/25/06
Franklin/Bush	5/24/06	5/24/06	Polk/Geary	5/25/06	5/25/06
Franklin/Pine	5/24/06	5/31/06	Polk/Post	5/25/06	5/25/06
Van Ness/Market	5/17/06	5/17/06	Polk/Sutter	5/25/06	5/25/06
Van Ness/Fell	5/17/06	5/31/06	Eighth/Market	6/1/06	5/31/06
Van Ness/Hayes	5/31/06	5/31/06	Octavia/Market/U.S. 101	5/31/06	5/31/06
Van Ness/O'Farrell	5/17/06	5/18/06	Polk/Cedar	5/25/06	5/25/06

CPMC PM Peak Hour Existing Conditions
Data Collection Days

Davies Campus		California Campus	
Intersection	Date	Intersection	Date
Divisadero/Haight	6/28/06	Arguello/Sacramento	1/3/07
Castro/Duboce	6/27/06	Arguello/California	6/8/06
Castro/14th	6/27/06	Arguello/Geary	6/13/06
Market/17th (Castro)[3]	8/15/06	Jordan/Cherry/California	6/8/06
Castro/Market (17th)[3]	8/15/06	Parker/Maple/California	6/8/06
Market/Church/14th	8/10/06	Spruce/California	6/13/06
Market/15th	8/10/06	Locust/California	6/13/06
Market/Sanchez	8/10/06	Palm/California	6/8/06
Scott/Duboce	6/27/06	Cherry/Sacramento	6/8/06
Noe/Duboce	6/27/06	Commonwealth/California	6/8/06
Noe/14th	6/27/06	Maple/Sacramento	6/13/06
Sanchez/Duboce	6/27/06	Spruce/Sacramento	6/13/06
Fillmore/Duboce	6/27/06	Locust/Sacramento	6/13/06
Church/Duboce	6/27/06	--	--

CPMC PM Peak Hour Existing Conditions
Data Collection Days

Pacific Campus		St. Luke's Campus	
Intersection	Date	Intersection	Date
Fillmore/California	6/1/06	Cesar Chavez/Dolores	5/27/09
Fillmore/ Sacramento	6/1/06	Guerrero/26th	5/27/09
Webster/California	6/1/06	Mission/29th	5/27/09
Buchanan/California	6/20/06	Guerrero/Cesar Chavez	6/10/08
Laguna/California	6/21/06	Valencia/Cesar Chavez	6/10/08
Fillmore/Clay	6/1/06	Mission/Cesar Chavez	6/10/08
Fillmore/Washington	6/20/06	S. Van Ness/Cesar Chavez	6/10/08
Webster/Sacramento	6/1/06	Guerrero/Duncan	6/10/08
Webster/Clay	6/1/06	Mission/Valencia	6/12/08
Webster/Washington	6/20/06	Valencia/26th	5/27/09
Buchanan/Sacramento	6/20/06	Guerrero/26th	6/12/08
Buchanan/Clay	6/20/06	Guerrero/28th	6/12/08
Buchanan/Washington	6/20/06	Valencia/Duncan	6/2/09
Laguna/Sacramento	6/21/06	--	--
Laguna/Washington	6/21/06	--	--

3.7.2.3 Future Scope for the Reuse of California Campus

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-99 TR, duplicate comment provided in 30-99 TR]

"54. In regards to the California Campus Study Area that is shown in Figure 4.5-3, Page 4.5-4, the DEIR shows only the transportation impact intersections between Arguello Blvd. and Laurel St. between Euclid Ave. and Pacific Ave. Only 12 intersections were studied with the farthest intersection studied to be only one block away. Intersections farther out from any proposed project on the California Campus need to be analyzed as well, up through the ½ -mi. project radius. The current California CPMC campus traffic impact goes well beyond these parameters out at least through the ½ -mile radius shown for the project. The transportation analysis needs to go as far as well. This is particularly important when there are big vehicle trip generating services being provided in the area such as the United States Post Office on Geary and Parker and the University of San Francisco which has lessened its on-campus parking spots so more of their students are parking on the street in the Jordan Park and Laurel Heights areas. There are also at least 4 schools catering to the pre-kindergarten through 8th grade levels among them with many parents showing up with vehicles to drop off and pick up their children on neighborhood streets that have a high capacity utilization of rather limited street parking. The current California Campus as it is today adds many vehicles that cannot be accommodated by the limited number of parking spots in the Jordan Park, Presidio Heights and Laurel Heights neighborhoods."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-102 TR, duplicate comment provided in 30-102 TR]

"If or when a new buyer comes in for the California Campus, the transportation and congestion needs to be addressed not only on the 12 intersections in this DEIR but also farther out as stated earlier. Even with current CPMC operations at the California Campus, the hospital staff persons are running out to move their vehicles in hospital scrubs. Visitors are constantly blocking residential driveways or double-parking in the area. And, there is not a lot of enforcement on these adjacent streets."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-103 TR, duplicate comment provided in 30-103 TR]

"Jordan Park is made of many single-family homes or duplexes and its streets were not meant to play the role of transit corridor vehicular arterials that they are being forced to become as unintended consequences of a transportation study that did not encompass a great enough distance from the proposed construction site and from expanded services at the California Campus."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-104 TR, duplicate comment provided in 30-104 TR]

"I also do not believe that traffic enforcement of parking regulations will be the solution to mitigating congestion when a project sponsor builds something in a primarily residential area and cannot accommodate the vehicular trips generated from its business."

The traffic that is forced down these residential streets is going against the San Francisco General Plan which includes provisions that traffic should be on the main corridors, not on the residential streets adjacent to them. And, if the building will continue to be used for women's and children's health services, most of the visitors will arrive by private vehicles rather than on public transit. The area of Jordan Park and Laurel Heights, along with other development projects in the pipeline such as 3657 Sacramento Street and its 18 new residential condominiums planned as a mixed-use building and with the construction of 2 new condominiums at 331 Arguello Boulevard, the level of traffic congestion circulation will fall to an 'F' level of service with all the vehicle trips generated."

Response TR-7

The comments raise concerns related to congestion, parking availability, the viability of traffic enforcement, and cut-through traffic in the Jordan Park area and Laurel Heights as well as the study area analyzed for the California Campus. Most of the analyzed intersections are within the immediate vicinity of the project site because intersections closest to the project site would be most likely to experience impacts. However, the analysis also includes the intersection of Geary Boulevard and Arguello Boulevard. As indicated on Draft EIR page 4.4-178, as part of the proposed CPMC LRDP, the facilities and operations of the California Campus (near Jordan Park) would remain unchanged until 2015 and then gradually decreased through 2020, when the majority of existing activities would be relocated to the proposed Cathedral Hill Campus and the reorganized Pacific Campus. Once the California Campus is sold and the majority of services are transferred to the proposed Cathedral Hill and Pacific Campus, the California Campus would no longer be considered part of CPMC.

Analysis of any potential reuse or future redevelopment on the California Campus site would be speculative. Any future proposals at the site would require a separate level of environmental review. With no planned changes in facilities or operations, transportation travel demand at the California Campus would be expected to remain similar to existing conditions until 2015, and then gradually decrease between 2015 and 2020. The proposed CPMC LRDP would not result in generation of any new vehicle trips at the California Campus and, therefore, would not add to existing traffic conditions, cut through traffic, or limit parking availability, as stated in the comment. Further, the project sponsor does not have the authority to enforce traffic laws or parking regulations. Those responsibilities fall to the San Francisco Police Department and San Francisco Parking Enforcement.

3.7.2.4 CONSISTENCY IN LEVELS OF SERVICE TABLES IN DRAFT EIR

Comments

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-22 TR]

“5) Draft EIR Contains Numerous Inconsistencies in Traffic Analyses for Near and Long Term - As pointed out above, there are many inconsistencies in the evaluation of 2006 baseline traffic data for the Cathedral Hill Campus and the other campuses. In addition, there are also inconsistencies within the various tables in the Draft EIR that provide delay and associated Level of Service for 2006 baseline conditions, 2015 No Project and Project conditions, and 2030 Cumulative No Project and Project conditions. While the examples discussed below relate to the Cathedral Hill Campus, there are other similar inconsistencies for the campuses. The inconsistencies within Tables 4.5-17 on Page 4.5-94 and 4.5-18 on Page 4.5-95 of the Draft EIR for the Cathedral Hill Campus, as well as in tables for other campuses, must be reconciled to provide proper traffic analyses of the Project.”

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-23 TR]

“a) Cathedral Hill Campus - AM Peak - For the intersection of Eighth/Market, Table 4.5-17 indicates delay of greater than 80 seconds and Level of Service (LOS) F for the existing baseline conditions in the AM peak in 2006. In 2015 with higher traffic volumes than 2006 and without any identified traffic improvements, delay is reduced to 78.8 seconds and performance improves to LOS E without Project traffic. In 2030 under cumulative conditions with higher traffic volumes than 2015 and without any identified traffic improvements, delay is reduced to 76.4 seconds and performance remains at LOS E without Project traffic. Without improvements, adding traffic to failing intersections or those operating at capacity does not reduce delay or improve intersection LOS performance.”

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-24 TR]

“b) Cathedral Hill Campus PM Peak - For the intersection of Franklin/Sutter, Table 4.5-18 indicates delay of 65.5 seconds and Level of Service (LOS) E for the existing baseline conditions in the PM peak in 2006. In 2015 with higher traffic volumes than 2006 and without any identified traffic improvements, delay is reduced to 57.0 seconds and performance remains at LOS E without Project traffic. Without improvements, adding traffic to intersections operating at capacity does not reduce delay."

Response TR-8

The comments state that inconsistencies exist between the level of service tables contained in the Draft EIR. Review of the specific tables cited in Comment 92-22, Table 4.5-17 and Table 4.5-18, which present LOS at Cathedral Hill Study intersections during the a.m. and p.m. peak hour, respectively, did not reveal any inconsistencies.

Comment 92-23 and 92-24 express concern that a reduction in peak-hour average vehicle delay was reported at the intersections of Eighth/Market and Franklin/Sutter between the existing conditions and 2015 Modified Baseline/2030 Cumulative conditions. Please see the beginning of Response TR-10, page C&R 3.7-26 for a summary of the methodology that was used to forecast increases in background traffic to study intersections in future scenarios. The peak-hour delay reductions cited in the comment can be explained by a key component—the peak-hour factor—which factors into the determination of intersection delay. The peak-hour factor is a way to quantitatively express the relationship of the peak 15-minute traffic volume to the full hourly traffic volume (i.e., a measure of traffic demand fluctuations within the peak hour). The peak-hour factor used in the existing conditions was based on observed traffic counts. Because forecasted traffic volumes cannot be observed, any analysis of future intersection operations must assume a peak-hour factor. It was assumed that at intersections where the peak-hour factor was below 0.95 under the Existing conditions scenario, adding background traffic to study intersections would increase the uniformity (i.e., spread out traffic volumes throughout the peak hour). To reflect this condition, a peak-hour factor of 0.98 was assumed for 2015 Modified Baseline and 2030 Cumulative conditions. This is a standard approach used by the Planning Department because of the number of closely spaced intersections where traffic growth at adjacent intersections can have the effect of 'metering' traffic during congested periods, such as the peak hours. Under certain conditions, this can cause average delay at an intersection to improve in a future scenario, as it did at the intersection of Eighth/Market and Franklin/Sutter.

3.7.2.5 MODIFIED BASELINE FOR TRAFFIC ANALYSIS

Comments

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-23 TR, duplicate comment was provided in 108-23 TR]

"3. Baseline for Analysis Inconsistent with CEQA.

Rather than determining traffic and transportation impacts based on existing conditions, the DEIR determined these impacts using an illusory 'Modified Baseline' *projected for* 2015, 2020, and/or 2030. This 'Modified Baseline' also assumed the implementation of the Cesar Chavez Street Streetscape Plan and the SF Muni Transit Effectiveness Project (pp. 4.5-61-67), despite evidence in the DEIR itself regarding Muni cuts to existing service, let alone Muni's ability to implement the Effectiveness Project (page 4.5-17). Section l5l25(a) the CEQA Guidelines provides: 'An EIR must include a description of the physical environmental conditions in the vicinity of the project, *as they exist at the time the notice of preparation is published.* This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.' As stated by the California Supreme Court, 'a long line of Court of Appeal decisions holds ... that the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, rather than to allowable conditions defined by a plan or regulatory framework .... [T]he baseline for CEQA analysis must be the 'existing physical conditions in the affected area,' that is, the 'real conditions on the ground' ... An approach using hypothetical allowable conditions as the baseline results in 'illusory' comparisons that 'can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts,' a result at direct odds with CEQA's intent.' *Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal. 4th 310, 320·322 (citations omitted)."

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-24 TR, duplicate comment was provided in 108-24 TR]

"By using *projected* rather than *existing* traffic as the baseline, the DEIR minimizes the actual impacts of the Long Range Plan. For instance, traffic generated by the Long Range Plan, if added to existing traffic, may cause intersection levels of service to deteriorate from D to E or F, a significant impact. But if both Long Range Plan traffic and projected 2015 traffic (which may or may not occur) are added to existing traffic, the effect of Long Range Plan traffic may be masked by projected traffic. Hence, the analysis provides only the 'illusory' comparisons that the Supreme Court found unacceptable."

Response TR-9

Comment 87-24 claims that "[b]y using *projected* rather than *existing* traffic as the baseline, the Draft EIR minimizes the actual impacts" of the proposed LRDP. Comment 87-24 further states: "For instance, traffic generated by the [LRDP], if added to existing traffic, may cause intersection levels of service to deteriorate from D to E or F, a significant impact. But if both [LRDP] traffic and projected 2015 traffic (which may or may not occur) are added to existing traffic, the effect of [LRDP] traffic may be masked by projected traffic."

Contrary to Comment 87-24, the Modified Baseline approach in the Draft EIR analyzed traffic impacts by assuming certain other projected future traffic increases, as discussed in more detail below. Therefore, the Modified Baseline approach, as detailed below, would indicate either the same or a greater number of intersections operating at LOS E or F after implementation of the proposed LRDP than a more typical baseline approach analyzing existing conditions.

Supplemental Comparison of Existing to Existing Plus Project Conditions

In order to demonstrate that this is in fact the case, supplemental traffic and transit analysis was performed overlaying the trips generated by the proposed LRDP on top of Existing conditions (2006) as opposed to the Modified Baseline conditions (2015/2020). This supplemental analysis is presented in the following tables (C&R Tables 3.7-1 through 3.7-6 on pages C&R 3.7-13 through 3.7-19), which provide a comparison of Existing to Existing plus Project conditions for all study intersections (except the California campus because the proposed CPMC LRDP would essentially close services at this campus by about 2020) for transit capacity utilization and for transit delay at the Cathedral Hill Campus.

Generally, the impacts at each intersection are the same or lower under Existing plus Project conditions than under the 2015 or 2020 Modified Baseline plus Project conditions analyzed in the Draft EIR. Therefore, Comments 87-23 and 87-24 are incorrect to the extent that they suggest that use of a Modified Baseline could result in minimized impacts compared to use of existing conditions as the baseline.

At the proposed Cathedral Hill Campus, as shown in C&R Table 3.7-1, the only potentially significant impact that would occur under Existing plus Project conditions would be a level of service change from LOS D to LOS E at the Polk Street/Geary Street intersection during the a.m. peak hour. However, as explained in the discussion of Impact TR-2 on page 4.5-98 of the Draft EIR, the Polk/Geary intersection was already identified in the Draft EIR as experiencing a service change from LOS D under 2015 Modified Baseline No Project conditions to LOS E under 2015 Modified Baseline plus Project conditions during the a.m. peak hour. Thus, the impact at the Polk/Geary intersection under the Existing plus Project analysis is essentially the same as the impact described in the Draft EIR. Similar to the analysis in the

Draft EIR, the proposed project's contributions to intersections that would operate at LOS E or F under Existing Plus Project conditions were found to be less than significant.

As shown in C&R Table 3.7-6, the Existing plus Project conditions would result in one potentially significant transit delay impact near the proposed Cathedral Hill Campus. An increased delay to the 19-Polk (northbound) bus route during the p.m. peak hour of 7 minutes and 12 seconds would occur under Existing plus Project conditions as compared to Existing conditions, which would be more than half of the existing headway and, therefore, would be above the significance threshold. However, as explained in the discussion of Impact TR-31 on page 4.5-123 of the Draft EIR, the 19-Polk bus route was already identified as experiencing an increased delay of approximately 8 minutes during the p.m. peak hour under 2015 Modified Baseline plus Project conditions. Thus, the impact to the 19-Polk bus route under the Existing plus Project analysis is essentially the same as the impact described in the Draft EIR.

Conversely, unlike the 2015 Modified Baseline plus Project conditions analyzed in the Draft EIR, the Existing plus Project analysis determined that impacts at the Van Ness/Market intersection would be less than significant. Similarly, unlike the Draft EIR's analysis of 2015 Modified Baseline plus Project conditions, the Existing plus Project analysis determined that impacts to the 49-Van Ness-Mission and 38/38-L Geary bus routes would be less than significant. Therefore, the modified baseline approach used in the Draft EIR identified additional transportation impacts of the proposed LRDP at the Cathedral Hill Campus that would not have been identified using existing conditions as the baseline.

C&R Table 3.7-1
Existing and Existing Plus Project Intersection Levels of Service – Cathedral Hill Campus

Intersection	Peak Hour	Existing			Existing Plus Project		
		Avg. Delay	LOS[1,2]	v/c Ratio	Avg. Delay	LOS[1,2]	v/c Ratio
1. Gough Street/ Geary Street	AM	**>80**	**F**	**1.17**	**>80**	**F**	**1.18**
	PM	29.9	C	--	34.1	C	--
2. Gough Street/ Post Street	AM	10.7	B		11.2	B	
	PM	8.6	A		9.1	A	
3. Gough Street/ Sutter Street	AM	9.5	A		10.5	B	
	PM	15.0	B		19.2	B	
4. Franklin Street/ O'Farrell Street	AM	**>80**	**F**	**1.23**	**>80**	**F**	**1.24**
	PM	30.7	C	--	30.1	C	--
5. Franklin Street/ Geary Street	AM	8.7	A		8.8	A	
	PM	22.1	C		20.6	C	
6. Franklin Street/ Post Street	AM	15.2	B		17.1	B	
	PM	12.3	B		12.7	B	
7. Franklin Street/ Sutter Street	AM	17.0	B		16.5	B	
	PM	**65.5**	**E**		**64.6**	**E**	
8. Franklin Street/ Bush Street	AM	**71.4**	**E**		**73.1**	**E**	
	PM	9.7	A		9.8	A	
9. Franklin Street/ Pine Street	AM	12.6	B		12.7	B	
	PM	16.8	B		20.2	C	
10. Van Ness Ave/ Market Street	AM	23.1	C		23.4	C	
	PM	49.1	D		49.1	D	
11. Van Ness Ave/Fell Street	AM	30.6	C		34.9	C	
	PM	23.3	C		23.2	C	

C&R Table 3.7-1
Existing and Existing Plus Project Intersection Levels of Service – Cathedral Hill Campus

Intersection	Peak Hour	Existing			Existing Plus Project		
		Avg. Delay	LOS[1,2]	v/c Ratio	Avg. Delay	LOS[1,2]	v/c Ratio
12. Van Ness Ave/ Hayes Street	AM	20.5	C		20.4	C	
	PM	23.3	C		24.0	C	
13. Van Ness Ave/ O'Farrell Street	AM	22.4	C		27.3	C	
	PM	26.3	C		26.8	C	
14. Van Ness Avenue/ Geary Street	AM	22.7	C		22.0	C	
	PM	26.3	C		24.5	C	
15. Van Ness Avenue/ Post Street	AM	15.3	B		15.5	B	
	PM	14.4	B		15.2	B	
16. Van Ness Avenue/ Sutter Street	AM	11.2	B		11.3	B	
	PM	16.9	B		17.1	B	
17. Van Ness Avenue/ Bush Street	AM	23.6	C		25.2	C	
	PM	26.6	C		34.0	C	
18. Van Ness Avenue/ Pine Street	AM	22.8	C		24.1	C	
	PM	23.2	C		26.5	C	
19. Van Ness Avenue/ Broadway	AM	28.0	C		28.5	C	
	PM	26.0	C		25.9	C	
20. Polk Street/ O'Farrell Street	AM	18.6	B		22.8	B	
	PM	18.3	B		25.0	C	
21. Polk Street/ Geary Street	AM	47.9	D		**55.2**	**E**	
	PM	28.6	C		51.2	D	
22. Polk Street/Cedar Street[3]	AM	14.6 (EB)	B		15.8 (EB)	C	
	PM	12.3 (EB)	B		25.2 (EB)	D	
23. Polk Street/Post Street	AM	18.3	B		20.8	C	
	PM	15.9	B		16.7	B	
24. Polk Street/Sutter Street	AM	27.5	C		37.4	D	
	PM	28.7	C		29.0	C	
25. Eighth Street/ Market Street	AM	**>80**	**F**	**0.87**	**>80**	**F**	**0.88**
	PM	**70.0**	**E**	**--**	**72.6**	**E**	--
26. Octavia Blvd/ Market /U.S. 101	AM	**>80**	**F**	**1.18**	**>80**	**F**	**1.17**
	PM	38.7	D	--	40.0	D	--
A. Polk Street/Ellis Street	AM	14.2	B		14.2	B	
	PM	16.3	B		17.8	B	
B. Larkin Street/Geary Street	AM	13.8	B		13.9	B	
	PM	15.3	B		15.3	B	
C. Hyde Street/O'Farrell Street	AM	12.6	B		12.7	B	
	PM	13.1	B		13.2	B	
D. Leavenworth Street/Geary Street	AM	12.4	B		12.5	B	
	PM	14.1	B		14.1	B	
E. Larkin Street/Grove Street	AM	13.4	B		13.5	B	
	PM	13.5	B		13.5	B	

C&R Table 3.7-1
Existing and Existing Plus Project Intersection Levels of Service – Cathedral Hill Campus

Intersection	Peak Hour	Existing			Existing Plus Project		
		Avg. Delay	LOS[1,2]	v/c Ratio	Avg. Delay	LOS[1,2]	v/c Ratio
F. 9th Street/Market Street	AM	14.0	B		14.1	B	
	PM	21.3	C		21.5	C	
G. 7th Street/Market Street	AM	16.7	B		16.9	B	
	PM	22.2	C		22.4	C	

Notes:

Bold font indicates deficient LOS of LOS E or LOS F.

1. LOS = Level of Service.
2. For signalized intersections and all-way stop-controlled intersections, LOS based on average intersection delay, based on the methodology in the *Highway Capacity Manual*, 2000 Edition. For stop-controlled intersections, the delay of the worst performing approach is presented.
3. At some of the study intersections, the average delay per vehicle would remain the same or slightly decrease with the addition of project-related traffic. Using the HCM methodology, the level of service is calculated based on an average of the total vehicular delay per approach, weighted by the number of vehicles at each approach. Increases in traffic volumes at an intersection usually result in increases in the overall intersection delay. However, if there are increases in the number of vehicles at movements with low delays, the average weighted delay per vehicle may remain the same or decrease.

Source: Fehr & Peers 2011

C&R Table 3.7-2
Existing and Existing Plus Project PM Peak Hour Intersection Levels of Service – Davies Campus

Intersection	Existing			Existing Plus Near-Term Project (Neuroscience Institute)			Existing Plus Full Program (Near- and Long-Term)		
	Avg. Delay	LOS[1,2]	v/c Ratio	Avg. Delay	LOS[1,2]	v/c Ratio	Avg. Delay	LOS[1,2]	v/c Ratio
26. Octavia Blvd/ Market /U.S. 101	38.7	D		39.2	D		40.0	D	
56. Divisadero Street/Haight Street	**72.9**	**E**		**77.3**	**E**		**> 80**	**F**	**1.00**
57. Castro Street/Duboce Avenue	**> 80**	**F**	**0.87**	**> 80**	**F**	**0.87**	**> 80**	**F**	**0.88**
58. Castro Street/14th Street	45.7	D		47.7	D		50.6	D	
59. Castro Street/Market Street/17th Street	**> 80**	**F**	**2.14**	**> 80**	**F**	**2.14**	**>80**	**F**	**2.92**
60. Scott Street/Duboce Avenue	10.1	B		10.3	B		10.4	B	
61. Noe Street/Duboce Avenue	10.3	B		10.4	B		10.6	B	
62. Noe Street/14th Street	12.9	B		13.4	B		14.3	B	
63. Sanchez Street/Duboce Avenue	10.3	B		10.3	B		10.4	B	
64. Fillmore Street/Duboce Avenue	8.8	A		8.8	A		8.8	A	
65. Church Street/Duboce Avenue	12.6	B		12.6	B		12.6	B	
66. Church Street/Market Street/14th Street	**> 80**	**F**	**1.21**	**> 80**	**F**	**1.28**	**> 80**	**F**	**1.35**
67. Sanchez Street/Market St/15th Street	**> 80**	**F**	**1.22**	**> 80**	**F**	**1.22**	**> 80**	**F**	**1.22**

Notes: **Bold** font indicates deficient LOS of LOS E or LOS F.
1. LOS = Level of Service.
2. For signalized intersections and all-way stop-controlled intersections, LOS based on average intersection delay, based on the methodology in the *Highway Capacity Manual*, 2000 Edition. For side-street stop-controlled intersections, the delay of the worst performing approach is presented.

Source: Fehr & Peers 2011

C&R Table 3.7-3
Existing and Existing Plus Project PM Peak Hour Intersection Levels of Service – Pacific Campus

Intersection	Existing		Existing Plus Long-Term Program	
	Average Delay[2]	LOS[3,4]	Average Delay[2]	LOS[3,4]
26. Octavia Boulevard / Market Street/ US101	38.7	D	40.0	D
28. Fillmore Street / California Street	16.8	B	18.4	B
29. Fillmore Street / Sacramento Street	17.2	B	18.1	B
30. Fillmore Street / Clay Street[5]	10.6(nb)	B	11.0(nb)	B
31. Fillmore Street / Washington Street[5]	9.0(sb)	A	9.1(sb)	A
32. Webster Street / California Street	20.2	C	22.5	C
33. Webster Street / Sacramento Street[5]	14.6(sb)	B	15.4(sb)	C
34. Webster Street / Clay Street[5]	10.8(nb)	A	10.5(nb)	B
35. Webster Street / Washington Street[5]	8.5(nb/sb)	A	8.7(nb)	A
36. Buchanan Street / California Street	11.2	B	12.0	B
37. Buchanan Street / Sacramento Street[5]	10.1(sb)	A	9.9(sb)	A
38. Buchanan Street / Clay Street[5]	8.5(sb)	A	8.5(sb)	A
39. Buchanan Street / Washington Street[5]	8.7(sb)	A	8.7(sb)	A
40. Laguna Street / California Street	14.6	B	14.8	B
41. Laguna Street / Sacramento Street[5]	11.5(sb)	B	11.6(sb)	B
42. Laguna Street / Washington Street[5]	10.1(sb)	A	9.9(sb)	A

Notes: **Bold** font indicates deficient LOS E or LOS F.

1. Signalized = Signal controlled; AWS (All-Way Stop) = 4-Way Stop Sign.
2. Average delay in seconds per vehicle.
3. LOS = Level of Service.
4. For signalized intersections and all-way stop-controlled intersections, LOS based on average intersection delay, based on the methodology in the Highway Capacity Manual, 2000 Edition. For side-street stop-controlled intersections, the delay of the worst performing approach is presented.
5. All-Way Stop Controlled intersection. If not noted, intersection is signalized.

Source: Fehr & Peers 2011.

C&R Table 3.7-4
Existing and Existing Plus Project PM Peak Hour Intersection Levels of Service – St. Lukes Campus

Intersection	Existing		Existing Plus Project	
	Avg. Delay[1]	LOS[2,3]	Avg. Delay[1]	LOS[2,3]
68. Cesar Chavez Street/Valencia Street[4]	38.1	D	53.2	D
69. Cesar Chavez Street/Guerrero Street[4]	37.9	D	38.1	D
70. Cesar Chavez Street/Bartlett Street[4,5]	12.4	B (sb)	12.5	B (sb)
71. Guerrero Street/27th Street[5]	**>80**	**F (eb)**	**>80**	**F (eb)**
72. Guerrero Street/28th Street [5]	**38.4**	**E (eb)**	**44.5**	**E (eb)**
73. Guerrero Street/Duncan Street	13.5	B	13.9	B
74. Mission Street/Valencia Street/Fair Avenue	11.0	B	39.5	D
75. Cesar Chavez Street/South Van Ness Ave[4]	24.8	C	28.9	C
76. Cesar Chavez Street/Mission Street[4]	22.6	C	22.7	C
77. Cesar Chavez Street/Dolores Street	38.8	D	39.5	D
78. Guerrero Street/26th Street	12.6	B	12.9	B
79. San Jose Avenue/29th Street	17.9	B	18.5	B
80. Valencia Street/26th Street	18.3	B	18.4	B
81. Valencia Street/Duncan Street/Tiffany Avenue[5]	9.0	A (nb)	9.3	A (nb)
82. Mission Street/29th Street	13.2	B	13.2	B

Notes: **Bold** font indicates LOS of LOS E or LOS F;
Signal = Signalized intersection, SSS = Side-Street Stop-Controlled.
1. Average delay in seconds per vehicle.
2. LOS = Level of Service.
3. For signalized intersections, LOS based on average intersection delay, based on the methodology in the *Highway Capacity Manual*, 2000 Edition. For side-street stop-controlled intersections, the delay of the worst performing approach is presented.
4. Cesar Chavez Streetscape Improvements assumed constructed at these intersections.
5. Side-Street Stop Controlled intersection. If not noted, intersection is signalized.
Source: Fehr & Peers 2011

C&R Table 3.7-5
Existing and Existing Plus Project Muni Transit Directional Corridor and Capacity Utilization

Direction	Peak Hour	Existing No Project			Existing Plus Project		
		Capacity	Ridership	Capacity Utilization	Project Trips	Ridership	Capacity Utilization
Cathedral Hill Campus							
Northbound[1]	AM	2,186	1,377	63%	188	1,565	72%
	PM	2,186	1,307	60%	74	1,381	63%
Southbound[1]	AM	2,186	1,242	57%	88	1,330	61%
	PM	2,186	1,176	54%	186	1,362	62%
Eastbound[2]	AM	5,737	3,687	64%	250	3,937	69%
	PM	4,657	2,408	52%	51	2,459	53%
Westbound[2]	AM	4,657	2,111	45%	60	2,171	47%
	PM	5,737	3,926	68%	238	4,164	73%
California Campus							
Northbound[3]	PM	1,008	382	38%	0	382	38%
Southbound[3]	PM	1,008	652	65%	0	652	65%
Eastbound[4]	PM	3,586	1,964	55%	0	1,964	55%
Westbound[4]	PM	4,497	3,228	72%	0	3,228	72%
Davies Campus							
Northbound[5]	PM	1,912	812	42%	26	838	44%
Southbound[5]	PM	1,912	1,421	74%	31	1,452	76%
Eastbound[6]	PM	9,066	3,122	34%	66	3,188	35%
Westbound[6]	PM	9,066	7,380	81%	15	7,395	82%
Pacific Campus							
Northbound[7]	PM	960	472	49%	28	500	52%
Southbound[7]	PM	960	550	57%	36	586	61%
Eastbound[8]	PM	3,586	1,964	55%	14	1,978	55%
Westbound[8]	PM	3,586	2,751	77%	10	2,761	77%
St. Luke's Campus							
Northbound[9]	PM	3,392	1,553	46%	29	1,582	47%
Southbound[9]	PM	3,862	2,157	56%	24	2,181	56%
Eastbound[10]	PM	630	442	70%	12	454	72%
Westbound[10]	PM	630	318	50%	6	324	51%

Notes:
1. 12 Pacific/Folsom, 19 Polk, 27 Bryant, 47 Van Ness, 49 Van Ness/Mission.
2. 1 California, 2 Clement, 3 Jackson, 5 Fulton, 16AX Noriega A Express, 16BX Noriega B Express, 31 Balboa, 38 Geary, 38L Geary Limited.
3. 33 Stanyan, 43 Masonic, 44 O'Shaughnessy.
4. 1 California, 1BX California B Express, 2 Clement, 3 Jackson, 38 Geary, 38L Geary Limited, 38BX Geary B Express.
5. 22 Fillmore, 24 Divisadero, J Church.
6. 6 Parnassus, 21 Hayes, 37 Corbett, 71 Haight, 71L Haight Limited, F Market, K Ingleside, L Taraval, M Ocean View, N Judah.
7. 22 Fillmore, 24 Divisadero.
8. 1 California, 2 Clement, 3 Jackson, 38 Geary, 38L Geary Limited.
9. 12 Pacific/Folsom, 14 Mission, 14L Mission Limited, 49 Van Ness/Mission, 67 Bernal Heights, J Church.
10. 27 Bryant, 48 Quintara.

Source: Fehr & Peers 2011

C&R Table 3.7-6
Existing and Existing Plus Project Transit Corridor Delay– Near Cathedral Hill Campus

Route	Peak Hour	Headway[1]	Existing		Project Increase in Travel Time	
			Northbound/ Eastbound Delay (min:sec)	Southbound/ Westbound Delay (min:sec)	Northbound/ Eastbound Delay (min:sec)	Southbound/ Westbound Delay (min:sec)
2 Clement	AM	10:00	2:24	1:48	+ 0:22	+ 0:15
	PM	10:00	2:06	2:48	+ 0:19	+ 0:21
3 Jackson	AM	10:00	2:24	1:48	+ 0:22	+ 0:15
	PM	10:00	2:06	2:48	+ 0:19	+ 0:21
19 Polk	AM	10:00	5:12	16:42	+ 0:31	+ 2:34
	PM	10:00	13:00	13:42	+ 0:26	**+ 7:12**
38 Geary	AM	8:00	11:12	3:06	+ 1:45	+ 0:35
	PM	6:00	2:36	2:18	+ 0:21	+ 0:52
38L Geary Limited	AM	7:00	11:12	3:06	+ 2:15	+ 0:24
	PM	6:00	2:36	2:18	+ 0:07	+ 1:26
47 Van Ness	AM	8:00	8:06	6:48	+ 0:41	+ 2:20
	PM	8:00	9:30	7:12	+ 1:38	+ 0:25
49 Van Ness/ Mission	AM	8:00	8:06	6:48	+ 3:04	+ 1:30
	PM	8:00	9:30	7:12	+ 0:32	+ 3:09

Notes:
1. Existing headways at the time of NOP (pre-December 2009). Based on information provided by the Planning Department on July 6, 2010.
Source: Fehr & Peers 2011

Similar to the Draft EIR, the Existing plus Project analysis did not identify any potentially significant impacts at intersections in the vicinity of the Pacific or St. Luke’s Campuses.

At the Davies Campus, as shown in C&R Table 3.7-2, the proposed LRDP under Existing plus Project conditions would exacerbate existing LOS F conditions at the Church Street/Market Street/14th Street intersection during the p.m. peak hour by making a significant contribution of additional trips to the critical southeast-bound (14th Street) through movement. As similarly explained in the discussion of Impact TR-75 on page 4.5-186 of the Draft EIR, the Church/Market/14th Street intersection was determined under 2020 Modified Baseline plus Project conditions to contribute considerably to critical movements already operating at LOS F under 2020 Modified Baseline No Project conditions. The transportation analysis for the Davies Campus also indicated that this condition would only become significant after the construction of the Castro Street/14th Street MOB and would be less than significant under 2015 conditions after construction of the Neurosciences Institute only.[1] Thus, the impact at the Church/Market/14th Street intersection under the Existing plus Project analysis is the same as the impact described in the Draft EIR.

As shown in C&R Table 3.7-2, under Existing plus Project conditions, a change from LOS E under Existing conditions to LOS F under Existing plus Project conditions would occur at the Divisadero Street/Haight Street intersection; and the intersection of Castro Street/Duboce Street would continue to operate at LOS F under Existing and Existing plus Project Conditions (with a volume to capacity ratio of 0.87 changing to 0.88 under Existing plus Project Conditions), with the project adding 52 trips to the critical northbound through movement. Similar to above, these changes would only occur under the program-level, long-term 2020 scenario with the implementation of the long-term project of the Castro Street/14th Street MOB, which would not commence construction before 2018 and would not be completed before 2020. As stated in the Draft EIR, future project approvals for long-term development would occur only after further project-level design and refinement and subsequent environmental review.[2] With the implementation of the Neuroscience Institute only, the LOS at the Divisadero Street/Haight Street intersection would remain at LOS E.

Thus, the findings at every case except for two, as described above, impacts would be similar and in many cases less under Existing plus Project conditions than under Modified Baseline plus Project conditions support the appropriateness of the use of the Modified Baseline analysis in the Draft EIR. The exceptions noted above might arise at the Davies Campus at a program-level analysis, but only after full buildout of the long-term program at Davies (i.e., only after completion of the Castro Street/14th Street MOB), sometime after 2020.

An exception to the finding that the Modified Baseline approach is equally or more conservative than use of an existing conditions baseline might arise at the Davies Campus, but only after full buildout of the long-term program at Davies (i.e., only after completion of the Castro Street/14th Street MOB), sometime after 2020. Existing plus Project conditions reflect a scenario that would never occur. The completion of both the near-term and the long-term projects at the Davies Campus would not occur before other anticipated growth in traffic that changes existing conditions, because the long-term project at the Davies Campus would not commence construction until at least 2018 under the Project description and would not be completed until at least 2020.

Nevertheless, since the intersection of Divisadero Street/Haight Street would deteriorate to LOS F with implementation of the Castro Street/14th Street MOB, an improvement measure has been identified to improve the post-2020 operating conditions to LOS D at the intersection of Divisadero/Haight (see text revisions to the Draft EIR discussion of Impact TR-128 in Chapter 4, "Draft EIR Text Changes," on page C&R 4-80). This would consist of re-striping the Divisadero/Haight intersection to accommodate a 125-foot northbound right-turn pocket. This capacity improvement would result in the loss of up to five on-street parking spaces but would decrease average delay at the intersection to acceptable levels. The

1 The Davies Campus Transportation Impact Study stated that the Castro Street/14th Street MOB would contribute the majority (approximately 60 percent) of the proposed LRDP's new trips at the Davies Campus (with the Neuroscience Institute generating the remaining 40 percent of new trips). As described in the study, a sensitivity test was conducted to determine whether the occupation of only the Neuroscience Institute, anticipated to occur in 2015, would result in any significant impacts before construction of the Castro Street/14th Street MOB. Under 2015 Modified Baseline conditions, the Church/Market/14th Street intersection (the only intersection at which a significant impact would occur after full buildout of the proposed LRDP at the Davies Campus under future 2020 plus Project conditions) would operate at LOS F. Although the impacted intersection would operate unacceptably in 2015, the Neuroscience Institute would not contribute significantly to the critical eastbound movement on 14th Street at this intersection. Therefore, the sensitivity analysis concluded that construction of only the Neuroscience Institute would have a less-than-significant impact under 2015 Modified Baseline plus Project conditions. Source: California Pacific Medical Center, 2010 (June), *California Pacific Medical Center, Long Range Development Plan, Davies Campus, Transportation Impact Study,* prepared by Fehr & Peers, San Francisco, CA.

2 The Existing plus Project analysis conducted by Fehr & Peers did not factor any reduction in the number of trips at the Divisadero/Haight intersection that could occur with the implementation of CPMC's proposed expansion of its current Transportation Demand Management (TDM) program.

project sponsor has agreed to fund this improvement measure, which would also prevent the LOS change from occurring under Existing plus Project conditions.

In sum, the information and analysis presented above regarding Existing plus Project conditions does not change the impact determination for any project approvals being sought in conjunction with the proposed CPMC LRDP; no new significant impacts would occur beyond what is presented in the Draft EIR under the Modified Baseline scenario. Together with the analysis in the Draft EIR, the above analysis results in a Final EIR that provides analysis under both a Modified Baseline and Existing Conditions plus Project approach.

Reasonable Use of Modified Baseline

The Modified Baseline approach was used to provide a more accurate representation of the transportation system at the time when either all or the most substantial portion of new construction work at each campus would be completed and occupied (i.e., the times at which new development would become operational or substantially operational and the majority of new project-generated transportation demand would occur).

As stated in Comment 87-23, "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." The Draft EIR provides a detailed and complete description of existing conditions. CEQA, however, distinguishes between the requirement to describe the environmental setting and the requirement to describe the effects of the proposed project on the environment. A better expression of the concern is to identify "the effects of projects on the actual environment upon which the proposal will operate."[3]

Under Section 15125(a) of the State CEQA Guidelines, the physical environmental conditions in the vicinity of the project at the time the NOP is published "will *normally* constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant" [emphasis added]. However, the State CEQA Guidelines allow flexibility to utilize a different approach. The use of the term "normally" provides the lead agency with discretion to deviate from the standard time-of-review baseline.[4] As the California Supreme Court recently explained in *Communities for a Better Environment v. South Coast Air Quality Management District*, "[A]n agency enjoys the discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured. Neither CEQA nor the CEQA Guidelines mandates a uniform, inflexible rule for determination of the existing conditions baseline."[5]

As another court has explained, "in some cases it is necessary to consider conditions over a range of time periods. In some cases, conditions closer to the date the project is approved are more relevant to a determination whether the project's impacts will be significant. For instance, where the issue involves an impact on traffic levels, the EIR might necessarily take into account the normal increase in traffic over time. Since the environmental review process can take a number of years, traffic levels as of the time the project is approved may be a more accurate representation of the existing baseline against which to

3 Envtl. Planning & Info. Council of W. El Dorado County, Inc. v. County of El Dorado, 131 Cal. App. 3d 350, 354 (1982).
4 See Fat v. County of Sacramento, 97 Cal. App. 4th 1270, 1278 (2002).
5 Cmtys. for a Better Env't v. S. Coast Air Quality Mgmt. Dist., 48 Cal. 4th 310, 328 (2010).

measure the impact of the project."[6] The key concern is to show the effects on the environment on which the proposal will operate, rather than a mechanical test that focuses on a particular point in time.

CEQA requires that the methodology used by the lead agency for determining the baseline condition "be supported by reasoned analysis and evidence in the record"[7] (e.g., the baseline should not assume the full buildout to the maximum extent allowed under the relevant jurisdiction's general plan).

Modified Baseline Rationale and Methodology

The decision to utilize a modified baseline for the analysis of the transportation impacts of the proposed LRDP was made based on the above baseline discussion and based on the nature and timing of the anticipated project approval process and the proposed CPMC LRDP's construction and phasing periods. Because of the relatively long approval and construction periods, an existing plus project scenario would not materialize. CEQA generally contemplates that an EIR will be completed within 1 year after publication of the NOP for an EIR, and in most cases consideration of entitlements for the project reviewed in an EIR and construction are completed shortly thereafter. In the case of the proposed CPMC LRDP, the environmental review, entitlement, and construction/phasing periods would be extended beyond what would normally occur.

After the publication of the Draft EIR, and well after the decision was made to utilize the modified baseline, the California Court of Appeal, Sixth District, published an opinion holding that the City of Sunnyvale had improperly used a modified baseline in an EIR analysis of transportation impacts.[8] Even more recently, the same court upheld the use of a modified baseline where data regarding existing conditions at the studied intersections was also provided (but without analyzing existing plus project conditions) and the methodology was supported by substantial evidence regarding anticipated future growth.[9] Unlike the modified baseline approach at issue in the earlier court decision (*Sunnyvale West*), but similar to the approach used in the subsequent decision (*Pfieffer*), the proposed CPMC LRDP's use of Modified Baseline conditions is supported by the substantial evidence in the record, relied on a tested, detailed and conservative SF-CHAMP model process. It did not assume full development of the City's General Plan or significant interim roadway improvements, and it included growth assumptions based on actual traffic counts at the study intersections. The Modified Baseline analysis provided the best description of conditions and analysis of resulting impacts that would exist at the time of the proposed LRDP would be implemented at each campus. Moreover, like the modified baseline approach upheld in the *Pfeiffer* decision, the modified baseline in the CPMC LRDP Draft EIR was based upon reasonable assumptions of growth added to data regarding existing conditions. The data regarding existing conditions is set forth in the Draft EIR in Tables 4.5-17, 4.5-18, 4.5-35, 4.5-37, 4.5-38 and 4.5-39 on pages, 4.5-94, 4.5-95, 4.5-169, 4.5-180, 4.5-185 and 4.5-202, respectively.

An NOP for the proposed CPMC LRDP, initially issued in July 2006, was updated on May 27, 2009, to incorporate the proposed Neuroscience Institute, which had been planned as a separate project, and other changes. The proposed CPMC LRDP also was required to undergo extensive review by the San Francisco Health Commission as part of the IMP process, which is a unique requirement for postsecondary and medical institution projects in San Francisco. CPMC filed an IMP update for the LRDP with the Planning Department in 2008. In addition to this review, a Blue Ribbon Panel was convened to discuss the future

---

6 *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors*, 87 Cal. App. 4th 99, 125–126 (2001). The *Save Our Peninsula Committee* court listed the date of project approval as an example of a potentially appropriate different baseline and did not establish the date of project approval as a standard or criteria for determining the appropriateness of a particular baseline for any given project.

7 *See Save Our Peninsula Comm.*, 87 Cal. App. 4th at 120.

8 *Sunnyvale W. Neighborhood Ass'n v. City of Sunnyvale City Council*, 190 Cal.App.4th 1351 (2010).

9 *Pfeiffer v. City of Sunnyvale City Council*, 200 Cal. App. 4th 1552 (2011)

of the St. Luke's Campus. The Planning Commission closed the public hearing on the IMP in November 2009, thereby accepting the IMP. [10]

Certification of the Final EIR and approval of project entitlements are anticipated in late 2012. The proposed LRDP would then require several years of construction at each CPMC campus (other than the California Campus) and multiple relocations of various uses among the CPMC campuses. Given the unusual length of the environmental review and project approval processes, the lengthy construction period at multiple campuses and multiple phases (e.g., over 4 years for the Cathedral Hill Campus), and the scale and complexity of the project, the Modified Baseline approach was selected to more accurately describe the environmental conditions at the time the LRDP would be implemented at each campus and at the time impacts would be expected to occur.

The San Francisco County Transportation Authority's (SFCTA) SF-CHAMP travel demand model, on which the Modified Baseline was based[11], is a detailed forecast of anticipated future traffic conditions in San Francisco. The Planning Department updates and maintains a land use forecast to form the basis for testing the transportation impacts of new projects or plans. The land use forecast is based on citywide projections from the Association of Bay Area Governments (ABAG), which issues biennial projections of population, jobs, and households. The Planning Department takes the citywide population and employment growth targets (control totals) developed by ABAG for San Francisco and distributes them among 981 Travel Analysis Zones (TAZs) within city and county limits. The base year for this procedure is 2005, as that year represented the best disaggregated information for housing units, households and employment counts at the time the analyses were initiated.[12]

Each of the five CPMC campuses falls within one or more of the 981 TAZs.[13] The Planning Department predicted a relatively low amount of growth in the number of dwelling units, population, and employment expected to occur between 2005 and 2015, between 2005 and 2020, and overall between 2005 and 2030.[14] Overall, as described in detail in *Assessment of No Project Cumulative Traffic Conditions – Years 2015 and 2030 Traffic Estimates, Adavant Consulting, April 2010*, the modified baseline reflected minimal changes in the population and number of dwelling units between 2005, 2015, and 2020 in the study TAZs.[15] The California Campus was not included in this comparison, as the proposed CPMC LRDP would close services at this campus by 2020.

The Planning Department provides its land use forecasts using a classification system that reflects the distinct characteristics of a given economic activity. These land use categories are then used by the SF-CHAMP model maintained by SFCTA. The most recent land use forecasts prepared by the Planning Department at the time the analyses were initiated were based on ABAG's *Projections 2007* and were developed in 5-year increments from 2005 to 2030. The land use forecasts for 2015 and 2030 were then

---

[10] CPMC filed and additional IMP Update for the LRDP in November 2011

[11] Adavant Consulting. 2010 (April 9). Assessment of No Project Cumulative Traffic Conditions near Five CPMC Campus Sites in San Francisco—Years 2015 and 2030 Traffic Estimates. This information is on file with the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, and is available for public review as part of the project file, in Case No. 2005.0555E.

[12] Ibid.

[13] Specifically, the western portion of the Cathedral Hill Campus is within TAZ no. 318, the eastern portion of the Cathedral Hill Campus is within TAZ no. 699, the Pacific Campus is within TAZ no. 336, the western portion of the California Campus is within TAZ no. 323, the eastern portion of the California Campus is within TAZ no. 718, the Davies Campus is within TAZ no. 564, and the St. Luke's Campus is within TAZ no. 124. Source: Adavant Consulting, 2010 (April 9), Assessment of No Project Cumulative Traffic Conditions near Five CPMC Campus Sites in San Francisco—Years 2015 and 2030 Traffic Estimates, p. 4, Table 2, "Existing and Future Land Use Data by CPMC Campus."

[14] Ibid, p. 4, Table 2, "Existing and Future Land Use Data by CPMC Campus," and p. 5, Table 3, "Future Land Use Growth Rates by CPMC Campus."

[15] Adavant Consulting, 2010 (April 9), *Assessment of No Project Cumulative Traffic Conditions near Five CPMC Campus Sites in San Francisco—Years 2015 and 2030 Traffic Estimates*, pp. 4-9.

used by SFCTA as its “standard model input” to perform travel demand analyses using the SF-CHAMP model.[16]

The Modified Baseline used in the Draft EIR was developed by applying the growth rates from the SF-CHAMP model to actual traffic counts collected at the study intersections under existing conditions, to obtain 2015 turning movement volumes.[17] The 2020 turning movement volumes were derived by adding one-third (representing 5 years) of the traffic growth increment, from 2015 to 2030, to 2015 traffic volumes.[18]

The traffic estimates developed and used in the 2015 and 2020 Modified Baseline represented 2015 No Project volumes at the Cathedral Hill, California, and St. Luke’s Campuses (i.e., future weekday peak-hour turning movement volumes, assuming no changes to the existing uses at each campus) and 2020 No Project volumes at the Pacific and Davies Campuses. Future Modified Baseline plus project traffic estimates for each campus were developed by adding the number of net new trips that would be generated by each campus.

The assumed population and employment growth from 2005 to 2015 and, in the case of the Pacific and Davies Campuses, 2005 to 2020, was quite minimal, indicating that the 2015 and 2020 Modified Baseline conditions would have similar levels of traffic as reported for Existing conditions. Thus, the City’s decision to use a modified baseline was reasonable, as 2015 and 2020 conditions are substantially similar to Existing conditions, although, in connection with the long-term projects at Davies Campus, an improvement measure has been identified at the Divisadero/Haight intersection. The impacts of the proposed CPMC LRDP as presented in the Draft EIR are not diluted or masked, and the Draft EIR analysis provides an accurate assessment of the impacts of the CPMC LRDP.

Comment 87-23 TR also questions the inclusion of the Cesar Chavez Street Streetscape Plan conditions in the St. Luke’s campus traffic analysis. The vehicle capacity reductions associated with the Cesar Chavez Streetscape Improvements were assumed to take place because at the time of analysis the Cesar Chavez Streetscape project was considered a near term project, being reasonably foreseeable and capacity restrictive, thus making for a more conservative analysis. The Department of Public Works and the San Francisco Public Utilities Commission have begun construction of the sewer line improvements in and around Cesar Chavez Street with the Streetscape Plan improvements planned for implementation following the utility work (likely Spring 2012) .

---

[16] Ibid. As explained in Footnote 19 on page 4.5-69 of the Draft EIR, the SF-CHAMP model is an activity-based travel demand model that has been validated to existing conditions and can be used to forecast future transportation conditions in San Francisco. Based on the criteria referenced above regarding growth in population, housing units, and employment, the model predicts person-travel by automobile, transit, pedestrian, and bicycle modes. The SF-CHAMP model also forecasts vehicular traffic on regional freeways, major arterial roads, and local roadway networks, taking into consideration the available roadway capacity, origin-destination demand, and congested travel speeds. The SF-CHAMP model travel demand estimates incorporate the ABAG land use and socioeconomic database and growth forecasts for 2030 (from ABAG *Projections 2007*), which provide forecasts of economic and population growth for San Francisco and the remaining eight Bay Area counties, as well as the Metropolitan Transportation Commission’s *Regional Transportation Plan* and SFCTA’s *Countywide Transportation Plan*.

[17] Ibid.

[18] Adavant Consulting used the SF-CHAMP standard model outputs containing traffic assignments for the a.m. and p.m. peak periods for 2005, 2015 or 2020, and 2030, in combination with traffic counts collected in the field to estimate future turning movement volumes for 2015 or 2020, and 2030 at the 83 study intersections. Weekday a.m. and p.m. peak-hour traffic growth rates were developed from the model output assignments for the 2005 to 2015, 2005 to 2020, and 2005 to 2030 horizon years, including the a.m. and p.m. peak periods for the Cathedral Hill Campus and the p.m. peak period for the Pacific, California, Davies, and St. Luke’s Campuses. These growth factors were then applied to the existing a.m. and p.m. peak-hour turning movement volumes that were available from counts that had been previously collected in the file. Turning movement counts collected in May and June 2006 for the Cathedral Hill, Pacific, California, and Davies Campuses, and in May 2008 for the St. Luke’s Campus were used. As discussed in Response TR-6, subsequent spot traffic counts collected in April 2009 in the vicinity of the CPMC campuses indicated that the 2006 and 2008 counts were generally higher (but still within an acceptable range – generally 10 percent or less) than April 2009 conditions, resulting in a more conservative approach for the analysis. (Ibid. p. 11.) This procedure is described in detail in *Assessment of No Project Cumulative Traffic Conditions – Years 2015 and 2030 Traffic Estimates*, Adavant Consulting, April 2010.

Please also see Response TR-14 (page C&R 3.7-33) for a discussion regarding the appropriateness of assuming implementation of the Muni TEP project.

3.7.2.6 PEAK-HOUR ANALYSIS

Comments

(Paul Wermer, September 23, 1010) [PC-261 TR]

"There's been a lot of discussion about traffic, and the DEIR traffic and circulation analysis is, in fact, significantly inadequate. It deals with the conventional CEQA application of looking at commute traffic at peak hours. However, CEQA does not say Thou Shalt Not Consider Other Impacts; in fact, if you read the enabling legislation, it talks about quality of life as the driver, and how the environment is important for a healthy quality of life; by the way, I'm not a lawyer, but I do try to read some of the source material to understand why something may be so. So, the problem is it looks only in many cases at the peak PM traffic, that is not when the worst impacts occur in many neighborhoods. In my area, the schools are letting out at about 3:00 p.m., there are peak traffic deliveries at that time, listening to the concern in the tenderloin with traffic in schools, increasing traffic outside of the peak PM period is going to have a direct impact on the residential environment. That is not considered in this document. The data used for the Pacific site was comparing daily averages, but you're comparing daily averages of visitors on a 24 hour operation to something that is moving to a daytime operation. Very difficult to make sense out of that, it doesn't leave us uncomfortable, and it is a data gap."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-13 TR, duplicate comment provided in 30-13 TR]

"What are the 'peak hours'? Would not some streets have different peak hours than others and differ depending on the day of the week? How much data has been gathered, e.g., during school season, off-season, during Japantown festival days such as when the Cherry Blossom Festival Parade crosses Van Ness or even Saturdays and Sundays?"

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-18A TR]

"5) TRANSPORTATION AND CIRCULATION:

(Comments apply to all sites)

Traffic Studies: The DEIR Traffic and Circulation analysis is inadequate as presented. The analysis ignored specific comments we raised about the inadequacy of LOS and peak pm/peak am analyses in our scoping comments."

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-20B TR]

"2) CPMC's future operations will introduce a high level of traffic at times that are currently at lower intensity, not just at peak am/peak pm periods. The assessment must look at impacts throughout the day, as the non-commute period impact significantly affects the quality of life in surrounding residential areas."

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-21 TR, duplicate comment was provided in 108-21 TR]

"F. <u>The DEIR's Analysis of Transportation Impacts Is Incomplete and Not Supported by Substantial Evidence.</u>

1. <u>Incomplete Peak Hour Analysis.</u>

The DEIR analyzes traffic impacts only during the evening peak hour (5-6 pm), except at the proposed Cathedral Hill Hospital, where traffic impacts are also analyzed during the morning peak hour (8-9 am) (page 4.5-15). Yet nothing in the DEIR identifies the daily pattern of traffic generated by hospitals and medical office buildings (MOBs) to determine whether higher levels of traffic generated by the hospitals and MOBs at other times may also have significant effects. The examined 'peak' hours do not coincide with the pattern of hospital traffic, which peaks at shift changes (7 am, 3 pm, 11 pm; see page 4.5-73), or MOB traffic, which peaks at key appointment times (mid-morning and mid-afternoon). The effect of this differential pattern of peak traffic may be to extend periods of congestion, or, on some streets, to reduce traffic levels of service at periods other than those studied. The analysis of traffic impacts needs to extend to periods that coincide with the peak periods of the medical facilities and extends beyond the limited peak periods identified."

(Margaret Kettunen Zegart , October 20, 2010) [97-15 TR]

"• DEIR program-level should analyze current (and projected, too) congestion of Franklin, Gough, Van Ness and, Geary. Post and Sutter streets are primary traffic and transit corridors for downtown and weekday commute access and need to be studied for impacts of daily traffic and adverse impacts of "cultural congestion" at afternoon, evening, and weekends (serving the local and regional cultural I entertainment events (Symphony, SF Ballet, Opera, City Hall centered gatherings, Herbst Theater, Conservatory of Music, local theatres and the destinations of National Park Service and Presidio.) Further study of traffic and already over burdened transit is needed, not only for peak hours' users."

(Stephanie Barton et al.—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-38 TR]

"The DEIR also needs to study traffic impacts during midday, rather than only during a.m. and p.m. peak hours, because a hospital is likely to have a greater volume of daytime traffic than most projects. Currently, the DEIR calculates expected traffic impacts for only the peak a.m. and p.m. hours. While this at times is an appropriate default methodology, San Francisco's traffic consultant guidelines acknowledge that greater analysis may be necessary depending on the nature of the project.[85]

The proposed hospital is not like most projects. The sprawling complex would border two of the busiest arterial streets in the city. In addition to the proposed Cathedral Hill Campus' numerous staff with non-traditional work hours, most patients and visitors likely would arrive during the day. This influx of traffic at irregular times may cause unacceptable traffic delays during off-peak hours. This is especially probable for streets like Van Ness Avenue, which already experiences heavy traffic all day, and for which the DEIR already found significant and unavoidable impacts during both, the a.m. and p.m. peak hours.[86] A proposed hospital located in two of the city's busiest traffic corridors needs to account for traffic patterns throughout the day in order to provide an accurate assessment of its potential impacts.

[85] Transportation Impact Analysis Guidelines, at 10.
[86] DEIR 4.5-215 to 4.5-232."

Response TR-10

The comments raise questions regarding the appropriateness of using peak-hour analysis for measuring the impacts of Cathedral Hill and other campus operations. The traffic analysis periods for each campus are consistent with the 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (SF Guidelines), and the p.m. peak hour was determined and analyzed for all campuses. The SF Guidelines state on page 1, "In most cases, the department evaluates conditions in the p.m. peak hour of the p.m. peak period (4:00 to 6:00 PM). This period was chosen because it is the time period when the maximum use of much the transportation system occurs."

In addition, based on the CPMC campus surveys, the project's p.m. peak-hour demand was higher than demand during the a.m. peak hour, or other times of day, at every campus. This was confirmed by the travel demand analysis calculations and traffic volumes observed presented in Appendix D, pages 119 and 121, of the report *CPMC LRDP: Travel Demand Estimation for the San Francisco Campuses* (Adavant Consulting, April 9, 2010). (The report is included as Appendix D of the CPMC LRDP *Transportation Impact Study Master Appendix*.)

However, for the Cathedral Hill Campus an a.m. peak-hour analysis was added for the following reasons:

- The project represented both a new and more intense land use on the site, rather than an expansion of an existing use;
- The site is adjacent to a state facility (U.S. Highway 101 [U.S. 101]);
- The California Department of Transportation (Caltrans) recommended this approach in a letter dated April 2006.

Other analysis periods were discussed for the Cathedral Hill site during the scoping process, including an afternoon peak analysis. The final decision, to not include additional analysis periods besides the weekday a.m. and p.m. peak periods, was made for the following reasons:

- A transit rider count at the Van Ness/Geary and Van Ness/Polk stops showed that the highest number of transit riders was found between 4 p.m. and 6 p.m.
- The number of hospital staff shift workers was relatively small compared to the number of employees working standard hours along with patient and visitor arrivals in the hours between 7 a.m. and 9 a.m. and between 4 p.m. and 6 p.m.

There was also discussion of a weekend analysis because of the site's location on Van Ness Avenue. However, a review of the weekend traffic volumes showed that the weekend peak-hour volumes were approximately 5 to 10 percent less than the weekday volumes (Fehr & Peers, September 2009, *2006 and 2009 Traffic Count Comparisons for Select Intersections& Weekday/Weekend Peak Hour Count Comparison for the California Pacific Medical Center Master Plan EIR*), and not all medical services are provided on the weekend. Therefore, no weekend analysis was performed.

The traffic analysis seeks to capture the most common levels of congestion in the transportation system. Analyzing "cultural congestion" does not fall into a clear pattern. The majority of large cultural events tend to occur on weekends and later on weekday evenings (i.e., at times when traffic volumes are lower than the weekday peak periods). In addition, the schedule of events varies throughout the year. For these reasons, event traffic is typically not analyzed for a project that does not hold special events. However, it should be noted that the traffic counts used for the analysis would have captured the effect of any weekday cultural events occurring at the time counts were made in the field. Additionally, although individual traffic increases may occur on local streets related to specific uses, such as schools, a p.m. peak hour analysis considers all traffic in the transportation network, which clearly increases during the p.m. peak hour from 4 p.m. to 6 p.m., with the addition of local and regional commute traffic. The 24-hour traffic volumes on Van Ness Avenue observed with the 2009 Traffic Count Comparisons analysis further confirmed that the weekday evening peak traffic volumes are, as anticipated, the highest during the p.m. peak period between 4:00 p.m. and 6:00 p.m.

The intent of analyzing the transportation network during the peak hour was to capture the network when the maximum use would occur; as such, any and all impacts that would occur during non-peak analysis time periods, weekday or otherwise, would be included in the impacts disclosed.

3.7.2.7 SECONDARY IMPACTS OF PEDESTRIAN/BICYCLE SAFETY MEASURES

Comment

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010) [101-21 TR]

"Page 4.5-204, Improvement Measure I-TR-87; Provide Pedestrian/Bicycle Improvements: CEQA requires adequate disclosure and evaluation of the environmental impacts of proposed mitigation measures--i.e., secondary environmental impacts. The flashing lights and audible signals at the garage exits recommended under this measure could cause significant noise and light pollution impacts on surrounding residential uses. The impacts of this proposed improvement measure must be disclosed and evaluated."

Response TR-11

The comment raises a concern regarding Improvement Measure I-TR-87, which recommends installing lights and audible signals at the parking garage exits at the St. Luke's Campus as a way to improve pedestrian and bicycle safety when vehicles exit the parking garage. The proposed parking garage at the St. Luke's Campus would be located at the northeast corner of the campus, below the proposed MOB/Expansion Building. Vehicles would be able to exit onto Valencia Street and Cesar Chavez Street. As shown in Draft EIR Figure 2-59, "St. Luke's Campus—Proposed Site Plan" (page 2-197), both of the proposed garage exits would be located within about 150 feet of the intersection of Valencia and Cesar Chavez Streets. As shown in Draft EIR Figure 4.1-13, "St. Luke's Campus—Surrounding Land Uses" (page 4.1-29), the nearest adjacent residential uses are south and west of the campus, more than 350 feet from the nearest proposed garage exit. At this distance, the flashing lights and audible signals at the garage exits would be far enough away from residential uses to not be visible or heard, should these added safety features be installed. It should also be noted that this improvement measure is not required mitigation for the project, but represents an improvement measure that could enhance safety for bicycles and pedestrians.

3.7.2.8 INTERSECTION SIGNIFICANCE CRITERIA

Comments

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-7 TR]

"In addition to the impacts that have been identified in the Draft EIR, conditions will actually be worse based upon the criteria used by the City and County. Unlike most other agencies, the San Francisco criteria used to identify significant impacts for development projects do not address incremental increases in delay at intersections once gridlock conditions occur at Level of Service (LOS) F. In other words, a development project could add a number of trips to an already failing intersection without being considered as contributing considerably to cumulative traffic increases for the most congested movements, and without requiring any mitigation measures.

Many of the intersections studied in the Draft EIR already operate at LOS F in peak hours under existing conditions, and the number of these failing intersections will Significantly increase in Years 2015, 2020, and 2030 according to Tables 4.5-17, 4.5-18, 4.5-35, 4.5-37, 4.5-38, and 4.5-39 of the Draft EIR. Adding Project trips to these failing intersections will increase vehicle delay beyond what is already being experienced, with no relief in sight."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-40 TR]

"**2. The DEIR Failed to Disclose Severe Impacts on Traffic and Transit**

The DEIR minimized the Project's actual impacts on traffic congestion because unlike most California jurisdictions, the City's criteria used to identify significant impacts for development projects do not address incremental increases in delay at intersections once gridlock conditions occur at Level of Service (LOS) F. This means that a development project could add any number of trips to an already failing intersection without being considered as contributing to cumulative traffic increases for the most congested roadways. This lax criterion In turn allows a developer to minimize a project's actual impacts and allows it to avoid mitigating its worst impacts on traffic congestion.

Here, many of the intersections identified in the DEIR already operate at LOS F in peak hours under existing conditions, and the number of failing intersections will significantly increase in Years 2015, 2020, and 2030[21] The Project's contributions to additional vehicle trips to these failing intersections will increase delay well beyond existing conditions. This issue is particularly serious for a hospital project. For example, the DEIR did not analyze how the increased traffic around the Cathedral Hill Campus will affect access for ambulances, labor and delivery vehicles and others urgently trying to reach the hospital. During gridlock traffic conditions which are much of the time around Van Ness Avenue, emergency patients may face life threatening delays while waiting in traffic. The DEIR failed to consider these and other critical circumstances in the traffic analysis.

[21] DEIR Tables 4.5-17, 4.5-18, 4.5-35, 4.5-37, 4.5-38, and 4.5-39."

(Gloria Smith—California Nurses Association, October 20, 2010) [96-19 TR, duplicate comment was provided in 110-19]

"**V. Traffic and Transportation Problems Due to Increased Traffic at Cathedral Hill Campus**

The Draft EIR's traffic and transportation analyses all suffer from the same fundamental mistake, i.e., failing to recognize that the projected future levels of service at intersections in the vicinity of the CPMC campuses is *not the only relevant criterion* that needs to be analyzed and would *not be the only consequence* of implementing the LRDP."

Response TR-12

The comments raise questions about the significance criteria used to determine impacts at intersections and raises a concern that only future intersection levels of service were used to determine impacts resulting from the proposed CPMC LRDP.

As stated on Page 4.5-56 of the Draft EIR,:

> The project was determined to have a significant traffic impact at an intersection if project-generated trips would cause an intersection operating at LOS D or better under No Project conditions to operate at LOS E or LOS F, or intersections operating at LOS E under No Project conditions to deteriorate to LOS F conditions. At intersections that would operate at LOS E or LOS F under No Project conditions, and would continue to operate at LOS E or LOS F under project conditions, the increase in project vehicle trips was reviewed at the critical movements to determine whether the increase would contribute considerably to critical movements operating at LOS E or LOS F.

As the traffic methodology above indicates, the analysis included an evaluation of whether additional vehicles generated by the proposed LRDP at intersections already operating at LOS E or LOS F would result in significant impacts. Specifically, for those intersections already operating at LOS E or LOS F under the Cumulative condition, project vehicle trips were reviewed to determine whether the increase would contribute considerably to critical movements (see discussion on page 4.5-93 of the Draft EIR). This type of analysis addresses the incremental increases in delays added by a project at intersections that are already operating with high vehicle delays. Therefore, the comment is incorrect in stating that "... a development project could add any number of trips to an already failing intersection without being considered as contributing to cumulative traffic increases for the most congested roadways."

The Draft EIR lists those intersections that are expected to operate at unacceptable levels of service (LOS E or LOS F) under the Cumulative condition at the beginning of the traffic analysis as well as in the level of service tables for each campus. For example, there are a number Cathedral Hill Campus study intersections that would operate at LOS E or F under the Cumulative condition. However, the Draft EIR states that less-than-significant impacts (i.e., less than significant project contributions to critical movements) would occur at these intersections (see Impact TR-102 on page 4.5-220 of the Draft EIR). The analysis for the Davies Campus, on the other hand, identifies a significant impact at one of the study intersections that is already operating at unacceptable levels (see Impact TR-127 on page 4.5-233 of the Draft EIR).

In light of the above, the significance thresholds and methodology clearly address incremental increases in delay at intersections already operating at unacceptable levels of service under both the Modified Baseline and the Cumulative scenarios.

Please also see Response TR-100 on page C&R 3.7-170 for a discussion regarding ambulance traffic and emergency access.

Additionally, the Draft EIR contains analyses of the proposed CPMC LRDP's effect on alternative modes, including transit, pedestrians, and bicyclists. The significance criteria for the respective modes are stated on pages 4.5-53 and 4.5-54 of the Draft EIR and excerpted below:

> **Transit**—The project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts on transit service levels could result.
>
> **Bicycles**—The project would have a significant effect on the environment if it would create potentially hazardous conditions for bicycles or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.
>
> **Pedestrians**—The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

3.7.2.9 ALTERNATIVE SIGNIFICANCE CRITERIA

Comments

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-19 TR]

"b) The analysis is only in terms of Level of Service (LOS) which is not the appropriate metric for residential and neighborhood commercial streets. We propose alternative or supplemental metrics below."

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-23 TR]

"We request that the traffic studies be revised using tools such as TIRE, the City of Portland Impact Threshold Curve; and the various approaches applied by Florida's DOT. Furthermore, we again ask that the study look at traffic outside of the peak commute periods.

At a minimum a qualitative assessment of driver behaviors on affected streets and intersections as traffic conditions change is required, as the general observation of residents in surrounding areas is that unsafe driver behaviors occur when some roads are highly congested and drivers attempt to find a less congested path.

These assessments will provide a much better assessment of the impact on residential and NCD streets than the LOS approach and Vehicle Trips Generated analysis used in the current DEIR. We urge MEA to work with affected residents to define the studies before implementing them, so that we all understand the options, the capabilities and the limitations before deciding on a final approach."

Response TR-13

The comment requests that alternative significance criteria be used to assess the traffic operations. The use of intersection LOS criteria is established in the *SF Guidelines* as the primary means for assessing the traffic impacts of a project on intersection operations. (For a discussion of how the analysis time periods were selected, see Response TR-10 on page C&R 3.7-26). However, unlike other jurisdictions, which use traffic impacts as the primary factor determining overall project transportation impacts, the San Francisco Planning Department also requires assessment of project impacts on transit, pedestrians, bicycles, freight and passenger loading, emergency access, and construction-related transportation impacts (significance criteria is included on pages 4.5-53–54 of the Draft EIR). In addition, parking conditions are presented for informational purposes. Therefore, the Planning Department's significance criteria address all modes, and do not only rely on intersection operating conditions to determine the impacts of a project.

Furthermore, tools such as TIRE (Traffic Intrusion in a Residential Environment) or Portland's Impact Threshold Curve provide a method for measuring relative increases in traffic, but generally are applicable to lower-volume suburban residential streets. Resident perception of roadway traffic depends on many variables: ambient traffic levels, speed of traffic, mix of traffic (trucks), environment (urban, suburban), etc. While more jurisdictions are moving away from solely using vehicle LOS to determine impacts and toward a more multimodal LOS approach, the transportation consulting profession has not adopted any method that would be considered a consensus approach. Alternatively, as discussed above, the City of San Francisco does analyze a project's transportation impacts based on its effects on all modes of travel, not just vehicle traffic.

3.7.2.10 TRANSIT EFFECTIVENESS PROJECT FOR FUTURE TRANSIT IMPROVEMENTS

Comments

(Unitarian Universalist CPMC Task Force, October 5, 2010) [44-4 TR]

"<u>Traffic impacts, public transportation</u>. Volume 3, Chapter 4, Number 3, Page 4.5-54: 'Planned transportation improvements **assumed** to be implemented by the City of San Francisco, and included in the impact assessment.' This is a fallacious assumption given that SF MUNI has recently reduced service city wide and has recently made a slight modification in evening service."

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-25 TR, duplicate comment provided in 108-25 TR]

"Similarly, the DEIR cannot include proposals for *future* improvements in transit service or street design as part of the baseline. Only conditions *existing* when the Notice of Preparation was issued can be used to determine project impacts."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-42 TR]

"Concerning public transit, the DEIR made erroneous assumptions that transit service would increase once the Project was operational. However, given severe budgetary constraints which directly affect/reduce service levels for the San Francisco Municipal Transportation Agency (Muni), and given projected increases in ridership, the DEIR grossly underestimated impacts the Project would have on Muni. According to the DEIR, the City is in the process of implementing 'recommendations designed to make Muni service more reliable, quicker and more frequent.'[24] From this, the DEIR assumed that increased Muni service would accommodate increased Project-related ridership thereby mitigating any potential transit impacts. But, as shown below, these assumptions are wrong; thus, the DEIR failed to calculate and disclose the Project's actual impacts on public transit.

CNA's traffic expert, engineer Tom Brohard, determined that transit service enhancements have, in fact, been suspended given the ongoing fiscal emergency. Indeed Muni service is frequently cut and then occasionally partially restored, with only incremental losses at best but never system-wide increases. Accordingly, in Mr. Brohard's opinion, the DEIR erred in its finding that it was reasonably foreseeable that Muni would increase services in the areas serving the five CPMC campuses.[25] Where the DEIR assumed that service enhancements would be made, the transit analysis of near term and long term transit conditions was flawed. This flawed analysis in turn resulted in a significant under estimation of impacts.

Mr. Brohard also found numerous errors in the DEIR's ridership data for all five campuses. These errors were both within various tables as well as in comparison to the DEIR's forecast number of Project transit riders in the description of transit impacts. These errors are described in detail in Mr. Brohard's attached comment letter.

[24] DEIR at page 4.5-61.
[25] Transit services were dramatically reduced in December 2009 and May 2010, twice in the last 10 months, and partially restored in September 2010."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-10 TR]

"More specifically, my review of the Draft EIR and the supporting traffic studies indicates a number of technical errors and inconsistencies in the Transportation and Circulation Analysis of the Project. Each of the issues identified below must be addressed and reevaluated through additional study in a revised and recirculated EIR as follows:"

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-13 TR]

"2) <u>Assumptions Regarding Future Muni Service Increases Are Not 'Reasonably Foreseeable'</u> - Page 4.5-61 of the Draft EIR states "SFMTA and the City Controller's Office are in the process of implementing the TEP, a review of the City's public transit system with recommendations designed to make Muni service more reliable, quicker and more frequent. The TEP proposals were endorsed by the SFMTA Board of Directors in October 2008.

From my review of the SFMTA website, plans to implement the TEP (Transit Effectiveness Project) and its numerous transit service enhancements have been suspended with the ongoing fiscal emergency. In my opinion, it is <u>not</u> reasonably foreseeable that Muni will increase transit services in the areas adjacent to the five CPMC campuses when transit services have been dramatically reduced in December 2009 and May 2010, twice in the last 10 months. As the Draft EIR has assumed that the TEP service enhancements will be made, the transit analysis of near term and long term transit conditions is flawed. This flawed analysis in turn resulted in a significant under estimation of impacts."

Response TR-14

Data collected during the TEP planning process was used to determine transit capacity and use for Modified Baseline and Cumulative conditions in the Draft EIR (Tables 4.5-21 & 4.5-22 , pages 4.5-119 and 4.5-121 in the Draft EIR). The TEP, which was developed in 2008 after extensive data collection and public comment, identifies proposed route changes, operational adjustments, and vehicle headway changes designed to improve transit service throughout San Francisco. The TEP has been endorsed for subsequent environmental review by the SFMTA Board of Directors, and the SFMTA recently published a TEP Implementation Strategy (April 5, 2011). The TEP Implementation Strategy anticipates that many of the service improvements would be implemented sometime between the end of Fiscal Year (FY) 2013 and FY 2015 and that the remainder of the service improvements would occur in FY 2016.[19]

Although the TEP has not been formally adopted, the service plans presented in the TEP represent the most likely changes to Muni service that would occur over the next several years. Furthermore, the TEP has been used to guide recent SFMTA Board decisions to implement recent budget-neutral service changes (i.e., the Muni service plan dated December 8, 2009), including the elimination of the 26-Valencia bus line that previously served the St. Luke's Campus. Finally, at the time of proposed LRDP scoping and analysis, it was not known that the SFMTA would declare a fiscal emergency for two consecutive years and reduce service. Therefore, the transit analyses in the Draft EIR assume that the TEP recommendations represent a reasonable transit operating plan for the time when the CPMC LRDP would become operational.

The comments suggest that using service changes planned by the TEP to project future capacity is inappropriate because of recent fiscal emergencies and service reductions at SFMTA/Muni. Despite the SFMTA declarations of fiscal emergency, implementation of the TEP service changes is expected to occur at about the same time as when construction of the Cathedral Hill Campus as well as other LRDP projects would be complete.

Nevertheless, in response to this comment, a supplemental transit analysis was conducted to compare the cumulative transit analysis presented in the Draft EIR with the transit capacity operating at the time that the NOP for the CPMC LRDP was released (May 27, 2009, i.e., before December 2009) as the baseline, rather than assuming implementation of the TEP. C&R Table 3.7-8 shows the cumulative transit capacity analysis for each of the CPMC campuses. C&R Table 3.7-9 evaluates the transit delay for each of the lines near the proposed Cathedral Hill Campus using the pre-December 2009 route headways.

As shown, only one directional screenline would operate in excess of Muni's established capacity standard of 85 percent. Under Cumulative No Project Conditions, the westbound transit screenline for the Davies Campus would operate at 89 percent. With the addition of the Davies Campus projects, the screenline would continue to operate at 89 percent. The proposed projects at the Davies Campus would add 15 new transit trips to the westbound direction during the p.m. peak hour. This represents approximately 0.2 percent of future westbound ridership. Therefore, the proposed projects at the Davies Campus would continue to have a less-than-significant impact on Muni if capacity were to be measured using the existing (pre-December 2009) transit service plan as opposed to the TEP.

The transit lines serving the proposed Cathedral Hill Campus were also evaluated to determine whether operation of the proposed Cathedral Hill Campus would result in any significant impacts related to transit delays. The transit-delay impacts were evaluated using the TEP-proposed headways for each of the transit

[19] SFMTA, Draft Transit Effectiveness Project Implementation Strategy, April 5, 2011, page 3-5.

> lines. The Draft EIR identified that operation of the proposed campus would result in significant impacts related to transit delays along several transit lines.

As shown above, the proposed Cathedral Hill Campus would result in operational delays on the 19-Polk and the 49-Van Ness/Mission transit lines. The Draft EIR analysis concluded that significant impacts would occur to these two transit lines (see Impacts TR-31 and TR-29, respectively, on pages 4.5-123 and 4.5-120 of the Draft EIR). As demonstrated in the analysis above, the LRDP would result in the same impacts as identified in the Draft EIR irrespective of whether the pre-December 2009 or the TEP operational plans are assumed in the analysis.

C&R Table 3.7-8
Muni Transit Directional Corridors and Capacity Utilization with Existing Headways—Modified Baseline and Cumulative Conditions

Direction	Peak Hour	Capacity	Modified Baseline No Project		Modified Baseline Plus Project			Cumulative No Project		Cumulative Plus Project	
			Ridership	Capacity Utilization	Project Trips	Ridership	Capacity Utilization	Ridership	Capacity Utilization	Ridership	Capacity Utilization
Cathedral Hill Campus											
Northbound[1]	a.m.	2,186	1,415	65%	154	1,569	72%	1,458	66%	1,612	74%
	p.m.	2,186	1,397	64%	67	1,464	67%	1,702	68%	1,769	81%
Southbound[1]	a.m.	2,186	1,373	63%	72	1,445	66%	1,521	69%	1,593	73%
	p.m.	2,186	1,198	55%	168	1,366	62%	1,267	50%	1,435	66%
Eastbound[2]	a.m.	5,737	3,722	65%	204	3,926	68%	3,761	66%	3,965	69%
	p.m.	4,657	2,599	56%	46	2,645	57%	3,242	65%	3,288	71%
Westbound[2]	a.m.	4,657	2,510	54%	49	2,559	55%	2,964	60%	3,013	65%
	p.m.	5,737	3,975	69%	217	4,192	73%	4,143	72%	4,360	76%
California Campus											
Northbound[3]	p.m.	1,008	387	38%	0	387	38%	393	39%	393	39%
Southbound[3]	p.m.	1,008	682	68%	0	682	68%	746	74%	746	74%
Eastbound[4]	p.m.	3,586	2,147	60%	0	2,147	60%	2,764	77%	2,764	77%
Westbound[4]	p.m.	4,497	3,467	77%	0	3,467	77%	3,643	81%	3,643	81%
Davies Campus											
Northbound[5]	p.m.	1,912	908	47%	26	934	49%	988	52%	1,014	53%
Southbound[5]	p.m.	1,912	1,421	74%	31	1,452	76%	1,421	74%	1,452	76%
Eastbound[6]	p.m.	9,066	3,543	39%	66	3,609	40%	3,839	42%	3,905	43%
Westbound[6]	p.m.	9,066	**7,750**	**85%**	**15**	**7,765**	**85%**	**8,073**	**89%**	**8,088**	**89%**
Pacific Campus											
Northbound[7]	p.m.	960	514	54%	12	526	55%	549	57%	561	49%
Southbound[7]	p.m.	960	550	57%	15	565	59%	550	57%	565	50%
Eastbound[8]	p.m.	3,586	2,401	67%	6	2,407	67%	2,764	77%	2,770	76%
Westbound[8]	p.m.	3,586	2,871	80%	4	2,875	80%	2,969	83%	2,973	81%
St. Luke's Campus											
Northbound[9]	p.m.	3,392	1,690	50%	27	1,717	51%	2,054	61%	2,081	61%
Southbound[9]	p.m.	3,862	2,163	56%	23	2,186	57%	2,181	56%	2,204	57%
Eastbound[10]	p.m.	630	460	73%	11	471	75%	500	79%	511	81%
Westbound[10]	p.m.	630	319	51%	6	325	52%	321	51%	327	52%

C&R Table 3.7-8
Muni Transit Directional Corridors and Capacity Utilization with Existing Headways—Modified Baseline and Cumulative Conditions

Direction	Peak Hour	Capacity	Modified Baseline No Project		Modified Baseline Plus Project			Cumulative No Project		Cumulative Plus Project	
			Ridership	Capacity Utilization	Project Trips	Ridership	Capacity Utilization	Ridership	Capacity Utilization	Ridership	Capacity Utilization

Notes:
[1] 12-Pacific/Folsom, 19-Polk, 27-Bryant, 47-Van Ness, 49-Van Ness/Mission.
[2] 1-California, 2-Clement, 3-Jackson, 5-Fulton, 16AX-Noriega A Express, 16BX-Noriega B Express, 31-Balboa, 38-Geary, 38L-Geary Limited.
[3] 33-Stanyan, 43-Masonic, 44-O'Shaughnessy.
[4] 1-California, 1BX-California B Express, 2-Clement, 38-Geary, 38L-Geary Limited, 38BX-Geary B Express.
[5] 22-Fillmore, 24 Divisadero, J-Church.
[6] 6-Parnasus, 21-Hayes, 37-Corbett, 71/71L-Haight/Noriega, F-Market, K-Ingleside, L-Taraval, M-Ocean View, N Judah.
[7] 22-Fillmore, 24 Divisadero.
[8] 1-California, 2-Clement, 3- Jackson, 38-Geary, 38L-Geary Limited.
[9] 12-Folsom/Pacific, 14-Mission, 14L-Mission Limited, 67-Bernal Heights, 49-Van Ness/Mission, J-Church.
[10] 27-Bryant, 48-Quintara.

Source: Data provided by San Francisco Municipal Railway in 2008 and Fehr & Peers in 2010

C&R Table 3.7-9
Transit Corridor Delay with existing headways—Near Cathedral Hill Campus Cumulative Conditions

Route	Peak Hour	Existing Headway1 (min:sec)	TEP Headway (min:sec)	Project Increase in Travel Time (Modified Baseline)		Project Increase in Travel Time (Cumulative)	
				Northbound/ Eastbound Delay (min:sec)	Southbound/ Westbound Delay (min:sec)	Northbound/ Eastbound Delay (min:sec)	Southbound/ Westbound Delay (min:sec)
2 Clement	a.m.	10:00	12:00	+ 0:20	+ 0:15	+ 0:20	+ 0:15
	p.m.	10:00	12:00	+ 0:16	+ 0:21	+ 0:16	+ 0:21
3 Jackson	a.m.	10:00	10:00	+ 0:20	+ 0:15	+ 0:20	+ 0:15
	p.m.	10:00	10:00	+ 0:16	+ 0:21	+ 0:16	+ 0:21
19 Polk	a.m.	10:00	10:00	+ 0:31	+ 2:05	+ 0:31	+ 1:53
	p.m.	10:00	10:00	+ 0:28	**+ 8:22**	+ 0:28	**+ 8:18**
38 Geary	a.m.	8:00	7:30	+ 0:51	+ 0:27	+ 0:51	+ 0:27
	p.m.	6:00	6:00	+ 0:27	+ 1:34[2]	+ 0:27	+ 0:54
38L Geary Limited	a.m.	7:00	5:00	+ 1:22	+ 0:16	+ 1:22	+ 0:16
	p.m.	6:00	5:00	+ 0:12	+ 1:27	+ 0:12	+ 1:28
47 Van Ness	a.m.	8:00	7:30	+ 1:34	+ 1:29	+ 1:58	+ 1:38
	p.m.	8:00	7:30	+ 2:20	+ 0:55	+ 2:37	+ 0:49
49 Van Ness/ Mission	a.m.	8:00	7:30	**+ 3:56**	+ 0:40	**+ 4:21**	+ 0:49
	p.m.	8:00	7:30	+ 1:14	+ 3:39	+ 1:31	+ 3:32

Notes:
[1] Existing headway at the time of NOP (pre-December 2009). Based on information provided by the Planning Department on July 6, 2010.
[2] Includes delay taken from the Planning Department's VISSIM model of the Geary Street section near the proposed MOB and Hospital.

Source: Fehr & Peers 2010

3.7.2.11 MUNI SERVICE REDUCTIONS NOT INCLUDED IN TRANSIT ANALYSES

Comment

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-11 TR]

"1) Muni Service Assumptions Do Not Match Existing Baseline - In discussion regarding San Francisco Municipal Transportation Agency, Page 4.5-17 of the Draft EIR states 'Figures 4.5-6 through 4.5-10 (beginning on Page 4.5-18) present Muni lines serving each campus, while Tables 4.5-1 through 4.5-5 (beginning on Page 4.5-23) present the frequency of service for the Muni bus, light rail, and cable car lines serving each study area. The information on frequency of service reflects Muni service before the December 5, 2009 service changes that resulted from SFMTA's ongoing fiscal emergency ... On December 5, 2009, Muni service changes associated with the budget deficit were implemented. The fiscal emergency declared on April 21, 2009 continued through fiscal year 2010. As a result, SFMTA is facing a shortfall in its current fiscal year, which ended on June 30, 2010. To address the continuing fiscal emergency, SFMTA implemented reductions in service beyond those implemented on December 5, 2009. As noted above, the transit service and ridership data do not reflect the recent

changes to Muni service resulting from SFMTA's ongoing fiscal emergency because ridership data for post-implementation conditions is not currently available for all lines.'

From my review of the SFMTA website, service changes included discontinued routes and route segments, extended and modified routes, and changes to service hours and frequencies. Service reductions were initially implemented on December 5, 2009 and additional reductions were made on May 8, 2010. While about 60 percent of the May 8, 2010 service reductions were subsequently restored on September 4, 2010, current Muni services are significantly reduced compared to 2006 and 2007 when the ridership data used in the Draft EIR was collected by Muni. With reduced service frequencies and the same level of transit ridership, some Muni lines are certainly experiencing higher occupancy than identified in the Draft EIR. This increase, combined with a large workforce at Project buildout, was not analyzed in the Draft EIR."

Response TR-15

The transit service baseline used in the analysis was developed to represent conditions at the time at which the NOP for the proposed CPMC LRDP was released (May 27, 2009). This represents a time before the implementation of fiscal emergency service reductions by SFMTA, which were partially restored , such as Owl Service and capacity on 13 weekday, three weekend, and nine evening routes, by September 2010. At the time of project analysis, it was not known that SFMTA would declare a fiscal emergency and reduce service, and based on SFMTA's commitment to restore service where temporary service reductions were made, the transit analysis presented in the Draft EIR is reasonable. Thus, no new analysis is required.

3.7.2.12 CUMULATIVE ANALYSIS LAND USE ASSUMPTIONS

Comments

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-24 TR]

"Cumulative impacts (Pacific Site):

The EIR must assess future uses of all nearby facilities, such as the Newcomer High School site, the Smith-Kettlewell Eye Research Institute and the UOP Dental School plans for the Pacific site."

(Hiroshi Fukuda [phon], September 23, 2010) [PC-161 TR]

"The DEIR does not address the cumulative impacts on several other projects, namely the 1481 Post Street project, which is proposed for 38 stories, and that would have a significant impact, and that, if it is approved, will be in the same timeframe as the CPMC project."

Response TR-16

The comments raise concerns about other future projects near the Pacific Campus and the potential for cumulative impacts. The cumulative traffic volumes were developed using the City's travel demand forecast model, which takes into account reasonably anticipated traffic growth, based on increases in population, housing units, and employment as forecasted by ABAG and the San Francisco Planning Department. It also factors in development that could occur under existing zoning, approved area plans, an area's potential zoning capacity, and anticipated redevelopment. Therefore, to the extent that future uses around the Pacific Campus site either are reflected in approved plans or are in the development pipeline, and thus are assumed as part of the SF-CHAMP background vehicle travel forecasts, they were addressed as part of the cumulative traffic analysis. Section 4.1.3, "Cumulative Conditions," of the Draft EIR notes that there are no large-scale vacant sites in the Pacific Campus vicinity where considerable construction could occur in the future. The Smith-Kettlewell Eye Research Institute and the Arthur A. Dugoni School of Dentistry are already developed sites. To the extent that these facilities could expand beyond what is anticipated in background population and employment growth, such expansion would be considered once there is a proposed project. Newcomer High School is not located near any of the CPMC campuses. Furthermore, no proposals to redevelop any of the above sites have been submitted to the Planning Department for review, and thus, the approach to determining cumulative land use assumptions should not be altered based on speculation.

The 1481 Post Street Project is proposed, but has not yet been approved. However, to the extent that the 1481 Post Street Project would fit within the City's current or potential zoning capacity, the potential traffic effects are captured by the cumulative analysis since increases in population growth are assumed in the background traffic growth in the SF-CHAMP model. At this time, the 1481 Post Street Project is at the conceptual stage of development, thus the timing of its construction is unknown. Therefore, analysis of cumulative construction impacts relative to proposed construction at the California Campus would be too speculative for consideration.

3.7.2.13 2006–2007 Transit Data

Comment

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-12 TR]

"In the evaluation of traffic impacts in the Draft EIR, peak hour traffic counts at critical intersections conducted in 2006 were validated by making new peak hour counts in 2009 and comparing the traffic volumes. However in the transit analyses in the Draft EIR, ridership and occupancy validation of the data collected in 2006 and 2007 prior to the service reductions has not occurred. Without updating and comparing ridership, service levels and transit capacity, current transit occupancy after the Muni service reductions has not been determined. Further, while the Draft EIR states that SFMTA does not have current ridership data for all lines, the Draft EIR should have included a validation process for the critical transit lines, particularly those approaching capacity that serve the five campuses. Without proper baseline data, the transit analysis is flawed."

Response TR-17

The comment suggests the analysis is flawed because transit ridership data is old and does not reflect recent Muni service reductions. The detailed transit volume data by bus stop used for the transit analysis were the most recent at the commencement of the analysis. This level of data was collected to prepare the TEP; however, data at this level of detail are not collected on a regular basis. Therefore, there was no alternate source of information to perform a detailed comparison of the bus stop boardings between the 2006–2007 data and transit use in 2009, when the transportation analysis commenced. Thus, the 2006–2007 data represented the best source of information for performing the transit analysis.

C&R Table 3.7-10 shows the annual weekday bus ridership for Muni at the system level and for the routes that serve the CPMC campuses. The table shows that while there were increases in the ridership in Fiscal Year (FY) 2007 and FY 2008, there has been a decrease in ridership in FY 2010.

C&R Table 3.7-10
Muni Weekday Passenger Boardings by Fiscal Year

Fiscal Year	Weekday Passenger Boardings	Annual Growth	Boardings on CPMC Lines	Annual Growth
2006	654,292	–	455,495	–
2007	650,874	-0.5%	453,686	-0.4%
2008	687,172	5.6%	491,914	8.4%
2009	704,635	2.5%	504,016	2.5%
2010	676,780	-4.0%	485,589	-3.7%

Source: San Francisco Municipal Transportation Agency 2010, *Federal Transit Administration's National Transit Database Report*

The TEP data set is far more robust than any other data set, and thus allows for a much more comprehensive transit impact analysis than otherwise could have been performed for the Draft EIR. Additionally, the TEP data set was collected more closely to the time of the issuance of the NOP than any other subsequent data set.

3.7.2.14 ADEQUACY OF THE TRANSPORTATION IMPACT ANALYSES

Comments

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-7 TR, duplicate comment provided in 108-7 TR]

"5. The DEIR does not adequately analyze many environmental impacts. In particular, its analysis of transportation impacts does not meet the requirements of CEQA."

(Sue Hestor, October 19, 2010) [89-3 TR]

"CPMC has decided ON ITS OWN to pick up and leave or reduce certain services that are currently provided in other neighborhoods and MOVE THEM TO ONE OF THE MOST CONGESTED and CRITICAL TRANSIT INTERSECTIONS IN THE CITY. The starting point for any CITY analysis of that decision must be resolution of serious problems that converge at this area."

(Sue C. Hestor—Attorney at Law, October 19, 2010) [89-10 TR]

"THIS SIMULTANEOUS or COORDINATED CONSTRUCTION of the BRT lines and CPMC BUILDINGS SHOULD BE A GOAL OF THE PROJECT AND REQUIREMENT ANALYZED IN THE EIR."

(Stephanie Barton et al.—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-49 TR]

"**E. The DEIR fails to provide substantial evidence that justifies overriding the proposed hospital's significant and unavoidable traffic impacts.**

While the DEIR's transportation analysis is deeply flawed and inadequate, it already admits that the proposed hospital, both by itself and in combination with the rest of the LRDP, will have significant and unavoidable environmental impacts on traffic and transit.[114] The DEIR admits that the Cathedral Hill Campus alone would cause significant and unavoidable delays at three intersections (Van Ness/Market, Polk/Geary and Franklin/Bush) and would create a traffic hazard on Geary Street.[115] The DEIR also admits that the proposed hospital, when combined with the LRDP, will result in further significant and unavoidable environmental impacts on both traffic and transit.[116] Three more intersections (Gough/Geary, Van Ness/Pine and Church/Market/14th Street) and five transit lines (49-Van Ness-Mission, 47-Van Ness, 38/38L- Geary, 19-Polk and 3-Jackson) will experience unavoidable delays due to increased traffic and congestion.

A project that acknowledges it will have such significant and unavoidable impacts should have powerful overriding considerations. Having seismically safe hospitals is vital to the quality of life for San Francisco's residents. However, the DEIR does not appear to meet the CEQA required burden of providing substantial evidence that the proposed project as presently configured sufficiently safeguards the environment of San Francisco.[117]

[114] DEIR 6-1 & 6-2.
[115] Id
[116] DEIR 6-3 & 6-4.
[117] *See* CEQA Guidelines §15093."

Response TR-18

The comments question whether the analysis of transportation impacts meet the requirements of CEQA and concerns regarding traffic impacts in the vicinity of the Cathedral Hill Campus. The transportation impact analyses presented in the Draft EIR evaluate the direct, indirect, and cumulative impacts of the projects proposed for the respective CPMC campuses on all modes of transportation in the study areas around the campus sites. The scope of the analyses conforms to the requirements of the *SF Guidelines*, which were developed to address CEQA requirements. The analysis considers the impacts on pedestrians, bicycle traffic, transit, and vehicles as well as ongoing transportation improvements projects such as the proposed Van Ness and Geary Bus Rapid Transit (BRT) projects. Because of the scale of the proposed CPMC LRDP, the Draft EIR included a specific section on the potential impacts of construction activities on the transportation network. The Draft EIR discloses the impacts on various transportation modes, identifies potential mitigation measures, and identifies impacts that are significant and unavoidable, which is the intent of the environmental document.

The comments note that a goal of the proposed LRDP should be to seek the simultaneous or consecutive construction of both the proposed Van Ness and Geary BRT projects, in concert with other LRDP construction, and this concurrent construction should be analyzed in the Draft EIR. As stated previously, the goal of the transportation impact analyses presented in the Draft EIR is to evaluate impacts of the proposed LRDP as defined in the NOP, not to bond one proposed aspect or project to another. The proposed Van Ness BRT project is currently under environmental review by the SFCTA, but the Draft EIS/EIR has not been released. The CPMC LRDP Draft EIR does analyze the impact of the project if both the proposed Van Ness and Geary BRT projects were implemented under both Modified Baseline (pages 4.5-111–114 of the Draft EIR) and Cumulative conditions (pages 4.5-228–229 of the Draft EIR).

Additionally, the comments note that the Draft EIR identifies a number of significant and unavoidable traffic and transit impacts but that it does not provide evidence as to why such impacts are acceptable.

State CEQA Guidelines Section 15093 (to which the comment refers) states that, “when a lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record.” This statement is referred to as the Statement of Overriding Considerations and is typically adopted by the decision-making body after EIR certification, in light of the whole record. It is not required by CEQA nor would it be appropriate for a Draft EIR to set forth the reasons as to why some or all of the identified significant, unavoidable impacts would be acceptable or unacceptable. Furthermore, it is the responsibility of the decision-makers (i.e., Planning Commission, Board of Supervisors, etc.), should they choose to approve the proposed LRDP, and not the responsibility of the Draft EIR to make findings regarding overriding considerations. Such findings must be based on substantial evidence in the record, which would include, but would not be limited to, the Draft EIR.

3.7.2.15 CEQA CHECKLIST

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-34 TR, duplicate comment provided in 30-34 TR]

“At any rate, in the CEQA checklist under the section entitled ‘XV- TRANSPORTATION / TRAFFIC,’ would the project:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

f) Result in inadequate parking capacity?

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

I believe the answer to all of the above questions, save for possibly ‘c,’ unless a helicopter is used in the construction, would be ‘yes.’ For CEQA XV-a, when traffic is forced onto neighborhood residential streets that should not take that kind of increased capacity, it is in violation. CPMC projects will do just that. For CEQA XV-b, Highway 101 will be impacted during and after CPMC projects are completed. And there is no mitigation solution for Van Ness/Market. I suppose we can say that San Francisco is a ‘Transit First’ city, but not everybody will leave their vehicles, including the physicians who primarily drive to and from work alone to the hospital sites per CPMC’s own surveys. Until a world-class transit system is in place with the proper infrastructure to accommodate, there will be congestion problems at not only Van Ness/Market but also at Polk/Geary as mentioned below. In fact, we are a ‘Transit First’ city that will have a transit impact during the construction of and at full build-out of this project. This project will impact the most heavily used transit line in the City, the

38/38L-Geary line. The more transit is impacted, the less people will rely on it. If the plan is to get SFMTA to run more buses on the impacted lines without fixing the traffic throughput, that will mean there will be more buses sitting in the traffic jam."

Response TR-19

The comment lists the prior contents of the CEQA checklist which were updated in 2007 and 2009, including the transportation section (Appendix G of the State CEQA Guidelines, can be found at www.ceres.ca.gov). Transportation-related updates included: changes to questions a) and b), listed above, to expand the analysis to other travel modes, and refer the reviewer to local/regional performance measures of the circulation system (not just Level of Service standards); and the deletion of question f) related to parking. The comment states that the CPMC LRDP would answer "yes" to most, if not all the checklist items. The CEQA checklist is used to determine whether a project would result in a significant impact and to establish whether there is a need to prepare an EIR. The Planning Department determined that an EIR would be prepared for the proposed CPMC LRDP; the Draft EIR prepared for the LRDP identified transportation impacts (including significant and unavoidable impacts) that would result from project implementation, as well as mitigation measures for those impacts, where feasible. Items a, b, c, and d of the checklist were analyzed as part of the traffic impacts section of each respective campus; item e of the checklist was analyzed as part of the emergency access impacts section of each respective campus; item f above, is no longer part of the State CEQA checklist and does not constitute a transportation impact, but a discussion regarding parking was included on pages 4.5-162 through 4.5-166 of the Draft EIR for informational purposes, and item g from the above checklist was analyzed as part of the alternative modes (including pedestrians, bicycles, and transit) section of the Draft EIR.

Specifically, the comment notes that traffic impacts would occur on Van Ness Avenue, including the intersection of Van Ness/Market and the intersection of Polk/Geary, and that transit impacts would occur on the 38/38L Geary bus line, all of which were discussed in the Draft EIR.

As noted in Section 4.5.3 of the Draft EIR on page 4.5-53, the transportation significance thresholds used for the transportation analysis follow the environmental checklist (Appendix G of the State CEQA Guidelines), which has been adopted and modified by the San Francisco Planning Department. In addition, Chapter 3 of the Draft EIR includes a discussion of the project's conformance with adopted policies, plans, and programs supporting alternative transportation.

3.7.3 TRIP GENERATION

3.7.3.1 DRIVE ALONE/CARPOOL ASSUMPTIONS

Comments

(Lisa Carboni, Caltrans (Regional), September 9, 2010) [6-1 TR, duplicate comment provided in 7-1 TR]

"Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the California Pacific Medical Center (CPMC) Long Range Development Plan Project. The following comments are based on the Draft Environmental Impact Report (DEIR)."

Forecasting

The project proposes to replace the existing hotel, office, and retail use with a hospital and a medical office building. In Table 30 on page 66 of the Transportation Impact Study (TIS), the table states a low auto (drive alone plus carpool) rate of 53 percent and 43 percent for the hospital and medical office respectively compared to other modes of travel. Also, in Table 30, the TIS used a vehicle occupancy rate of 1.0 for physicians, 1.32 for staff, and 1.14 for patients and visitors. The Department believes the drive alone plus carpool rate is understated because patrons to the hospital or the medical office would likely be physicians and staff which would have dedicated parking spaces or drive alone or carpool since they are too ill to take other travel modes, Therefore, we recommend the study adopt a more conservative and reasonable approach on modal split for these uses."

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-20A TR]

"c) The data used to develop the traffic impact looks at daily averages, and does not assess actual traffic patterns based on intended use of the facilities.

1) The arrival and departure pattern are very dependent on actual services to be provided. For the Pacific site, comparisons of daily averages now (when the hospital is a 24 hour operation) with daily averages in the future (when operations will primarily be 7am - 6 pm is misleading."

Response TR-20

The comments question the assumptions used for the travel demand analysis. The travel demand methodology developed for the CPMC transportation impact study reports is based on the techniques outlined in the *SF Guidelines*, which are used to analyze the transportation impacts of development projects throughout the City. The approach estimates the person trips for each campus and applies mode-choice factors to determine the number of vehicle, pedestrian, bicycle, and transit trips. The mode-choice factors reflect the characteristics of the existing CPMC campuses and the travel characteristics within a given area of San Francisco. The characteristics considered for the individual campuses included the types of medical services provided; the numbers of employees, patients, and visitors; and travel data collected through a series of travel surveys, interviews, and field counts. The surveys, interviews, and field counts were used to collect information on employee, patient, and visitor arrivals at the four existing campuses. The employee data included shift information and the category of employees, including physicians, medical staff, administrative staff, and visiting physicians. The data were also broken down by hospital, medical office, and ambulatory care functions.

These data were used to develop mode-choice factors for each existing campus (Pacific, Davies, California, and St. Luke's) by type of user (employee, patient, or visitor). These mode choice factors were used to estimate the existing trip generation for each existing campus. The trip generation for the existing campuses was compared to traffic counts. This comparison showed that during the a.m. peak hour, the trip generation estimates were close to the traffic counts, but that in the p.m. peak hour, automobile use tended to be overestimated. Therefore, the traffic analysis would be more conservative. The mode-choice factors for the proposed Cathedral Hill Campus were taken from the factors for the Van Ness Commercial District that are presented in the *SF Guidelines*. The assumptions, methodology, and results of this analysis are summarized in the report *CPMC LRDP: Travel Demand Estimation for the San Francisco Campuses* (Adavant Consulting, April 9, 2010). The report is included in Appendix D of the *Cathedral Hill Transportation Impact Study*.

Future mode choice patterns for each campus were adjusted based on the services/functions that would be provided at each location. As indicated in the comment, on-site parking would be provided for all physicians; therefore, it was assumed that 100 percent of physicians would drive alone to the campus. The vehicle occupancy rates used for staff, patients, and visitors were based on the mode choice assumptions and compared to surveys at existing campuses. The vehicle occupancy rates of 1.32 for staff and 1.14 for patients reasonably reflect that (1) on-site staff parking is not guaranteed, so there would be an incentive to carpool or use alternate travel modes, and (2) patients are commonly driven by others to medical facilities. The visitor auto occupancy of 1.14, calculated from the *SF Guidelines* mode choice data, is substantially below the auto occupancy rates of 1.39 to 1.43 from the existing campus surveys conducted at Pacific, California, and Davies Campuses, and thus provides a conservative analysis in terms of vehicle trip generation. With the approach described above, the travel demand estimates for the CPMC campuses were not based solely on the land use, but also on the characteristics of existing CPMC operations and the future uses that would be located on each campus. Similarly, the analysis based the parking demand on the existing mode choice rather than applying standard parking ratios to estimate the demand, which could have overestimated the demand in an urban area with high transit accessibility.

3.7.3.2 TRIP DISTRIBUTION

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-20 TR, duplicate comment provided in 30-20 TR]

"Why would the staff need to use their vehicles and require parking if they live in the City, considering that this is a 'Transit First' City. I think there is an assumption being made that the CPMC staff people will choose to live in the City for this project at all levels to work. I think with the salary being paid the nurses, etc. at CPMC, they can afford to live in San Francisco but nobody can force them to stay in a City if they have family for which the ''Transit First' policy is family unfriendly."

Response TR-21

The comment requests clarification of the Draft EIR's assumptions about trip distribution and assignment of CPMC staff, particularly vehicle and transit trips. The project-generated person-trips were assigned to local and regional origins and destinations: four San Francisco superdistricts (northeast, northwest, southeast, and southwest San Francisco), the East Bay, the North Bay, the South Bay, and areas outside the region. For most development projects in San Francisco, person-trips are distributed according to average trip patterns of San Francisco residents and employees, as summarized in the *SF Guidelines*. However, hospitals and medical facilities often have trip patterns that are unique to the populations that they serve. Therefore, the trip distribution for the Cathedral Hill analysis was determined using information collected by CPMC in origin-destination surveys of employees, patients, and visitors taken at CPMC's Pacific Campus in February 2001 and April 2003. Using the results of these surveys is appropriate because the emergency services and many of the other medical services that are currently located on the Pacific Campus would be transferred to or provided at the proposed Cathedral Hill Campus. The assumptions, methodology, and results of the trip generation and distribution analysis are summarized in the report *CPMC LRDP: Travel Demand Estimation for the San Francisco Campuses* (Adavant Consulting, April 9, 2010). The report is included in Appendix D of the *Cathedral Hill Transportation Impact Study*.

The transportation analysis assumed that over 50 percent of all CPMC employees would be coming from within San Francisco. The remaining employees would arrive from other regions of the Bay Area. This assumption was based on CPMC employee survey data. Furthermore, it was assumed that 50 percent of CPMC employees would use transit to access the Cathedral Hill Campus, based on the work trip patterns to the Van Ness Commercial District per *SF Guidelines*. Therefore, the analysis reasonably accounts for employees living outside San Francisco and for the CPMC employee's use of transit to access the Cathedral Hill Campus.

3.7.3.3 JAPANTOWN PARKING AND TRIP DISTRIBUTION

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-24 TR, duplicate comment provided in 30-24 TR]

"The DEIR mentions the leasing of these 400 spaces at the Japantown Garage on Page 5-14. Currently, CPMC only pays 50% of the going rate for the spaces it does lease at the Japantown Garage. This discounted parking offering is not an incentive for staff, visitors or construction workers to take public transit or to use the CPMC shuttles. If Japantown will be impacted by the Cathedral Hill Hospital project at all levels (i.e. Hospital, MOB and Tunnel construction), perhaps the Japantown Garage could charge CPMC market rate for its spaces. Even if CPMC were to not use this garage or the other possible garages for its workers, it appears that parking will be at a shortage not only because offsite parking at Japantown will occur but also considering issues such as the 1375 Sutter Street personnel who will be using 107 spaces for parking at the Cathedral Hill Hospital parking garage. With all the personnel parking spaces being shared amongst the campus parking areas, there will still be a shortage that will impact the residential and merchant areas surrounding these campuses and this shows that people will not abandon their vehicles to take public transit. If 80% -90% of the people who worked at CPMC actually lived in the City, perhaps more of them would all take public transit once it is made super efficient; however, I have taken Muni and it is no wonder people will not abandon their vehicles, especially if they are from out of town. The CPMC workers' salaries are such that these workers can afford to live in the City but as it was shown in some recent news articles, some well-paid workers do not choose to live in San Francisco even if they work here."

Response TR-22

The comment presents concerns regarding the use of the Japan Center Garage by CPMC staff members. CPMC currently leases 400 spaces at the Japan Center Garage for off-site employee parking and provides an employee shuttle between the Japan Center Garage and the existing campuses. There is no proposal to allow construction workers or visitors to use these spaces. The 400 spaces were assumed to remain in use by CPMC in the future, but the specific campus employees who would use these spaces would change somewhat. The parking supply at the Pacific Campus would increase to accommodate the parking demand, but the proposed Cathedral Hill Campus would have a parking shortfall for staff members; therefore, as many as 162 of the 400 spaces that CPMC leases in the Japan Center Garage may be assigned to Cathedral Hill employees in the future. The overall parking deficit for the combined CPMC campuses was 41 spaces.

As stated in the parking discussion on page 4.5-162 of the Draft EIR, San Francisco does not consider parking supply as part of the permanent physical environment. Therefore, San Francisco does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Thus, the availability of parking spaces (or lack thereof) is not a permanent physical condition but changes over time as people change their modes and patterns of travel. Parking deficits are considered to be social effects rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment.

Based on the available survey data, over 50 percent of CPMC employees reside within San Francisco. For the traffic analysis, it was assumed that this pattern would continue into the future. Although transit use will vary by campus, the transit use for all CPMC employees is 39 percent. Based on the *SF Guidelines*, 50 percent of CPMC employees in the Van Ness Commercial District use public transit. Therefore, it was assumed that 50 percent of the employees at the Cathedral Hill Campus would use public transit (excluding physicians who, it was assumed, would drive) because this would be a new campus and could not be surveyed. The assumptions, methodology, and results of the trip generation, mode choice, and trip distribution analysis are summarized in the report *CPMC LRDP: Travel Demand Estimation for the San Francisco Campuses* (Adavant Consulting, April 9, 2010). The report is included in Appendix D of the *Cathedral Hill Transportation Impact Study*.

The price that a project sponsor pays for parking is not typically included in the environmental analysis, and the price that CPMC pays for parking spaces at the Japan Center Garage does not affect the transportation analysis of the proposed CPMC LRDP and would not affect any of the conclusions reached in the Draft EIR. However, for informational purposes, CPMC pays monthly rates of $135 per space and charges its employees $60 per space per month for use. The non-CPMC monthly rate is $165 per space.

3.7.3.4 Hotel Driveway Counts/Transportation Demand Management Assumptions

Comment

(Unitarian Universalist CPMC Task Force, October 5, 2010) [44-6 TR]

Traffic impacts, Parking, Cathedral Hill: Volume 3, Page 4.5-72 & 73: 'Additional Travel-Related Criteria.' On page 4.5-73 the report says that parking analysis data included 'inbound and outbound vehicle counts at the parking garage at the Cathedral Hill Hotel.' This is like comparing apples to oranges. We need a parking impact report that approximates the number of people coming to CPMC by car and who will have to park on the street. Traffic impacts, Parking, Cathedral Hill: Volume 3, Page 4.5-77: 'Although the CPMC LRDP development plans assume an increase in parking supply with the construction of new garages, it is assumed that similar transportation management strategies to those that exist today would be in place when such facilities are opened to act as disincentives to driving by employees, patients, and visitors despite the increase in the supply of off-street parking'. This is a false assumption that the majority of CPMC employees would resort to public transportation when the Cathedral Hill facility opens."

Response TR-23

The comment questions the use of the existing Cathedral Hill Hotel driveway counts. The statement on page 4.5-73 of the Draft EIR related to inbound and outbound vehicle counts at the Cathedral Hill Hotel referred to the driveway counts that were collected to determine the amount of existing traffic accessing hotel parking. In the traffic analysis these traffic volumes were considered as automobile trips that would be removed from roadways in the study area after the hotel's closure. These volumes were not considered in the parking analysis for the proposed CPMC Cathedral Hill Campus. The mode choice for the proposed Cathedral Hill Campus was taken from the Van Ness Commercial District factors that are presented in the *SF Guidelines,* described in Response TR-20 on page C&R 3.7-42.

Parking demand considered the mode splits for each campus. The traffic analysis assumed that the future CPMC Transportation Demand Management (TDM) program would be similar to the current program; however, CPMC has proposed enhancing the existing TDM program by adding new incentives (and disincentives in the form of parking fees) to encourage use of alternative travel modes. The proposed CPMC TDM Plan, prepared by Nelson-Nygaard & Associates (2011), is provided in Appendix F. The proposed CPMC TDM Plan includes expansion or implementation of new programs to reduce drive-alone trips by 15 percent over the existing conditions. Some of the key new programs would include:

- provision of a full-time TDM coordinator to monitor the TDM program and institute improvements as needed to meet the needs of the various users;
- increased marketing and outreach efforts to employees, patients and visitors;
- improving/expanding existing transit subsidies to all campuses and increased subsidy levels;
- provision of carpool and vanpool preferential parking;
- promotion of a vanpool program with financial incentives;
- monitoring bicycle parking and creation of additional spaces as needed; and
- provision of signage to improve wayfinding for campus users.

Therefore, the future TDM program should increase the use of alternative modes over the existing levels. As is standard, the traffic analysis did not assume any additional reduction in driving (vehicle trips) as the result of the proposed enhancements to the TDM program.

3.7.3.5 PARKING AVAILABILITY AND TRIP GENERATION

Comments

(Howard Strassner—Sierra Club, October 12, 2010) [51-2 TR]

"Current EIR methodology says that land use determines driving and not the availability of parking. Users of the land, the hospital developer, say if there is not enough parking, not enough people will be able to drive to their facility. The truth is that the availability of parking determines driving. This truth is demonstrated by observation: Throughout the Bay Area over 90% of people drive to work in their own car. However, in downtown San Francisco, where parking is limited and expensive over 50% get to work without their own car. Many of both groups are neighbors and similar people. The difference is the availability of parking and when less parking is available the analysis should show less driving."

(Howard Strassner—Sierra Club, October 12, 2010) [51-3 TR]

"We are concerned that when land use predicts driving and parking is provided to accommodate the driving the City will never reduce driving to meet SB 32 and SB375 requirements. In addition the predicted additional driving may create the political straw that prevents the City from completing the adjacent proposed BRT projects."

Response TR-24

The comments question the mode-choice assumptions used in the travel demand analysis that are based on current travel patterns and suggests that parking reductions would reduce vehicle travel demand. The travel demand analysis assumed that 50 percent of the employee trips to the Cathedral Hill Campus site would be by public transit. Another 13 percent of the employees would walk or use other non-automobile modes to access the site. For the proposed Cathedral Hill Campus, it was assumed that 60 percent of patients and visitors would arrive in an automobile (driving alone or carpooling). The parking demand analysis methodology considered the population (i.e., employees, patients, and visitors) projected for each campus, then applied the appropriate mode-choice factor for driving alone and carpooling for employees, patients, and visitors. Therefore, the parking demand for each campus was estimated based on the travel characteristics of each campus and the populations they would support (i.e., physicians, staff, patients, and visitors).

Table 4.5-13 of the Draft EIR, page 4.5-80, includes the estimated parking demand by campus for the LRDP. Additional information on the parking supply and demand is provided in Responses TR-69 and TR-70 (pages C&R 3.7-129 and 3.7-135, respectively).

Draft EIR 4.5 Transportation and Circulation impact analysis, pages 4.5-111 through 4.5-114, and pages 4.5-228 through 4.5-232, and Section 5.1 on page 176-189 of the *Cathedral Hill Transportation Impact Study* (Fehr & Peers 2010) evaluates the effects that the Van Ness and Geary BRT projects would have on the area around the proposed Cathedral Hill Campus. Implementation of the Geary Street/Boulevard BRT project would have less of an impact on traffic operations because there is an existing dedicated bus lane within the study area. Implementation of the Van Ness BRT project would have a more substantial effect on traffic operations because it would reduce the number of lanes on Van Ness Avenue, which in turn would increase delays for vehicles using the remaining lanes.

Each of these BRT projects will be subject to its own planning, analysis, environmental review, and approval process. Because of the City's Transit First Policy and the resources invested to date in the BRT projects, it is unlikely that these projects would not be completed as a result of the construction of the proposed CPMC LRDP. Instead, the City could view the BRT projects as even higher priority to help serve a new institution. In any event, the viability of the BRT because of a change in the political climate is speculative.

3.7.3.6 OUTDATED SURVEY DATA

Comment

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-22 TR, duplicate comment was provided in 108-22 TR]

"2. Outdated Data.

The key surveys of employees, patients, and visitors were completed in 2001. Travel surveys and counts were completed in 2002 and 2003. (page 4.5-72). Pedestrian and bicycle counts were taken in 2006. Numerous changes in street configurations, transit service, bicycle access, etc. have occurred since this outdated data was generated, and all need to be redone."

Response TR-25

The comment questions the travel demand analysis' use of survey data that are taken from different years. When developing trip generation estimates for a proposed project, it is desirable to have survey information either from an existing facility or from facilities similar to those included in the proposed project. A diverse set of travel data for the CPMC campuses has been collected over a number of years. These data included information on the mode of travel, origins/destinations, parking locations, and parking costs. This information was collected for employees, patients, and visitors to the site. The earliest surveys were collected at the three then-existing CPMC campuses (Pacific, California, and Davies) in 2001, and additional data were collected in both 2002 and 2003. The St. Luke's Campus was surveyed in 2009, 2 years after the campus became a part of the CPMC system. Although the travel survey data are several years old, they provide important details about the specific travel characteristics of CPMC employees, patients, and visitors that are not available from other sources. The economic and seasonal effects on the intersection turning movement count data used for the Draft EIR is discussed in Response TR-6, page C&R 3.7-6.

CPMC prepared a memorandum summarizing the changes in employment and in the TDM programs at the existing campuses between 2001 and 2008. This memorandum, *CPMC Employment and Other Factors Contributing to Trip Generation, 2001-present (*December 13, 2010) is on file and available for review at the San Francisco Planning Department. C&R Table 3.7-11 below summarizes the employment levels and number of annual visits at the existing campuses. Based on this data, the campuses have remained relatively stable between 2002 and 2008 in terms of the employment and level of care provided. The largest increase in the number of employees occurred when St. Luke's joined the CPMC system in 2007. Therefore, surveys and counts conducted over this time period, including pedestrian and bicycle counts were examined and determined to be appropriate for the transportation analysis, with the exception of the St. Luke's campus where some data was missing and updated counts, including pedestrian and bicycles, were taken in 2009.

C&R Table 3.7-11
CPMC Employee Data for 2002, 2004, and 2008

Employees	Year[1]		
	2002	2004	2008
Pacific Campus	2,857	2,856	2,790
California Campus	1,315	1,283	1,540
Davies Campus	724	868	831
St. Luke's Campus	NA	NA	1,012
Total[2]	**4,895**	**5,007**	**6,173[3]**
MD/Visits			
MD Staff	1,600	1,450	1,855[4]
Acute Volume	27,329	26,452	30,405[5]
Emergency Department Visits	50,164	46,949	70,219[6]
Employee Residence			
San Francisco/Other	49%/51%	52%/48%	49%/51%

Notes:
NA = Not applicable.
1 Years 2002, 2004, and 2008 are the dates in the source *Institutional Master Plan* document. In some cases, data were the most current available, typically from the prior year.
2 Campus totals do not include off-campus employment (e.g., research, hospice).
3 St. Luke's employment for 2008 was 1,012 persons. CPMC began to operate the campus in 2007.
4 St. Luke's MD staff = 361, all other campuses = 1,644. Approx. 100 MDs assumed on both rosters, resulting in 1,855 total CPMC MD staff.
5 St. Luke's acute discharges = 4,604, all other campuses = 25,801.
6 St. Luke's Campus Emergency Department visits = 23,697, all other CPMC campuses = 46,522 visits.
Source: California Pacific Medical Center 2010, *CPMC Employment and Other Factors Contributing to Trip Generation, 2001-Present*

Although changes to roadways, transit service, and bicycle facilities have occurred that might make alternative modes more attractive, changes to the CPMC employee TDM program would likely have the highest potential to change commuter behavior. Since 2001, no substantial changes have been made to the CPMC TDM program, only changes to parking fees (because of increased costs) and the modification of shuttle schedules. The TDM program consists of a variety of activities, including an annual transportation fair, transit pass sales and subsidies, car-sharing/carpool facilities (parking) and promotions, vanpool subsidies and parking; private shuttles connecting to the Civic Center BART station, and an active parking pricing program. For a discussion of planned transit improvements (TEP), transit data use and how Muni service changes were addressed in the analysis, see Response TR-14 on page C&R 3.7-33 and Response TR-15 on page C&R 3.7-36.

Finally, as an additional reasonableness check to confirm that the trip generation rate estimates being proposed for this analysis were appropriate, comparable rates and travel demand data were gathered from other medical-related transportation impact study reports and sources. Specifically, trip generation data from the following sources were gathered and reviewed:

- University of California, San Francisco (UCSF) Medical Center at Mission Bay (2008);
- *San Francisco General Hospital Medical Center Master Plan* (2008);
- *Kaiser San Francisco Medical Center Master Plan* (1996);

- *Trip Generation Report, 8th Edition*, from ITE;
- *San Diego Traffic Generators* from the San Diego Association of Governments (SANDAG); and
- *Trip Ends Generation Research Counts* from Caltrans.

The results of the comparison showed that the rates generated from the CPMC data were either comparable to or slightly more conservative than the rates presented in these sources. The assumptions, methodology, and results of the trip generation analysis are summarized in the report *CPMC LRDP: Travel Demand Estimation for the San Francisco Campuses* (Adavant Consulting, April 4, 2010). The report is included in Appendix D of the *Cathedral Hill Transportation Impact Study*.

3.7.3.7 CPMC Employment Growth

Comments

(Gloria Smith—California Nurses Association, October 19, 2010) [90-41 TR]

"Concerning Project-specific impacts, the DEIR did not adequately analyze increases in both transit use and vehicle miles traveled resulting from the Project. CPMC is the second largest employer in San Francisco.[22] The total number of employees at all of the CPMC campuses will increase by 4,170 employees system-wide. This new employment, while certainly a benefit to the City, will create population growth and household growth.[23] People traveling into the City and across the City for these new job opportunities will increase traffic and further burden public transit. Because the DEIR did not factor in these new commuters, a revised EIR must analyze this impact.

22 DEIR at page 5-16.
23 *Id.* At page 4.3-31"

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-9 TR]

"Finally, the Draft EIR did not adequately analyze increases in both transit use and vehicle miles traveled resulting from the Project. According to Page 5-16 of the Draft EIR, CPMC is the second largest employer in San Francisco. The total number of employees at all of the CPMC campuses will grow to approximately 10,730 by 2030. This would be a net growth of 4,170 employees to the CPMC system between 2006 and 2030. This new employment would create population growth and household growth of approximately 3,480 people or approximately 3 percent according to Page 4.3-31 of the Draft EIR. People traveling into the City and across the City for these new job opportunities will increase traffic and further burden public transit. Thus, a revised EIR must analyze this impact."

Response TR-26

The comments suggest that the EIR did not adequately analyze the effects of employment growth that would result from the project, and the resulting increases in transit use and vehicle miles traveled. In developing the travel demand forecasts for the transportation analysis, the travel demand associated with the five study sites (Cathedral Hill, Pacific, California, Davies, and St. Luke's) was estimated on a weekday daily, a.m. and p.m. peak-hour basis using population (employees, visitors, patients). Because site population, including employees, patients, and visitors, was used as the primary basis for the trip generation, the future increase in employment is captured in the travel demand for each site. Further, the transportation impact analysis prepared for each CPMC campus included the traffic generated by each of the other CPMC campuses in the background traffic growth. Therefore, travel demand for all campuses was accounted in the analysis for each individual campus, and the transportation impact analyses considered the additional traffic on the roadways and transit use generated by the increase in employment on all of the CPMC campuses. In terms of the adequacy of the transit analysis, see Response TR-53, page C&R 3.7-80.

The project vehicle miles traveled (VMT) is referenced in Section 4.8, "Greenhouse Gas Emissions," of the Draft EIR. Total VMT were calculated by multiplying the number of trips by the average trip length for each type of trip. Vehicle trip counts were obtained from the traffic analyses prepared for each campus. URBEMIS default values for trip-type percentages (e.g., commuting, non-work, customer) and their corresponding urban trip lengths were used to determine total mileage.

3.7.3.8 Retail and Service Commercial Trip Generation

Comment

(Gloria Smith—California Nurses Association, October 19, 2010) [93-32 TR]

"• Specific retail service and other commercial uses. This detailed information is critical to accurate trip generation assumptions, parking demand, and determining whether or not uses will actually result in reducing trips/air quality and greenhouse gas emissions or merely become attractors for additional vehicle trips."

Response TR-27

The comment questions the inclusion of retail and other commercial uses in the travel demand calculations. The proposed Cathedral Hill Campus would include 3,100 square feet (sq. ft.) of retail space on the site of the proposed hospital and several small shops totaling 7,825 sq. ft. of retail space on the site of the proposed Cathedral Hill MOB. A total of 10,925 sq. ft. would be provided on the two sites. The retail space would front onto adjacent streets and would include uses that generally support the services provided by the hospital and MOB, including small cafes. The analysis assumed that these retail spaces would not generate a substantial amount of new trips to the area because of their relatively small size. Rather, they would primarily serve the employees, patients, and visitors at the proposed Cathedral Hill Campus and from other adjacent buildings.

3.7.3.9 Labor and Delivery Trip Generation

Comment

(Barbara Savitz, September 23, 2010) [PC-337 TR]

"I work Labor and Delivery at CPMC California campus. We have 18 labor beds and usually about three to five visitors for patients in labor, that would be about 54 cars coming to see the patients. After delivery, the patient goes to postpartum for mother and baby care, and there we have approximately 50 beds, so then, if we have three people visiting, three cars visiting, that's 150 cars coming to visit the patients. After this, the cars of nurses, doctors, auxiliary coming to work, what a challenge."

Response TR-28

The comment provides information about travel demand based on experience at CPMC's California Campus. The travel demand estimates for the proposed CPMC LRDP were developed based on the existing characteristics of the CPMC campuses, the types of functions at each campus, and the population of each campus (employees, patients, and visitors); therefore, the trip generation analysis captured the type of activity described in the comment. The estimates of travel demand assumed that parking would be generally available on- or off-site for staff, patients, and visitors who choose to drive. The available survey data indicates that the number of vehicles would not necessarily be a one-to-one correspondence with the number of people in a given area.

3.7.3.10 PARKING FEES TO PROMOTE TRANSIT USE

Comment

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010)
[67-22 TR]

"e) CPMC's Traffic Demand Management (TDM) plan for patients and accompanying visitors is flawed, as it imposes high parking fees to encourage patients to take the bus—the reality is that patients circulate looking for nearby parking, adding to congestion, or have friends or family drop them off doubling the number of vehicle trips and lane blockages due to double parking. Accepting the TDM plan as mitigation completely ignores the fact that, at least in the case of patients and visitors, the observations of nearby residents indicate the result is contrary to the stated intent."

Response TR-29

The comment states that the CPMC TDM plan is flawed and that high parking fees would encourage patients and visitors to park on the street in the neighborhoods. Where the CPMC TDM plan suggests higher parking fees, these fees are coupled with incentives to switch from single-occupancy vehicle usage to other modes of transport. Many factors in addition to parking fees would be anticipated to influence travel mode choice of visitors and patients. Travel demand for each individual campus for the transportation analysis, as described in "CPMC LRDP Travel Demand Estimation for the San Francisco Campuses" (Appendix D of the Traffic Impact Study), was based on surveys and counts of patients and visitors at each existing CPMC campus. CPMC has developed a systemwide TDM plan that was provided to the City, and is included in Appendix G. A discussion of specific items in the planned CPMC TDM plan is included in Response TR-23, page C&R 3.7-45. The CPMC TDM plan parking fee structure would be designed to discourage long-term parking at the facilities. The parking rates at the campuses would need to be high enough that a patient or visitor would use the parking to attend to their medical or business needs at the CPMC campus, but would generally choose not to use the parking for non-CPMC activities. This approach to managing the parking fees would ensure sufficient turnover in the patient and visitor parking areas to accommodate the demand. Conversely, the TDM program would use higher parking fees for employees to park on campus to encourage people to carpool if arriving by vehicle and to encourage transit use and other modes of transportation by employees. Furthermore, the TDM plan is not proposed as a mitigation measure for any of the CPMC LRDP transportation impacts. As discussed in the Draft EIR Section 4.5.3, "Significance Criteria – Person Trip Generation, Page 4.5-75," although the TDM plan would be anticipated to encourage the use of alternate travel modes, the transportation analysis did not assume any additional reduction in driving (vehicle trips) as the result of the proposed enhancements to the TDM program.

The comment also expressed a concern for increased patient and visitor vehicle trips resulting in an increased amount of blocked travel lanes and double parking from patient/passenger loading and unloading. Passenger loading demand and analysis for each campus is contained in the Draft EIR, pages 4.5-82 through 4.5-84; 4.5-141 (Cathedral Hill); 4.5-174 (Pacific); 4.5-189 (Davies); and 4.5-206 (St. Luke's). New passenger loading and unloading zones have been designed for the Pacific, Cathedral Hill, Davies and St. Luke's Campuses, which improve passenger loading and unloading conditions at all new buildings.

3.7.3.11 Medical Services Data

Comment

(Gloria Smith—California Nurses Association, October 19, 2010) [93-33 TR]

"• Projected emergency room admissions and ambulance trips for both near-term and long-term project phases. This information is essential to an analysis of the adequacy of health care services and conclusions regarding impacts such as cumulative impacts on transit and traffic generated by patients having to travel greater distances for services. Details including total projected psychiatric admissions is essential for impact analyses as well."

Response TR-30

The comment indicates that information about the projected number of emergency room, ambulance, and psychiatric admissions is essential for estimating travel demand associated with the CPMC LRDP. The comment is noted. As described in Response TR-20 (page C&R 3.7-42), the trip generation and mode choice were determined based on the number of employees, patients, and visitors. These data were used to perform the transportation analyses. These person-trips included patients for all types of medical treatment, including emergency admissions, general admissions, and medical office appointments. In addition, CPMC provided information about the number of daily existing and projected future ambulance trips and data on the existing daily distribution of ambulances at the existing emergency departments. These data were used to analyze the ambulance loading areas.

The relocation of medical services between the campuses may increase trip length for some patients and shorten trip lengths for others. As noted above, it is speculative to estimate the variation in patient trip length because the location of the patients would vary over time. Therefore, the focus of the analysis was on the net new trips generated by patients and visitors to and from the campuses and the effects of these trips on the transportation network. Additional discussion of the medical services provided and the distribution of those services to the various campuses is included in the Major Response HC-8 on page C&R 3.23-32.

3.7.4 Traffic Impacts

3.7.4.1 Adequacy of Transportation Analysis

Comments

(Merle Easton, October 18, 2010) [66-1 TR, duplicate comment was provided in 73-1a TR])

"The EIR for the CPMC project is inadequate. The proposed Cathedral Hill Hospital is too large and it's environmental impacts too great. It is clear from the EIR that it isn't possible to mitigate the thousands of additional car trips to and from the Cathedral Hill buildings that will affect the intersections in the mid NE of the city. On the streets surrounding the proposed Cathedral Hill buildings cars and trucks will be trying to enter and exit the buildings and add to the gridlock. The EIR acknowledges some of these problems, referring to some as 'significant and unavoidable' without proposing mitigations, others are called 'less than significant'. Major bus routes on Van Ness (Hwy 101) and Geary (major bus and car route to downtown) will be gridlocked.

(Paul Wermer, CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-1 TR]

"The CPMC Neighbors Coalition represents near neighbors of CPMC's Pacific site at Clay and Buchanan. We have been actively working with CPMC/Sutter Health to mitigate impacts of their existing operations since 2003, and have previously submitted comments on the scope of the never completed 2006 EIR process, and more recently (June 25, 2010) on the EEA that formed the basis for this DEIR. The Pacific Heights Residents Association represents residents in the area bounded by Bush St., Presidio Ave., Union St. and Van Ness Ave.

This area includes CPMC's Pacific Site, and PHRA has worked with the CPMC Neighbors Coalition to provide clear, consistent messages to CPMC/Sutter Health.

The comments in this letter represent the concerns of both the Pacific Heights Residents Association and the CPMC Neighbors Coalition.

We note with regret that several salient issues we raised in our June 25 scoping comments were not addressed in the DEIR, especially with respect to traffic impact assessments. We hope that this can be corrected without untoward delays in the overall process."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010)
[92-33 TR]

"The California Pacific Medical Center (CPMC) Long Range Development Plan (Project) in San Francisco creates significant traffic and transit impacts that have not been properly disclosed, analyzed or mitigated through alternatives and/or traffic improvements. The errors identified in this letter require that each of these issues be reanalyzed and reevaluated through additional study in a revised and recirculated EIR. If you should have any questions regarding these findings, please contact me at your convenience."

(Linda Chapman [76-17 TR duplicate comment was provided in 111-17 TR]

"Regardless of traffic studies based on LOS (selected intersections at a particular point in time), those who regularly travel city streets can report that tremendous transit delays, due to congestion around the Van Ness Corridor, are not uncommon. Viewing intersections a few times may be sufficient to estimate normal conditions (but only for hours studied). Congestion that is irregular, but not infrequent, is evidence that the proposed location cannot tolerate traffic inducing uses."

(Gloria Smith—California Nurses Association, March 8, 2011) [121-2 TR]

Many of the intersections in the vicinity of the proposed Cathedral Hill Campus are already failing during peak traffic hours as there is more vehicle demand than capacity available. These intersections currently operate at Level of Service (LOS) "F", the lowest performance measurement of efficiency. Under LOS "F" conditions, flow is forced and each vehicle moves in lockstep with the vehicle in front of it, with frequent slowing and stopping required. The number of these failing intersections will significantly increase in future years. Adding LRDP trips to these failing intersections will increase vehicle delay and gridlock beyond what is already being experienced, with no relief in sight.

Response TR-31

The comments raise concerns about intersection and transit-delay impacts that would occur as a result of implementing the proposed Cathedral Hill Campus project. The Draft EIR addresses each category contained in the comments. To summarize:

- Impact TR-1 and Impact TR-99 identify significant and unavoidable impacts that would occur at the intersection of Van Ness/Market under 2015 Modified Baseline and 2030 Cumulative conditions, respectively. No feasible mitigation was identified through the course of analysis and in consultation with the SFMTA. Potential mitigation measures that were discussed include, but were not limited to, increasing right-of-way to provide additional travel lanes, removing pedestrian walk phases to allow for overlap turning patterns, and the conversion of bus-only lanes to mixed-flow travel lanes. Through discussion with SFMTA staff, mitigation measures were deemed infeasible.

- Impact TR-2 and Impact TR-101 identify significant and unavoidable impacts that would occur at the intersection of Polk/Geary under the 2015 Modified Baseline and 2030 Cumulative conditions, respectively. No feasible mitigation was identified through the course of analysis and in consultation with the SFMTA. Potential mitigation measures that were discussed include, but were not limited to, increasing right-of-way to provide additional travel lanes and the conversion of bus-only lanes to mixed-flow travel lanes. Through discussion with SFMTA staff, these measures were deemed infeasible.

- Impact TR-100 identifies a significant and unavoidable impact that would occur at the intersection of Van Ness/Pine under the 2030 Cumulative conditions. No feasible mitigation was identified through the course of analysis and in consultation with the SFMTA. Potential mitigation measures that were discussed include, but were not limited to, increasing right-of-way to provide additional travel lanes and the removal of on-street parking to provide additional travel lanes. Through discussion with SFMTA staff, these measures were deemed infeasible.

- Impact TR-3 and Impact TR-102 identify intersections that would operate at unacceptable peak-hour LOS before and after implementation of the proposed Cathedral Hill Campus project under 2015 Modified Baseline and 2030 Cumulative conditions, respectively. The project's contribution to the intersections' poor operating conditions was determined not to be significant, and therefore, the impacts were identified as less than significant.

- Impact TR-4 and Impact TR-103 identify intersections that would operate at acceptable peak-hour LOS before and after implementation of the proposed Cathedral Hill Campus project under 2015 Modified Baseline and 2030 Cumulative conditions, respectively, and thus the impacts were identified as less than significant.

- Impact TR-29 and Impact TR-134 identify significant impacts (increased delay) on transit vehicle operation on Van Ness Avenue as a result of increased traffic congestion and transit ridership with implementation of the proposed Cathedral Hill Campus project under 2015 Modified Baseline and 2030 Cumulative conditions, respectively. Mitigation Measure MM-TR-29 was identified to reduce the project's impact to a less-than-significant level. However, because of uncertainty about SFMTA's ability to provide the additional transit service identified in the mitigation measure, the project's impact was determined to be significant and unavoidable. Please refer to Responses TR-54 and TR-55 (page C&R 3.7-86 and 3.7-89) for a detailed discussion regarding transit corridor delay impacts and identified mitigation measures.

- Impact TR-30 and Impact TR-135 identify significant impacts (increased delay) on transit vehicle operations on Geary Street as a result of increased traffic congestion and transit ridership with implementation of the proposed Cathedral Hill Campus project under 2015 Modified Baseline and 2030 Cumulative conditions, respectively. Mitigation Measure MM-TR-30 was identified to reduce the project's impact to a less-than-significant level. However, because of uncertainty about SFMTA's ability to provide the additional transit service identified in the mitigation measure, the project's impact was determined to be significant and unavoidable. Please refer to Response TR-54 (page C&R 3.7-86) for a detailed discussion regarding transit corridor delay impacts and identified mitigation measures. Impact TR-31 and Impact TR-136 identify significant impacts (increased delay) on transit vehicle operations on Polk Street as a result of increased traffic congestion and transit ridership with implementation of the proposed Cathedral Hill Campus project during 2015 Modified Baseline and 2030 Cumulative conditions, respectively. Mitigation Measure MM-TR-31 was identified to reduce the project's impact to a less-than-significant level. However, because of uncertainty about SFMTA's ability to provide the additional transit service identified in the mitigation measure, the project's impact was determined to be significant and unavoidable. Please refer to Response TR-54 (page C&R 3.7-86) for a detailed discussion regarding transit corridor delay impacts and identified mitigation measures.

- Impact TR-40 summarizes the pedestrian impact assessment. With implementation of the proposed Cathedral Hill Campus project, the effect on the pedestrian environment would not be substantial enough to result in a significant impact. The analyses presented include evaluations of sidewalk and crosswalk capacity and conditions and potential improvements the City could pursue to improve pedestrian conditions. Improvement Measure I-TR-40, wherein the project sponsor could provide funding for the study and possible implementation of additional streetscape, pedestrian, and related improvements in the vicinity of the proposed LRDP campuses, is included as a staff-initiated text change to the Draft EIR. Please refer to Response TR-63 (page C&R 3.7-110) for a detailed discussion regarding pedestrian safety included in the Draft EIR.

- Comment 66-1 expresses concern that vehicles entering and exiting the proposed Cathedral Hill Campus buildings (Hospital, MOB, and 1375 Sutter MOB) would add to any existing gridlock. As shown in Figure 4.5-19, page 4.5-101 of the Draft EIR, the parking ticket gates would be located within the garage to accommodate internal queuing. Furthermore, as discussed on pages 4.5-100 through 4.5-103 of the Draft EIR, a vehicle queuing analysis was performed to identify whether the potential would exist for queues to spill back from the proposed Cathedral Hill Campus building driveways and affect traffic operations of the adjacent streets. The analysis showed that this would not occur, even during peak times of use of the parking garages, such as during shift changes at the facilities. Furthermore, vehicles entering and exiting the proposed Cathedral Hill building access points were shown not to have a detrimental effect on the operation of bus lines that travel on the adjacent streets, the 38/L- Geary and 19-Polk bus lines.

Additionally, Comment 66-1, which states that Van Ness Avenue and Geary Boulevard/Street would be gridlocked for both cars and buses, is conjecture. As shown in Table 4.5-18 on page 4.5-95 of the Draft EIR, during the 2030 cumulative p.m. peak-hour scenario, 70 percent (9 of 13) of study intersections on Van Ness Avenue or Geary Boulevard/Street would operate at level of service D or better, which would be considered acceptable in the City of San Francisco. In other words, during the time when the transportation network was used the most, the p.m. peak hour, with 20 years’ worth of development assumed as background growth, and with the construction and operation of the proposed Cathedral Hill Campus as part of the proposed CPMC LRDP, many of the study intersections on Van Ness Avenue and Geary Street/Boulevard would still operate acceptably.

- Comment 76-17 expresses concern that the proposed location is not ideal because of the delays that would be caused to transit service by congestion on the Van Ness Avenue corridor. In an effort to remedy this existing transit delay, the SFCTA and SFMTA are proceeding forward with two projects, the Van Ness BRT and Geary BRT, that would increase both corridors’ transit performance and reliability by converting two of the current six vehicle travel lanes on Van Ness Avenue for Van Ness BRT to separate transit-only lanes, making transit use more efficient and more attractive as a travel mode.

Additionally, Comment 76-17 states that the peak-period nature of the transportation analysis does not take into account “irregular congestion.” The peak period was selected for study in the Draft EIR because it is the time at which there is the greatest demand on the transportation network, and thus represents the most conservative scenario upon which to analyze transportation impacts on a network-wide basis. By its nature, “irregular” congestion is difficult to define and quantify for inclusion in transportation analyses. Please refer to Response TR-10 (page C&R 3.7-26) for a detailed discussion regarding the peak hour analysis included in the Draft EIR.

The adequacy of the transportation impact analyses in the Draft EIR, as raised in Comment 67-1 TR, is also addressed in Response TR-18, page C&R 3.7-39. EIR scoping comments received from the public were considered along with City Guidelines and professional practice to develop the transportation analysis contained in the Draft EIR Section 4.5 “Transportation and Circulation.”

3.7.4.2 California Campus Intersection Impacts

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-16 TR, duplicate comment was provided in 30-16 TR]

"As a general comment, to state, e.g., as on Page 4.5-179 for the California Campus, Impact TR-67, that 'Implementation of the CPMC LRDP would not cause the level of service at California Campus study intersections to deteriorate from LOS D or better to LOS E or LOS F, or from LOS E to LOS F, and therefore, the project would not result in a significant traffic impact (Less than Significant),' to say that the intersections are already at a low LOS so implementing a project that exacerbates the problematic issues so that the traffic impact is deteriorated not only on the nearby adjacent streets but out farther into streets even ½-mile away is rather an illogical manner of handling problems with circulation.

Many more additions of vehicles into the area makes it worse so a solution needs to be developed to bring the LOS at these intersections such as at Gough/Post, Franklin/Geary, Van Ness/Geary, Polk/Post, etc. as on Page 4.5-100, to a more efficient LOS prior to starting the Cathedral Hill Project.

And for the DEIR to put the onus on surrounding projects that contribute to the 'poor operating conditions at these study intersections' and that are 'due to background traffic volume increases associated with other developments' in the area of the proposed Cathedral Hill Campus Project as on Page 4.5-99 should not be used as the basis to allow approval of the project without seriously fixing the intersections to better LOSs first.

I do not believe this should be in the 'Less Than Significant' category but rather should be in the 'Significant' category. I am also not sure it is 'Unavoidable.' Since the DEIR states the problem of transit impacts in the Cathedral Hill project as 'less than significant,' CPMC is then not required to give a mitigation measure.

I think there needs to be a mitigation measure because saying that they are constructing in an area of bad traffic circulation so building a structure that will make a LOS F area a worse LOS F area is not solving the traffic and circulation problem. Making a bad situation worse is not being a good neighbor to the citizens of San Francisco."

Response TR-32

The comment raises concerns whether it is appropriate or logical to determine that an impact of a project would be less than significant at an intersection that already operates poorly (LOS E or LOS F conditions). The transportation analysis performed in the Draft EIR is based on the methodology as set forth in the *SF Guidelines* and the determination of significance is based on established quantitative thresholds that are applied equally to all substantial development projects throughout the City. Furthermore, the Draft EIR does not say that the proposed CPMC LRDP would have no impact at the intersections that are already failing under 2015 or 2020 baseline conditions. Rather, it states that the additional traffic generated by the proposed LRDP, in some cases, would be below a quantitative threshold of significance at some of these failing intersections. Furthermore, it is possible to add vehicles to an already failing intersection without deteriorating its overall operations, which is why the City has quantitative thresholds for determining when the addition of new vehicles does in fact result in exacerbating already poor operating conditions.

3.7.4.3 PACIFIC CAMPUS

Comment

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010)
[67-10 TR]

"The DEIR fails to assess the impact of the increased traffic density resulting from the expanded ambulatory care services at CPMC's Pacific site, especially with regard to small businesses in the vicinity, and pedestrian usage of the surrounding streets as residents walk to schools, parks and use public transit. Without this assessment, it is not possible to determine whether the new operations are appropriate to this neighborhood."

Response TR-33

The comment identifies concerns about new vehicle trips at the Pacific Campus. The Pacific Campus projected daily population would be less than the population under existing conditions. Acute-care medical services would be transferred to the proposed Cathedral Hill Campus and other planned changes (i.e., expanded ambulatory care services) would be made to the campus under the CPMC LRDP, which would lessen the intensity of daily traffic at the Pacific Campus. As stated in Impact TR-59 on Draft EIR page 4.5-168, implementing the Pacific Campus project would result in a net increase of 71 vehicle trips during the p.m. peak hour. With the addition of the new vehicle trips, the 16 study intersections around the Pacific Campus would continue to operate at acceptable LOS conditions. Therefore, the impact of the traffic increase that would result from project implementation would be less than significant. Also, an additional 648 parking spaces would be added to the Pacific Campus by 2020 (Draft EIR page 4.5-168) to accommodate the parking demand on site. The additional parking spaces would reduce the number of CPMC-related drivers parking on the street in the adjacent neighborhoods, and would reduce the amount of vehicles circling around the neighborhood by patients and visitors looking for parking. The comment also expresses concerns that the Draft EIR did not evaluate other growth near the Pacific campus, specifically small businesses in the vicinity that could result from CPMC transitioning to an Ambulatory Care Center at this location. Employment growth, including medical use, is part of the land use growth projections incorporated into the transportation analysis. Furthermore, a portion of any growth in the area would replace existing businesses and would not necessarily represent new employees or person trips. The potential or extent of expanded medical-related employment in the surrounding area beyond that already projected or beyond existing business growth would be speculative in nature.

As stated in Impact TR-62 on Draft EIR page 4.5-171, the proposed LRDP would result in an increase in pedestrian traffic at the Pacific Campus. Overall, implementing the Pacific Campus project would add about 64 net new pedestrian trips to the surrounding streets during the p.m. peak hour (Draft EIR page 4.5-173). The new pedestrian trips generated by the project could be accommodated on nearby sidewalks without substantially affecting pedestrian conditions. New pedestrian access to the main entrance of the Ambulatory Care Center (ACC) would be provided at the new Campus Drive entrance. Existing pedestrian conditions on sidewalks and crosswalks were observed to be acceptable, with adequate space to accommodate additional pedestrians. Additionally, the proposed LRDP would include several improvements to the sidewalk network. The net new pedestrian trips would not result in substantial overcrowding on the sidewalks or hazardous conditions; therefore, the impact of the Pacific Campus project on pedestrian conditions would be less than significant.

The Pacific Campus project is a long-term CPMC LRDP project, and as such, would be subject to additional project-specific environmental review under CEQA.

3.7.4.4 CATHEDRAL HILL CAMPUS

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-36 TR, duplicate comment was provided in 30-36 TR]

"In addition, other transportation impacts to Van Ness/Market are TR-6 (Two-way Post St. Variant with 'significant impact' with no mitigation measure, TR-12 (MOB Access Variant), TR-20 (Cathedral Hill Campus project implementation + Van Ness & Geary BRTs), TR-23 (Two-way Post St. Variant + Van Ness & Geary BRTs), TR-26 (MOB Access Variant with Cathedral Hill Project implementation + Van Ness & Geary BRTs), TR-99 (Implementation of Cathedral Hill Campus project), TR-105 (Cathedral Hill Campus project + Two-way Post St. Variant), TR-111 (Cathedral Hill Campus project MOB Access Variant), TR-118 (Cathedral Hill project + Van Ness & Geary BRTs cumulative and significant impact), TR-121 (Two-way Post St. Variant + Van Ness & Geary BRTs + Cathedral Hill Campus project) and TR-124 (MOB Access Variant, Van Ness & Geary BRTs + Cathedral Hill Campus project). In addition there are transit impacts at Polk/Geary including 2-way Post St. option, MOB access option (see Pages S-43-59, TR-2, TR-7, TR-13, TR-17 (MOB access option possible traffic hazard on Geary St.), TR-19 (Cathedral Hill Campus project implementation + Van Ness & Geary BRTs), TR-22 (Geary and Van Ness BRT projects commencing at same times), TR-25, TR-101 (Cathedral Hill Campus project implementation cumulative impacts), TR-108 (Cathedral Hill Campus project with Two-way Post St. Variant), TR-113 (MOB Access Variant), TR-117 (cumulative impacts from combined Van Ness and Geary BRT projects), TR-120 (two-way Post St. + combined cumulative Van Ness and Geary BRT projects) and TR-123 (MOB Access Variant + Van Ness and Geary BRT projects). With all these transit impacts, it would be helpful to commence traffic calming measures in the areas of all 5 campuses - Cathedral Hill,· Davies, California, St Luke's and Pacific on the residential streets and especially on streets with schools for sensitive receptors such as elementary children."

Response TR-34

The comment states that because of the intersection and transit impacts associated with the Cathedral Hill Campus or project variants identified in the Draft EIR, it would be prudent to commence with traffic calming measures on residential streets within all five campus areas. No nexus is provided between the finding of transportation impacts at Cathedral Hill Campus and the need to provide mitigation or improvement measures at other campuses where corresponding transportation impacts would not occur. In addition, the transportation impacts listed in the comment are from different scenarios/variants, and thus would not happen concurrently. Furthermore, the project sponsor is committed to a proposed Cathedral Hill Campus Streetscape Plan, which would be consistent with San Francisco's *Better Streets Plan* standards and many of the recommendations contained in the *Little Saigon Report*. As part of the project approval process, the streetscape plan has been reviewed by City agencies to ensure that it would be consistent with the City's goals and policies related to the pedestrian environment. If approved, the project sponsor would be committed to the elements identified in the streetscape plan for the campus. See Response TR-126 (page C&R 3.7-220) for a list of the proposed streetscape improvements at the Cathedral Hill Campus.

The project sponsor, through the proposed development agreement, would also provide funding for the City to study and potentially implement additional streetscape, pedestrian, and related improvements in the vicinity of the proposed LRDP campuses that would provide benefits to the communities. The community benefits could, for example, include improvements identified in the *Little Saigon Report* as well as other sidewalk widenings, bulb-outs, and pedestrian lighting. These community benefit improvements would be permitted, designed and constructed by the City. They would not be related to any environmental impacts of the proposed LRDP and would undergo separate environmental reviews, as needed.

Comment

(Donald Scherl, October 18, 2010) [74-4 TR]

"3.1.4: Notwithstanding the above, as the draft EIR notes, there are numerous impacts that would occur if any hospital were to be built at Cathedral Hill. Listed among these is: the traffic snarl that would increase unavoidably at Market and Van Ness Ave., neighborhood noise and air pollution, the numerous Traffic and Transportation impacts listed on pages S-42-46, and subsequent pages, as 'significant and unavoidable', and a 'significant impact' (TR-44) involving 'potentially hazardous conditions on Franklin St.' CPMC complains that changing sites would delay the process beyond the State deadline, but this is a difficulty CPMC has only itself to blame and should not place the Commission in the position of feeling forced by circumstances not of its creation to approve the meritless CPMC LRDP, nor the draft EIR, as they pertain to Cathedral Hill and St. Luke's."

Response TR-35

The comment states that the proposed Cathedral Hill Hospital, if constructed, would create numerous significant impacts. The comment states that "CPMC complains that changing sites would delay the process beyond the State deadline." Please refer to Major Response HC-2 (page C&R 3.23-8) for a detailed discussion regarding the basis for the location and size of the proposed Cathedral Hill Campus and the St. Luke's Campus. The comment is correct that implementing the proposed Cathedral Hill Campus would result in a significant and unavoidable impact at the intersection of Van Ness Avenue/Market Street. As stated on page 4.5-98 of the Draft EIR, and further discussed in Response TR-31 (page C&R 3.7-53), no feasible mitigation measures exist that would reduce impacts at the Van Ness Avenue/Market Street intersection to a less-than-significant level.

Impact TR-44 regards the operation of the proposed Cathedral Hill Hospital's off-street loading facility. As described on pages 4.5-138 through 4.5-139 of the Draft EIR, the impact of loading operations for trucks larger than 46 feet in length, at the off-street loading facility on Franklin Street would be potentially significant. However, this impact would be less than significant with implementation of Mitigation Measure M-TR-44 (page 4.5-139 of the Draft EIR), which would require loading dock restrictions, ongoing monitoring, and an attendant.

Noise and air quality impacts are analyzed in Sections 4.6 and 4.7 of the Draft EIR, respectively.

Please note that the project approval process occurs after certification of the Final EIR by the City decision-makers and is separate from the environmental review process. The project approval process can only occur after certification of the Final EIR and is procedurally separate from the environmental review process. The decision-makers may select the project variants or one of the alternatives presented in the document if determined feasible, or may approve, modify, or disapprove the project as proposed.

3.7.4.5 FRANKLIN STREET IMPACTS

Comment

(Galen Workman, October 14, 2010) [55-3 TR]

"Finally, the report does not adequately address the impact on traffic flow on Franklin. Franklin is already a completely clogged mess for most of the weekday daytime hours. We cannot add ANYTHING to the configuration without negative impact to the already dismal congestion. (And, unless a new building is dropped fully formed from the sky, north-south traffic will be significantly disrupted during the construction period.)"

Response TR-36

The comment identifies concerns about existing traffic conditions on Franklin Street and impacts during construction of the proposed Cathedral Hill Hospital. The comment correctly notes that construction of proposed Cathedral Hill Campus would disrupt traffic operations. The traffic analysis evaluated six intersections along the Franklin Street corridor from O'Farrell Street to Pine Street. Impact TR-3 on Draft EIR page 4.5-99 indicated that three of the six intersections on Franklin Street would operate at LOS E or LOS F under 2015 Modified Baseline No Project and plus Project conditions; however, the project traffic would not contribute significantly to the poor operations of three of the six intersections; Franklin/O'Farrell, Franklin/Sutter, and Franklin/Bush. As identified in Impact TR-4 on Draft EIR page 4.5-100, the other three intersections on Franklin Street would operate at acceptable LOS D or better under 2015 Modified Baseline plus Project conditions (Franklin/Geary, Franklin/Post, and Franklin/Pine).

The traffic analysis also evaluated the same six intersections along the Franklin Street corridor for 2030 Cumulative plus Project conditions. Impact TR-102 on Draft EIR page 4.5-220 indicated that three of the six intersections on Franklin Street would operate at LOS E or LOS F under 2030 Cumulative plus Project conditions; however, the project traffic would not contribute significantly to the poor operations (Franklin/O'Farrell, Franklin/Sutter, Franklin/Bush). As identified in Impact TR-103 on Draft EIR page 4.5-220, the other three intersections would operate at an acceptable LOS D under 2030 Cumulative plus Project conditions (Franklin/Geary, Franklin/Post, Franklin/Pine).

Impact TR-55 on Draft EIR page 4.5-147 identifies that there would be a significant and unavoidable transportation impact during construction of the proposed Cathedral Hill campus. Mitigation Measure MM-TR-55 (on page 4.5-159 of the Draft EIR) requires that CPMC prepare a construction transportation management plan before beginning construction. This plan would be reviewed by the appropriate City agencies to reduce the impacts on traffic, transit, and the adjacent neighborhood during the construction period. However, the Draft EIR concluded that this impact would remain significant and unavoidable after implementation of Mitigation Measure MM-TR-55 because of the extent and duration of construction activities. Additional information about construction impacts and the construction worker transportation plan is provided in Response TR-106 on page C&R 3.7-185.

Comments

(Barbara Kautz- CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-26 TR, duplicate comment was provided in 108-26 TR]

"4. No Effort to Identify Feasible Mitigation Measures.

The DEIR identifies numerous significant traffic and transportation effects yet makes no effort to identify feasible mitigation measures for these impacts. For instance, pages 4 4.5-93 to 4.5-116 identify 26 significant impacts yet identify only *one* mitigation measure, declaring the rest of the impacts to be 'significant and unavoidable.' There is no serious discussion of potential mitigation. Instead, the same language is repeated throughout: that physical modifications would require narrowing of sidewalks or demolition of buildings, which is infeasible; and that changes in signal timing would 'likely' be infeasible. No analysis whatsoever of either of these mitigations is included in the DEIR, nor of any other typical measures to mitigate traffic impacts, such as changes in lane configurations, removal of on-street parking, etc."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-76 TR]

"3. The DEIR Lack Effective Measures to Mitigate the Project's Impacts on Traffic Congestion and Public Transit

The DEIR identified over 150 traffic impacts associated with the LRDP. For the near term, years 2015 and 2020, the DEIR identified 98 traffic impacts, with 58 of those associated with the Cathedral Hill Campus alone. For the long term, year 2030, the DEIR identified 53 cumulative traffic and transit impacts, with 42 of these associated with the Cathedral Hill Campus alone. The intense development proposed for the Cathedral Hill Campus creates nearly two-thirds of all of the Project's overall impacts to the roadway and transit system. Of the 100 traffic impacts associated with the Cathedral Hill Campus, the DEIR indicated that 30 impacts are significant, unavoidable, and cannot be mitigated. Worse, in Mr. Brohard's expert opinion, the DEIR's estimate of unmitigable impacts is likely low.

For 2015, the DEIR identified the intersections of Van Ness/Market and Polk/Geary as significantly impacted by traffic generated by the Cathedral Hill Campus.[44] For both, the DEIR found that mitigation in terms of increasing vehicular capacity at the intersections was not feasible. Therefore, the DEIR omitted any mitigation measures to reduce Project impacts to less than-significant levels aside from hoping that CPMC would expand its current transportation demand management program ('TDM') to discourage use of private automobiles. Although this may reduce the number of trips through the intersection, the extent of this program or reduction to impacts is not known, is vague and wholly unenforceable.

CEQA requires that the City impose all feasible alternatives and/or mitigation measures before concluding that traffic impacts are 'significant and unavoidable' as it did here. The DEIR must document the geometry of both intersections that the City finds to have significant and unavoidable traffic impacts, then identify the specific traffic measures or alternatives evaluated, and discuss why each of these options cannot feasibly be implemented. Without adding this analysis to a revised EIR for public review, the City may not dismiss the potential mitigation measures as infeasible."

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-4 TR]

"The Draft EIR identifies over 150 traffic impacts associated with the CPMC Long Range Development Plan. For the near term in Years 2015 and 2020, the Draft EIR identifies 98 traffic impacts, with 58 of those associated with the Cathedral Hill Campus. For the long term in Year 2030, the Draft EIR identifies 53 cumulative traffic and transit impacts, with 42 of these associated with the Cathedral Hill Campus. From this summary of traffic and transit impacts alone, the intense development proposed for the Cathedral Hill Campus creates nearly two-thirds of all of the Project's overall impacts to the roadway and transit system. Of the 100 traffic impacts associated with the Cathedral Hill Campus, the Draft EIR indicates that 30 impacts are significant, unavoidable, and cannot be mitigated. My review indicates that the Draft EIR's estimate of unmitigable impacts is likely low."

(Sue Hestor, October 19, 2010) [89-1 TR]

"I am submitting these comments on the DEIR my own behalf.

Cathedral Hill Transportation Impacts

CPMC proposes to dramatically transform the intersection of two major arterials, one of them US Rte 101 and two major transit streets - Van Ness and Geary. The transportation analysis for Cathedral Hill is replete with Impact analyses that conclude as it does for Impact TR-1 (significant impact at the intersection of Van Ness/Market – 'no feasible measures are available for Impact TR-1')."

(Donald Scherl, October 18, 2010) [74-14 TR]

"4.5: Transportation and Circulation: In this section, the impacts are multiple and severe, with numerous impacts labeled SU ('significant and unavoidable').

Impacts TR-1, TR-12, TR-20, TR-23, TR-26, TR-105, TR-111, TR-118, TR-121, TR-124: As noted in the draft EIR, 'Implementation of the Cathedral Hill Campus would result in a significant impact at the intersection of Van Ness/Market.' The report correctly notes that there are 'no feasible mitigation measures' for this calamity (my word). Were this not sufficient, the report notes the adverse and substantial impacts the proposed Cathedral Hill Campus (Hospital and MOB) would have at the intersection of Post/Geary (e.g., Impacts TR-2, TR-6&7, TR-19, TR-22, TR-25, TR-108, TR-123), as well as Franklin and Bush (Impacts, TR-106) - none of which can be mitigated or avoided.

In addition, Impact-100 Identifies unavoidable and severe impacts at Polk/Geary (TR-19, TR-108, TR-113, TR-117, TR-120) and possibly Franklin/Bush, Van Ness/Pine (TR-107, TR-112), and Gough/Geary (TR-104)."

Response TR-37

The comments raise concerns that the Draft EIR either did not properly identify mitigation measures or provide an analysis of their feasibility. Comments 87-26, 90-76, and 92-4 sum the number of transportation impacts contained in Draft EIR as a means of overstating the transportation impacts generated by the proposed CPMC LRDP, without noting that the transportation impacts that are being grouped together are from different scenarios/variants, and thus could not happen concurrently. For example, Comment 87-26 states that on pages 4.5-93 through 4.5-116 of the Draft EIR, 26 significant impacts are identified. This total groups together significant and less than significant transportation impacts associated with the proposed Cathedral Hill Campus, MOB Access Variant, Two-Way Post Variant and consideration of the project in combination with BRT projects. As a point of reference, the number of transportation impacts generated by the proposed LRDP at the Cathedral Hill Campus in the same referenced pages of the Draft EIR (4.5-93 through 4.5-116) is five significant and less than significant impact statements. In total, not considering the cumulative analysis, there are 17 traffic impact statements related to the proposed LRDP development at Cathedral Hill and of those 17, eight are significant and unavoidable impacts and nine are less than significant impacts. Comments 89-1 and 74-14 are slightly different in that they do not state the Draft EIR did not identify feasible mitigation measures, but state that the Draft EIR includes significant impacts without feasible mitigation measures.

Comment 90-76 also references CPMC's proposal to enhance its existing TDM program. CPMC has proposed this as part of the proposed LRDP and not as part of a mitigation or improvement measure. The enhanced TDM program might be required by City decision-makers as a condition of approval, but it has been integrated as a component of the proposed LRDP.

Appendix F of the *CPMC LRDP Transportation Impact Study Master Appendix* contains intersection LOS analysis calculations that document intersection geometry—the combination of through/turn lanes by approach and Muni-only lanes, peak-hour intersection traffic volumes, signal timing, etc.—for all scenarios evaluated in the Draft EIR. This document is on file with the San Francisco Planning Department and available for public review.

In all cases where significant project impacts were identified, authors of the Draft EIR, in consultation with the SFMTA, explored options to mitigate the impact. This included examination by a traffic engineer of the intersection geometry, signal timing, turn restrictions and related operational aspects, at every location where an impact was identified, to determine what mitigations, if any, could be made. Options that did not require additional right-of-way, such as removal of parking or implementation of time-limited parking restrictions, were considered. In most cases, however, peak-period parking restrictions are already in place to provide the maximum capacity on the major streets such as Franklin Street and Geary Street. Similarly, although signal timing adjustments at intersections were considered, peak-period signal timing is already optimized for the congested vehicular movements. In general, substantial physical impediments (such as narrowing of sidewalks and/or demolition of adjacent private property) and City policy (the City's Transit-First Policy, wherein alternative modes of travel are promoted over private vehicles) rendered many improvements infeasible, such as adding vehicle capacity at intersections or arterials; thus, the project impacts were determined in the Draft EIR to be significant and unavoidable. This conclusion was reached largely because the project is located within the urban core of San Francisco, where space allocation for travel modes (pedestrians, bicycles, transit, and automobiles) is constrained by existing development. Given the project's urban location, providing additional through lanes or turning lanes is infeasible without incurring substantial cost, land acquisition, and potentially compromising the environment for other modes of travel.

Under CEQA, using the term "unavoidable" to describe an impact means that the impact would be significant even after application of all feasible mitigation. The methodology used to analyze the potential traffic impacts associated with the proposed CPMC LRDP and project variants is presented on Draft EIR pages 4.5-93 through 4.5-247. Each impact determination was based on the significance criteria presented in Section 4.5.4, "Impact Evaluations," of the Draft EIR. Significant traffic impacts were determined to be "unavoidable," as defined by CEQA, if the mitigation measure(s) included in the Draft EIR would not reduce the identified impact of the LRDP to a less-than-significant level or if no feasible mitigation measure was available to reduce the impacts.

3.7.4.6 MITIGATION—FAIR SHARE CONTRIBUTION (CALTRANS)

Comment

(Lisa Carboni, California Department of Transportation, September 9, 2010) [6-2 TR, duplicate comment was provided in 7-2 TR]

"Highway Operations

On page 4.5-93 in the DEIR, the proposed project would cause 'Significant and Unavoidable' impact at the intersection of Van Ness Avenue/Market Street (Impact TR-l). Since no feasible mitigation measures have been identified to reduce project impacts to less than significant levels, the Department recommends contributing a fair share for future improvements."

Response TR-38

The comment requests a fair-share contribution to improvements at the intersection of Van Ness/Market. On Draft EIR page 4.5-93, Impact TR-1 identifies a significant and unavoidable impact at the intersection of Van Ness/Market. Under 2015 Modified Baseline plus Project conditions, operating conditions at the intersection would change from LOS D to LOS E. To mitigate the poor operating conditions at this intersection, it would be necessary to provide additional capacity through the intersection. Increasing the number of lanes is infeasible without creating additional right-of-way area to maintain adequate pedestrian facilities. Because there are no currently planned or programmed improvements at this intersection, there is no basis for calculating a fair-share contribution. Therefore, it is not possible to estimate the amount of the project's contribution for future undefined improvements.

3.7.4.7 MITIGATION—VAN NESS AVENUE CORRIDOR INTERSECTIONS

Comment

(Lisa Carboni, California Department of Transportation, September 9, 2010) [6-3 TR, duplicate comment was provided in7-3 TR]

"In addition, in Tables 4.5,17 and 4.5c 18 on pages 4.5-94 and 4.5-95, the proposed project will also degrade level of service (LOS) at various intersections on Van Ness Avenue (listed below) for AM and/or PM peak. The Department recommends providing mitigation measures to reduce these impacts.

- Intersection #10 - Van Ness Avenue/Market Street
- Intersection #11- Van Ness Avenue/Fell Street
- Intersection #12 -Van Ness Avenue/Hayes Street
- Intersection #13 - Van Ness Avenue/O'Farrell Street
- Intersection #14 - Van Ness Avenue/Geary Boulevard
- Intersection #18 - Van Ness Avenue/Pine Street"

Response TR-39

The comment requests the implementation of mitigation measures at six intersections along Van Ness Avenue. On Draft EIR page 4.5-93, Impact TR-1 identifies a significant and unavoidable impact at the intersection of Van Ness Avenue/Market Street. Under 2015 Modified Baseline plus Project conditions, operating conditions at the intersection would change from LOS D to LOS E. Providing additional capacity through this intersection would be necessary to mitigate the poor operating conditions at the intersection. Increasing the number of lanes is infeasible without creating additional right-of-way area to maintain adequate pedestrian facilities. Additionally, signal timing changes are not feasible because of required minimum timing for pedestrians and coordinated timing along the corridor, and these changes alone would not fully mitigate the impact on the intersection. Therefore, this impact would be significant and unavoidable.

On Draft EIR page 4.5-100, Impact TR-4 indicates that under 2015 Modified Baseline plus Project conditions, the remaining study intersections on Van Ness Avenue (Van Ness/Fell, Van Ness/Hayes, Van Ness/O'Farrell, Van Ness/Geary, and Van Ness/Pine) would operate at LOS D or better. Therefore, based on the intersection significance criteria, the impacts of the proposed Cathedral Hill Campus project at these intersections would be less than significant. Because project-specific impacts at these intersections were not identified, the project would not be required to provide mitigation measures.

3.7.4.8 MITIGATION—VAN NESS AVENUE/MARKET STREET TRAFFIC CIRCLE

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-32 TR, duplicate comment was provided in 30-32 TR]

"Page S-42, Impact TR-1: Implementation of the Cathedral Hill Campus project would result in a significant impact at one of the nearby intersections -- Van Ness/Market. The DEIR states that no mitigation measure is available for this impact. I think that Van Ness/Market can be reconfigured by SFMTA to improve circulation before the start of this CPMC project. What about a traffic circle?"

Response TR-40

The comment suggests reconfiguring the intersection of Van Ness/Market to a traffic circle. Because of the heavy volume of traffic using this intersection (more than 5,000 existing vehicles during both the a.m. and p.m. peak hours) and existing streetcars along Market Street, converting this intersection to a roundabout (traffic circle) would require a multilane roundabout with a diameter of approximately 200 feet. Therefore, the roundabout would require the taking of right-of-way, land acquisition, and probably the removal of at least one existing building. Further, large roundabouts are generally not conducive to pedestrian, bicycle, and transit access, because they make it more difficult for these alternative modes to easily cross the flow of traffic without introducing designated additional facilities for these modes and additional traffic control devices. Therefore, a roundabout would likely be incompatible with the existing streetcar use on Market Street and the proposed Van Ness Avenue BRT project. Therefore, a roundabout at this location would be considered infeasible, and the project impact at this intersection would remain significant and unavoidable.

3.7.4.9 Mitigation—Church Street/Market Street/14th Street

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-46 TR, duplicate comment was provided in 30-46 TR]

"Impact TR-75 on Page S-52 states that there will be a 'significant impact' at the intersection of Church/Market/14th Street that would operate at LOS F under the 2020 Modified Baseline No Project conditions. LOS (level of service) 'F' is the worst case with bad congestion, and there is no mitigation measure associated with this impact. What transportation changes have been studied that would change the LOS to a better grade with the '2020 Modified Baseline No Project' conditions? Traffic circles? Other?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-47 TR, duplicate comment was provided in 30-47 TR]

"In addition, TR-127 (Davies Campus implementation) will have significant impact at Church/Market/14th Street under both the 2030 Cumulative No Project and 2030 Cumulative plus Project conditions to a LOS F. No mitigation measure for this either.

What are some of the assumptions made to conclude that this intersection will operate at this poor level?"

Response TR-41

The comments indicate concerns about the existing operations and significant impacts associated with the Davies Campus project at the intersection of Church/Market/14th. This intersection currently operates at LOS F during the p.m. peak hour. The increase in delay, and thus degradation of level of service under 2020 Modified Baseline and 2030 Cumulative conditions, can be attributed primarily to the increase in the forecasted background traffic and traffic generated by implementation of the Davies Campus project. Although other potential improvements were considered at this 5-leg intersection, such as revision to traffic signal timings and expansion or reconfiguration of travel lanes to reduce the peak-hour average vehicle delay, additional right-of-way for vehicle travel lanes would have to be added to the intersection to accomplish this. Because of the presence of Class II bicycle lanes on the eastbound and westbound approaches, a passenger boarding island for the historic F-Market & Wharves streetcar on the eastbound approach, passenger boarding islands for Muni bus lines on the northbound and southbound approaches, and Muni Metro subway portals located at the northwest and southwest quadrants of the intersection, providing additional right-of-way or conversion of the intersection to a traffic circle was determined to be infeasible. Traffic signal timing is already maximized and coordinated along Market Street to allow vehicles, pedestrians and transit to move efficiently. Therefore, the impact of the Davies Campus project at this intersection would be significant and unavoidable.

3.7.4.10 Mitigation—Van Ness Avenue/Pine Street

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-49 TR, duplicate comment was provided in 30-49 TR]

"25. Page S-54, Impact TR-100 (Cathedral Hill Campus project implementation results in significant and cumulative impacts to Van Ness/Pine intersection). There not being a mitigation measure from this will result in the commuter traffic to eke out onto the adjacent smaller streets."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-50 TR, duplicate comment was provided in 30-50 TR]

"26. On Page S-54, Impact TR-107 states that the Two-way Post St. Variant will result in significant project and cumulative impacts at Van Ness/Pine. Again, no mitigation measure is in place."

Response TR-42

The comments indicate concerns about significant cumulative impacts associated with the proposed Cathedral Hill Campus project at the intersection of Van Ness/Pine. Although potential improvements were considered, such as a second northbound left-turn lane, the removal of on-street parking on Pine Street, and traffic signal timing revisions to allow for more green time for vehicles on Van Ness Avenue, it was decided in consultation with the SFMTA that these measures were infeasible. To mitigate the poor operating conditions at the intersection, additional capacity would be necessary. Additionally, traffic signals on Van Ness Avenue are coordinated to allow for efficient vehicle progression (one green light after the other) through the corridor, and thus revising signal timings at an isolated intersection would be at the detriment of the corridor. Providing additional lanes would reduce the available sidewalks (and also increase pedestrian crossing distances) and/or require demolition of existing adjacent buildings. Further, adding vehicular capacity to the intersection would conflict with the goals and physical improvements that are a part of the Van Ness Avenue BRT project, which is currently undergoing environmental analysis. The goal of the Van Ness Avenue BRT project is to increase the corridor's transit performance and reliability by converting two of the current six vehicle travel lanes on Van Ness Avenue to separate transit-only lanes. For these reasons, no feasible mitigation measure was identified, and this cumulative transportation impact was determined to be significant and unavoidable.

3.7.4.11 MITIGATION—FRANKLIN STREET/POST STREET

Comments

(Helene Dellanini, DBC MOA, October 18, 2010) [71-2 TR, duplicate comment was provided in 72-2]

"Project Management Advisors, Inc., along with subject matter expert consultants, Veneklasen Associates (acoustics), and Wilsey Ham (civil), have reviewed the CPMC LRDP DEIR on behalf of the Daniel Burnham Court Master Owner's Association (DBC) and have the following comments for submission to the City planning staff.

TR-4: Implementation of the Cathedral Hill Campus project would have less-than-significant impacts at 18 study intersections that would operate at LOS D or better under 2015 Modified Baseline plus Project conditions.

TR-4 Comments: Although the intersection of Franklin and Post was not predicted to drop to a Level of Service below acceptable thresholds, it is recommended that some measure of mitigation be prescribed to alleviate the additional trips at the intersection due to traffic related to the hospital. We recommend that a portion of the curbside area (50 ft) should become a dedicated right turn lane. Currently, vehicles are allowed to park in this area, except during peak PM traffic hours on weekdays."

(Helene Dellanini, DBC MOA, October 18, 2010) [71-24 TR, duplicate comment was provided in 72-24]

"Wilsey Ham has performed a review of the traffic related information for the Cathedral Hill Campus (CHC) as described in the CPMC EIR. This review has been performed to understand the impacts of the project as they will affect the Daniel Burnham Court Owners Association, and to assess how the proposed mitigation measures will minimize the effect of those impacts on the neighborhood. Our comments are as follows:

Impact Comment

TR-4 To make a right turn onto Post, northbound vehicles on Franklin currently make the turn from the easternmost through-lane, or from the curbside metered parking spaces that are also striped for a right turn lane. Parking is prohibited in these spaces from 4 pm - 6 pm on weekdays (and from 8 am- 10 am on Wednesdays for street sweeping). Due to the increase in northbound traffic approaching the hospital on Franklin, a portion of this curbside parking area should be a dedicated right-turn lane on Franklin to Post Street to help facilitate the flow of traffic. We recommend a length of approximately 50 feet."

(Helene Dellanini, DBC MOA, October 18, 2010) [71-5 TR, duplicate comment was provided in 72-5]

"TR-103: Implementation of the Cathedral Hill Campus project would have less-than-significant impacts at eight study intersections that would operate at LOS D or better under 2030 Cumulative plus Project conditions.

TR-103 Comment: Same as comment for TR-4."

Response TR-43

The comments state that the proposed Cathedral Hill Campus would not result in significant traffic impacts, but request extending the existing p.m. peak hour curb right-turn-only lane to occur at all times at the approach of Franklin Street to Post Street. The comments correctly state that under Impact TR-4 and Impact TR-103, no mitigation measures would be required at the intersection of Franklin/Post under either 2015 Modified Baseline plus Project or 2030 Cumulative plus Project conditions because these impacts are less-than-significant. During off-peak periods, when there are no parking restrictions, four lanes are available on Franklin Street in the northbound direction. Adding a 24-hour right-turn lane on Franklin Street at the approach to Post Street, as suggested by the comment, would require removing three to four on-street parking spaces now available to the public during off-peak hours between the Emergency Department driveway and Post Street. Although this improvement was considered by Planning and SFMTA staff, it is not recommended, as the intersection currently operates and is projected to continue to operate at an acceptable level of service during both a.m. and p.m. peak hours with the proposed LRDP in place.

3.7.4.12 MITIGATION—FRANKLIN STREET/BUSH STREET

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-66 TR, duplicate comment was provided in 30-66 TR]

"32. Gough/Geary will be impacted by the Two-way Post St. Variant with no mitigation measure available. Some of the traffic may go southbound or northbound along Laguna St. when Gough at Geary gets clogged up. During the evening and morning commutes, this will impact Japantown.

33. The intersection of Franklin/Bush will be affected with the Two-way Post Street Variant per Impact TR 106 on Page S-54. Again, Laguna Street may get cut-through traffic which may need to be mitigated for the Japantown area.

34. Van Ness/Pine will result in significant and cumulative impacts with the implementation of the Cathedral Hill Campus project MOB Access Variant as per Impact TR-112 on Page S-55."

Response TR-44

The comment correctly states that significant and unavoidable cumulative project impacts would occur at the intersection of Gough/Geary (Impact TR-104) with implementation of the proposed Cathedral Hill

Campus Two-Way Post Street Variant, and the intersections of Franklin/Bush (Impact TR-106) and Van Ness/Pine (Impact TR-112) with implementation of the proposed Cathedral Hill Campus MOB Access Variant and Two-Way Post Street Variant, respectively. Although potential improvements were considered, such as traffic signal timing revisions to allow for more green time for vehicles on Geary Boulevard (Geary/Gough), Franklin Street (Franklin/Bush) and Van Ness Avenue (Van Ness/Pine), a second northbound right-turn lane (Franklin/Bush), and the removal of on-street parking on the northern leg of Franklin/Bush, it was decided in consultation with the SFMTA that these measures were infeasible. Geary Boulevard, Van Ness Avenue and Franklin Street's traffic signals are coordinated to allow for efficient vehicle progression (one green light after the other) through the corridors, and thus revising signal timings at isolated intersections would be to the detriment of the corridor. To mitigate the project variant impacts, additional travel lanes would be required. Providing additional lanes would reduce the available sidewalks (and thus increase pedestrian crossing distances) and/or require demolition of existing adjacent buildings.

At the Gough/Geary intersection, the approach that operates at an unacceptable LOS is the eastbound approach. Because no left turns are permitted from Geary Boulevard to Laguna Street, traffic would not be able to shift to Laguna Street to avoid the Gough/Geary intersection. During the evening commute, the northbound approach operates at LOS A because of the coordination of traffic signals on Franklin Street and the peak period tow-away lane, thus it would be unlikely anyone traveling north would divert to Laguna Street. Furthermore, in the San Francisco General Plan, Gough Street, Geary Boulevard, Van Ness Avenue and Franklin Street are classified as Major Arterials in the Congestion Management Plan Network, and as such are designed to accommodate evening and morning commuter traffic.

3.7.4.13 MITIGATION—TRANSPORTATION DEMAND MANAGEMENT PLAN

Comments

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-25 TR, duplicate comment was provided in 90-77 TR]

"6) Traffic Impacts and Mitigation Measures - Impact TR-1 and Impact TR-2 on Page 4.5-98 of the Draft EIR identify the intersections of Van Ness/Market and Polk/Geary as significantly impacted by traffic generated by the Cathedral Hill Campus in Year 2015. For each, the Draft EIR states 'Providing additional traffic lanes or otherwise increasing vehicular capacity at this intersection is not feasible because it would require narrowing of sidewalks to substandard widths, and/or demolition of buildings adjacent to these streets. Signal timing adjustments may improve intersection operations, but would likely be infeasible due to traffic, transit or pedestrian signal timing requirements. Therefore, no feasible mitigation measures have been identified to reduce project impacts to less-than-significant levels. CPMC has indicated that it is planning on expanding its current transportation demand management program (TDM) to discourage use of private automobiles; although this may reduce the number of trips through this intersection, the extent of this program or reduction to impacts is not known. The traffic impact at the intersection would therefore remain significant and unavoidable.'

CEQA requires lead agencies to impose all feasible alternatives and/or mitigation measures before concluding that traffic impacts are 'significant and unavoidable.' The Draft EIR and the supporting Traffic Study for the Cathedral Hill Campus must document the geometry of both intersections that the City finds to have significant and unavoidable traffic impacts, then identify the specific traffic measures or alternatives evaluated, and discuss why each of these options cannot feasibly be implemented. Without doing this; the Draft EIR may not dismiss the potential mitigation measures as infeasible.

All feasible mitigation measures must also include enhancements to the current CPMC TDM plan. The Draft EIR acknowledges that 'CPMC has indicated that it is planning on expanding its current TDM program ... ' but offers no specifics or evaluation of potential vehicle trip reductions that could be achieved. Enhancements to the existing

CPMC TDM Plan were included on Pages 117 through 119 of the 2008 Transportation Study prepared by CHS Consulting Group, and include the following:

- Designate a TDM Coordinator
- Promotion of the TDM Program
- Increase financial incentives to transit use and disincentives to SOV use
- Provide amenities to transit and bicycle users
- Expanded shuttle bus program

At a minimum, the Draft EIR must evaluate the potential effectiveness of these additional TDM measures and others that also may be appropriate. CPMC must be required to implement necessary additional TDM measures to mitigate traffic impacts considered to be 'significant and unavoidable'."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-77 TR, duplicate comment was provided in 92-25 TR]

"All feasible mitigation measures must also include enhancements to the current CPMC TDM plan. The DEIR acknowledged that 'CPMC has indicated that it is planning on expanding its current TDM program...' but offers no specifics or evaluation of potential vehicle trip reductions that could be achieved. Enhancements to the existing CPMC TDM Plan include the following:

- Designating a TDM Coordinator
- Promoting the TDM Program
- Increasing financial incentives to transit use and disincentives to single occupancy vehicle ('SOV') use
- Providing amenities to transit and bicycle users
- Expanding shuttle bus program

The Project's traffic mitigation strategy requires much, much more. Still, at a minimum, the DEIR must evaluate the potential effectiveness of these TDM measures and many others. CPMC must be required to implement necessary additional TDM measures to mitigate traffic impacts considered to be 'significant and unavoidable.'"

(Barbara Kautz (1)) [87-27 TR, duplicate comment was provided in 108-27]

"More importantly, the DEIR utterly fails to consider mitigations that would reduce trip generation-additional shuttles provided by CPMC, reduced parking, greater incentives for transit use, etc."

Response TR-45

The comments request that the transportation analysis evaluate the potential effectiveness of CPMC's proposed TDM Plan and discuss all feasible mitigation measures. A similar comment and response related to the consideration of feasible mitigation measures is provided in Response TR-37 on page C&R 3.7-62.

As the comments note, the Draft EIR included an explanation that CPMC would expand its TDM program with the implementation of the proposed CPMC LRDP in order to reduce the number of private vehicles driven to the campuses (see Draft EIR pages 5-14 to 5-15). However, it is important to note that CPMC already has a TDM program in place for its employees (see Draft EIR pages 4.5-74 to 4.5-75), including a shuttle system that serves employees, patients, and visitors. Since the trip generation used for the transportation analyses was based on CPMC travel surveys, the traffic analysis already assumes some reduced level of private vehicle use by employees, patients and visitors because of the continued implementation of existing TDM measures. Based on the surveys and the *SF Guidelines*, it was assumed that 20 to 40 percent of employees and 30 percent of the patients would use public transit for their trips to CPMC campuses, depending on their destination campus. Due to the types of services provided at hospitals, medical office buildings, and other health care service facilities, there is a limit to the number of patient, staff, and visitor trips that can be reduced or diverted from single-occupant vehicles. The Draft EIR recognizes that the TDM program would be expanded, but does not assume an increase in effectiveness (vehicle trip reduction) of that program.

Please see Response TR-23 (page C&R 3.7-45), Response TR-45 (page C&R 3.7-69), and Response AQ-12 (page C&R 3.9-36), for additional discussion on the effectiveness of CPMC's proposed expanded TDM program, prepared and documented in a memorandum by Nelson-Nygaard & Associates (2011) and provided in Appendix G.

Comment

(Madlyn Stein—Seniors of Cathedral Hill, October 5, 2010) [45-5 TR]

"-have all entrances on Van Ness and Geary coordinated so that traffic flow from the current campus, proposed as an outpatient facility, will come down Van Ness Blvd and NOT ON POST STREET."

Response TR-46

The comment requests that the proposed Cathedral Hill Campus entrances be located on Van Ness Avenue and Geary Boulevard/Street and be designed to minimize the use of vehicles traveling to the campus on Post Street and maximize the use of Van Ness Avenue. With the exception of vehicles that would enter or exit the Cathedral Hill Hospital, which represent approximately 25 percent of the Cathedral Hill Campus project-generated vehicle trips during the a.m. peak hour or 15 percent of the project-generated vehicle trips during the p.m. peak hour, there is no evidence to support the notion that Post Street would be unduly impacted by the proposed LRDP. This is confirmed by the fact that all Post Street study intersections, as documented in Tables 4.5-17 and 4.5-18 located on pages 4.5-103 and 4.5-104 of the Draft EIR, operate at acceptable LOS B or better in the 2030 Project Cumulative Conditions scenario.

The Two-Way Post Street Variant would result in a slightly higher percentage of project-generated vehicles on Post Street, but all Post Street study intersections, as documented in Tables 4.5-19 and 4.5-20 on pages 4.5-103 and 4.5-104 of the Draft EIR, operate at acceptable LOS D or better in the 2030 Two-Way Post Street Variant Cumulative conditions scenario.

Comments requesting that the Cathedral Hill Campus project Two-Way Post Street Variant not be adopted will be transmitted to decision-makers as part of the administrative record proceeding the project approval process.

3.7.4.14 Two-Way Post Street Operation

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-48 TR, duplicate comment was provided in 30-48 TR]

"24. Page S-43, Impact TR-8 (Cathedral Hill Campus implementation with Two-way Post Street Variant will have a 'significant impact' at the Franklin/Bush intersection. Bush is a major commute street that runs in the west-to-east direction. There is no mitigation measure for this issue. When one lane of Post Street is blocked off between Franklin and Van Ness, drivers who cannot avoid congestion at Geary/Franklin and Van Ness will turn north on Laguna to Bush eastbound. If you make Post a two-way street and close one lane (one side of the street), you end up with one lane in only one direction. So what is the point of making Post a two-way street when the trucks will be taking up the parking lane (and probably one lane of traffic for safety reasons) for almost 6.4 years (332 weeks) per the Administrative documents that accompany the CPMC DEIR by Herrero-Boldt?"

(Helene Dellanini, DBC MOA, October 18, 2010) [71-6 TR, duplicate comment was provided in 72-6]

"TR-6, 7, 8, 22, 23, 24, 56, 104, 105, 106, 107, 108, 120, 121: Implementation of the Two-way Post Street Variant (TWPSV) would result in significant impacts to various intersections.

TR-6, 7, 8, 22, 23, 24, 56, 104, 105, 106, 107, 108, 120, 121 Comment: Since this variant is an option and not part of the baseline project, and since it has been found to create numerous significant and unavoidable impacts, it does not appear to be environmentally superior to the baseline project as proposed and thus should not be adopted."

(Helene Dellanini, DBC MOA, October 18, 2010) [71-27 TR, duplicate comment was provided in 72-27]

"TR-6, TR-7, TR-23,

TR-8, TR-22, TR-23,

TR-26, TR-104, TR-105,

TR-106, TR-107, TR-108,

TR-120, TR-12 The DEIR indicates that implementation of the Two-way Post Street Variant (TWPSV) would result in a number of significant impacts to traffic in the vicinity of the project, and states that 'No feasible mitigation measures are available...' Due to the number of significant impacts that do not have feasible mitigations, and since the TWPSV is an optional feature that is not required for implementation of the project, it seems reasonable and appropriate that the TWPSV should not be approved as part of the project."

Response TR-47

The comments state that implementing the Two-Way Post Street Variant when the proposed Cathedral Hill Campus is under construction would result in additional congestion. The comments further state this access variant would result in a significant impact at the intersection of Franklin/Bush, and that the variant should not be approved as part of the proposed Cathedral Hill Campus project.

The Two-Way Post Street Variant was one of two access variants analyzed in the Draft EIR. The Two-Way Post Street Variant was designed to provide full access (in both the eastbound or westbound directions) on Post Street from the Hospital driveway; ingress from Geary Boulevard would continue to be allowed. If this access variant were selected, Post Street would not be converted to two-way operation until construction of the proposed Cathedral Hill Hospital is completed, and the full width of Post Street would be available for vehicular traffic. The comment is correct that if the access variant were implemented, the project would result in one new significant and unavoidable impact (Impact TR-106, Draft EIR page 4.5-222), when compared to the number of transportation impacts generated by the proposed Cathedral Hill Campus project. However, it is important to note that during the a.m. peak hour the Franklin/Bush intersection without the project (Modified Baseline 'No Project') is already operating at the high end of the LOS E range, with only 1.7 additional seconds of delay remaining before operations become LOS F. The Two-Way Post Street variant adds 2.3 seconds of delay to the intersections operations, , a small amount, but which would trigger the identification of a significant impact. Essentially, any differences in the intersection operating conditions of the Proposed Project, the Two-Way Post Street, and the MOB Access Variant would be imperceptible.

Comments requesting that the Cathedral Hill Campus project Two-Way Post Street Variant not be adopted will be transmitted to decision-makers as part of the administrative record proceeding the project approval process.

3.7.4.15 TRAFFIC IMPACTS AND BUS RAPID TRANSIT OPERATIONS

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-67 TR, duplicate comment was provided in 30-67 TR]

"In general, for some of these impacts, there is the assumption in this DEIR that if there were the Van Ness and Geary BRTs already running, the various alternatives to the CPMC campus build-outs will be 'less than significant.' For example, on Page S-55, Impact TR-119 states that the five intersections around the Cathedral Hill project (Franklin/Geary, Franklin/Pine, Van Ness/Bush, Van Ness/Pine, and Polk/Sutter) are at LOS 'D' and are 'less than significant impact' and five intersections (Gough/Geary, Franklin/O'Farrell, Van Ness/Fell, Van Ness/Hayes, and Van Ness/Broadway) will be at LOS 'E' or 'F' with the Two-way Post St. Variant. I think the five intersections at LOS 'E' and 'F' should have separate 'Impact TR-xxx' items in the 'Table S-2, Summary of CPMC LRDP Impacts and Mitigation Measures.' These 5 intersections for each of the variants should say 'significant' impact or 'significant and unavoidable' but there could be a mitigation measure that would not make it 'unavoidable.' These need to be added to Table S-2. See also Pages 4.5-229 - 4.5-230 for details on TR-119 where the intersections are mentioned. The impacts from the BRTs also have to be looked at from intersections farther away from just the project sites because traffic congestion will move into streets at least a half-mile or even up to a mile away. This also will occur when the CPMC project tasks coincide with BRT construction work."

Response TR-48

The comment notes that the structure of presenting the impacts of the proposed Cathedral Hill Campus project with implementation of the Van Ness Avenue and Geary Corridor BRT projects is different from presenting conditions without the BRT projects. Also, the comment notes that the BRT projects may shift traffic to other streets. Because detailed information about the BRT design and impacts on the transportation network were not available from SFCTA at the time the analysis for the proposed Cathedral Hill Campus project was conducted, a sensitivity analysis of traffic impacts was conducted to assess the potential combined effects of the proposed Cathedral Hill Campus and the two BRT projects. The analysis methodology for the sensitivity analysis is presented on Draft EIR page 4.5-112. The same approach was taken to this sensitivity analysis as was for the project, wherein less-than-significant impacts for the selected intersections would be presented within one impact statement, and that intersections where the combined effects were identified as significant would be called out as separate impacts. Therefore, for both 2015 Modified Baseline plus Project and 2030 Cumulative plus Project conditions, the less-than-significant combined impacts of the BRT projects and CPMC LRDP are presented in Impacts TR-18 and TR-116 for the proposed Cathedral Hill Campus project, including Impacts TR-21 and TR-119 for the Two-Way Post Street Variant and Impacts TR-24 and TR-122 for the MOB Access Variant.

The comment also states that cumulative effects could occur if CPMC and both the Van Ness and Geary BRT projects were under construction concurrently. Neither of the BRT projects have been approved, nor have their construction plans been identified. At the time that these projects overlap, all project sponsors, including CPMC, would be required to coordinate with SFMTA, the Planning Department, and the SFCTA to ensure that elements of each project's Construction Transportation Management Plan (TMP) were effective and what coordination would be required to ensure that construction impacts, including construction worker parking, on surrounding areas was minimized. This coordination process is described further in Response TR-105 (page C&R 3.7-180).

At the time of analysis, detailed information was not available regarding the BRT design and impacts on the transportation network; however, the environmental review of the BRT projects would, in the case of the Geary BRT project, and does, in the case of the Van Ness BRT, analyze the potential shift of traffic to other streets. Similar to the environmental analysis for the CPMC LRDP, the environmental analysis for the BRT projects would need to consider planned and reasonably foreseeable projects.

3.7.4.16 MOTOR VEHICLE CODE ENFORCEMENT

Comment

(Paul Wermer, CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-28 TR]

“Mitigations:

CPMC/Sutter’s mitigation for most traffic and parking issues suffer from a significant defect: they assume that patients, visitors, contractors and CPMC/Sutter will obey the Motor Vehicle Code, and that there is adequate enforcement to ensure compliance with regulations. Unfortunately, over 15 years of experience at Pacific site have demonstrated that all entities—including CPMC/Sutter—routinely violate these regulations and related Use Conditions, and that there, is no effective enforcement. The final EIR must demonstrate how this issue will be resolved.”

Response TR-49

The comment raises a concern that there is an existing problem with enforcement of the Motor Vehicle Code (i.e., the California Vehicle Code) in the area around the Pacific Campus. Although it is not within CPMC’s ability to enforce the California Vehicle Code, CPMC has worked over the years to address the community’s concerns within site constraints. As part of the design development process for the CPMC LRDP, the Pacific Campus was designed to proactively reduce impacts on the adjacent neighborhood. For example, the project would add new parking spaces on the campus to reduce patient, visitor, and staff reliance on on-street parking in the neighborhood; would expand on-site loading facilities (the Draft EIR includes additional improvement measures to minimize the potential for impacts); and would provide for additional on site and on-street passenger loading zones to accommodate the projected demand for the new program. Similarly, efforts were made to integrate features into the design of other campuses that would proactively minimize impacts to the surrounding neighborhood, specifically: internal drop-off zones and loading docks, on-site parking, a TDM program, and an enhanced shuttle program.

Additionally, non-compliance with traffic laws is not an environmental impact, nor is it ultimately the responsibility of CPMC to enforce. No evidence exists that employees, patients, or visitors to the Pacific Campus would be any more likely to violate traffic laws than drivers to any other proposed project or existing building in San Francisco.

3.7.4.17 NOISE AND AIR QUALITY

Comment

(Linda Chapman October 19,2010) [76-28, duplicate comment was provided in 111-28]

“Automobile noise and air pollution will multiply when cars are trapped in congestion, or circulate in residential areas.”

Response TR-50

The comment raises concerns about an increase of noise and degradation of air quality in the areas adjacent to the proposed Cathedral Hill Campus as a result of traffic congestion. Project impacts related to noise and air quality are addressed in Sections 4.6 and 4.7 of the Draft EIR. The noise and air quality analyses used the traffic volume data and intersection analysis results as inputs into the analysis. The assessment of impacts of additional traffic on noise levels determined that future traffic noise levels would not exceed the significance thresholds, and that impacts on noise levels at the proposed Cathedral Hill Campus would be less than significant (see Impact NO-4 on pages 4.6-58 to 4.6-60 of the Draft EIR). Similarly, operations of the proposed Cathedral Hill Campus under the LRDP would not exceed the significance thresholds for air quality impacts related to toxic air contaminants, and the impact would be less than significant (see Impact AQ-12 on Draft EIR page 4.7-73).

3.7.4.18 Mitigation and Monitoring

Comments

(Helene Dellanini, DBC MOA, October 18, 2010) [71-4 TR, duplicate comment was provided in 72-4]

"To verify accurate traffic modeling, as well as to hold CPMC accountable for validating its environmental analysis, findings, and the effectiveness of mitigation measures, the EIR should include a requirement for CPMC to perform traffic counts and LOS monitoring at Franklin and Post. If the LOS at that intersection is found to be worse than anticipated and below D, then additional mitigation measures should be imposed."

(Helene Dellanini, DBC MOA, October 18, 2010) [71-26 TR, duplicate comment was provided in 72-26]

"We also recommend that a mitigation measure be included in the EIR requiring CPMC to perform traffic counts and LOS monitoring of the Post Street intersections 6-months after occupancy of the hospital. If the measured LOS at the intersections of Post/Franklin or Post/Geary have deteriorated to LOS E or F, the City of San Francisco should require additional traffic mitigation measures."

Response TR-51

The comments request that a mitigation measure be added to require additional mitigation measures if the intersection LOS deteriorates to LOS E or LOS F at the intersections of Franklin/Post and Post/Geary. The comments refer to the intersection of Post/Geary, which does not exist. It is assumed that the comment intends to refer to the intersection of Post/Gough. Under 2015 Modified Baseline plus Project and 2030 Cumulative plus Project conditions, the intersections of Franklin/Post and Gough/Post are anticipated to operate at LOS D or better (see Impact TR-4 on Draft EIR page 4.5-100 and Impact TR-103 on Draft EIR page 4.5-220). The same is true of the Cathedral Hill Campus variant scenarios. Because the intersections are projected to operate at acceptable LOS under both 2015 buildout conditions and 2030 Cumulative conditions scenarios, mitigation measures are not required; therefore, including monitoring activities is not needed.

Additionally, the commenter indicates they want the City to hold CPMC accountable for validating its environmental review. The project sponsor is not responsible for the environmental analyses contained in the Draft EIR. The City, with the SF Planning Department acting as the Lead Agency, is responsible for the contents of the Draft EIR.

3.7.4.19 General Transportation Statements

Comments

(Diane and Richard Wiersba, October 11, 2010) [49-3 TR]

"Van Ness is a major highly-travelled, US route and placing a traffic-attracting monster hospital on this route is going to exacerbate an already unsafe traffic situation. At first glance, having a hospital adjacent to public transit seems positive but, in thinking of the times we have had to reach a hospital as soon as possible, we realize the use of public transit for this purpose is unlikely. Effective public transit is affected by traffic conditions and CPMC will be placed right in the middle of an already difficult traffic situation; it will, in fact, be the cause of increased and bottlenecked traffic."

(Charles Freas (1), October 19, 2010) [79-1 TR, duplicate comment was provided in 100-1]

"The EIR for the CPMC project contains too many convenient assumptions that will come back to haunt the City if implemented. The gargantuan Cathedral Hill Hospital as Sutter proposed is too problematic and it's environmental impacts too great.

The EIR acknowledges that a significant number of traffic problems are significant, unavoidable (SU) and impossible to mitigate. Further, these issues impact a concentration of critical east/west and north/south arterials - Geary, Van Ness (Hwy 101), Franklin, and Gough. The streets surrounding this area that are expected to drain off this impacted flow are not efficient distributors and will simply exacerbate the problem."

(Wallace Cleland, October 19, 2010) [86-3 TR]

"The fact that this structure would be imposed on three of our most traffic-congested streets would affect adversely every aspect of the neighborhood (noise, air quality, safety, aesthetics.)"

(Linda Chapman October 19, 2010) [76-14 TR, duplicate comment was provided in 111-14]

"4. Traffic and transportation

The stated purpose for building on Van Ness Avenue is easy access for drivers from the North Bay, patients and doctors. Adding Highway 101 drivers to the Van Ness Corridor is sufficient reason to downsize a hospital campus, if it is to locate there at all.

From my experience, traffic congestion on Highway 101 spills over from Van Ness to Polk Street, clogging two Muni preferential streets: Traffic circulating around a hospital, medical office buildings, and garages will impede through traffic on Van Ness (Highway 101), on Geary Boulevard, and other major automobile routes like Franklin, Gough and Post.

Circulation on streets of the Polk Street Neighborhood Commercial District (NCO), lower Nob Hill, and the Tenderloin will be affected by cars driving to the hospital and MOB, by adding emergency vehicles, by increasing service vehicles at the site, including trucks."

(Maria (last unknown), September 19, 2010) [PC-117 TR]

"And also, I want to talk about the traffic."

(Linda Chapman, September 23, 2010) [PC-282 TR]

"It [the Van Ness Plan] also would avoid producing a great deal of traffic on a street that is already at an impasse of traffic, that would occur with either a great deal of high-rise development or office development, or this development. It was determined that this was the most important boulevard in San Francisco besides Market Street, that it deserved this kind of consistent treatment, and that, in addition, it was the perfect place for housing. It was near downtown, it was on transit, and there were a lot of infill spaces for that. So, that is what we should have for the most part. If they are going to build this here, we must consider the fact that Van Ness is prone to be completely tied up with traffic. How are these people, who is it so important to get them all immediately to care, it took me two hours this winter to get from Pine Street to 22nd and Mission. How fast will people from the Mission be able to get over to the hospital? And that was only because it rained in the morning, you know? The bus driver said, 'Get off and walk to Market,' and everybody did because, you know, the traffic was just completely tied up."

(Linda Chapman, September 19, 2010) [PC-284 TR]

"Now, I've ridden in on Highway 101 when it is all blocked up and people go over to Polk Street and drive down and block up Polk Street, the whole area around there could be blocked up."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-51 TR, duplicate comment was provided in 30-51 TR]

"27. Earlier in my comments, I mentioned the 'Transit First' policy that the Planning Department believes will be the way most everyone will get around the City. I think that it is very 'family unfriendly' for the Planning Department to promote 'family-sized housing' and presume that these same families will take transit all over the City instead of driving. Not only does the Planning Department promote such development but it also allows them to be built without realizing that more families will leave after building these so-called 'family sized units' with no parking.

If one really wants to eliminate vehicles in the City to get people to take Muni, a taxicab or shared rides, perhaps street parking should be prohibited after 11 p.m., for example, just as done in Golden Gate Park.

One caveat is that people who are seniors and disabled may not be able to take public transit so these people may be given an exception."

(Hiroshi Fukuda) September 23, 2010 [PC-164 TR]

"And also, another factor is that CPMC should force their contractors to obey—abide by the San Francisco Transit First Policy. They need to make them follow the policy. Please have CPMC mitigate those factors. Thank you."

(Joel Koppell) September 23, 2010 [PC-224 TR]

"And one thing the project does have working for it is the amount of one way streets that will encourage easier transition from streets into the property. It is a lot more difficult the more intersections there are, and the more two-way traffic there is. But CPMC told me about their Transit Demand Management Plan, which made me feel a lot better about things, and the fact that they're going to use multi-level driveways and incorporate loading stations that are designed to get vehicles off the roads. So, Van Ness and Geary, Post and Franklin, one way streets are going to help mitigate any of these issues. So, once again, we urge the approval, we think this document is adequate, and thanks for your time."

Response TR-52

The comments express personal experience with traveling in San Francisco, concerns regarding the siting and size of the proposed Cathedral Hill Campus, existing and future congestion levels, and the number of significant impacts associated with the proposed project. The proposed Cathedral Hill Campus project is located in a centralized area of the City where existing traffic conditions are on occasion congested because adjacent streets are major thoroughfares. Siting a project in an area served by major arterials and abundant transit options encourages the use of transit and reduces the use of local streets for vehicular access. Additionally, the Construction Transportation Management Plan that CPMC must develop as part of the project approval process, and as required by Mitigation Measure TR-55, would seek to minimize the impacts of construction activities on adjacent neighborhoods, including promoting the use of transit by construction workers.

Comment PC-282 shares a personal anecdote regarding an unpredictable circumstance in traveling from the general area of the Cathedral Hill Campus to the Mission District, and then asks how quickly patients could travel from the Mission District to the Cathedral Hill Hospital. It is not the goal of the transportation analyses contained in the Draft EIR to predict or capture every potential trip origin or destination in analyzing the impacts of the proposed CPMC LRDP. Trip distribution methodology for the analysis was based on the SF Guidelines, as discussed in more detail in C&R Response TR-21. Several modes of transport, of varying speeds, would be available to travel from the Mission District to the proposed Cathedral Hill Campus, including private vehicles, transit, taxis, etc.

Comment PC-282 states that the Planning Department believes that because of SF's Transit First Policy, almost everyone is expected to travel in the City via transit. This is not the stated intention of the policy; rather, the policy seeks to inform modal equity decisions in the City and prioritize the movement of people rather than the movement of private vehicles. Furthermore, the Transit First Policy did not play a role in the transportation analyses contained in the Draft EIR, as data collected in San Francisco, including mode shares, formed the basis for analyzing the transportation impacts of the proposed CPMC LRDP.

The remainder of the comments are noted; however, they do not raise issues regarding the adequacy, accuracy, or completeness of the Draft EIR. The comments will be transmitted to and may be considered by the decision-makers as part of their deliberations on the project.

3.7.5 TRANSIT IMPACTS

3.7.5.1 TRANSIT SCREENLINE CAPACITY METHODOLOGY

Comments

(Paul Wermer, CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010)
[67-25 TR]

"Transit:

The assessment of the impact on MUNI capacity is flawed, in part because MUNI's load data methodology is inadequate to capture actual demand as it affects transit riders and influences decisions to take transit. We already see crush loads on many MUNI services—even though average load is reported as under 90% of capacity. This defect is significant, as it means many potential transit riders will in fact opt to drive—vitiating critical assumptions in the overall traffic analysis and TDM mitigations.

Furthermore, it is unclear that MUNI will increase capacity to meet increased service demands at peak periods."

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010)
[92-14 TR]

"3) <u>Numerous Errors in Muni Corridor Analyses for Near and Long Term</u> - There are many errors in the ridership data, both within various tables as well as in comparison to the Draft EIR's forecast number of Project transit riders in the description of transit impacts. While the first two examples discussed in detail relate to the Cathedral Hill Campus, there are other similar errors for each campus that are also summarized below. The inconsistencies between the impact statements and the tables, together with internal errors in the tables, void the subsequent calculations of transit capacity utilization as well as all transit mitigation measures that have been based on these flawed analyses."

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010)
[92-15 TR]

"a) Cathedral Hill Campus - AM Peak - Impact TR-27 on Page 4.5-118 of the Draft EIR indicates that the Cathedral Hill Campus will generate 586 new transit trips in the AM peak hour. In comparing the forecast ridership in Table 4.5-21 in 2015 under 'No Project' and 'Project' conditions in the AM peak hour, 479 new transit riders will be generated by the Cathedral Hill Campus (the difference between the sum of the ridership in all directions in 2015 with Project and without Project - 9,499 minus 9,020 equals 479). In comparing the forecast ridership in 2030 under 'No Project' and 'Project' conditions, 479 new transit riders will be generated by the Cathedral Hill Campus (the difference between the sum of the ridership in all directions in 2030 with Project and without Project - 10,183 minus 9,704 equals 479). The 586 new transit riders at the Cathedral Hill Campus in

2015 and 2030 as stated in Impact TR-27 must be used to evaluate transit impacts, not the 479 new transit riders in Table 4.5-21."

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010)
[92-16 TR]

"b) Cathedral Hill Campus - PM Peak - Impact TR-27 on Page 4.5-118 of the Draft EIR indicates that the Cathedral Hill Campus will generate 551 new transit trips in the PM peak hour. In comparing the forecast ridership in Table 4.5-21 in 2015 under 'No Project' and 'Project' conditions in the PM peak hour, 498 new transit riders will be generated by the Cathedral Hill Campus in the PM peak hour (the difference between the sum of the ridership in all directions in 2015 with Project and without Project - 9,667 minus 9,169 equals 498). In comparing the forecast ridership in 2030 under 'No Project' and 'Project' conditions, 289 new transit riders will be generated by the Cathedral Hill Campus in the PM peak hour (the difference between the sum of the ridership in all directions in 2030 with Project and without Project - 10,852 minus 10,563 equals 289). The number of new transit riders in the PM peak hour at the Cathedral Hill Campus in 2015 and in 2030 in Table 4.5-21 should be the same, not 209 less in 2030. The 551 new transit riders at the Cathedral Hill Campus in 2015 and 2030 as stated in Impact TR-27 must be used to evaluate transit impacts, not the 498 new transit riders in 2015 and the 289 new transit riders in 2030 in Table 4.5-21."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010)
[92-17 TR]

"c) St. Luke's Campus - PM Peak - Impact TR-86 on Page 4.5-201 of the Draft EIR indicates that the St. Luke's Campus will generate 39 new transit trips in the PM peak hour. In comparing the forecast ridership in Table 4.5-21 in 2015 and in 2030 under 'No Project' and 'Project' conditions in the PM peak hour, 67 new transit riders will be generated by the St. Luke's Campus in the PM peak hour. The new transit riders forecast in the PM peak hour at the St. Luke's Campus in Impact TR-86 should be the same in Table 4.5-21 to properly evaluate transit impacts at the St. Luke's Campus in 2015 and in 2030."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010)
[92-18 TR]

"d) California Campus - PM Peak - In the southbound direction, the baseline ridership in Table 4.5-21 is 1,421, the same number of riders for existing conditions and for ridership forecasts in both 2015 and 2030. The lack of southbound baseline ridership growth is not a reasonable assumption..."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010)
[92-19 TR]

"e) Pacific Campus - PM Peak - Impact TR-60 on Page 4.5-168 of the Draft EIR indicates that the Pacific Campus will generate 37 new transit trips in the PM peak hour. In comparing the forecast ridership in Table 4.5-36 in 2015 and in 2030 under 'No Project' and 'Project' conditions in the PM peak hour, 190 new transit riders will be generated by the Pacific Campus in the PM peak hour. The new transit riders forecast in the PM peak hour at the Pacific Campus in Impact TR-60 should be the same in Table 4.5-36 to properly evaluate transit impacts at Pacific in 2015 and in 2030."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010)
[92-20 TR]

"f) Davies Campus - PM Peak - In the southbound direction, the baseline ridership in Table 4.5-21 is 1,421, the same number of riders for existing conditions and for ridership forecasts in both 2015 and 2030. The lack of southbound baseline ridership growth is not a reasonable assumption. Even though the Davies Campus is several miles from the California Campus, existing ridership and forecasts for 2015 and 2030 in the southbound, eastbound, and westbound directions for the Davies Campus are identical to the existing and the forecast ridership for the California Campus, without and with Project riders added. This cannot be correct."

(Stephanie Barton et al. Hastings Civil Justice for the Good Neighbor Coalition, October 19, 2010) [104-39 TR]

"**3. The DEIR's transit analysis is inadequate because it ignores the disproportionate crowding and delays that the proposed hospital will likely cause in the Tenderloin.**

Transit routes in the Tenderloin are already crowded and reliability is below average. Therefore, the neighborhood is likely to experience the most significant transit impacts caused by the proposed hospital. As outlined in the Little Saigon Report, Muni buses in the Tenderloin are some of the most crowded and unreliable because they are in the middle of very long routes with many opportunities for passenger loading and delays.[87] Two lines through the Tenderloin already exceed Muni's load standards, and all lines but one are less reliable than the Muni average.[88] Even the DEIR's own draft traffic study found that over half of all studied lines were at their maximum load point ('MLP') at stops within or bordering the Tenderloin.[89]

The DEIR measured the proposed hospital's effects on transit by combining multiple bus lines into north/south and east/west transit corridors on the assumption that people: will choose to walk to a line that is less crowded even if it is farther away.[90] The DEIR determined that an increase in demand would be a significant impact if the number of passengers rose above 85% of a corridor's total capacity during the a.m. or p.m. peak hours or if any individual lines needed more buses in order to maintain their usual time between stops.[91] The DEIR never mentions the locations of the MLPs for each bus route even though that information is in the draft version of the DEIR's underlying transportation impact study, which found that one-third of the respective a.m. and p.m. MLPs were within the Tenderloin.[92] In addition, when expanded by only two blocks in each direction, the area contained nearly half of the a.m. and nearly two-thirds of the p.m. MLPs for the studied routes.[93]

87 Little Saigon Report, at 3-4.
88 *Id.*
89 Fehr & Peers, California Pacific Medical Center Long Range Development Plan: Cathedral Hill Campus Draft Transportation Impact Study, 29-30 (2010)
90 DEIR 4.5-27.
91 DEIR 4.5-60.
92 Fehr & Peers, 29-30
93 *Id.*"

(Stephanie Barton et al., Hastings Civil Justice for the Good Neighbor Coalition, October 19, 2010) [104-40 TR]

"An EIR should consider 'coverage, speed, convenience, reliability safety and comfort' when evaluating transit impacts.[94] An EIR may study transit routes individually, as groups or in some combination of the two, depending on the nature of the project.[95] EIRs typically: account for the project's location in relation to each transit line's MLP.[96] The DEIR's method of analyzing transit impacts better applies to projects in certain Downtown, SOMA and Mission Bay districts.[97] The proposed hospital is not in any of those districts. Consequently, the DEIR should tailor its transit analysis to the nature of the proposed hospital and their nature of its surrounding neighborhoods in order to adequately evaluate its potential transit effects.[98]

94 DEIR Appendix F, 5
95 *Id.*
96 *Id.*
97 San Francisco Planning Dept. Guidelines 11 (transit corridor analysis for C-3, SOMA, and Mission Bay districts).
98 *Id.*"

(Stephanie Barton et al., Hastings Civil Justice for the Good Neighbor Coalition, October 19, 2010) [104-41 TR]

"The DEIR's transit analysis needs to account for the disproportionate number of MLPs that are within or bordering the Tenderloin as well as the neighborhood's current transit conditions. It is not accurate to assume that people will walk to less crowed lines that are farther away, because the mere act of walking is more likely to be difficult for people who need to travel to a hospital. Moreover, it does not take into account that the Tenderloin has a large number of disabled and elderly residents who depend on transit, as well as a large number of small children who also depend on transit to get to and from school."

(Stephanie Barton et al., Hastings Civil Justice for the Good Neighbor Coalition, October 19, 2010) [104-42 TR]

"Grouping lines together does not tell the community and decision makers which lines are most crowded. Nor does measuring ridership capacity for the entire route indicate whether there is an especially high concentration of riders along one part of the route while other parts may be virtually empty. The DEIR's reliability analysis similarly does not take into account whether certain sections of the route have longer delays for which the bus must compensate along more sparse sections. As the Little Saigon Report outlined, the Tenderloin already suffers from crowded, unreliable transit service, and therefore is likely to have a disproportionate amount of significant impacts due to the proposed hospital. To study adequately the potential transit effects the proposed hospital will have on the Tenderloin, the DEIR needs to examine each transit route individually and should at least determine the transit impacts of the proposed hospital for the stops at and near the MLPs."

(Carol and Michael Stack, October 17, 2010) [62-3 TR]

"It [The project] will put an insupportable burden on the area's public transportation system—the buses now are notoriously overcrowded at all times during most of the day."

Response TR-53

The comments raise concerns about the screenline methodology used to assess impacts on transit capacity and the location of the maximum load points used in the transit analysis. The comments also identify discrepancies in the number of transit trips generated by the individual campuses and reflected in the screenline analysis. The transit analysis presented in the Draft EIR was developed consistent with the methodology for transit analyses presented in the City's *Transportation Impact Analysis Guidelines for Environmental Review* ("SF Guidelines") and in consultation with the SFMTA. The *SF Guidelines* allow analysis of transit based on the location and character of the development, including the direction and distribution of trips to and from a project site. A project's impact on transit capacity may be analyzed using a screenline and/or direction link analysis, both of which assume that certain transit lines are grouped together by a common characteristic—most typically direction of travel. The rationale for using this type of capacity analysis is that someone traveling on transit in a certain direction will choose one of the transit lines that collectively serve the corridor or that direction of travel. It also assumes that if one line is overloaded, the transit user could shift to another line headed in the same general direction.

All of the CPMC projects are located outside of the downtown area (for which the *SF Guidelines* presents established screenlines); therefore, to tailor the transit analysis to the proposed LRDP, the transit analysis in the Draft EIR grouped Muni transit routes located within one-half mile of each campus by direction (i.e., northbound, southbound, eastbound, westbound). These groupings reflect that persons riding transit to each of the campuses may choose a transit route based on frequency of service and usage, as well as whether a certain line connects to a transfer point for other Muni or regional transit providers. For example, BART transit riders to and from the Davies Campus may take BART to the Civic Center station and transfer to the N Judah to reach the campus; transit riders from the Richmond District may take the 24 Divisadero north and transfer to another east-west line such as the 1 California. Furthermore, the transit analysis assumed that some project-generated transit trips would use Muni to access regional transit hubs, even though CPMC plans to operate private shuttles between the proposed Cathedral Hill Campus and existing Pacific Campus and the Civic Center BART/Muni Metro station, and between the St. Luke's Campus and the 24th Street BART station.

Each directional screenline represents the sum of the total ridership at the maximum load point (MLP) during the peak hour for each route, obtained from SFMTA's TEP. The data set from SFMTA's TEP includes ridership data, including boardings and alightings, at each stop along each Muni transit lines. The MLP represents the point along the line with the largest number of riders, and therefore, the highest capacity utilization during the a.m. and p.m. peak hours being analyzed. The MLP may not necessarily fall within the one-half-mile transit study area because project-generated transit riders may continue to ride a line beyond that radius; however, the MLP represents the highest utilization of the Muni route that the project could be contributing to. Utilization of the line at points other than the MLP is indeed lower and additional riders would not necessarily cause capacity utilization issues at points farther from the MLP.

Comment 104-42 suggests that the Draft EIR should have evaluated the project's impact on individual lines in the Tenderloin because several transit lines have MLPs located in or near the Tenderloin. An individual line(versus directional) analysis would be difficult and speculative because it would require assigning a certain number of trips to lines that might or might not serve streets where employees or patients lived, i.e., a substantial amount of data would need to be collected about transit preferences of future and unknown hospital and MOB patients, visitors, and employees. As discussed in Response TR-21 (trip distribution) (page C&R 3.7-43), the distribution of the project's transit trips were based on known data that is based on larger areas or regions from where employees, patients, and visitors would commute to the campus. Because many transit lines serve each area or region, the screenline analysis presents a more reasonable transit capacity impact analysis for the project; transit riders would likely ride different lines. The transportation impact studies do, however, present the MLP for each line for informational purposes.

As indicated in Comments 104-39 and 104-41 and in the transportation impact studies for each campus, several of the MLPs for individual lines near the proposed Cathedral Hill Campus are located east of Van Ness Avenue, within the Tenderloin neighborhood. The transit analyses account for this by including these MLP ridership statistics within the study area as part of the directional screenline analysis. As discussed in the Draft EIR, implementing the proposed Cathedral Hill Campus project would not cause any screenline to exceed Muni's established standard, 85 percent capacity. Some individual lines may reach 85 percent capacity during the peak hours, but riders have several transit options heading in the same direction. Therefore, the screenline represents that at any time during the peak hour, some capacity is available for passengers headed northbound, southbound, eastbound, or westbound. Because capacity exists in all directions, overcrowding on any one line was not considered to affect overall transit use and capacity utilization.

Comment 104-41 states that the MLP screen line analysis does not acknowledge disabled and elderly residents who depended on transit would be disproportionally affected by over-crowding on transit lines because they would be less able to walk to other less crowded lines; however, the comment does not note any specific transit lines where this would be of particular concern. Muni buses have designated priority seating, identified by blue decals above the seats, located at the front of each bus, and these seats are to be surrendered for seniors and people with disabilities. For people with more severe disabilities, Muni operates a paratransit service, available to those who request such service.

Furthermore, as shown in Tables 5 and 6 of the *Cathedral Hill Transportation Impact Study*, on file and available for review at the San Francisco Planning Department, only one bus line—the 38L-Geary—has an individual capacity utilization that exceeds available capacity at its MLP; the remaining bus lines through the Tenderloin generally operate below 82 percent of available capacity in all directions during the peak hours, suggesting that available space would exist for bus riders on all lines.

Several comments identified inconsistencies in the transit corridor analysis for each of the CPMC campuses. Discrepancies between the transit trip generation, as prepared by Adavant Consulting, and the project transit trip assignment were identified in Draft EIR Tables 4.5-21 and 4.5-36 (pages 4.5-119 and 4.5-172, respectively). Specifically, there was an error in the reported number of net new transit trips generated by the St. Luke's Campus project, and an error in ridership under the p.m. peak-hour 2030

Cumulative No Project scenario for the proposed Cathedral Hill Campus project. Additionally, the assumptions for transit ridership were not clearly outlined in the Draft EIR in a way that would enable a reader to recreate the transit analysis using the net new project trip generation.

The transit corridor analysis discussion for each CPMC campus has been updated to clarify the analysis.

Cathedral Hill Campus—As presented in the Draft EIR, the proposed Cathedral Hill Campus would generate 551 net new a.m. peak-hour transit trips and 586 net new p.m. peak-hour transit trips. However, the transit corridor analysis presented in the Draft EIR assumed that the proposed Cathedral Hill Campus project would add 479 and 498 net new transit trips during the a.m. and p.m. peak hours, respectively, to the screenlines near the campus. This difference is partially the result of a reasonable transit analysis assumption that some CPMC transit riders would use the CPMC shuttles to travel between the Civic Center BART/Muni Station and the campus, and would thereby not cross the Muni screenlines. Altering Table 4.5-21 in the Draft EIR to assume employees and visitors would not take advantage of the CPMC shuttle, does not substantially alter the capacity utilization percentages which would continue to operate at less than Muni's 85 percent capacity utilization standards under Modified Baseline plus Project or Cumulative 2030 plus Project conditions, as stated in Impact TR-27, page 118) in the Draft EIR.

Comment 92-16 notes a discrepancy between 2015 and 2030 project transit trips during the p.m. peak hour. Table 4.5-21 incorrectly stated 2030 No Project ridership for the eastbound and westbound screenlines. The table has been revised to show 3,242 eastbound riders and 4,143 westbound riders under Cumulative 2030 No Project conditions. This revision does not affect the results of the analysis. This update to Table 4.5-21 in the Draft EIR would slightly lower the capacity utilization numbers under Cumulative 2030 No Project and Cumulative 2030 Project conditions and would therefore, not alter the cumulative impact analysis presented in the Draft EIR.

St. Luke's Campus—Table 4.5-11 on page 4.5-77 of the Draft EIR indicates that the St. Luke's Campus project would generate 39 net new p.m. peak-hour transit trips. As shown in the trip generation forecasts prepared by Adavant Consulting and included in Appendix D of the *St. Luke's Campus Transportation Impact Study*, the St. Luke's Campus project would generate 71 net new p.m. peak-hour transit trips. This change does not alter the analysis conclusion in the Draft EIR, which were drawn from the Transportation Impact Study that correctly analyzed the higher amount of transit trips. The transit corridor analysis presented in the Draft EIR assumes that the St. Luke's Campus project would add 67 net new transit trips to the screenlines near the campus. This difference is the result of the reasonable assumption that because a shuttle would be available, some CPMC transit riders would use the CPMC shuttles to travel between the 24th Street BART Station and the St. Luke's Campus, and would thereby not cross the Muni screenline. Table 4.5-21 on page 4.5-119 of the Draft EIR, has been updated to reflect 71 net new transit trips, instead of the 39 net new transit trips previously reported. Table 4.5-11 in the Draft EIR (page 4.5-77) has been revised as shown below to clarify transit trips.

In addition, page 4.5-204 of the Draft EIR is revised as follows:

> The St. Luke's Campus project would result in an increase in pedestrian activity in the vicinity of the campus, including walk trips to and from the proposed uses, plus walk trips to and from Muni bus stops and 24th Street BART Station. Overall, during the p.m. peak hour the project would add about 64 net-new pedestrian trips (an increase of 25 walk trips, and ~~39~~ 71 net-new trips that account for walk trips to and from the transit stops) to the surrounding streets (see Table 4.5-11, page 4.5-77).

Table 4.5-11
Net-New Peak-Hour Person Trips by Mode and Vehicle Trips by Campus [1]

	Person Trips by Mode					
Campus	Auto	Transit	Walk	Other 2	Total	Vehicle Trips
Cathedral Hill Campus						
a.m. peak hour	682	586	108	54	1,430	593
p.m. peak hour	689	551	107	50	1,399	609
Pacific Campus						
p.m. peak hour	114	37	27	20	198	71
Davies Campus						
p.m. peak hour	224	138	10	34	406	202
St. Luke's Campus						
p.m. peak hour	~~251~~223	~~39~~71	~~25~~23	~~6~~9	~~321~~326	207

Notes:
1 The analysis does not assume any new travel demand at the California Campus because campus activities would remain unchanged until 2015, and would then be gradually relocated to the Pacific and Cathedral Hill Campuses. By 2020, almost all CPMC-related uses at the California Campus are expected to cease.
2 "Other" includes bicycle, motorcycle and taxi trips.
Source: Data compiled by Adavant Consulting and Fehr & Peers in 2010

Pacific Campus—Table 4.5-36 on Draft EIR page 4.5-172 indicates that the Pacific Campus project would generate 190 net new p.m. peak-hour transit trips. As shown in Table 4.5-11 on Draft EIR page 4.5-77, the Pacific Campus project would actually generate 37 net new p.m. peak-hour transit trips. Table 4.5-36 in the Draft EIR (page 4.5-77) has been revised as shown below to clarify the Muni Corridor Analysis for the Pacific Campus.

The change would not substantially affect the results of the analysis, and the capacity utilization would slightly decrease. The impacts of the Pacific Campus project on transit capacity would continue to be less than significant.

Davies Campus—Table 4.5-36 on Draft EIR page 4.5-172 assumed that the Davies Campus project would generate 138 net new p.m. peak-hour transit riders. This is consistent with the trip generation forecasts prepared by Adavant Consulting and presented in the Draft EIR. No change is required to address the transit analysis for this campus.

Some of the comments note that the Draft EIR assumed little to no growth between Modified Baseline and Cumulative conditions on certain transit screenlines, specifically at the Davies and California Campuses. Cumulative transit ridership growth was based on output from the SFCTA's SF-CHAMP model, which accounts for projected land use changes and growth in the City, including increases and decreases in population, housing unit, and employment forecasts from the Association of Bay Area Governments (ABAG) that have been refined by the City. The model also considers available capacity, congestion, and travel speed when assigning ridership to specific routes. Although ridership along many routes might increase in the future, that ridership growth likely would be spread over the entire length of the line and would not be concentrated at the MLP. Overall ridership at the MLP might remain relatively stable. For more information about how transit ridership under Modified Baseline and Cumulative Conditions was determined, see Response TR-9 (page C&R 3.7-11).

Table 4.5-36 (Revised)
Muni Corridor Analysis—Pacific and Davies Campuses—P.M. Peak-Hour Conditions

	Existing		Modified Baseline 2020 No Project		Modified Baseline 2020 Project			Cumulative 2030 No Project		Cumulative 2030 Project	
	Ridership	Capacity Utilization	Ridership	Capacity Utilization	Project Trips	Ridership	Capacity Utilization	Ridership	Capacity Utilization	Ridership	Capacity Utilization
Pacific Campus											
Northbound	472	49%	514	45%	12	~~542~~526	~~48~~46%	549	48%	~~577~~561	~~51~~49%
Southbound	550	57%	550	49%	15	~~586~~565	~~52~~50%	550	49%	~~586~~565	~~52~~50%
Eastbound	1,964	55%	~~2,417~~2,401	66%	6	~~2,415~~ 2,407	~~66~~65%	2,764	76%	~~2,778~~ 2,770	~~77~~76%
Westbound	2,751	77%	2,871	79%	4	~~2,881~~ 2,875	79%	2,969	81%	~~2,979~~ 2,973	~~82~~81%
Davies Campus											
Northbound	812	42%	908	39%	26	934	40%	988	43%	1,014	44%
Southbound	1,421	74%	1,421	61%	31	1,452	62%	1,421	61%	1,452	62%
Eastbound	3,122	34%	3,543	35%	66	3,609	36%	3,839	38%	3,905	39%
Westbound	7,380	81%	7,750	77%	15	7,765	77%	8,073	80%	8,088	80%

Notes:
Capacity utilization calculations reflect capacity changes associated with the TEP project. Service changes resulting in capacity increases are proposed for the 5-Fulton, 12-Folsom-Pacific, 19-Polk, 21-Hayes, 22-Fillmore, 24-Divisadero, 27-Bryant, 31-Balboa, 38L-Geary Limited, 44-O'Shaughnessy, 47-Van Ness, 49-Van Ness-Mission, F-Market & Wharves, J-Church, L-Taraval, and N-Judah.
Service changes resulting in decreases in capacity are proposed to occur on the 1BX-California Express, 2-Clement, 16AX/BX-Noriega Expresses, 38BX-Geary Express, 48-Quintara-24th Street, and M-Ocean View
Source: Data compiled by Fehr & Peers in 2011

Upon review of the transit tables, the transit ridership identified for the California Campus in Table 4.5-21 of the Draft EIR was incorrect for Southbound, Eastbound, and Westbound directions. Table 4.5-21 on Draft EIR page 4.5-119 was be updated for the California Campus as shown below. Overall, transit ridership is lower than what was shown in the Draft EIR, and therefore, no new impacts would result from the change.

Table 4.5-21 Revised
Muni Corridor Analysis—California Campus—P.M. Peak-Hour Conditions

	Existing		Modified Baseline 2015 No Project		Modified Baseline 2015 Project		Cumulative 2030 No Project		Cumulative 2030 Project	
	Passengers	Capacity Utilization	Passengers	Capacity Utilization	Passengers	Capacity Utilization	Passengers	Capacity Utilization	Passengers	Capacity Utilization
California Campus										
Northbound	382	38%	387	32%	387	32%	393	32%	393	32%
Southbound	~~1,421~~652	~~74~~65%	~~1,421~~682	~~61~~56%	0	682~~1,452~~	56%~~62%~~	~~1,421~~746	~~61~~62%	746~~1,452~~
Eastbound	~~3,122~~1,964	~~34~~55%	~~3,543~~2,147	~~35~~59%	0	2,147~~3,609~~	59%~~36%~~	~~3,839~~2,764	~~38~~76%	2,764~~3,905~~

Table 4.5-21 Revised
Muni Corridor Analysis—California Campus—P.M. Peak-Hour Conditions

	Existing		Modified Baseline 2015 No Project		Modified Baseline 2015 Project		Cumulative 2030 No Project		Cumulative 2030 Project	
	Passengers	Capacity Utilization	Passengers	Capacity Utilization	Passengers	Capacity Utilization	Passengers	Capacity Utilization	Passengers	Capacity Utilization
Westbound	~~7,380~~3,228	~~81~~72%	~~7,750~~3,467	~~77~~79%	0	3,467~~7,765~~	79%~~77%~~	~~8,073~~3,643	~~80~~83%	3,643~~8,088~~

Notes:
Capacity utilization calculations reflect capacity changes associated with the TEP project. Service changes resulting in capacity increases are proposed for the 5-Fulton, 12-Folsom-Pacific, 19-Polk, 21-Hayes, 22-Fillmore, 24-Divisadero, 27-Bryant, 31-Balboa, 38L-Geary Limited, 44-O'Shaughnessy, 47-Van Ness, 49-Van Ness-Mission, F-Market & Wharves, J-Church, L-Taraval, and N-Judah.
Service changes resulting in decreases in capacity are proposed to occur on the 1BX-California Express, 2-Clement, 16AX/BX-Noriega Expresses, 38BX-Geary Express, 48-Quintara-24th Street, and M-Ocean View
Source: Data compiled by Fehr & Peers in 2010

3.7.5.2 TRANSIT DELAY

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-126 TR, duplicate comment was provided in 30-126 TR]

"68. On Page 4.5-123, Impact TR-30 states, implementation of the Cathedral Hill Campus project would increase congestion and ridership along Geary Street, which would increase travel times and impact operations of the 38/38LGeary bus routes. (Significant and Unavoidable with Mitigation).' As discussed earlier in this document, the mitigation measure is to compensate SFMTA for the 'cost of providing the service needed to accommodate the project at proposed levels of service.' Although some people may get on the bus to visit the Hospital, the MOB and 1375 Sutter Street Building areas, the vehicular traffic may not diminish by much because the drivers are not all visiting the hospital area. They are on their way to some other place but are still using Geary. When the LOS of Geary falls to 'F,' people will find the neighboring streets to get to their destination. This is what is happening to the California Campus as it is today. The small residential streets surrounding the California

Campus get as much traffic as one direction of traffic on Geary in a few cases such that the neighborhood association had to install and pay for speed humps. It was not all CPMC and the California Campus as there were also the UCSF shuttles almost continuously traversing the residential streets of Jordan Park. This was mitigated by having the UCSF shuttles become 'good neighbors' and not overburden the residential streets and adhere to the street Muni already runs on (more commercial streets) on a fixed route transit basis. CPMC needs to let the public know what routes will be used in the neighborhood. This was never addressed in the DEIR."

(Linda Chapman, October 19, 2010) [76-15 TR, duplicate comment was provided in 111-15]

"The campus is ideally situated for its vehicle traffic to impede transit services: Golden Gate Transit and two major Muni lines on Van Ness; the 38 on Geary and O'Farrell (the nation's most heavily traveled line); two lines running on Post and Sutter. Autos that slow traffic as they enter and exit garages, or execute turns onto streets with garage entries, cannot fail to affect transit on the same streets."

(Linda Chapman, October 19, 2010) [76-19, duplicate comment was provided in 111-19]

"Garage entries on Geary require drivers approaching from the west to navigate various one-way streets. Drivers forced to turn onto Van Ness or Polk in order to head west at Geary will add congestion to several transit preferential streets."

Response TR-54

These comments address the transit delay impact of the Cathedral Hill Campus on Van Ness Avenue and Geary Street, potential traffic spillover to adjacent streets because of congestion, and shuttle routes on local residential streets. Traffic spillover onto adjacent streets is discussed in Responses TR-5 and TR-31 (Methodology and Traffic Impacts, respectively, pages C&R 3.7-5 and 3.7-53). Shuttle routing is discussed in Response TR-56 (CPMC Shuttle Service, page C&R 3.7-93).

As discussed in the Draft EIR, a transit-delay analysis was conducted for Muni transit lines near the Cathedral Hill Campus because of the complexity and scale of the development, and because of the location of the proposed medical campus at a transit hub. The amount of new development would be greater at the proposed Cathedral Hill Campus than at any other CPMC campus. In addition, because of the site's location along major transit lines along Van Ness Avenue and Geary Street/Boulevard, more existing transit lines would carry more daily passengers near the proposed Cathedral Hill Campus than near the other CPMC campuses. Finally, the Cathedral Hill Campus is the only location where the proposed CPMC LRDP would introduce a local and regional medical center as an entirely new land use.

The transit-delay analysis in the Draft EIR identified transit-delay impacts on several Muni lines which included such inputs as: project-generated vehicles navigating around the campus on roadways with transit lines, background traffic and traffic growth between existing conditions, Modified Baseline conditions and Cumulative 2030 conditions, and passenger boarding delays associated with CPMC transit riders. The transit-delay calculation for the 38/38L-Geary also includes adjustments to account for delays associated with the project driveway on Geary Street. The SFMTA also analyzed the impact of the project on operational costs of transit lines in the transit study area.

Impacts were identified where the added transit delay would increase transit travel times by more than half of the scheduled headway or where SFMTA's Muni cost/scheduling tool showed that the project would result in increased operational costs associated with running additional vehicles. The impact analysis indicates that the proposed Cathedral Hill Campus project would increase transit delay, requiring Muni to operate additional transit vehicles along the 3-Jackson, 19-Polk, 38/38L-Geary, 47-Van Ness, and 49-Van Ness-Mission bus lines.

3.7.5.3 TRANSIT MITIGATION MEASURES

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-53 TR, duplicate comment was provided in 30-53 TR]

"If the transit lines will be impacted as stated in the DEIR, not many people will be relying on the buses to get places not the families, not the workers. This City will only become more congested and fewer families will stay in the City. The recourse for the transit delays caused by the CPMC projects is to solve it through financial payouts to the SFMTA. This is what seems to be stated in Mitigation Measure MM-TR-29 as stated on Page S-45. This mitigation measure only allows for a 'financial contribution' between CPMC and the SFMTA to resolve the increase in travel times on the Muni bus routes.

Any amount of money paid to SFMT A to get more buses to run on already clogged streets only adds more buses being stuck in traffic. Will Muni be running shuttles around the project areas? What other mitigation measure will be used to ensure that transit will not be impacted?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-54 TR, duplicate comment was provided in 30-54 TR]

"Page S-46, Impact TR-30 states how the 38/38 L-Geary lines will be impacted with increased travel times. Again, only a 'financial contribution' mitigation measure is mentioned with a 'Transit Mitigation Agreement' to be entered into to bring the level of service to a proposed level as stated in Mitigation Measure MM-TR-29, Page S-45. What proposed level would that be? What are these financial contributions supposed to pay for? Will more buses be run? Where will they go? Will they be allowed to go off route? If so, on what streets? If no additional buses will be run, will there be alternate solutions that this 'financial contribution' will pay for? If so, what would these be? Impacting the City's most used 38/38-L Geary bus line is a bad idea that will get worse. Will people be routed over to streets that parallel Geary and be shuttled in the north-south direction in some loop route? That will minimize having to run extra buses (conserve fuel) and only have to run short loop services.

The 38/38L-Geary line will also be impacted by the Two-way Post St. Variant because it will increase ridership along Geary per Impact TR-33. The 38/38L-Geary line will also be impacted by the MOB Access Variant adding to the congestion and travel times as per Impact TR-36."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-55 TR, duplicate comment was provided in 30-55 TR)]

"This same page says the same impact to the 19-Polk line. This is a major line for people from the southeast portion of the City to the northeast portion of the City. With all the impacts to the bus lines being resolved with the 'financial contribution' mitigation measure mentioned earlier, perhaps there could be an outline of a foreseeable new transit rerouting/addition of buses or shuttles to mitigate the lengthened travel time people will be experiencing. The Two-way Post St. Variant would also cause a problem on Polk St. adding to the 19-Polk line travel time as per Impact TR-34 on Page S-46."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-56 TR, duplicate comment was provided in 30-56 TR]

"Per Impact TR-133, Page S-57, the impact on the 49-Van Ness Muni line will be 'significant' and 'unavoidable' (SU) but will be addressed again by MM-TR-29 as mentioned earlier.

Per Impacts TR-134 through TR-147 (Pages S-57 through S-59), bus lines 47-Van Ness, 38/38L-Geary, 19-Polk, 3-Jackson, and 49-Van Ness will all be 'significantly and unavoidably' (SU) impacted with all the mitigation measures for each of these the same as MM-TR-29 which involves the financial 'Transit Mitigation Agreement' between CPMC and SFMTA. Each of the mitigation measure numbers assigned to the impact may be different but it is all the same solution by way of this financial arrangement. Also, if the 3-Jackson is impacted, so would the 2-Clement line. The 2-Clement has not been written up as being impacted in the executive summary. Perhaps I missed it."

(Sue Hestor, October 19, 2010) [89-7 TR]

"The EIR - as insufficient as it may be - shows substantial impacts on transportation and transit. Shifting patients, visitors and staff around means that CPMC must take ENORMOUS steps to really encourage transit usage. Which best occurs when transit is accessible, reliable and fast. CPMC must make that happen, again because they have chosen to 'blow out' the Geary and Van Ness intersection."

(Barbara Kautz, CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-28 TR, duplicate comment was provided in 108-28 TR]

"The failure to identify any serious mitigation for traffic impacts carries over into the analysis of impacts on transit. Numerous significant and unavoidable transit impacts are related to the increased traffic congestion created by the Long Range Plan; yet, the DEIR identifies no mitigation measures that could reduce traffic generation from the project."

(Lois Scott, September 23, 2010) [PC-25 TR]

"A big issue for Cathedral Hill, itself, is transportation, and the future capacity of our already stressed public transit system. This impact needs serious mitigation, both capital and operating costs."

(Felicidad Afenir, October 23, 2010) [PC-34 TR]

"Traffic will be congested in this area, considering that this area is a main route of public transportation, transportation will be much—it will be impacted and traffic will be congested, and people who commute daily in their respective destinations will experience hardship. There are solutions to be made by CPMC to mitigate the problems."

(Donald Scherl, October 18, 2010) [74-15 TR]

"Impacts TR-29, TR-30, TR-31+TR-32-36, TR-99, TR-133-147: The Cathedral Hill campus project would 'increase congestion and ridership along Van Ness Ave., which would increase travel times...' for both cars and buses. While the draft report says this is serious and unavoidable, it suggests CPMC could somehow mitigate this by financially compensating the SFMTA for the cost of providing ... additional services' as if this would resolve either the bus or auto problems. It could not. In fact, it might make it worse."

(Sue Hestor, October 19, 2010) [89-2 TR]

"Another 'reply' is as for **Impact TR-29** (increase congestion and ridership along Van Ness Avenue, which would increase travel times and impact operations of the 49-Van Ness-Mission bus route (for which the response is 'financially compensating the SFMTA for the cost of providing the service needed to accommodate the project at proposed levels of service. The financial contribution shall be calculated and applied in a manner that is consistent with the SFMTA cost/scheduling model. The amount and schedule for payment and commitment to application of service needs shall be set forth in a Transit Mitigation Agreement between CPMC and SFMTA.' Similar language is used for the impacts on other streets with buses.

There needs to be a much STRONGER analysis and requirement."

(Sue Hestor, October 19, 2010) [89-4 TR]

"The City has had on its books for MANY years planned resolution of Van Ness Avenue congestion/delays by construction of the Van Ness Bus Rapid Transit. This route extends to Van Ness and Market (the intersection with 'no feasible measures') and beyond to Mission Street.

Similarly, Muni has problems on Geary Street/Boulevard for which the City knows that an important solution is construction of the Geary Street BRT.

Once CPMC made a PRIVATE decision to impose its PRIVATE facilities in the middle of these public transportation problems, it became responsible and should be required by the City to make sure that the SOLUTIONS ARE IMPLEMENTED. They are planning to change the circulation pattern, around the west and east blocks on the north side of Van Ness and Geary. The project will not only affect busses running on Van Ness and Geary, but those on Post and Polk in the immediate area, and other lines that connect to Geary and Van Ness several blocks away."

Response TR-55

The comments raise concerns about the transit impacts related to increased delays to transit lines in the proposed Cathedral Hill Campus vicinity, and the effectiveness of the transit mitigation agreement required under Mitigation Measure MM-TR-29 (on page 4.5-122 of the Draft EIR).

The Planning Department, in consultation with SFMTA, is responsible for determining appropriate mitigation measures to address the transit impacts of a proposed project. The SFMTA sets forth its recommendations using a cost/scheduling tool that determines the costs required to provide the level of transit service needed to accommodate future transit demands and the cost to maintain the proposed Muni transit headways along the length of the affected Muni route. The SFMTA cost/scheduling tool has been developed and calibrated by Muni and accounts for the maintenance and operational costs, as well as capital costs, for each line analyzed. As described in the Draft EIR, the cost/scheduling tool accounts for transit travel delay, passenger boarding delay, and operational needs (e.g., bus layovers, driver breaks).

The Draft EIR and *Cathedral Hill Transportation Impact Study* identify Mitigation Measures MM-TR-29 through MM-TR-31 (Draft EIR pages 4.5-122, 4.5-123, and 4.5-124), MM-TR-134 (Draft EIR page 4.5-238), and MM-TR-137 (Draft EIR page 4.5-240). These mitigation measures would ensure that CPMC would financially compensate SFMTA for the cost of providing additional service along these bus lines.

As explained on Draft EIR page 4.5-117, although this mitigation measure would reduce the impact to a less-than-significant level, the ability of SFMTA to provide additional service for the project is uncertain. Therefore, the Draft EIR concluded that the transit impacts of the CPMC LRDP would be significant and unavoidable.

CPMC's financial contribution to mitigate the transit-delay impacts on the bus lines identified above would be calculated and applied in a manner that is consistent with SFMTA's existing cost/scheduling tool. The final financial compensation package would include CPMC's fair share of costs associated with operating additional transit vehicles along certain lines over an extended amount of time, operation costs to cover any additional transit drivers, maintenance of transit vehicles along impacted lines, and capital costs to purchase new vehicles where needed (including costs allocated for construction of additional transit vehicle storage facilities). The financial compensation provided to SFMTA by CPMC would also be used, in part, to fund implementation of the BRT projects, including CPMC's fair share of funding the cost of BRT improvements along the proposed Cathedral Hill Campus frontage. SFMTA would retain discretion for how to best accommodate the additional ridership and delay created by the project.

Pursuant to the Draft EIR mitigation measures identified above, the amount and schedule for payment related to the proposed CPMC LRDP would be set forth in a transit mitigation agreement between CPMC and SFMTA or other appropriate documentation, and may be included in the development agreement between CPMC and the City of San Francisco.

3.7.5.4 CPMC Shuttle Service

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-37 TR, duplicate comment was provided in 30-37 TR]

"A few areas not considered at all by the DEIR are the impacts of traffic and congestion and shuttle system impact to the areas outside of the CPMC project sites such as the Western Addition neighborhood, and specifically Japantown; the Richmond District (specifically mid-Richmond Geary merchant area, Jordan Park, Laurel Heights), Presidio Heights and Pacific Heights. CPMC shuttles will be running frequently through Japantown, mid-Richmond, Jordan Park, Laurel Heights, Presidio Heights and Pacific Heights on neighborhood streets to get to outlying parking structures such as the Japan Center Garage on Post Street and the use of the Kabuki Hotel area at 1625 Post Street for convenient pickups and drop offs. Japantown is a heritage cultural center. It should not be used as a transportation mitigation measure for CPMC. In the Richmond District, the shuttles drop off and pick up people at the Geary & 16th Avenue Garage so the workers take up parking from people who want to shop the Geary Street merchants and cannot because the mid Richmond is one of the hardest places to find parking nowadays. The shuttles running to the California Campus where workers already use the parking structures mentioned in Item 18 above (Cherry St., etc.) from the Pacific Campus will cause parking and congestion issues in Laurel Heights, Jordan Park, Presidio Heights and Pacific Heights. The DEIR has not addressed the greater issue of the moving impacts of CPMC's vehicular use and leasing of spaces in various neighborhoods throughout San Francisco. This traffic study has not been done for the CPMC users and its impact on the residents and shoppers who cannot use the parking spaces because CPMC has them reserved. CPMC cannot create new parking at the new site sufficient for its proposed plan so it will be taking up more spaces in the neighborhoods?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-38 TR, duplicate comment was provided in 30-38 TR]

"What I believe is occurring is that CPMC has created its own "bus service" instead of having its workers use Muni. It has taken over the neighborhood streets with all of its shuttles that do not even stick to fixed routes on streets that are transit use streets. They have created their own van/shuttle/bus service and is probably also impacting the SFMTA Muni revenue stream. Why would the City cater to a private for-profit entity and allow the neighborhoods to be overtaken basically by a transit service that does not put in to the City's coffers? The least they can do is to be good neighbors and stick to the streets that Muni presently runs on vs. zigzagging all over town even down strictly residentially-zoned streets. They should especially stay off of streets with schools for young children. MITIGATION MEASURE: I think all the shuttles should be staged outside of the City at the BART stations so that the workers will be forced to take public transit (BART, Muni) if coming in from out of town. They can get off at the Van Ness Station or the Civic Center Station to get to work on the Cathedral Hill projects. All those who live in the City should take Muni. CPMC should learn from UCSF which has shuttles on routes that stick as much as possible to the large streets that already carry Muni bus traffic. UCSF has a good neighbor policy in place that allows a transportation manager to get input on rogue shuttles going off course without any transit blockage on their regular fixed route. And this is also necessary for the CPMC shuttles which do not always travel on the large main streets or those on which Muni already runs."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-39 TR, duplicate comment was provided in 30-39 TR]

"Granted, CPMC is not the only one running its own "bus service" as so is Genentech, Google, etc. However, there must be a trade-off to the community for increased greenhouse gases, congestion, noise and vibration and the negative impacts to sensitive receptors for these institutions that use their own transportation services. Perhaps an ordinance is required to curb institutions and "bus service" on neighborhood primarily residential streets unless they have a pickup or drop-off of disabled patients on the particular streets. Otherwise, these shuttles and vans become all day cut-through traffic to the neighbors."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-40 TR, duplicate comment was provided in 30-40 TR]

"If CPMC does not wish to relinquish all the parking spaces they take up from City lots that could be used by people who actually shop and live in the City and keep the businesses viable, the prices of the parking spaces should not be increased because of the currently artificial demand that is created by CPMC for the local public. (See Item 64 below.) In addition, with the number of projected FTEs to CPMC being 10,720 (See Item 91), more CPMC personnel will use the parking facilities to squeeze out those who wish to conduct business at the associated shopping center garages but cannot and cause the residential streets to become congested and overburdened with traffic. Please reference the following CPMC shuttle information and use of public garages for their 8 shuttle lines:

C-line: California Campus - Pacific Campus

-Every 15 minutes 6:30 am - 6:15 pm
-Courtesy stops on California St.; Walnut, Locust, East Campus
-Courtesy stops all day: Maple and Sacramento

D-line: Davies Campus - Pacific Campus

-Every 15 minutes 6:15 am - 6:15 pm
-Services Japan Center parking lot 6:25 am – 8:55 am
-Courtesy stops: Post and Pierce (before 9:00 am); Sutter and Scott (after 9:00 am)
-Courtesy stops all day on Scott St: O'Farrell, McAllister, Hayes, Haight

F-line: Pacific Campus – Folsom building

-Every 30 minutes 7:15 am – 5:30 pm
-Pick up and drop off will be in the white zone at 633 Folsom, except after 3:30 pm, when pick up and drop off will take place on Hawthorne.

JC-Express: Japan Center – Pacific Campus

-Every 10 minutes 5:05 am – 10:55 am and 2:40 pm – 8:50 pm

GMG Line: Geary Mall garage at 16th Ave – California Campus

-Every 15 minutes 6:15 am – 9:30 am
-Every 15 minutes 3:15 pm – 6:15 pm

BV-Line: Civic Center BART Station – Pacific Campus

*-Every 15 minutes** 5:35 am – 7:05 pm*
***Every 10 minutes 6:30 am – 9:30 am and 3:30 pm – 5:30 pm*

St. Luke's Shuttle: Davies Campus – St. Luke's Campus

-Every 30 minutes 8:30 am -3:45 pm (no services from 12:15 pm to 1:15 pm)
-Davies first services at 8:30 am and last Davies service at 3:30pm
-St. Luke's first service at 8:45 am and last St. Luke's service at 3:45 pm

K Line: Pacific Campus To – Hotel Kabuki (1625 Post) To – Cathedral Hill Office Building (1255 Post) To – 1825 Sacramento To – 1700 California Street

-Every 20 minutes from each location between the hours of 6:30 am to 6:20 pm
-Departures occur at the same time each hour from each location: Pacific at :10, :30, :50; Kabuki at :13, :33, :53; Cathedral Hill at :15, :35, :55; 1825 Sacramento at :00, :20, :40; and 1700 California at :05, :25, :45.

Source: *http://www.cpmc.org/visiting/shuttle.html* (as of Sept. 21, 2010)

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-110 TR, duplicate comment was provided in 30-110 TR]

"Page 4.5-31 speaks of the existing CPMC shuttle service. It states that the shuttles run from 5 a.m. to 9 p.m. about every 20 minutes per day. I believe this has changed from that to start around 6 a.m. and run until about 6 p.m. or 7 p.m. and only once every 30 minutes instead of 20 minutes. On Page 4.5-32, Table 4.5-8 shows the shuttle service daily capacity utilization for the Japan Center Garage to have 381 riders daily. The California Campus has 414 riders daily with a daily capacity utilization of 62%. The Civic Center BART and Van Ness/Market shuttle has 503 daily riders with a capacity utilization of 56%. How many of these riders will still have to rely on the shuttles for their daily commute when the new campuses are completed? How many of the 381 riders from the Japan Center Garage will have to still use the Japan Center Garage after CPMC completes its projects? How many riders out of the 82 that use the Geary Mall Garage will need to use that garage after the completion of the CPMC projects?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-117 TR, duplicate comment was provided in 30-117]

"63. Pages 4.5-84 and 4.5-85 indicate that CPMC will have 14-passenger shuttles running with 8 routes over the 6 routes in existence today. It also indicates that at least 15 shuttles will be required to service the estimated ridership. What is still not determined are the "non-CPMC private shuttle services" that "would be provided by a private garage operator as demand for off-campus parking increases." On Page 4.5-214, there is mention of the "12th Street Garage Shuttle," as a private operated shuttle. The daily passenger demand for this shuttle is 750 riders assuming that a total of 375 staff from St. Luke's and from Davies park in other off-site garages. Which garages would those be?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-118 TR, duplicate comment was provided in 30-118 TR]

"64. On Page 4.5-86, Table 4.5-16 ("Daily CPMC Shuttle Demand") shows that the existing demand of the "Cathedral Hill/Pacific/Japantown/BART" shuttle of 172 daily riders will balloon to 1,756 - 2,004 riders daily. And the overall shuttle ridership will go from 2,005 riders daily to 7,542 - 8,001 riders daily. When it is discovered more shuttles need to be procured to accommodate the increase of ridership, is CPMC going to procure more shuttles? If so, where will they be parked without impacting the parking being taken away from the public? And how will these shuttles which could be running almost 24/7 be kept on the main commercial transit corridors without cutting through residentially zoned areas?

The DEIR shows that all 14 shuttles will be parked at the Cathedral Hill Hospital when not in service but I think these shuttles should not be parked at the Hospital. Instead, they should lease spaces at other underutilized parking structures throughout the City so that these 14 spaces are made available to the paying public. Overall, if CPMC has to have this many shuttles for this LRDP, the size of all the proposed garages is not sufficient for the workers, visitors and patients that this project is going to attract. It is also telling that this many shuttles are necessary because the transit in the areas will not accommodate these visitors in a timely fashion or be able to support the sheer number of people who will be accessing these campuses."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [37-6 TR]

8. When the **major streets** such as Van Ness, Franklin and Geary have their lanes blocked depending on construction conditions, the cut-through traffic into adjacent areas will be impacted. So even the parking at St. Luke's and Davies will have an effect on the other areas because it is all dependent on how many people CPMC employs who will drive to work. As a "Transit First City," it does not mean to drive in and then take up neighborhood or merchant parking and shuttle it in to the campuses. **MITIGATION MEASURE**: Shuttles to stay out of SF. Perhaps those CPMC workers should BART it in and take the Muni if they live out of town and those living in the City should take the bus unless they are 24-hour on-call/emergency personnel.

Reference: 31,000 acute discharges (33% of SF total)
7,300 births (50% of SF)
74,300 Emergency Department visits (32% of SF)
541,200 Outpatient visits
1,200 medical staff (largest in SF)"

(Bob Hamaguchi—Japantown BNP Organizing Committee, October 8, 2010) [47-8 TR, duplicate comment was provided in 50-8 TR (Richard Matsuno, October 12, 2010]

"For example, will CPMC's TDM policy and shuttle services inadvertently increase CPMC staff, patient or visitor demand on the Japantown parking? Will peak p.m. traffic have an effect on evening visitation to Japantown?"

(Paul Wermer, CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-27 TR]

"CPMC Shuttle Services:

CPMC's shuttle services will run on a significantly increased frequency. Absent a detailed analysis of the proposed shuttle routes and schedules, it is not possible to evaluate how this will affect the overall traffic issues at the various sites. Based on observations at Pacific site, shuttle operations can have adverse impacts on pedestrian crosswalks and traffic flow."

(Helene Dellanini, DBC Master Owner Association, October 18, 2010) [71-3 TR, duplicate comment was provided in 72-3 TR]

"The Cathedral Hill Campus Transportation Impact Study indicates that the hospital shuttle will generate 36 trips per hour, or 1.7 trips per minute. The proposed shuttle drop-off area is located immediately east of the one and only egress from the hospital's passenger drop off area and parking garage. All normal, non-emergency vehicular traffic exiting the hospital will be required to turn right onto Post in essentially the same location that the shuttle drop-off traffic will transition from the traffic lane into the shuttle drop-off. A Muni lane that runs buses #2 and #3 is also adjacent to the proposed shuttle drop-off area and each bus route averages 10 minutes between buses of the same route number during peak periods. This equates to a combined average of one bus every five minutes. The combined traffic movements of the bus traffic, shuttle traffic and egress traffic from the hospital will add significant congestion on Post during peak-hour traffic periods. Therefore, it is recommended that the shuttle drop-off be relocated from Post and combined with the main internal shuttle drop-off area that is access from Geary."

(Helene Dellanini, DBC Master Owner Association, October 18, 2010) [71-25 TR, duplicate comment was provided in 72-25 TR]

"TR-4 The proposed site plan for the Cathedral Hill Campus includes a curbside, shuttle drop-off area on Post Street west of Van Ness. The Cathedral Hill Campus Transportation Impact Study indicates that the shuttle traffic will result in 36 shuttle trips per hour, or approximately one shuttle every 1.7 minutes. The proposed drop-off area is located immediately east of the egress for the internal CHC drop-off and parking garage. All normal, nonemergency, vehicular traffic exiting the hospital will be required to turn right onto Post in essentially the same location that the shuttle drop-off traffic will transition from the traffic lane into the shuttle drop-off. A Muni diamond lane is also adjacent to the proposed shuttle drop-off area which provides for bus routes #2 and #3. Each bus route averages 10 minutes between buses of the same route number during peak periods, which equates to a combined average of one bus every five minutes. The combined traffic movements of the bus traffic, shuttle traffic and egress traffic from the hospital will add significant congestion on Post Street during peak-hour traffic periods. As a result of this anticipated congestion, it is recommended that the shuttle drop-off be relocated from Post and combined with the main internal shuttle drop-off area that is accessed from Geary."

Response TR-56

The comments generally express concern about the impact of the CPMC shuttle service. Specifically, the comments address: existing shuttle service; shuttle demand and planned capacity; the use of shuttle service rather than Muni; conflicts at shuttle loading/unloading areas; shuttle routing within residential neighborhoods; and the use of shuttles to serve off-site parking lots.

Comments 18-40 and 18-110 discuss existing shuttle service. As described on page 4.5-31 through 4.5-32 of the Draft EIR, CPMC currently provides free shuttle bus service during daytime operating hours (approximately 5 a.m. to 9 p.m.) for doctors, staff, visitors, and patients: between the Davies, California, and Pacific Campuses; off-site parking at the Japantown Garage and Geary Mall Garage (1600 Geary); Civic Center BART/Muni Metro station; 24th Street BART Station; and the future site of the proposed Cathedral Hill Campus (existing Cathedral Hill Hotel and office building), where some administrative offices are currently located. Shuttles run every 15 to 30 minutes between approximately 5 a.m. and 6 p.m. After 6 p.m., extended service (until 9:00 pm) is provided to the Japan Center Garage.

Seven existing "full-service" fixed shuttle routes operate through the day and three limited service shuttle routes operate during employee shift changes. A detailed map of the existing system can be found in Appendix F of the *CPMC LRDP Transportation Impact Study Master Appendix*. These shuttles are part of CPMC's TDM program, which is designed to reduce private vehicle trips between campuses and encourage transit ridership by serving regional transit hubs. As summarized in Table 4.5-8 on page 4.5-32 of the Draft EIR, the existing shuttles have a daily capacity utilization from 17 percent (CH-Line between the existing Pacific Campus and Cathedral Hill administrative offices) to 63 percent (D-Line between the Pacific Campus, the Japantown Garage, and the Davies Campus).

Several comments express concern about the ability of the proposed shuttle system to accommodate the expected demand. With the shifting of primary hospital and inpatient-care uses from the Pacific Campus to the proposed Cathedral Hill Campus, the CPMC shuttle system would be reconfigured with several new routes serving the site (see Appendix F). The system would include eight routes that would serve the four future campuses—Cathedral Hill, Pacific, Davies, and St. Luke's—and BART and Caltrain. The following routes, as described on page 4.5-85 of the Draft EIR, are proposed and routes shown in C&R Figure 3.7-1 (page C&R 3.7-96) which follows:

- The Pacific-BART line would serve the Pacific campus, the Japantown Garage, the proposed Cathedral Hill campus, and the Civic Center BART station at approximately 6-minute headways. The route is assumed to operate between approximately 5:30 a.m. and 7 p.m. (similar to the existing BV-Line). Approximately five shuttles would be needed to operate the shuttle route at 6-minute headways, depending on traffic conditions.

- The Cathedral Hill-BART line would serve the proposed Cathedral Hill Campus and the Civic Center BART station at approximately 3-minute headways. The route is assumed to operate between approximately 5 a.m. and 11 a.m. and between 2:30 p.m. and 9 p.m. (similar to the existing JC-Express shuttle route serving commuting hours). Approximately five shuttles would be needed to operate the shuttle route at 3-minute headways, depending on traffic conditions.

- The Folsom/Caltrain line would serve the proposed Cathedral Hill Campus, the Fourth Street Caltrain Station, and CPMC offices located at 633 Folsom Street at approximately 30-minute headways. This route is assumed to operate between approximately 6 a.m. and 9 a.m. and between 3 p.m. and 6 p.m. and would require one shuttle to operate the route at 30-minute headways.

- The Cathedral Hill-Davies line would serve the proposed Cathedral Hill Campus and the Davies Campus at approximately 30-minute headways. This route is assumed to operate between approximately 6 a.m. and 6.p.m. (similar to the existing D-Line). One shuttle would be needed to operate the shuttle route at 30-minute headways.

- The Cathedral Hill-St. Luke's line would serve the proposed Cathedral Hill Campus and the St. Luke's Campus at approximately 30-minute headways. This route is assumed to operate between approximately 6 a.m. and 6 p.m. (similar to the existing SL-Line). One shuttle would be needed to operate the shuttle route at 30-minute headways.

- The Davies-St. Luke's line would serve the Davies and St. Luke's Campuses and the 24th Street BART station in San Francisco at approximately 30-minute headways. One shuttle would be needed to operate the shuttle route at 30-minute headways.

- The Davies-Pacific line would serve the Pacific Campus and the Davies Campus at approximately 30-minute headways. One shuttle would be needed to operate the shuttle route at 30-minute headways.

For the future shuttle system, CPMC is considering use of a system fleet with individual shuttle capacities of 14, 20, or 35 passengers per shuttle. It was assumed that an individual shuttle capacity of 14 passengers per shuttle for the entire fleet would be used for all routes. As discussed in Impact TR-97 on page 4.5-213 of the Draft EIR, the proposed shuttle system was designed to and could accommodate the proposed ridership demand of the proposed LRDP (7,542–8,001 daily trips, including intra-campus trips), and therefore, would be a less-than-significant impact. As shown in Table 4.5-40 on page 4.5-214 of the Draft EIR, the proposed shuttle routes would operate at approximately 60 percent of proposed shuttle capacity.

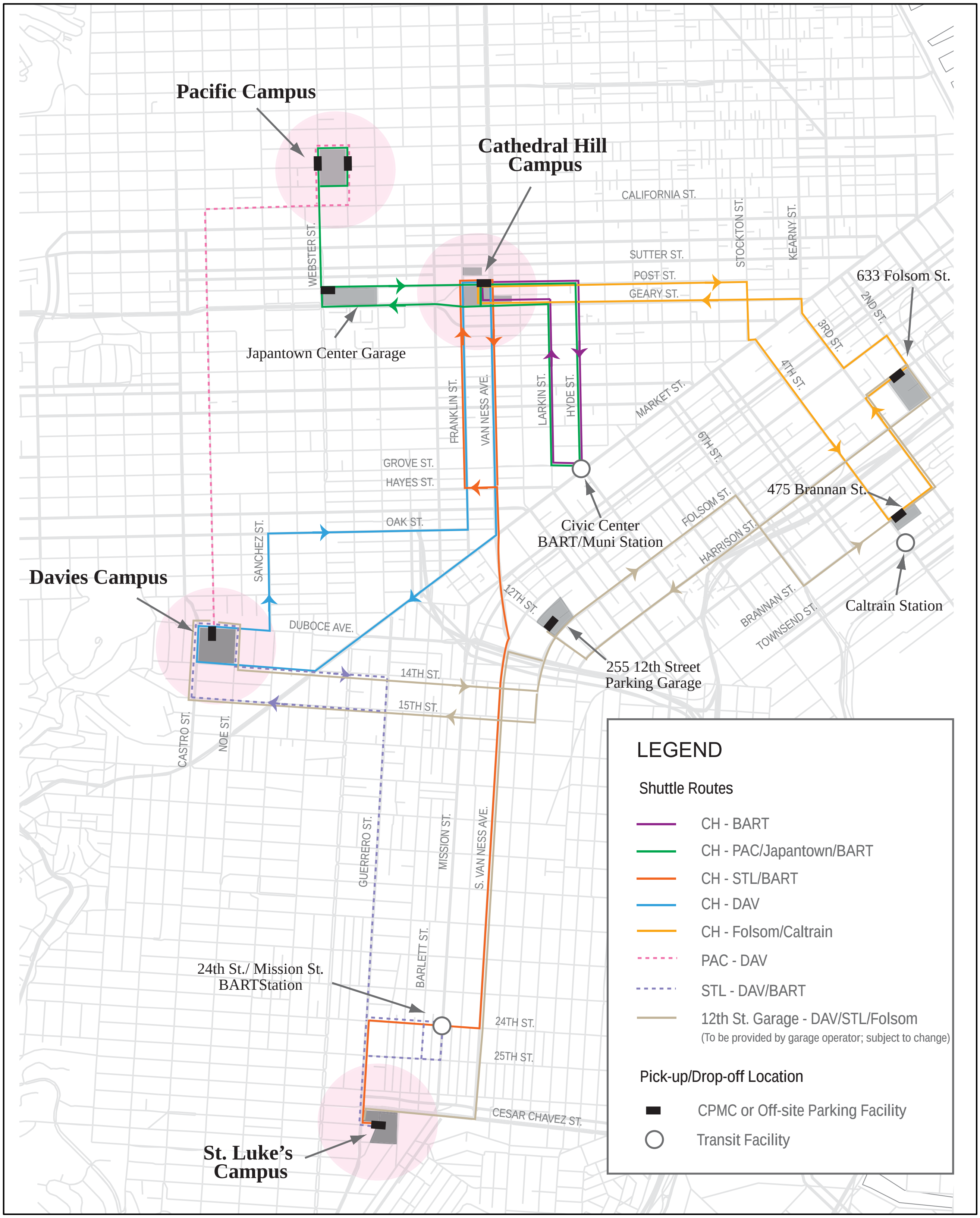
Comment 18-118 specifically addresses the increase in demand for the CH-Line serving the Cathedral Hill Campus, Pacific Campus, Japantown Garage, and Civic Center BART. This shuttle route, the Pacific-BART line described above, would operate at approximately 60 percent of its available capacity. CPMC actively monitors its shuttle fleet and maintains extra shuttles that can be used to meet observed increases in shuttle demand.

In general, the CPMC shuttle routes would be set routes and would continue to use major city streets to access the various destinations and nearby transit hubs, including Post Street, Geary Street, Larkin Street, Hyde Street, Van Ness Avenue, Franklin Street, Oak Street, Market Street, 14th Street, 15th Street, Guerrero Street, Cesar Chavez Street, 24th Street, California Street, Third Street, and Fourth Street. Due to the location of some of the CPMC campuses, shuttles would continue to use some neighborhood streets immediately adjacent to the campuses, including Scott Street, Duboce Street, Sanchez Street, and Webster Street. The shuttle's use of residential streets surrounding each campus is an existing condition that would not change as a result of the changes to the CPMC shuttle system. A map showing the routes of the proposed shuttle system is on file and available for review at the San Francisco Planning Department.

Shuttles would continue to operate primarily between 5 a.m. and 6 p.m., with limited service between 6 p.m. and 9 p.m. The system would not operate "24/7" as described in Comment 18-118. Currently, the City has no restrictions on private shuttle service operations; however, it is recommended that shuttle services coordinate with SFMTA. The San Francisco County Transportation Authority is currently investigating ways to manage private shuttle routes and their impact on residential neighborhoods throughout the City, including CPMC's existing service. Therefore, shuttle impacts on residential streets are expected to be less than significant.

As described in the Draft EIR, each campus would have a dedicated passenger loading area for CPMC shuttles, to permit shuttles to pull out of traffic to load and unload, and these facilities were determined to be adequate to accommodate the shuttle demand. Shuttle loading areas would be provided at the following locations:

- Cathedral Hill Campus—Post Street near Van Ness Avenue (approximately 100 feet) and within the interior passenger drop-off/pick-up area
- Davies Campus—Interior to the campus between the existing 45 Castro Street MOB and Davies Hospital North Tower
- Pacific Campus—Webster Street between Sacramento Street and Clay Street, and Buchanan Street between Sacramento Street and Clay Street
- St. Luke's Campus—San Jose Avenue at 27th Street (approximately 40 feet)



Source: CPMC 2011

Proposed CPMC Shuttle Routes **C&R Figure 3.7-1**

Comments 67-27, 71-3, and 71-25 express concern about on-street conflicts between CPMC shuttles, Muni vehicles, private vehicles, and pedestrians. All shuttle loading at the Davies Campus would occur interior to the site; therefore, minimal on-street conflicts would occur, aside from shuttles entering and exiting the site via Duboce Avenue as occurs at present. The St. Luke’s Campus would have one shuttle arriving per hour, as at present; therefore, minimal conflicts would occur with other roadway users. Comment 67-27 is particularly concerned about shuttle conflicts on the Pacific Campus. The Pacific Campus currently serves as the hub of the existing CPMC shuttle system. After construction, the proposed Cathedral Hill Campus would become the hub of the CPMC shuttle system. The proposed shuttle plan includes one shuttle between the Pacific Campus, Japantown Garage, Cathedral Hill Campus, and BART at 6-minute headways, and one shuttle between the Pacific Campus and Davies Campus at 30-minute headways. This would be a net reduction in shuttle service to the Pacific Campus; therefore, impacts to pedestrian and vehicle traffic in the area would be less than what occurs at present.

The proposed Cathedral Hill Hospital would have a shuttle loading zone, located on the south side of Post Street near Van Ness Avenue. This zone would be the main staging area for the six shuttle routes serving the Cathedral Hill Campus. During the morning and afternoon peak periods, an average of one shuttle would arrive at the zone every 3 minutes. These shuttles would have to cross the transit-only lane on Post Street; however, once in the zone, the shuttles would not conflict with Muni transit on Post Street.

The Cathedral Hill Hospital shuttle loading zones is located approximately 25 feet east of the hospital parking garage driveway/egress. and set into the sidewalk to separate stopped shuttles from transit on Post Street. The shuttle loading zone is separated from the driveway by a curb extension. While some conflicts may occur between vehicles exiting the garage and shuttles pulling into the loading zone, exiting vehicles would be required to yield. Based on the project trip assignment, this exit from the hospital parking garage would serve 43 vehicles during the a.m. peak hour and 157 vehicles during the p.m. peak hour. During these peak hours, traffic exiting the garage may have to yield to through traffic onto Post Street, including transit and shuttle vehicles. During the a.m. peak hour, less than one vehicle per minute would exit the garage, and substantial conflicts or internal queuing is not expected to occur. During the p.m. peak hour, two to three vehicles exiting the garage per minute may need to yield to traffic on Post Street and some queuing internal to the parking garage may occur; however, there would be sufficient distance within the building for this to occur.

Comments 18-38 and 37-6 suggest that one method for CPMC to reduce the impact of shuttles on local residents would be to stage shuttles at major transit stops outside of San Francisco and require employees to use Muni to access each campus. The CPMC shuttle system serves two purposes. First, it allows employees who take regional transit to San Francisco to avoid the need to transfer to Muni to access the campus. Because CPMC employees live throughout the Bay Area, it would be infeasible for CPMC to operate a shuttle system in outlying cities that serve a limited number of employees. Providing the shuttle service within San Francisco allows CPMC to serve a critical mass of its employees who choose to take transit rather than drive. Second, the shuttle system allows patients, visitors, and employees to travel between campuses for free. Even with a system outside of San Francisco, CPMC would still likely operate a shuttle system between campuses, and shuttles would continue to use streets immediately surrounding the campuses. Intercampus shuttle frequency would be no different than what is described in the Draft EIR.

Several comments note that many shuttle routes would serve off-site parking garages where CPMC would lease parking spaces for its employees. One comment notes that as CPMC increases its use of shuttles and TDM measures, demand for these parking spaces may increase. As shown in Table 4.5-34 on page 4.5-164 of the Draft EIR, CPMC would lease 400 parking spaces at the Japantown Garage; 180 spaces at the Geary Street Garage; and 43 spaces within a garage at 2015 Steiner Street. These are the same number of parking spaces that CPMC leases in these facilities today; therefore, there would be no substantial change in demand for shuttle service to these parking facilities. Implementation of the proposed LRDP also would not impact availability of parking in these garages to local residents and business because CPMC has the same number of lease parking spaces at present. CPMC employees without parking permits at these facilities would not be allowed to park unless they paid for parking without assistance from CPMC. For a discussion of how CPMC parking at off-campus lots impacts local parking supply and demand, see Response TR-69 (page C&R 3.7-129).

Comment 30-117 notes the Draft EIR discussion that CPMC would lease 375 parking spaces at the Kissling Street Garage (255 12th Street). At the time the Draft EIR was being prepared, CPMC was negotiating to lease spaces in a parking garage in this area of South of Market to meet the forecast parking demand at St. Luke's and Davies Campuses. Shuttle service to a garage in this area would be operated by a private shuttle service or by the parking garage operator. However, to be conservative, Table 4.5-40 on page 4.5-214 of the Draft EIR assumed that CPMC would provide this service. As shown, CPMC shuttles would continue to have adequate capacity.

The total fleet would operate with 15 active shuttles. When not in service, CPMC shuttles would be parked on CPMC property. Comment 18-118 notes that these spaces should be available to the general public and shuttles should park in leased garages. CPMC currently proposes to have approximately 15 shuttles in active service and some reserve shuttles. Greatest shuttle storage demand generally overlaps with periods of greater parking supply availability (7 p.m.–7 a.m.) and, depending on parking availability at various campuses, shuttles may be parked where capacity exists. Therefore, using these parking spaces for shuttles would not result in a substantial change in the visitors, employees, or patients parking availability (15 to 20 spaces, which would represent less than 2 percent of available parking supply at the Cathedral Hill Campus).

3.7.5.5 Impact on Geary Street/Boulevard Muni Service

Comment

(Quivner Zabeles, October 19, 2010) [77-1 TR, duplicate comment was provided in 81-2 TR]

"Thank you for the opportunity to comment on the CPMC EIR. I have public comments related to the Cathedral Hill campus, Please confirm receipt of these comments.

The EIR does not adequately address impacts to Muni transit service on Geary Street. Due to the proposed new driveways on Geary, the project would relocate the existing 38 Geary bus stop to the far Side of Van Ness. This would cause a significant transit impact to transit, for the following reasons:

1) Moving the bus to the far side would add delay to Muni because it now has to sit through the light before stopping again on the far side

2) Cars entering the hospital garage will have to turn in front of the bus. This will lead to collisions with Muni vehicle

3) The bus would have to start from a much steeper grade, which decreases the acceleration of the bus, and also causes undue wear on the bus motor and transmission.

These three factors will cause a significant impact to Geary transit service, which the EIR fails to disclose.

The appropriate mitigation for this impact would be to remove the driveways for both the hospital and the Medical Office Building, which would allow the bus stop to stay where it is currently located. This would prevent the three impacts listed above."

Response TR-57

The comment states concerns about relocating the bus stop on Geary Street, and about the locations of the proposed Cathedral Hill Hospital and Cathedral Hill MOB garage driveways. The project sponsor has indicated that provision of vehicular ingress into the MOB and Hospital Parking Garages from Geary Street (in addition to vehicular access from Cedar and Post streets, respectively) is an important aspect of the project. As part of the traffic and transit analysis conducted for the CPMC LRDP, CPMC met with the San Francisco Planning Department, SFMTA, and SFCTA to evaluate potential options for accommodating the existing bus stops alongside the proposed new driveways on Geary Street/Boulevard. As described in the Draft EIR, the Planning Department developed a microsimulation of Geary Street, the project entrances, and nearby cross streets. The results of that analysis, presented in Impact TR-17 on Draft EIR pages 4.5-10 and 4.5-11, describes the significant impacts on pedestrians and traffic that would result from the Cathedral Hill MOB's driveways onto Geary Street. The same simulation was also used to evaluate the location of transit stops along Geary Boulevard and included vehicles turning into proposed campus facility driveways. The analysis showed that buses loading on the near (east) corner of Van Ness Avenue (which was the originally proposed bus stop location) would experience some delay as a result of queued vehicles turning right onto Van Ness Avenue.

Relocating the bus stop to the far side of the intersection was conceived to address this delay problem, although the Planning Department did note the issues the comment addresses, including signal timing, vehicles entering the hospital, and the grade of the roadway. None of these issues were considered to create as substantial an impact as not relocating the bus stop from the near corner of the intersection. At this intersection, the far side stop would reduce delays by allowing the bus to bypass the right-turn queue onto Van Ness Avenue. Although vehicles would enter the hospital in front of the bus stop, only 55 vehicles are expected to use this driveway during the a.m. peak hour (12 in the p.m. peak hour), and the analysis presented in the Draft EIR confirms that a queue is not expected to form that would block the bus at the stop. Although restarting on a hill after making a stop would require additional startup time by the bus, this would be similar to other diesel buses that operate on steep hills throughout the city, such as the 27 Bryant.

A discussion of the revocable nature of the MOB and Hospital driveways and curb cuts on Geary Street can be found in Response TR-80, page C&R 3.7-149.

Based on the results of the simulation, SFMTA and the San Francisco Planning Department determined that relocating the existing transit stop to the far side of Van Ness Avenue would minimize impacts to Muni while providing vehicular access for the MOB and Hospital from Geary Street.

3.7.5.6 FUNDING OF OTHER TRANSIT PROJECTS

Comment

(Sue Hestor, October 19, 2010) [89-8 TR]

"The CPMC development project must be TIED TO and significantly FUND construction of the Van Ness and Geary BRT lines which shall be open at the same time CPMC opens on Cathedral Hill."

Response TR-58

The comment states that the proposed Cathedral Hill Campus project must be tied to and significantly fund the proposed Van Ness Avenue BRT and Geary Corridor BRT projects. Although the Van Ness BRT service is currently being studied by a project team including SFCTA and SFMTA, substantial elements of the project's planning, design, and environmental review have not yet been completed. The transit analysis included an assessment of the capacity of the transit system to accommodate the demand generated by CPMC LRDP and, as presented in Impact TR-27 on Draft EIR page 4.5-118, determined that the impact of the added demand would be less than significant.

However, the Draft EIR did identify transit-delay impacts associated with occupation of the proposed Cathedral Hill Campus. The impacts indicate that the proposed Cathedral Hill Campus project would increase transit delay, requiring Muni to operate additional transit vehicles along the 3-Jackson, 19-Polk, 38/38L-Geary, 47-Van Ness, and 49-Van Ness-Mission bus lines. As described in Mitigation Measures MM-TR-29 through MM-TR-31 (Draft EIR pages 4.5-122, 4.5-123, and 4.5-124), MM-TR-134 (Draft EIR page 4.5-238), and MM-TR-137 (Draft EIR page 4.5-240), CPMC would be required to financially compensate SFMTA for the cost of providing some additional services along these bus lines. As explained on Draft EIR page 4.5-117, although this mitigation measure would reduce the impact to a less-than-significant level, the ability of SFMTA to provide additional service for the project is uncertain. Therefore, the Draft EIR concluded that the LRDP's transit impacts would be significant and unavoidable.

Planning for the Van Ness Avenue BRT project is progressing; however, the final design has not been selected. Some details about the project are known, and thus, the transit analysis included an assessment of traffic conditions at the study intersections with implementation of both BRT projects based on available information. Under conditions with the proposed Cathedral Hill Campus project and Van Ness Avenue BRT and Geary Corridor BRT operations, average vehicle delays at intersections would increase, and the proposed Cathedral Hill Campus project was determined to contribute to significant traffic impacts at three study intersections. However, no new project-specific impacts were identified.

The financial compensation provided to SFMTA by CPMC could, in part, be used to fund implementation of the BRT projects. SFMTA would retain discretion for how to best accommodate the additional ridership and delay created by the project.

3.7.5.7 General Muni Comments

Comments

Linda Chapman, October 19, 2010 [76-16 TR, duplicate comment was provided in 111-16 TR]

"EXAMPLE OF EXISTING CONDITIONS:

Absent CPMC impacts, one morning this year when Van Ness was congested, it took me two hours to catch a 49 at Pine and travel to 22nd Street. With traffic at a standstill, the driver advised passengers heading for Market Street to get off and walk several blocks in the rain. After waiting about an hour to board at Pine, I saw the driver of this packed vehicle leave passengers stranded at subsequent stops-- maybe waiting an hour for the next 49 (after waiting the hour I'd waited for this one)."

Response TR-59

These comments are noted; they do not raise issues regarding the adequacy, accuracy, or completeness of the Draft EIR. The comments will be transmitted to and may be considered by the decision-makers as part of their deliberations on the project.

3.7.5.8 GOLDEN GATE TRANSIT

Comments

(Golden Gate Bridge Highway and Transportation District, September 14, 2010) [11-2 TR]

"Impacts TR-29, TR-32, TR-35, TR-133, TR-134, TR-138, TR-139, TR-143, and TR-144 indicate that the Cathedral Hill Campus project will increase travel times of Muni's 47 and 49 bus lines. Because GGT Routes 10, 70, 73, 93, and 101 also operate on Van Ness Avenue in the study area during congested periods, the District would expect a similar disclosure of impact to its operations. It is unclear why no impacts or mitigation measures are identified for GGT. The District requests clarification on this matter."

(Golden Gate Bridge Highway and Transportation District, September 14, 2010) [11-3 TR]

"Impacts TR-l00, TR-107, and TR-112 indicate that significant and unavoidable impacts will occur at the Van Ness/Pine intersection. GGT operates several bus routes through this intersection and is sensitive to increased travel times resulting from additional congestion. Excess congestion can adversely impact GGT operations and ultimately increase operating costs.

Thank you for providing the District with the opportunity to submit comments on the CPMC DEIR. You may contact David Davenport, Associate Planner, at 415.257.4546 if you have any questions regarding these comments."

(Linda Chapman, September 23, 2010) [PC-283 TR]

"Also, on other occasions, it is Highway 101, that is a consideration, too, as well as being the local transit agency is a major street, and for the Golden Gate transit."

Response TR-60

These comments suggest that the Draft EIR should consider how project traffic could affect Golden Gate Transit (GGT) routes on Van Ness Avenue. The transit-delay analysis in the Draft EIR identified transit-delay impacts on several Muni lines as a result of increased traffic along transit routes and because of increased transit ridership. Impacts were identified where the added transit delay would increase transit travel times by more than half of the scheduled headway, resulting in increased operational costs associated with running additional vehicles (as calculated using SFMTA's Muni cost/scheduling mode). Although GGT routes operating along Van Ness Avenue (GGT Routes 10, 70, 73, 93, and 101) would experience similar increases in delay as a result of traffic increases and ridership increases, a transit-delay analysis for these routes was not completed. GGT typically operates its vehicles at much longer headways (e.g., 30–60 minutes) that would not be substantially affected by much smaller increases in delay at relatively few intersections.

Based on the transit-delay analysis that was completed for the Muni routes running along Van Ness Avenue, the increase in vehicle trips on Van Ness Avenue would result in an increase in delay for GGT routes of less than 1 minute in either direction during both the a.m. or p.m. peak hour, and most delay would be incurred during passenger boarding. Assuming that all transit trips to and from the North Bay used one of the GGT routes near the campus, the proposed LRDP would increase delay for GGT vehicles in the peak direction during the peak hour, as shown in C&R Table 3.7-12. However, these increases in travel time delay would not be significant because they would be less than half of the route's headway.

C&R Table 3.7-12 Transit Corridor Delay Analysis—Golden Gate Transit		
	Increase in Travel Time between Modified Baseline No Project and Project Conditions (minutes:seconds)	
Peak Hour	Northbound	Southbound
a.m.	1:24	2:36
p.m.	3:24	0:25
Source: Fehr & Peers 2011		

3.7.6 BICYCLE

3.7.6.1 ST. LUKE'S CAMPUS

Comment

Francis Taylor, October 29, 2010 [117-2 TR]

"The proposed garage will have ramps spilling traffic onto both Cesar Chavez Street and Valencia. Valencia currently has a very busy bike lane, and Cesar Chavez is slated for major bicycle and pedestrian improvements in the next few years, including bike lanes. This garage will endanger more residents that the hospital will serve patients!"

Response TR-61

The comment expresses a concern that the proposed project at St. Luke's Campus will have a parking garage with ingress and egress driveways on Cesar Chavez Street and Valencia Street. Bicycle traffic observed in the area as part of the analysis during the p.m. peak period indicated a much higher amount of bicycle traffic on Valencia Street than Cesar Chavez Street. The analysis completed as part of the Draft EIR assumes that the bike lane improvements identified in the Cesar Chavez Streetscape Improvement Project would be in place by the time the proposed new facilities at St. Luke's, including the proposed parking garage, were operational. As discussed in Impact TR-87 on page 4.5-203 of the Draft EIR, project-generated vehicle trips to this facility would result in increased vehicle/bicycle conflicts on a street that is designed to facilitate bicycle travel. During the p.m. peak hour, more project vehicles would be exiting from the Cesar Chavez Street driveway than the Valencia Street driveway of the MOB. As noted in the document, these conflicts, although greater, would be similar to those that occur at the existing hospital driveways on both Cesar Chavez Street and Valencia Street, and the impact was considered to be less than significant. Although bicycle impacts would be less than significant, the Draft EIR identified Improvement Measure I-TR-87 on Draft EIR page 4.5-204 to further reduce less-than-significant impacts, by requiring pedestrian and bicycle warning signals at the proposed garage exits, warning signage for drivers, and a colored bicycle lane treatment on Cesar Chavez Street near the St. Luke's Campus driveway.

3.7.6.2 BICYCLE PARKING

Comment

(Ryan Bresnick, August 1, 2010) [57-3 TR]

"I am one of a hand full of people who bicycle to work everyday. The hospital seems to give no mind to cyclist, and I think many of us feel marginalized. The only real bicycle parking is the city-mandated spots they put in the parking garage that is over a block away from the main hospital. Posted up around this bike rack are grainy photos of people in the process of stealing employees' bikes. Not a safe spot. There is also a bike rack that you can slide your wheel into close to the main lobby, but this type of bike rack is known as a 'wheel bender', is not secure, and I would never lock my bike up here. Lately, the hospital's proposal has been in the news lately, with congestion being one of the major concerns. I hope you will be able to demand CPMC to create some sort of thought out plan for bicycle accessibility. If CPMC promoted cycling in any way at all, they could easily have a high percentage of employees who cycle to work, lowering congestion considerably. With CPMC's current way of thinking though, I expect the only bike amenities will be the city-mandated spots down in the parking garage. Thank you for taking the time to consider my opinions."

Response TR-62

As part of the proposed CPMC LRDP, CPMC would provide both Class 1 and Class 2 bicycle parking spaces at all of the campuses. CPMC would provide Class 1 facilities for use by employees, which would include a fenced-off secured storage area, and secured bicycle parking rooms. Class 1 bicycle parking includes facilities that protect the entire bicycle, its components, and accessories against theft and against inclement weather, including wind-driven rain. Examples of Class 1 spaces include lockers, check-in facilities, monitored parking, restricted access parking, and personal storage. Class 2 bicycle parking spaces include bicycle racks that permit the rider to lock the bicycle frame and one wheel to the rack and that support the bicycle in a stable position without damage to wheels, frame, or components.

The proposed Cathedral Hill Hospital would have 150 bicycle parking spaces, of which 100 would be for staff in a secured facility, located on Level 1/P1 of the parking garage and accessible from Post Street. At the proposed Cathedral Hill MOB, 62 bicycle parking spaces would be provided, of which 34 would be for staff in a secured facility, on Level 1 of the parking garage and accessible from Cedar Street. Twelve bicycle parking spaces would be provided at the proposed 1375 Sutter MOB.

St. Luke's Campus would provide a secure bicycle room, sufficient to contain space for 20 bicycles in the proposed MOB/Expansion Building and accessible from Valencia Street. Seven bicycle parking spaces would be available in the Campus Plaza between the existing St. Luke's building at 1570 Valencia Street and existing building at 555 San Jose Avenue, and accessible from San Jose Avenue, Cesar Chavez Street, and Valencia Street. The Duncan Street Parking Garage would contain seven bicycle parking spaces, accessible from San Jose Avenue. After construction, the St. Luke's Campus would have a total of 34 bicycle parking spaces.

The Davies Campus currently has 26 bicycle parking spaces, located on Level 1 of the existing Castro Street/14th Street Parking Garage and accessible from Castro Street and Duboce Avenue. Bicycle parking would remain in this location after construction of the Neuroscience Institute. The Neuroscience Institute would provide 25 new bicycle parking spaces in the main plaza by the building's entrance. As the second element of the Davies Campus project, the Castro/14th Street MOB would be a long-term project that would replace the existing parking garage on the campus. This project would be required to replace the existing parking spaces removed when the parking garage was demolished, as well as provide bicycle parking as required by the SF *Planning Code* at the time of its project-level approval by the Planning Department.

The proposed Pacific Campus would be a long-term project and details on bicycle parking would be required at the time that project-level environmental review was conducted. Bicycle parking would be included on site to at least meet the Planning Code requirements, which would be an increase over existing conditions.

3.7.7 Pedestrian Impacts

3.7.7.1 Pedestrian Safety

Comments

(Marvis Phillips—Alliance for a Better District 6, August 6, 2010) [4-4 TR]

“3) Foot traffic going between Pacific outpatient services and Cathedral Hill services esp at the east campus at Geary +Van Ness. Senior + person with disabilities have a tendancy to walk slower than the light is run espe. if that make out the island for the Van Ness line (SFMTA). Senior + persons with disabilities will have no where to stand if caught in the middle of the street.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-43 TR, duplicate comment was provided in 30-43 TR]

“In addition, when pedestrians are walking along Franklin, what safety measures will be in place when the vehicles are going across the sidewalk into the Hospital? People walking northbound on Franklin will have their backs to traffic. With 3 curb cuts on Franklin St., the measures taken to protect pedestrians must be more than just blinking lights and audible signals. The proposed plan to use a fulltime attendant to watch and guide pedestrians in an area that could have a high incidence of pedestrian and vehicular conflict may or may not work.”

(Unitarian Universalist CPMC Task Force, October 5, 2010) [44-9 TR]

“Regarding Traffic, how can there be 152 ‘significant and unavoidable’ traffic impacts listed in the Summary on pages S42 - S57 but no negative effects for pedestrians, especially given the preponderance of senior housing in the area? Already existing traffic problems will be exacerbated by drivers circling for parking and back ups on Franklin Street accommodating the loading dock.”

(Jane Seleznow, October 8, 2010) [48-4 TR]

“Increased traffic will endanger pedestrians and increased siren noise will have a detrimental effect on those of us who live nearby, especially affecting our sleep.

I do not believe the current DEIR adequately addresses all the issues.”

(Merle Easton, October 18, 2010) [66-1 TR, duplicate comment was provided in 73-1b TR])

“Pedestrian safety isn’t even addressed.”

(Rev. Fred Rabidoux—First Unitarian Universalist Church, October 14, 2010) [59-1 TR]

“There are many aspect of the proposed hospital that seem inappropriate to Cathedral Hill, as well as the needs of the city and the existing distribution of health care services. Increase traffic is particularly worrisome, not only for the air pollution, noise, and congestion, but for the immediate personal safety of the many elderly residents.

As Minister of Pastoral Care at the First Unitarian Church, I am acutely aware of the anxieties already suffered by seniors coming to community events at the UU Center on 1187 Franklin Street or simply trying to take care of their local shopping needs.

Residents of Martin Luther Towers must cross four busy intersections on Franklin Street to reach the nearest grocery store, and Sequoia’s residents are already intimidated by the Geary Street traffic and miss out on many events that are only a block away.

Parents picking up children from the House of Montessori and Up On Top have no safe parking zones on the south side of Geary and must manage to get their young children across the street during rush hour traffic. What will happen when this traffic doubles?

Leaving the UU Church and Center is perilous for all of us, as cars driving North on Franklin turn left on Geary while looking at traffic from the right. Our church staff has witnessed both traffic and pedestrian accidents, and many close calls.

The impact of thousands more vehicles daily is distressing. Cathedral hill has many senior housing complexes, schools and churches, but the DEIR does not consider them. If CPMC builds this mega hospital, priority must be given to pedestrian safety. I see no acknowledgement of these issues in the DEIR, and ask for further study and mitigations."

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-21 TR]

"d) The assessment of bicycle and pedestrian impacts are inadequate.

1) The DEIR only looks at the capacity of sidewalks and crosswalks. That ignores the very real interaction between pedestrians and wheeled traffic In 'the vicinity of CPMC facilities, and ignores the reduced mobility of many pedestrian visitors to the sites. For I examples, standard assumptions about how quickly pedestrians can cross a street fail to consider those with disabilities of various sorts.

2) The Pacific Campus' new design calls for high-volume traffic crossings sidewalks at 3 new points, yet the DEIR ignores altogether the likely impact of this change on traffic (lanes blocked while vehicles wait for pedestrians to clear a driveway) and pedestrians, many of whom will be disabled or ill, and who will now have to contend with cars crossing sidewalks frequently. The labor actions that clog CPMC's sidewalks occasionally will only worsen the effects of this new design.

3) Vehicular traffic data is inadequate, and so there is no way to assess the increase or decrease in pedestrian/bicycle/vehicle interactions in the residential and commercial streets covered in the study. Furthermore, there has been no assessment of increased hazardous driver behaviors induced by traffic issues in these streets - yet such behavior changes are readily observable when congestion develops."

(Donald Scherl, October 18, 2010) [74-16 TR]

"Impact TR-42: Proceeding with the project would even create a 'pedestrian hazard ...'"

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-30 TR, duplicate comment was provided in 108-30 TR]

"The DEIR states that the proposed project would have no significant impacts on pedestrians or pedestrian safety, yet the evidence in the DEIR belies those conclusions. The DEIR reveals that:

- Virtually the entire street frontage along Franklin and Post Streets adjacent to the proposed Cathedral Hill Hospital will be used for loading docks: passenger drop-offs, ambulance bays, parking garage entrances, and shuttle drop-offs. A large drive-through extends from Geary Blvd. to Post St.

- The proposed Cathedral Hill MOB proposes to convert virtually its entire Van Ness frontage to a passenger drop-off; extending around the corner to Cedar Street.

The DEIR's conclusion that these obvious conflicts between pedestrians and vehicles create no conflicts or safety hazards is unsupported by any analysis. It is also contrary to the numerous letters sent to the City regarding the number of seniors in the Cathedral Hill area and existing pedestrian hazards. CPMC proposes an underground pedestrian tunnel between its proposed MOB and the Cathedral Hill Hospital. Clearly CPMC itself recognizes that even crossing Van Ness Avenue poses a significant obstacle to pedestrians, made worse by the increasing congestion and traffic created by the proposed Hospital."

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-31 TR, duplicate comment was provided in 108-31 TR]

"This absence of any substantial evidence to support conclusions regarding pedestrian safety and the pedestrian environment is repeated throughout in the analysis of pedestrian impacts at other facilities. For instance, at the Pacific Campus, although street frontage would be converted to a new shuttle stop, new driveway, and new parking garage entrance, the DEIR simply states that there will be no effects on pedestrians, without analysis."

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-39 TR, duplicate comment was provided in 108-39 TR]

"Also, the increases in traffic, loading, noise, and disruptions to the pedestrian environment can all be expected to combine to make the area less desirable for pedestrians, residents, local-serving retail businesses, and nearby churches and schools."

(Margaret Kettunen Zegart, October 20, 2010) [97-6 TR]

"Smaller scale / mass and height of structures with increased setbacks from property lines and Class I bicycle lanes should be added in planning as well as transit pull outs."

(Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-36 TR]

"The DEIR's failure to analyze pedestrian safety impacts in the Tenderloin also disregards provisions of the San Francisco General Plan that promote pedestrian safety and comfort throughout the city.[73] Policy 18.4 discourages high-speed traffic on local streets through calming measures.[74] In accordance with this policy, the Little Saigon Report's proposals include calming measures, one of which is to convert one-way streets to two-way streets. The Little Saigon Report concludes that this change is not likely to increase congestion or cause vehicle delay but would (1) reduce average travel speeds and (2) reduce traffic volume thus making conditions safer for pedestrians.[75] Another proposal calls for additional pedestrian lighting to improve pedestrian conditions by implementing pedestrian street light fixtures as a part of standard street lighting infrastructure.[76] Additionally, the General Plan specifically designates Van Ness Avenue and Hyde Street as parts of the city-wide pedestrian network. A Citywide Pedestrian Network Street is defined as 'an inter-neighborhood connection with citywide significance.'[77] On these streets especially, pedestrian movement is a priority and should not be compromised.[78] Pedestrian safety is too important of an issue to have received such little attention in the DEIR.

[73] General Plan, Transportation Element, Policy 1.2.
[74] General Plan, Transportation Element, Policy 18.4.
[75] Little Saigon Report, at 3-4.
[76] *Id.* at 5-1.
[77] General Plan, Transportation Element, Policy 18.4.
[78] *Id.*"

(Lower Polk Neighbors, October 19, 2010) [103-33 TR, duplicate comment was provided in 113-33 TR]

"**Summary:** Construction of the Cathedral Hill Campus ("CHC") of CPMC represents both a major transition for the Lower Polk Street Neighborhood, which lies immediately east, and a great opportunity for revitalizing and improving the public space network of the area. Given that the campus construction will cause a large disruption to neighborhood life over several years, and that several of the impacts identified in the Draft Environmental Impact Report cannot be mitigated, or will adversely affect pedestrians, cyclists and transit riders regardless of mitigation, the neighborhood requests that the following approach and measures be considered by CPMC as part of its construction plan. We recommend the following as an effective and innovative strategy for learning through interim, iterative design during the initial phase of construction, followed by long-term, permanent improvements to the neighborhood public space network, based on information gained during the interim phase.

"**1) Approach**

a. Two-Phased Approach
We recommend a two-phased approach for implementing public space improvements in the Lower Polk Street area, consisting of "interim" and "long-term" improvements. These two phases should overlap in time, but generally begin immediately with interim improvements, which will be exploratory and temporary/reversible in nature and inform the design of long-term improvements, which will take place over several years during and following completion of the CHC project. Interim improvements should be made with the intent of evolving eventually into long-term, permanent improvements, if successful in the short-term.

b. Escrow account
An escrow account should be set up to fund the various streetscape projects which will take place over the short- and long-term. The escrow account would allow the improvements to stretch out over a longer period than is typically considered for capital projects, and possibly longer than the construction of the CHC itself.

c. Interim improvements
"Interim improvements" can be implemented both during and immediately after the CHC construction project. They would be exploratory in nature, reversible, temporary and/or portable, and aim to physically test various approaches to streetscape improvements through a process of iterative design. Examples of interim improvements include San Francisco's *Pavement To Parks* program pilot projects, the *Market Street Trials* of bicycle, pedestrian and vehicle traffic control changes, and *Park(ing) Day*, which temporarily converts metered parking spaces to parks. Interim improvements would generally not permanently change infrastructure such as curbs, paving materials and utility lines, but rather use portable "add-on" designs that test the functionality of various streetscape designs without committing large amounts of funding.

d. Long-term improvements
"Long-term improvements" should be durable and permanent changes to the streetscape, potentially implicating changes to infrastructure such as curbs, utilities and paving surfaces. Their specific design and approach should be informed by explorations and the iterative design process in the interim improvement phase. They should also be consistent with the goals set out in applicable specific plans and, especially, the *Better Streets Plan*. Long-term improvements would commit larger proportions of funding to new streetscape designs than interim improvements.

e. Scoping Committee
We recommend the formation of a committee to outline the scope of the streetscape improvement project, including the delineation of both the interim and long-term efforts. The group should include representatives of CPMC, the City of San Francisco, the neighborhood and design consultants."

(Lower Polk Neighbors, October 19, 2010) [103-36 TR, duplicate comment was provided in 113-36 TR]

"c. Increased vehicular traffic and congestion

i. The proposed CHC project would add vehicles to the street network and riders to the Muni lines, adversely impacting bicyclists, pedestrians, and transit riders. The increased congestion and ridership would cause operational delays to Muni lines 49-Van Ness-Mission (a.m. and p.m. peak hours), 38/38L-Geary (a.m. and p.m. peak hours), and 19-Polk (p.m. peak hour), requiring additional vehicles to maintain proposed levels of service (4.5-117). Providing additional traffic lanes or otherwise increasing vehicular capacity at this intersection is not feasible because it would require narrowing of sidewalks to deficient widths, and/or demolition of adjacent buildings. Signal timing adjustments may improve intersection operations, but would likely be infeasible due to traffic, transit or pedestrian signal timing requirements (4.5-219). <u>Pedestrians and bicyclists</u>

will experience a more crowded, dangerous and time-consuming transit experience in the Lower Polk area as the CHC project generates more vehicle trips which compete for space and time with other modes of transportation. Even with the proposed mitigation measures, transit riders will also experience "significant and unavoidable" impacts (4.5-124). Therefore we recommend that additional streetscape improvements addressing pedestrian, bicycle and transit rider comfort, convenience and safety are undertaken in the Lower Polk area to offset unavoidable degradations due to the CHC project.

ii. Interim Phase:
   1. Portable bike racks and bike corrals which can be transported around the neighborhood to test the most effective locations
   2. Widen sidewalks into the parking lane using portable sidewalk extensions similar to Pavement to Parks "parklet" trials
   3. Pedi-cab trials for local area
   4. Close alleys to vehicle traffic, create pedestrian zones (delivery traffic excepted, can be restricted to certain times of day)
   5. Test "Shared Street" conditions where sidewalks and street are combined; pedestrians are given priority in all areas of street but automobiles still have access
   6. Bollards to delineate increased pedestrian or transit rider zones.
   7. Raised pavement surface (flush curb) conditions
   8. Wider bike lanes
   9. Pedestrian lighting to create safer/comfortable conditions

iii. Long-term Phase:
   10. Replace street surfaces with special pavement that slows traffic
   11. Relocate curbs to increase sidewalk width, provide bulb-outs, midblock crossing, etc.
   12. Pursue other designs recommended in the Better Streets Plan"

(Lower Polk Neighbors, October 19, 2010) [103-39 TR, duplicate comment was provided in 113-39 TR]

" 3) Site-specific proposals

a. Polk Street
   i. Sidewalk extensions - The sidewalks along Polk are narrow for a Neighborhood Commercial street and do not provide adequate space for a comfortable throughway zone between the frontage zone and the edge zone. The Better Streets Plan sets a sidewalk width recommendation of fifteen feet for Neighborhood Commercial streets. In addition, use of the following sidewalk improvements from the Better Streets Plan would increase the quality of pedestrian life on Polk:
      1. Interim Phase:
         a. Parklet and Walklet installations to explore how an expanded throughway zone affects pedestrian traffic and life on Polk Street
      2. Long-term Phase:
         a. Curb corner extensions at Polk/Geary; Polk/Post; Polk/Sutter; Polk/Bush
         b. Transit bulb outs
         c. Extended and/or midblock bulb outs with landscape design and public seating
   ii. Landscaping - Polk Street at Geary has a low tree density. What trees are there lack the height, foliage, and beauty that make great streets. Polk is located in the Bay climate zone and can therefore accommodate trees up to 50 feet tall.
      1. Interim Phase: installation of moveable planter boxes and Parklets with shrubbery, flowers, and small trees
      2. Long-term Phase:
         a. Propagation of large shade-giving trees
            i. Stormwater treatment landscaping

iii. Bicycle infrastructure
1. Interim Phase:
a. Portable bike racks and corrals
b. Public Pump on Polk (PPonP) to serve bicycle commuters using bicycle Route 16
c. Public bicycle repair station
2. Long-term Phase:
a. Permanent bike racks, corrals based on success of portable versions
b. Trash receptacles – Polk Street is lacking in trash receptacles between Geary Street and Sutter, even though the Better Streets Plan calls for a receptacle every 200 feet in commercial zones
c. Pedestrian-scale street lights

b. Geary Street
i. Interim Phase:
1. Parklets and pocket parks
2. Planter boxes
ii. Long-term Phase:
1. Pedestrian-scale lighting
2. Stormwater treatment landscaping

c. O'Farrell Street
i. Interim Phase:
1. Parklets and pocket parks
2. Planter boxes
ii. Long-term Phase:
1. Pedestrian-scale lighting
2. Stormwater treatment landscaping

d. Post Street
i. Interim Phase:
1. Parklets and pocket parks
2. Planter boxes
ii. Long-term Phase:
1. Pedestrian-scale lighting
2. Stormwater treatment landscaping

e. Sutter Street
i. Interim Phase:
1. Parklets and pocket parks
2. Planter boxes
ii. Long-term Phase:
1. Pedestrian-scale lighting
2. Stormwater treatment landscaping

f. Bush Street
i. Interim Phase:
1. Parklets and pocket parks
2. Planter boxes
ii. Long-term Phase:
1. Pedestrian-scale lighting
2. Stormwater treatment landscaping

g. California Street
i. Interim Phase:
1. Parklets and pocket parks
2. Planter boxes
ii. Long-term Phase:

1. Pedestrian-scale lighting
2. Stormwater treatment landscaping"

(Lower Polk Neighbors, October 19, 2010) [103-40 TR, duplicate comment was provided in 113-40 TR]

"h. Alleyways – the Alleyways in general should receive treatment according to the Better Streets Plan recommendations for Alleys, which would convert them into shared public ways with low traffic speeds, and limited parking, if they are not converted to pedestrian-only walkways.

1. Interim Phase:
   a. Tented multi-purpose community "center" and market area.
   b. Temporary/movable parking lane planters with ornamental and edible plant elements including flowers which attract birds, butterflies, and honeybees.
   c. Parklets.
   d. High density bicycle parking racks.
   e. Flexible seating.
   f. Bird, pollinator and bat nesting installations.
   g. Large mobile planters that can be moved with trucks, providing lawn or ornamental garden areas.
   h. Potentially portable food garden containers, given appropriate sunlight, protection and security.
   i. Pop-up retail providing amenities to attract users to alleys, including coffee, lunch food, etc.
2. Long-term Phase:
   a. Trees and green sidewalks.
   b. Curb corner bulb outs at intersections with Geary and Polk Streets.
   c. More lighting and more pedestrian-scale lighting.
   d. Pollinating animal gardens, edible landscaping including fruit trees."

(Paul Wermer, September 23, 2010) [PC-262 TR]

"The assessment of the bicycle and pedestrian impacts is inadequate. It looks at how pedestrians fit on the sidewalk, it doesn't look at the vehicle interaction with the pedestrians – it is a big deal."

(Commissioner Moore, September 23, 2010) [PC-369 TR]

"Given that we have short blocks, I believe that if CPMC is not getting that tunnel underneath a state highway, which is a very difficult thing to do, and the EIR does not make a commitment that will occur, given the short blocks that we are creating, other impacts with people on foot moving across a rather difficult street relative to movement of traffic and people needing to cross, I think that particular analysis is not adequately addressed."

Response TR-63

The comments state concerns regarding pedestrian safety in the vicinity of the proposed Cathedral Hill Campus and other campuses, and the adequacy of the pedestrian analysis included in the Draft EIR. The pedestrian impact analysis included in the Draft EIR assessed the projected increase in pedestrian, transit, bicycle, and vehicle trips associated with the proposed Cathedral Hill Campus within the existing transportation network, and also considered the proposed improvements that would be part of the proposed LRDP. The impact analysis identified additional improvements that would further enhance pedestrian and bicycle conditions in the Cathedral Hill Campus vicinity. Therefore, the analysis adequately considers the anticipated interaction between pedestrians, bicyclists, and vehicles. The increase in pedestrian trips at nearby intersections are presented on pages 4.5-133 and 4.5-134 of the Draft EIR, and traffic volume data is provided on pages 4.5-94 and 4.5-95 of the Draft EIR.

As described in the Cathedral Hill Campus pedestrian impact analysis on pages 4.5-130 to 4.5-132 in the Draft EIR, the proposed Cathedral Hill Campus would include the following improvements to sidewalks in the vicinity of the campus:

- Along Van Ness Avenue, sidewalks would be widened into the adjacent parking lane. On the west side of Van Ness Avenue, sidewalks would be widened from 16 feet to 22–24 feet.
- Along Geary Boulevard between Van Ness Avenue and Franklin Street, sidewalks would be widened into the adjacent parking lane to 19 feet in width for approximately 130 feet west of the intersection of Geary Boulevard with Van Ness Avenue. This widening would accommodate the proposed bus stop that would be relocated from the east side of Van Ness Avenue.
- Along Geary Street between Van Ness Avenue and Polk Street, sidewalks would be widened into the parking lane to 12 feet because the existing midblock bus stop would be removed, and the sidewalk on this portion of Geary Street would be a uniform 12 feet in width.
- Along Post Street between Van Ness Avenue and Franklin Street, the sidewalk would be widened into the adjacent parking lane, from 10 feet to 17 feet.
- At the intersection of Cedar Street with Van Ness Avenue and with Polk Street, a raised crosswalk, creating a level street crossing, would be provided to facilitate pedestrian crossings, increase driver visibility of pedestrians, and reduce vehicle speeds across the crosswalk.

These improvements were developed as part of an extensive public outreach process to community groups and public agencies, including those shown in C&R Figure 3.7-2. These improvements were developed to facilitate pedestrian travel, including reducing pedestrian-vehicle conflicts at intersections, consistent with policies contained in San Francisco's *Better Streets Plan* and *General Plan*. The proposed improvements support, and do not conflict with, designation in the General Plan of Van Ness Avenue as a Citywide Pedestrian Network Street. Provision of Class I off-street bicycle paths adjacent to the project site, as suggested, would not be appropriate as they would not connect with any existing or planned bicycle routes identified in the San Francisco Bicycle Plan and would reduce the sidewalk area available to pedestrians. Bicycle lanes (Class II facilities) are provided on Polk Street for Bike Route 25, and Sutter and Post Streets are designated as Class III (signed routes only) bicycle facilities (Bike Route 16).

As part of the proposed Cathedral Hill Campus, a pedestrian tunnel under Van Ness Avenue would be constructed between the proposed hospital and MOB. The process for review and approval of the pedestrian tunnel within the Caltrans right-of-way is underway. In January 2011, CPMC and Caltrans concluded a formal Highway Improvement agreement, which laid out the terms of Caltrans review and oversight of the design and approval process. CPMC has retained an engineering firm to prepare a Project Report/Project Study Report consistent with Caltrans requirements which would contain all of the rationale and engineering for the proposed tunnel project. The purpose of the proposed pedestrian tunnel under Van Ness Avenue is to provide a convenient internal connection between the proposed hospital and MOB. The Van Ness pedestrian tunnel is not proposed because the surface street crossing of Van Ness Avenue represents a significant obstacle to pedestrians. The tunnel is anticipated to be used by patients, visitors, physicians, and CPMC staff members, allowing them a direct connection between the two buildings. It would also be used for the movement of records, equipment and materials.

As part of the improvements at Polk Street, one parking space on Polk Street directly north of Cedar Street would be eliminated, and a sidewalk extension would be constructed to improve sight distance and reduce the potential for bicycle-vehicle conflicts. In addition, as part of Improvement Measure I-TR-40, the project sponsor could provide funding for the study and possible implementation of additional streetscape, pedestrian, and related improvements in the vicinity of the proposed LRDP campuses that would improve the less-than-significant impacts to the pedestrian and bicycle environment.

Workshop Attendees

Workshop #1 – Design Professionals
May 21, 2009

David Baker, David Baker & Partners Architects – Design Professional
John Bela, Rebar Group – Design Professional

Workshop #2 – Design Professionals
June 15, 2009

Ron Case, Case & Abst Architects – Design Professional
Carolyn Abst, Case & Abst Architects – Design Professional
Merle Easton, Unitarian Church – Design Professional
Peter Winkelstein, Design Professional
Madeleine Zayas-Mart, Solomon etc WRT, Design Professional

Workshop #3 – City Agencies
June 17, 2009

Elizabeth Watty, SF Planning
Scott, Mayor's Office
Joshua Switzey, SF Planning
Andres Power, SF Planning
Rachel Hiatt, San Francisco Transportation Authority
Zabe Bent, San Francisco Transportation Authority
Paul Bignardi, SFMTA
Nick Carr, SFMTA – Planning
Astrid Haryati, Mayor's Office

Workshop #4 – City Agencies
July 22, 2009

Joshua Switzky, SF Planning
Colin Burgett, Fehr & Peers
Christine Fitzgerald, Fehr & Peers
Greg Riessen, Planning MEA
Ron Miguel, Planning and Commission
John Kwong, SF DPW
Yatman Kwan, Caltrans
Paul Bignardi, SFMTA
Rachel Hiatt, SFCTA
Sophie Hayward, SF Planning
Elizabeth Watty, SF Planning
Devyani Jain, SF Planning

Workshop #5 - Neighbors
August 5, 2009

Shawn Houghtaling, Walgreens
Helene Dellanini, Daniel Burnham Court
Melinda LaValle, Daniel Burnham Court
Roland Andersen, Daniel Burnham Court
Frank Baldanzi, Daniel Burnham Court
Jon Cosner
Ron Case, Lower Polk Neighbors
Nick Mironov, Gayner Engineers
Henry Johns, Concordia Argonaut
Wallace Cleland, Unitarian Universalist Society
Alan Wofsy, Emeric Goodman Building
Derrick Chang, Van Ness Post Center, LLC
Joseph Fang, Van Ness Post Center, LLC
Maria Fang, Van Ness Post Center, LLC
Judith Mana, Emeric Goodman Building

Workshop #6 – City Agencies
August 24, 2009

Jerry Robbins, SFMTA
Rachel Hiatt, SFCTA
John Kwong, DPW
Colin Burgett, Fehr and Peers
Christine Fitzgerald, Fehr and Peers
Devyani Jani, Planning MEA
Greg Riessen, Planning MEA
Yatman Kwan, Caltrans – Planning
Paul Bignardi, SFMTA

Workshop #7 – City Agencies
September 23, 2009

Rachel Hiatt, SFCTA
Eric Womeldorff, Fehr and Peers
Robert Eckols, Fehr and Peers
Greg Riessen, SF Planning
Joshua Switzky, SF Planning
Anh Nguyen, Caltrans
Paul Bignardi, SFMTA

Source: CPMC; SmithGroup, 2010

Cathedral Hill Streetscape Workshops Held & Attendees **C&R Figure 3.7-2**

05235.020.1916519v35235.020.1916519v25235.020.1916519v1

Although these pedestrian improvements would facilitate travel for all users on the sidewalk, additional improvements to accommodate senior citizens and people with disabilities could be implemented by SFMTA. Some pedestrian improvements along Van Ness Avenue would occur with the Van Ness BRT project. Senior citizens and people with disabilities face challenges at intersections with multiple travel lanes, especially on streets where median refuges are not available. On Van Ness Avenue, the existing median provides refuge for pedestrians with slower walking speeds than the standard the signal timing allows. Seniors and persons with disabilities would be able to cross one direction of traffic and could remain on the median within a safe zone while waiting for the next signal for pedestrians. Recent installations of pedestrian countdown signals throughout San Francisco have improved pedestrian crossings by providing pedestrians with an indication of the available time at the start of the green signal phase.

Any such signal timing modifications would affect traffic and bus operations at the intersections by reducing green time available for vehicles (e.g., because of a leading pedestrian interval) or by redistributing green time from one approach to another to accommodate the extended minimum green times, and would need to be approved by SFMTA. Other design solutions similar to the special signage that school zones receive (as part of SFMTA's School Area Safety Program) could assist senior citizens and people with disabilities by calling drivers' attention to their presence. Determination of the need and extent of changes in signal timing or other improvements would be conducted and implemented by SFMTA as part of the agency's Livable Streets Program. A substantial number of patients and visitors are not anticipated to walk between the Pacific Campus and the proposed Cathedral Hill Campus, as the campus sites are located about a mile apart and a shuttle service would be provided. For those pedestrians that do choose to walk between the sites, adequate pedestrian facilities would connect the two campuses.

See Response TR-63 (page C&R 3.7-110) regarding pedestrian conditions in the Tenderloin-Little Saigon neighborhood.

Impact TR-40, beginning on page 4.5-130 in the Draft EIR, presents the pedestrian impact assessment for the proposed Cathedral Hill Campus. Based on the impacts assessment of the proposed Cathedral Hill Campus project on the pedestrian environment, the project would not result in substantial overcrowding on sidewalks or crosswalks, or result in hazardous conditions. In general, the addition of pedestrians, vehicles, and bicycles to the roadway network would result in increased conflicts; however, it would not result in significant safety impacts or result in increased hazardous driver behavior.

Impact TR-42, beginning on page 4.5-135 of the Draft EIR, identifies a significant pedestrian hazard impact for the for the MOB Access Variant at the proposed Cathedral Hill Campus. The MOB Access Variant would reconfigure the proposed Cathedral Hill MOB access driveway on Geary Street to permit both ingress and egress. The proposed LRDP would provide MOB garage egress onto Cedar Street only, and therefore would not result in this pedestrian hazard condition.

Convenient and properly placed passenger zones are essential components of medical facilities to support patients and visitors, and to ensure pedestrian safety. Passenger zones provide a protected place for passengers to get into and out of vehicles. The passenger zones for the proposed Cathedral Hill Campus were located and designed with input from SFMTA to address safety concerns. The Van Ness Avenue passenger zone would be within the existing recessed bay and would support taxis so that vehicles would not double park on Van Ness Avenue or Geary Street. The hospital drive-through would take the passenger loading function out of the public right-of-way and reduce pedestrian-vehicle conflicts. The functions associated with the Emergency Department and loading were placed on Franklin Street because this street would have lower pedestrian volumes than other streets and would minimize conflicts with pedestrians. Driveways and loading facilities are expected in urban areas and, therefore, they would not represent unusual conflicts or unsafe conditions. The loading facilities at the Cathedral Hill Hospital would be actively managed and most deliveries would occur during non-peak periods. Pedestrians walking northbound on Franklin Street would be able to see vehicles exiting the project site as they approached the driveway. Because of the relatively low volume of trips to and from the driveways on Franklin Street, additional measures are not recommended or required. Impacts of increased noise in the vicinity of the proposed Cathedral Hill Campus are discussed in Impact NO-2 on pages 4.6-57 and 4.6-68 in the Draft EIR. The use of emergency sirens, horns, and lights could cause a temporary elevation of ambient noise levels on an intermittent basis at nearby noise-sensitive land uses. See Response NO-59 (page C&R 3.8-64) regarding noise impacts related to emergency response vehicles.

Comments 103-33, 103-36, 103-39, and 103-40 provide suggestions for public realm improvements both directly adjacent Cathedral Hill Campus and the surrounding neighborhood. As previously mentioned at the beginning of this response, the Project Sponsor has developed a set of improvements to the public realm in the vicinity of the campus as part of an extensive public outreach process to community groups and public agencies. While not linked to specific impacts caused by the Proposed Project (see discussion of Impact TR-40 on previous page and in Response TR-64, below) or conditions changed by the Proposed Project, potential improvements the City could implement include additional streetscape elements or amenities in and around Polk Street and the Tenderloin neighborhood to improve upon pedestrian safety (including considering more pedestrian lighting, bulbouts, and pavement treatments), and calm traffic, and other suggestions may be considered by the City as funding sources, typically grants, are identified.

Comment 59-1 describes an existing condition wherein parents or guardians picking up children on Geary Boulevard from the House of Montessori School or the Up On Top afterschool program must cross with their children to/from the north side of Geary Boulevard during the p.m. peak period due to the hour restrictions on the two existing passenger loading areas near the school**.** Operating hours of the Montessori School are from 9 a.m. to 3 p.m., with an afternoon daycare program from 2:30 p.m. to 6:00 p.m., so a majority of the passenger drop-off/pick-up activity related to the school would be anticipated to be able to use existing passenger zones (36 feet on the west side of Franklin Street, 36 feet on Geary Boulevard, plus a small (1 space) inset area on Geary Boulevard when they are available during off-peak hours. However, the commenter is correct that these zones and passenger zones on the north side of the Geary Boulevard are restricted (tow-away zones) during the p.m. peak period (4 p.m.–6 p.m.). Observations indicate that some traffic still attempts to use these zones during p.m. peak hour restrictions, a traffic violation, causing a hazardous traffic condition.

The commenter also suggests the traffic following the CPMC LRDP would potentially double on Geary Boulevard and Franklin Street. Traffic generated by the Cathedral Hill Campus will contribute 4 percent and 3 percent to the westbound traffic on Geary Boulevard during the p.m. peak hour under the Modified Baseline and Cumulative scenarios, respectively. Additionally, assuming the Cathedral Hill Campus is constructed and occupied under the Modified Baseline (year 2015) and Cumulative (year 2030) scenarios, the Geary Boulevard westbound approach at Franklin Street is expected to increase in total by 48 vehicles per peak hour (from 996 to 1044 vehicles) between existing conditions and year 2015 and by 211 vehicles per peak hour (from 1044 to 1255 vehicles) between year 2015 and year 2030. This represents a total growth increase in westbound traffic of 5 percent and 20 percent, respectively, not a doubling, as the comment suggests.

Since it is unlikely that the p.m. peak hour tow-away lanes along Geary Boulevard and Franklin Street would be altered to address the commenter's concern, the school and afterschool program, could request that SFMTA install signage to advise motorists that children are present in order to alert drivers to this condition, such as "watch for children" or "children crossing" traffic safety signs. However, this is an existing condition that is part of the baseline for the project, and the Draft EIR concluded that the project's impact on pedestrians, including at the intersection in question (Franklin/Geary), would be less than significant.

Although the project's impact on pedestrians was found to be less than significant at this (Franklin Street/Geary Boulevard) intersection, as part of I-TR-40, the project would improve the pedestrian crossing at this intersection by installing pedestrian countdown signals.

Comment 67-21 states the vehicular traffic data contained in the draft EIR is inadequate. As part of the transportation impact analysis, traffic data was collected at each campus and at 70+ intersections for the LRDP campus areas. This data collection effort included observations of the existing vehicle/pedestrian interactions on each campus and at each study intersection. The study was thus quantitative in nature, as it accounted for not only the growth in traffic generated by each campus, but also the increase in background traffic between the existing condition and the years 2015 and 2030. As such, the analysis contained sufficient data to inform the analysis and determine project- related impacts in the Draft EIR. See Response TR-49 (page C&R 3.7-73) for a discussion of drivers responsibility to obey traffic laws.

See Response AE-4 (page C&R 3.4-7) regarding the level of massing and height of structures that currently exists in the project area and how implementation of the proposed CPMC LRDP would result in the development of similarly scaled structures. As such, the need to provide smaller scale/mass and height of structures with increased setbacks is not considered necessary to reduce aesthetic impacts to less than significance. Also, as noted above, adjacent to the proposed Cathedral Hill Hospital and MOB, the sidewalks would be widened along Van Ness Avenue and Geary Street/Boulevard.

At the Pacific Campus, the overall number of pedestrians and vehicle trips destined to and from the campus on a daily basis would decrease once the acute-care hospital and related uses were relocated to the proposed Cathedral Hill Campus. As indicated in Table 4.5-10 on page 4.5-76 of the Draft EIR, on a daily basis about 4,700 fewer person-trips would be generated by Pacific Campus LRDP uses. However, during the p.m. peak hour, the number of pedestrian and vehicle trips would increase slightly over existing conditions, to about 27 more walk trips and 71 more vehicle trips. The Pacific Campus proposed design addresses the inadequate existing parking supply, which results in patients and visitors circling in the vicinity trying to locate on-street parking (which is metered or subject to residential permit parking restrictions) and walking to CPMC facilities. The proposed provision of on-site parking to meet the demand and the proposed internal passenger loading/unloading within the new North-of-Clay Parking Garage would reduce the bicycle-vehicle and pedestrian-vehicle conflicts at nearby intersections that are associated with vehicles circling around the campus looking for parking and patients and visitors walking from those parking spaces. Although the number of vehicles crossing the sidewalk would increase at some locations, overall, the pedestrian and vehicle trips would be reduced. The labor actions referenced in one of the comments refers to picketing activity that has occasionally taken place. Future activity of this type, if any, would likely be similar, occurring occasionally and not on a daily basis, and would not worsen with implementation of the proposed LRDP.

3.7.7.2 Tenderloin–Little Saigon Neighborhood Conditions

Comments

(Bobbi Lopez—La Voz Latina, September 23, 2010) [20-3 TR]

"Latino families often walk around the neighborhood, often to drop their children to and from school or at afterschool programs. The Tenderloin is one of the most dangerous neighborhoods for pedestrian safety and in our survey, 86% felt unsafe crossing the streets in the area. Upon hearing that the CPMC project would bring tens of thousands more cars to the neighborhood, these are some of the reactions: 'this will make it more dangerous for us; we need more count-downs; this is not good to hear; this will bring more pollution; We deserve to feel safe with our children and they need to realize the affect this will have on us; where are they gonna put all these cars?; and this is a problem for the neighborhood.'"

(Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-34 TR]

"**1. The DEIR fails to adequately assess what impact increased traffic through the Tenderloin poses on pedestrian safety.**

The Tenderloin has the lowest car ownership rate in San Francisco at 18%.[64] Tenderloin residents are a transit-dependent population who must walk to access public transit. Consequently, safe pedestrian conditions are especially important to residents. Even now, without a voluminous hospital facility in the vicinity of the Tenderloin, the neighborhood has hazardous traffic-and pedestrian conditions. The streets of the Tenderloin are currently designed to move large volumes of traffic going through the Tenderloin.[65] These multi-lane, one-way arterials cause drivers to speed and make careless turn movements. As a result, pedestrian accident rates are six times higher in the Tenderloin then in San Francisco at large.[66] In the 'Downtown/Civic Center' area which includes the Tenderloin, there were 519 pedestrian injuries or deaths between 2004 and 2008.[67] In addition, the Little Saigon report found that pedestrian accident rates were especially high at Market Street intersections and the intersection of McAllister, and, Leavenworth Streets.[68] This analysis was not provided in the DEIR. These statistics are particularly disconcerting due to the fact that approximately 3,500 children reside in the Tenderloin.[69] The DEIR does not recognize, analyze, or discuss how the project proposal will magnify the already hazardous pedestrian conditions in the Tenderloin.

64 Little Saigon Report, at 3-2.
65 *Id*. at 3-4.
66 *Id*. at 3-3.
67 San Francisco Dep't of Public Health, *Number and Rate of Pedestrian Injuries,* Available http://www.thehdmt.org/indicators/view/56.
68 Little Saigon Report, at 3-3.
69 Tenderloin Neighborhood Development Corp., Fact Sheet, Available http://www.tndc.org/home/fact_sheet.html."

(Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-35 TR]

"The DEIR Transportation and Circulation section does address the need to examine potential .conflicts between pedestrians and vehicles.[70] The DEIR states, '[t]he project would have a significant effect on the environment if it' among other things would 'create potentially hazardous conditions for pedestrians....'[71] However, it carries out its analysis within too narrow a geographic frame. As a result, the DEIR incorrectly and sweepingly concludes that because an additional 600 hospital-related pedestrian trips during each of the peak hours time frames 'would not result in substantial overcrowding on the sidewalks and crosswalks, or result in hazardous conditions, the project's impact on pedestrians would be less than significant.'[72] What also needs to be examined is the extent to which additional traffic from CPMC Cathedral Hill Campus' staff, patients and visitors will exacerbate already hazardous pedestrian conditions in the Tenderloin.

70 Transportation Impact Analysis Guidelines, at 14.
71 *Id*. at 54.
72 *Id*. at 2."

(Sister Elaine Jones, September 23, 2010) [PC-27 TR]

"Good afternoon. My name is Sister Elaine Jones and I live in the Tenderloin. I am here to let you guys know that my husband and I, Mr. Arthritis and I, have a very hard time getting across streets. I was coming down Van Ness to take the 47 Bus, it took me 65 seconds to get across the street, and then this guy decides he wanted, because he saw a parking space, he wanted to cut in front of me, almost killing me just to get this parking space, I mean, it is based on common sense, the seniors in that area, it takes time to get across the street. The common sense, the impact on these seniors, it is not going to help us, it's gonna make it worse. We're going to end up isolating because we can't get out of our rooms to go down the street because we're in fear of our lives."

(Erin Chin, September 23, 2010) [PC-71 TR]

"Despite this fact, there is only one local elementary school and no middle or high school in the neighborhood. What this means is a large number of our children must travel in and out of the neighborhood daily, usually using mass transit or on foot, so when I was listening to some of the seniors talking about their concerns with traffic in the neighborhood and getting across the street, as somebody who has tried to cross the street with 30 kind of ditzy five-year-olds, it's a huge concern for safety in the neighborhood."

(Peggy Lindrod, September 23, 2010) [PC-100 TR]

"I also want to say that I've been here for a year in San Francisco, and even I know, and I pretty much haven't drove in it, that it's the compact that they are going to take Geary and Larkin every time, and during the commute hour, it's very congested, and when you go from a one-way street on Larkin and you turn on Geary to go towards Van Ness, usually when you're ready to cross the street, the cars – people in the cars are going to use that as their corner, as a right-hand turn, they will not stop. So, I think it would cause a problem and it would take in consideration, I guess, the studies of this neighborhood traffic safety report that was done because it also implement maybe having more crosswalks with actually numbers going across because some of it in those areas do not, they just turn green, or just turn red, and some of the streets that they are not projecting, but they will go on, and the second thing, create more of a barrier to the space on the sidewalk so that the residents will have more space because we do have a lot of residents that are handicapped, that have wheelchairs, so all that can be in consideration, and I don't think that anyone will necessarily site a hospital coming in,"

(Margarita Mena, September 23, 2010) [PC-113 TR]

"Buenos Tardes. [Spanish] TRANSLATOR: Good afternoon, my name is Margarita and I live in the Tenderloin. I am a mother. I know that you guys are here because you are talking about building a hospital, but I just want to share some of my concerns. A lot of us live in the area and we walk in that area that you are talking about, and I am really concerned about the danger that is going to happen for our children because we walk in that area. My biggest concern, of course, is the fact that because we walk in the area, you know, it is already dangerous to begin with. What are we going to do about the traffic situation?"

(Catalina Dean, September 23, 2010) [PC-155 TR]

"Good day, my name is Catalina Dean. And I would like to I guess jut recap because everything that everybody has said has already been said, so the first gentleman that spoke, he thanked this Board for being here. I know some of you members because I have worked with some of you, and I guess what I'm trying to say is that I can only tell you what my experience is."

(Catalina Dean, September 23, 2010) [PC-156 TR]

"I live here in the Tenderloin and my last experience was very horrible. I took a real giant scream over somebody who, when I was trying to cross the street when it said "Walk," he almost ran me over, and the thing that saddened me the most is he was an older gentleman like I was, and he grabbed his head like this. I felt his sorrow of almost running me over, and I felt my heart pounding, thinking I was going to be under that car."

(Barbara [Unidentified Last Name], September 23, 2010) [PC-269 TR]

"But the other thing that really came across, which really talked to the EIR, is the traffic and the contamination issue. I know that before you have been a million and one pedestrian reports, in the Tenderloin, it is one of the most dangerous pedestrian areas to walk through, it is also the highest density of children, and so, for us, it is very disconcerting to see that we're going to have another 10-20,000 more cars coming through the neighborhood where we already have one of the highest pedestrian deaths, and you know, I had a family years ago where the child was killed, two-years-old, and so it's something that affects us when we work in the community, we see our families get hit by cars, and I've got to tell you, the traffic thing is a very serious issue, as is the pollution, the construction. Again, the map that is one of the packages shows that a lot of our families live on the block at Larkin and Geary, how is that construction going to handle it?”

Response TR-64

The comments state that the Draft EIR fails to adequately analyze the impacts of the proposed Cathedral Hill Campus project on pedestrian conditions in the Tenderloin-Little Saigon neighborhood and identifies existing pedestrian concerns in the Tenderloin-Little Saigon neighborhood. The issues associated with travel within the Tenderloin-Little Saigon neighborhood have been assessed by the San Francisco Transportation Authority and documented in the *Tenderloin-Little Saigon Neighborhood Transportation Plan*.[20] The comments refer to this transportation plan and additional information in the comments underscores existing concerns related to pedestrian safety in the Tenderloin-Little Saigon neighborhood. The *Tenderloin-Little Saigon Neighborhood Transportation Plan* identified transportation needs related to improved pedestrian safety, improved public transit service reliability and accessibility, and reductions in vehicular travel speeds through the neighborhood.

Through a process involving both community outreach and technical analysis, the *Tenderloin-Little Saigon Neighborhood Transportation Plan* identified a number of priority improvements and actions. Some specific improvements and actions proposed in this transportation plan include:

- Improve pedestrian safety: Construct intersection bulb-outs to reduce crossing distances, make crosswalks more visible with improved markings, install red light runner cameras to reduce travel speeds, install pedestrian countdown signals at intersections, and install on-street Class II (separate bicycle lane) or Class III (within travel lane) bicycle lanes when possible.

- Calm traffic: Narrow travel lanes, install designated bicycle or bus-only lanes, convert one-way streets to two-way streets, retime signal progressions to reduce average vehicle travel speeds, reduce the number of overall travel lanes, and plant trees at uniform distances within the parking lane (four per block).

- Improve public transit service: Install bus bulb-outs to decrease bus reentry times and improve reliability, add colored pavement for Geary Street and O’Farrell Street bus-only lanes, alter the street circulation network (one-way to two-way streets) to consolidate bus routes, and upgrade and improve bus stops.

- Enhance the streetscape: Install pedestrian-scale sidewalk lighting, widen sidewalks, plant trees at uniform distances within the parking lane (four per block), and install pedestrian-scale directional signs to improve wayfinding.

Since publication of the Tenderloin-Little Saigon Neighborhood Transportation Plan in 2007, a number of improvements have been implemented (e.g., corner bulb-out at the intersection of McAllister/Jones, and sidewalk extension on C J Brenham Place), several improvements are currently under construction (e.g., sidewalk bulbs at Ellis/Hyde, Eddy/Hyde, Ellis/Mason, and Eddy/Jones, and road diets on Eddy and Ellis Streets), and funding for additional improvements is being pursued. In response to comments on the Draft EIR, additional analysis was conducted to clarify the impact of the proposed Cathedral Hill Campus project on traffic, bicycle, and pedestrian conditions at additional intersections in the Tenderloin-Little Saigon neighborhood, and to conduct a sensitivity analysis of the transportation impacts if a higher percentage of motorists traveling to the Cathedral Hill Campus were to travel through the South of Market and the Tenderloin neighborhoods, rather than the routes assumed in the Draft EIR. The assessment is documented in the technical memorandum included as C&R Appendix E: *Supplemental-Sensitivity*

[20] SFCTA, 2007 (March), Tenderloin-Little Saigon Neighborhood Transportation Plan Final Report.

Transportation Impact Analysis for the CPMC Cathedral Hill Campus in San Francisco[21] and is also addressed in Responses TR-124 (page C&R 3.4-207) and TR-125 (page C&R 3.4-214).

Pedestrian trips associated with the proposed Cathedral Hill Campus would generally be limited to the area in the immediate vicinity of the campus, with the exception of walk trips between the new facility and residences in adjacent neighborhoods. Pedestrian trips would primarily be along Van Ness Avenue, Geary Street, Polk Street, and Post Street, and would primarily include trips to and from the nearby public transit stops; however, they would also include trips to nearby restaurants, parking facilities, and other area businesses. Because of the area topography, a substantial number of pedestrian trips that would include pedestrians walking through the Tenderloin-Little Saigon neighborhood are not anticipated to be generated by the proposed Cathedral Hill Campus project.

The discussion on page 4.5-132 in the Draft EIR presents the pedestrian volumes generated by the proposed Cathedral Hill Campus project. During the a.m. peak hour, the project would add about 694 new pedestrian trips—an increase of 108 walk trips, and 586 trips that would account for walk trips to and from public transit stops. During the p.m. peak hour, the project would add about 660 new pedestrian trips—an increase of 107 walk trips and 553 walk trips to public transit stops. The proposed Cathedral Hill Campus project would result in increased traffic volumes as drivers traveled through the Tenderloin-Little Saigon neighborhood to and from the campus.

The increase in traffic volumes at the supplemental study intersections and the percent contribution to the total traffic volumes are documented in the technical memorandum *Supplemental-Sensitivity Transportation Impact Analysis for the CPMC Cathedral Hill Campus in San Francisco* and further discussed in C&R Response TR-124 (page C&R 3.4-207). Based on the supplemental analysis, the number of Cathedral Hill Campus project-generated vehicles at the Tenderloin-Little Saigon Report study intersections would range between five and 31 vehicles during the a.m. peak hour, and between two and 77 vehicles during the p.m. peak hour. The greatest number of CPMC-related vehicles would be on Polk Street. At intersections along Market Street at Ninth/Larkin and Seventh Street, an additional 10 to 14 vehicles would travel in the a.m. peak hour, and three to four vehicles in the p.m. peak hour. At the intersection of Leavenworth/Geary, an additional 31 vehicles would travel in the a.m. peak hour and six vehicles in the p.m. peak hour.

Similar to the conclusion in Impact TR-40 on page 4.5-130 of the Draft EIR, the supplemental and sensitivity analysis found that the proposed Cathedral Hill Campus project impacts on bicyclists and pedestrians would be less than significant. In general, under the supplemental analysis, the Cathedral Hill Campus would increase vehicle trips through the supplemental study area, which could increase the number of conflicts between vehicles, pedestrians, and bicyclists; however, this increase would not be substantial enough to result in significant impacts. Continued implementation of the recommendations included in the *Tenderloin-Little Saigon Neighborhood Transportation Plan*, and additional improvements such as curb extensions, leading pedestrian intervals, installation or increased all-red phases, and high-visibility crosswalks by SFDPW and SFMTA would serve to alleviate the existing deficiencies identified in the comments and enhance safety in this neighborhood. Although impacts on the pedestrian (Impact TR-40 identified in the Draft EIR) and bicycle environment were determined to remain less than significant, the project sponsor has agreed as part of the development agreement negotiations to provide certain funding for the study and possible implementation of additional streetscape, pedestrian, and related improvements in the vicinity of the proposed Cathedral Hill Campus, beyond what is being done immediately adjacent to the project site as part of the proposed project, that would improve the less-than-significant impacts to the pedestrian and bicycle environment. Improvements would be consistent with those identified in the Little Saigon Report as well as other potential sidewalk improvements such as bulb-outs, lighting and pedestrian signal modifications, advance stop bars, right

[21] Fehr and Peers, 2011 (April 27), Supplemental-Sensitivity Transportation Impact Analyses for the California Pacific Medical Center Cathedral Hill Campus in San Francisco, CA.

turn vehicle turn restrictions and other safety facilities, at such intersections as Polk Street/Ellis Street, Larkin Street/Geary Street, Larkin Street/Grove Street, Larkin Street/9th Street, Hyde Street/O'Farrell Street, and Leavenworth Street/Geary Street. Funding would allow City agencies, including the San Francisco Planning Department, SFMTA, and DPW, to conduct additional investigations, analyze and possibly implement these or other similar improvements.

Improvement Measure I-TR-40 on page 4.5-134 of the Draft EIR has been revised as follows:

Improvement Measure I-TR-40 Pedestrian Improvements

As an improvement measure to facilitate pedestrian movements, SFMTA should install pedestrian countdown signals for all directions at the signalized intersections of Franklin/Sutter, Franklin/Post, Franklin/Geary, Van Ness/Sutter, Van Ness/Post, and Polk/Post.

<u>In addition to the above, although the project would have less than significant impacts on the pedestrian and bicycle environment, the project sponsor has agreed as part of the development agreement negotiations to provide certain funding for City agencies, including Planning, SFMTA, and DPW to study and possibly implement additional streetscape, pedestrian, and related improvements in the vicinity of the proposed Cathedral Hill Campus that would improve the less-than-significant impacts to the pedestrian and bicycle environment. Improvements under consideration by the City would be consistent with those identified in the Little Saigon Report as well as other potential sidewalk improvements such as bulb-outs, lighting and pedestrian signal modifications, advance stop bars, right turn vehicle turn restrictions and other safety facilities, at such intersections as Polk Street/Ellis Street, Larkin Street /Geary Street, Larkin Street /Grove Street, Larkin Street /9th Street, Hyde Street /O'Farrell Street, and Leavenworth Street/Geary Street. The City would have sole authority to determine whether to proceed with the Tenderloin and Little Saigon neighborhood area improvements and to issue required permits and authorizations. The City would also retain the discretion to modify or select feasible alternatives to the improvements to avoid any identified impacts or concerns that arise in connection with their further review, including any required environmental review under CEQA.</u>

Also see Response AQ-22 (page C&R 3.9-61) regarding the public health effects of air quality impacts related to the proposed project, and Response TR-63 (page C&R 3.7-110) above, related to the safety of senior citizens and people with disabilities at intersections. In addition, CPMC and the City have been in negotiations regarding the terms and conditions of a development agreement, that would, among other things, provide certain assurances and benefits, subject to the terms and conditions of the development agreement, with respect to the delivery of health care services. Please see Section 3.23.1.2 "Development Agreement" on page C&R 3.23-41 for additional details regarding the development agreement.

3.7.7.3 BETTER STREETS PLAN POLICIES

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-41 TR, duplicate comment was provided in 30-41 TR]

"21. The 'Better Streets Plan' to be adopted by the City with a 'Mitigated Negative Declaration' discusses the creation of safe and non-conflicting spaces for pedestrians and vehicles. It will be an adopted plan of the City of San Francisco; and this CPMC DEIR will be in violation on certain portions of it. I think that TR-17 with the pedestrians on the sidewalk coming and going and having the traffic come from in back of the pedestrians is going to cause not only a traffic jam on Geary but possible injuries of pedestrians. Traffic should not be allowed to cross the sidewalk there unless there is a separate lane or island made for pedestrians only. Under CEQA, the situation with TR-17 will be violating “g” in that it will be in conflict with a City-adopted plan. I think more study and alternatives need to be considered prior to having this approved. On Page S-44, per MM-TR-17, flashing yellow lights for pedestrians to cross will not be enough nor will an audible signal for those who are both deaf and blind. An additional vibrating device may need to be installed for the blind and deaf. When traffic starts to extend into adjacent intersections, the mitigation measure will not be working. The situation here will become as bad as that already seen at Geary and Divisadero with the Kaiser vans and westbound Geary traffic coming to a standstill because people will double-park next to the vans and drop off passengers since they cannot get into the garage because the queue is backed out to the street or there are no more spaces to park on the street because the parking spaces in the structured garages are all taken. Then one sees the vans double-parked next to other vans. Geary at that spot turns into a one-lane (only open lane is the leftmost lane) from a three-lane thoroughfare. I think it will be worse on the narrower section of Geary at the CPMC site.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-68 TR, duplicate comment was provided in 30-68 TR]

“35. Page S-47, Impact TR-42 states the implementation of the Cathedral Hill Campus project MOB Access Variant would result in a pedestrian hazard impact at the MOB’s driveway on Geary St. Again, as per Page S-41, the mitigation measure is MM-TR-17, which, as I mentioned earlier, involves a flashing light and an audible signal to warn drivers and pedestrians of the pedestrian-vehicle conflict at this location. This is in violation of the ‘Better Streets Plan’ to make streets safe for pedestrians. The dangerous condition that will be set up may be better mitigated with either an underground tunnel for pedestrians or a pedestrian bridge. How often will the audible signal and flashing lights be triggered in a given day? I think the pedestrian traffic between the MOB and the Cathedral Hill Hospital will be almost constant so Geary will face considerable congestion. All construction projects should not impact the City transportation system to this degree. One of the “Priority Policies” of the City’s ‘General Plan’ is that ‘commuter traffic not impede Muni transit services or overburden our streets or neighborhood parking.’ The 38/38L-Geary Muni line travel times will be increased if one lane on Geary is blocked due to pedestrians crossing.”

Response TR-65

The comments state concerns that the proposed Cathedral Hill Campus project would be in violation of Better Streets Plan policies and that Mitigation Measure M-TR-17 (on page 4.5-111 of the Draft EIR) is not sufficient to address all pedestrian conflicts, particularly from the garage driveways on Geary Street. The proposed Cathedral Hill Campus project, which would provide MOB garage egress onto Cedar Street only, would not result in this traffic hazard impact. Impact TR-17 on pages 4.5-110 and 4.5-111 in the Draft EIR identifies a traffic hazard impact at the Geary Street driveway under the MOB Access Variant, not the proposed LRDP project, related to peak period queuing on Geary Street at the approach to Van Ness Avenue, increased pedestrians on Geary Street, and peak period vehicles entering and exiting the MOB garage at this location.

The proposed LRDP is not anticipated to substantially increase the number of hearing- and visually impaired people in the vicinity of the proposed Cathedral Hill Campus or at the other campuses. No warning devices (such as a vibrating device, noted in the comment) are currently in place at any driveways in San Francisco for persons that are both hearing- and visually impaired, and SFMTA is not aware of any requirements for such technology. Hearing- and visually impairedpersons walking in the area are anticipated to have assistance, such as the use of a support service provider (SSP) who would be trained to relay visual and environmental information to a hearing- and visually impairedperson, or a service dog that would be specially trained to recognize audible and visual alerts. Considering the above, no additional mitigation measures are required or improvement measures are proposed. Also see Response TR-63 (C&R 3.7-110), related to the safety of senior citizens and people with disabilities at intersections.

The transportation analysis determined (on pages 4.5-100 through 4.5-102 of the DEIR) the average and maximum lengths of queues of cars entering both the MOB and Hospital garage entrances, as a result of the ticket dispensing machines. The analysis concluded that the driveway length of both buildings, from the sidewalk to the ticket dispensing machine, would be long enough to contain vehicle queues.

However, queues could potentially result if the garage were to be fully occupied and appropriate actions were not taken to redirect incoming cars elsewhere, which the comment states occurs at the Kaiser hospital (on Geary Street west of Divisadero Street). To ensure that queues would not spill onto the street if the garage were to become full, an improvement measure, I-TR-5, has been developed which would require the operator of the garage to take appropriate actions to ensure that such queues would not occur. (See Response TR-89 on page C&R 3.7-157 for the added improvement measure I-TR-5.)

Furthermore, the curb cuts and associated driveways on Geary Street could be revoked by the City if it was determined that they substantially interfered with street operations (including transit and pedestrian movements). See Response TR-80 on page C&R 3.7-149.

Pedestrian crossing of Van Ness Avenue would occur within the crosswalks currently provided at the adjacent intersections at Geary Street and at Post Street, and pedestrians would not block any travel lanes on Geary Street. Therefore, pedestrian crossings would not conflict with any Better Streets Plan or General Plan policies related to public transit or pedestrians.

3.7.7.4 PORTE COCHERE CLARIFICATION

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-129 TR, duplicate comment was provided in 30-129 TR]

"In the 'Project Description' section of the CPMC DEIR, Chapter 2, on Page 2-35, an explanation is given that 'portes cocheres' would 'create inviting entries for hospital users and other pedestrians. The proposed Emergency Department drop-off zone (off of Franklin Street) would be designed to be more like a pedestrian plaza than a vehicular drive-through area. Similarly, the Cathedral Hill MOB would have passenger drop-off zone on Cedar Street near Van Ness Avenue.' There will still be pedestrian and vehicle conflict in these "portes cocheres." Again, the safety of the pedestrians may need to be mitigated by not just flashing lights and audible signals as proposed in MM-TR-17."

Response TR-66

The comment notes concern about pedestrian and vehicle conflicts within passenger loading zones. The on-site Emergency Department drop-off area on Franklin Street and curb passenger loading zone for the MOB on Cedar Street would be designed to safely accommodate passenger loading/unloading activities, and would not result in significant impacts. CPMC has indicated that the MOB drop-off area would have a staff person to assist with vehicle circulation. (Additional information regarding the Emergency Department loading area is provided in Response TR-88, page C&R 3.7-156.) Therefore, mitigation measures would not be required. The flashing lights and audible signals proposed in Mitigation Measure MM-TR-17 on page 4.5-111 in the Draft EIR would be for the MOB garage driveway on Geary Street under the MOB Access Variant, where peak period congestion on Geary Street and vehicles entering and exiting the driveway would result in a traffic hazard impact. Flashing lights and audible signals would not be appropriate for curbside or internal on-site passenger zones.

3.7.7.5 MIDBLOCK CROSSING ON POST STREET AT FORMER OCTAVIA STREET

Comment

(Madlyn Stein—Seniors of Cathedral Hill, October 7, 2010) [45-6 TR]

"-provide a blinking yellow light at the crossing on Post Street where former Octovia Street crossed so that seniors crossing between two large facilities, the Sequoias and the Carlisle, will not be run over."

Response TR-67

The comment's request to provide a flashing yellow light at the unsignalized midblock crosswalk on Post Street between Gough Street and Laguna Street (at former Octavia Street) has been reviewed with SFMTA. SFMTA has reviewed the community request for flashing yellow lights, in-street pedestrian crossing signs, STOP signs, and consolidation of crosswalks, and has indicated that installation of a solar-powered, push button-activated flashing beacon on existing poles would be possible. SFMTA is exploring funding possibilities for installation of the flashing beacon. The pedestrian impact analysis for the proposed Cathedral Hill Campus, as presented in Impacts TR-40 through TR-42 on pages 4.5-130 through 4.5-136 of the Draft EIR, did not identify any significant pedestrian impacts along Post Street. Therefore, providing a flashing yellow light at the existing midblock crosswalk is not required as a mitigation measure.

3.7.7.6 CALIFORNIA CAMPUS CONDITIONS

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-105 TR, duplicate comment was provided in 30-105 TR]

"Not only that, but the Jordan Park area also has a very high number of children as well as schools for little children up to middle school age. Having too much traffic congestion and cut-through traffic will endanger their lives. We have already had to resort to traffic calming measures which are being circumvented in this area."

Response TR-68

The comment states concerns related to congestion and cut-through traffic in the Jordan Park area. As indicated on page 4.4-178 in the Draft EIR, as part of the proposed LRDP, the facilities and operations of the California Campus (in the vicinity of Jordan Park) would remain unchanged until 2015, when the majority of existing activities would be relocated to the Pacific Campus and the proposed Cathedral Hill Campus. Once the majority of services are transferred to the proposed Cathedral Hill and Pacific Campuses, the California Campus would no longer be considered part of CPMC. Analysis of any potential reuse or future redevelopment on the site would be speculative. Any future proposals at the site would require a project-specific, project-level environmental review. With no planned changes in facilities or operations, transportation travel demand at the California Campus would be expected to remain similar to existing conditions until 2015, and then gradually decrease after 2015. The proposed LRDP would not result in any new vehicle trips and, therefore, would not add to existing traffic congestion or cut-through traffic in the area.

3.7.8 PARKING

Comments

3.7.8.1 PARKING – GENERAL CPMC LRDP

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-31 TR, duplicate comment was provided in 30-31 TR]

"Page S-22 states that one of the 'Project Objectives' for 'Site Planning' and 'Site Selection' is to 'ensure that all hospital facilities· are located so that they have the capacity to be supported with medical office space, parking facilities, and other supportive functions.' I think the site selection and proposed builds lack the capacity to support the parking needs of visitors, staff and delivery personnel. In fact the following statistics will show that the total proposed maximum parking at the campuses themselves at 3,890 spaces will not support the 2008 figures as follows:

- 31,000 acute discharges (33% of SF total) .
- 7,300 births (50% of SF)
- 74,300 Emergency Department visits (32% of SF)
- 541,200 Outpatient visits
- 1,200 medical staff (largest in SF)

This came from www.rebuildcpmc.org/assets/CPMC CommunityForum.pdf. CPMC thus must rely on City-owned garages and private garages to address parking for their people.

The parking facilities fall way short of the projected number of people who will work, visit and use this facility. This is what will cause the visitors/patients who arrive in vehicles (many of them because they are ill and cannot take public transportation) to keep circling the campuses and cause congestion when the garages/parking structures are full. That is why this CPMC project requires a Conditional Use (CU) authorization for excess parking at the Cathedral Hill Hospital as noted on Page S-25; however the excess parking request is still not enough. Again, this is evidenced by the need to still lease out garage space at some other off-site locations. And when these lots are transformed from a parking use to some other use, CPMC will lose those parking spots and get into a worse situation with parking to such a large hospital that is planned in a very busy area of town."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-111 TR, duplicate comment was provided in 30-111 TR]

"58. On Page 4.5-80, Table 4.5-13 ('Parking Demand by Campus') shows that for the Cathedral Hill Campus for all 3 projects (hospital, MOB and 1375 Sutter), there will be a net demand of 1,389 .spaces assuming the California Campus does not have any new demand. The Pacific Campus is shown to have less demand by 229 spaces, the Davies Campus shows new demand of 264 spaces and the St. Luke's Campus shows net new demand of 240 spaces. In total, there will be a demand of 1,664 parking spaces (1,389+264+240-229). Will there be sufficient parking spaces for the physicians and the other staff and visitors at all the campuses?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-154 TR, duplicate comment was provided in 30-154 TR]

"91. On Page 4.3-31 in the 'Population, Employment, and Housing' section, the following statistics for the year 2030 are given:

- 5380 FTEs at Cathedral Hill Campus
- 2060 FTEs at Pacific Campus
- 1750 FTEs at Davies Campus
- 1530 FTEs at St. Luke's Campus
- 10,720 FTEs at above campuses...

It states, ‘The total number of personnel at all CPMC campuses would grow to approximately 10,720 by 2030. This would be a net new growth of 4,170 FTE personnel for CPMC system-wide between 2006-2030 (See Table 4.3-10 on Page 4.3-16.). In 2006, there were 5,801 FTEs. For 2015, the FTE count is expected to be 8,350. With a total of 3,890 parking spaces for all projects, parking will be severely inadequate for all the staff, patients' visitors, users of the medical facilities. That is again the reason CPMC has all the extra leases with several garages. (See Item 20.)”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-155 TR, duplicate comment was provided in 30-155 TR]

“Some garages used by the CPMC California Campus, e.g., like the 17th & Geary Garage, are causing a big problem with vehicles circling .in the area and causing more vehicle/pedestrian conflicts. In addition, having streets in the Richmond District that allow free parking all day need to be metered if we are all going to the ‘Transit First’ mode of operation; however, not while allowing favorable uses to a for-profit entity at the expense of the neighbors. The total of the above equals 10,720 FTEs. The additional 10 FTEs to arrive at the 10,730 FTE figure are from the California Campus that is not described with the above bullet points under the ‘CPMC LRDP Projects at Full Build-out (2006-2030)’ section; rather, they are on Page 4.3-29.”

Attachment of Parking Spaces Chart:

CPMC Parking	LRDP	ALT 1	ALT 3A – 3B			
		NO PROJECT	REDUCED PROJECT			
CATHEDRAL HILL						
New CH Hospital	513	275				
(14 van spaces excluded -Page 6-39)						
New CH MOB	542					
Existing 1375 Sutter	172	172				
Existing 1255 Post	demol’n	130				
TOTAL	1227	577	1005	existing=**405**	(Page 6-271)	
	(p. 6-270)					
CALIFORNIA – Alt 3B						
New 100-ft 3698 Calif St.		PROPOSED				
	460 Cherry	290	existing			
	3838 Calif	120	Existing			
	3698 Calif	197	New – 100-ft bldg			
	SUB-TOTAL	607				
	3905 Calif	25	(Page 6-277)			
	TOTAL	632				
		EXISTING				
	3698 Calif	81				
	3700 Calif	7				
	460 Cherry	290				
	3838 Calif	120				
	3773 Sac’to	36				
	3905 Sac’to	25				
	TOTAL	559				

PACIFIC		PROPOSED				
	Web-Sacto Garage	248	new			
	No of Clay	440	new			
	1200 Webster	400				
	2333 Buchanan	27				
	???					
	TOTAL	1115	sh/b **1510**			
		EXISTING				
	2100 Webster	400				
	2333 Buch	11				
	2405 Clay	411				
	220 Webster	25				
	SUB-TOTAL	847	structure	(NO PROJECT, Page 6-45		
	2300 Calif	41				
	ClayStTunn	10				
	2333 Buchanan	32				
	2329 Sac'to	9				
	SUB-TOTAL	92	surface			
	TOTAL	939				
		ALT 2				
	ACC N/S Twrs	728				
	Clay Web Garage	248				
	2405 Clay	411				
	TOTAL	1387	(Page 6-175)			
ST. LUKE'S		LRDP	1A – Page 6-62	1B – Page 6-6	3A – Page 6-281	3B – Page 6-287
	St. Luke's MOB	220				
	Duncan St. Garage	215				
	St. Luke's surface	15				
	TOTAL	450	329	541	702	541
	Additional 600 spaces					
	(Page 6-271)					
		EXISTING				
		329				
DAVIES	PROPOSED	EXISTING				
	626	496				
FULL LRDP BUILDOUT	3662	struc pkg				
	228	surf pkg				

	3890	TOTAL				
	18	loading spaces				
	14	van spaces	not included in			
			count for CU			
PUBLIC PARKING GARAGES/LOTS	more public spaces used	neighborhoods	impacted			

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [37-5 TR]

"7. So when the parking demand at the new CPMC project is changed so that it cannot support the projected FTEs (10,700+ by 2030) + (see 2008 figures below for reference) and visitors that will utilize the services, the impact is not only a block or two away but on neighborhoods. The resulting congestion in traffic in the neighborhood is a serious concern. Part of the problem is with all the people working at CPMC who drive and take up the spaces in the neighborhood lots so that the local merchants have less business and people will circle around looking for street parking which also is becoming increasingly rare."

(Linda Chapman, October 19, 2010) [76-23 TR, duplicate comment was provided in 111-23]

"Even the reduced Alternative 3 proposes more than one-third increase in square footage for parking, compared to existing conditions. This is unacceptable in the transit-rich central city-- when city policy has advanced to contemplating auto use limited to out of town trips and grocery shopping. The Planning Code eliminated obsolete 1:1 residential requirements for downtown and additional parts of the northeast quadrant, Octavia Boulevard, and some other transit-rich areas. The VNAP should be updated consistent with newer area plans (inasmuch as its intent was to produce a transit-rich residential district). Meanwhile, it is inconsistent with recent policy direction for a planning rule to impose minimum parking spaces for new medical campuses."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-51 TR]

"Off-street loading space dimension: the proposed Cathedral Hill campus would also require Conditional Use authorization to exceed the allowable parking."

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-30 TR]

"9) Parking Impacts Will Be Significant - Table 4.5-34 on Page 4.5-164 summarizes the parking supply and demand for each campus. As shown, the Cathedral Hill Campus is proposed to have a parking shortage where demand exceeds supply by 162 spaces. Other parking shortages will occur at the Davies Campus (203 spaces) and at the SI. Luke's Campus (309 spaces). Without the 623 "off-campus" parking spaces, the Project shortage is 664 parking spaces, about 15 percent of the overall parking demand."

(Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-43 TR]

"4. The DEIR incorrectly analyzed parking conditions as a social impact rather than focusing on the potential physical impacts on the Tenderloin.

The parking conditions as described in the DEIR will potentially result in physical impacts in the Tenderloin. The DEIR estimates the peak parking demand shortfall for the Cathedral Hill Campus to be 162 spaces.[99] In addition, the proposed sidewalk widening and other pedestrian improvements would result in the displacement of 26 standard metered spaces, one handicapped-accessible space, and ten commercial vehicle loading/unloading spaces.[100] The DEIR concludes that parking conditions are considered to be social impacts rather than physical impacts on the environment.[l01] This conclusion relies on the assumption that "the secondary effect of drivers searching for parking is typically offset by a reduction in vehicle trips due to some drivers, who are aware of the constrained parking conditions in a given area, shifting to other modes."[102] However, the DEIR recognizes '[t]he loss of parking may cause potential social effects, which would include cars circling and looking for a parking space in neighboring streets.'[103]

[99] DEIR 4.5-163.
[100] *Id.*
[101] DEIR 4.5-162.
[102] DEIR 4.5-166.
[103] DEIR 4.5-166."

Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-44 TR]

"The DEIR does not analyze what impact the parking shortfall will have on the parking demand in the Tenderloin neighborhood, CEQA provides that, '[e]conomic or social effects of a project may be used to determine the significance of physical changes caused by the project;'[104] Although 'the social inconvenience of having to hunt for scarce parking spaces is not an environmental impact, the secondary effect of scarce parking on traffic and air quality is.'[105] Accordingly, the DEIR needs to fulfill its CEQA-mandated purpose by identifying ways in which the secondary environmental impacts resulting from the project parking deficits can be mitigated.[106] The Tenderloin is close to downtown, which leads to a significant number of commuters parking in the neighborhood. The consequences of Cathedral Hill's parking shortfall could overflow into the Tenderloin causing an increase in traffic on the streets of the Tenderloin and a decrease in parking spaces available for non-hospital related drivers and local residents. The DEIR must analyze the potential physical impacts on the Tenderloin of increased traffic caused by CPMC staff, patients, and visitors seeking parking in the neighborhood.

[104] *CEQA* Guidelines §15131(b).
[105] *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco*, 102 Ca. App. 4th 656, *697* (1st Dist. 2002).
[106] *Id*."

(Charles Freas, October 19, 2010) [79-2 TR, duplicate comment was provided in 100-2]

"Parking challenges are given short shrift and yet what will be their real traffic friction flow impact?"

(Commissioner Antonini, September 23, 2010) [PC-348 TR]

"There is also a lot of concerns that have been voiced about parking, and in reading the DEIR, it appears that the parking is being increased in all the facilities that are part of the hospital, other than the one that is California, which is slated to be closed in the distant future, and I think that's important because we've heard about the amount of traffic involved and, certainly, while we've encouraged people to take public transit, realistically they are going to be a lot of people who will be driving to all of the hospitals and we need to be able to accommodate them. And as I see being a Kaiser member, there are a lot of people who, you know, have limited mobility and have to be able to drive right into the facility, even for out-patient services, and sometimes be assisted. So, that's an important consideration. One thing – oh, I guess that's it!"

Response TR-69

The comments summarize information contained in the Draft EIR regarding the CEQA analysis of the CPMC LRDP parking demand and supply, express concern related to the parking supply and accommodation of demand, and request provision of fewer or more parking spaces at the CPMC campuses.

Significance Criteria—As explained on pages 4.5-162 and 4.5-163 in the Draft EIR, San Francisco does not consider parking supply as part of the permanent physical environment and, therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. The San Francisco Planning Department acknowledges, however, that parking conditions may be of interest to the public and the decision-makers. Therefore, a parking analysis and discussion for the proposed LRDP is presented in the Draft EIR for informational purposes.

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (State CEQA Guidelines, Section 15131[a])

The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., public transit service, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to public transit service in particular would be in keeping with the City's "Transit-First" policy. The City's Transit-First Policy, established in the City's Charter Article 8A, Section 8A.115, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis and the traffic assignments used to prepare the intersection analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the proposed CPMC campuses and then would seek parking farther away if convenient parking was unavailable. Moreover, the secondary effects of drivers searching for parking typically would be offset by a reduction in vehicle trips because of others who would be aware of constrained parking conditions in a given area. As a conservative assumption, the transportation analysis did not account for this reduction in vehicle trips traveling to the study area. Any secondary environmental impacts which might result from a shortfall in parking in the vicinity of the proposed LRDP would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably address potential secondary effects.

As noted above, the effect of patients, visitors and staff accessing CPMC parking facilities was assessed as part of the traffic impact analysis, and therefore the impacts of parking on traffic flow are reflected in the intersection LOS analysis. In addition, at the proposed Cathedral Hill Campus garages, a queuing analysis was conducted for the three parking garages to determine whether vehicles accessing the garages would queue out into the adjacent travel lanes and impact traffic flow. The discussion of parking operations on traffic flow is presented in Impact TR-5 on page 4.5-100 to 4.5-102 in the Draft EIR, and the potential impact from garage operations on traffic flow was determined to be less than significant. Even though impacts were found to be less than significant, an improvement measure, I-TR-5, has been developed which would require the operator of the garage to take appropriate actions to ensure that such queues would not occur. See Response TR-89 (page C&R 3.7-157).

CPMC LRDP Parking Supply—The parking supply at each campus is presented in Table 4.5-34 in the Draft EIR on page 4.5-164. This supply would include vehicle parking spaces, including wheelchair-accessible spaces. The parking spaces would not include motorcycle, carshare, or bicycle spaces. Each CPMC garage would provide the Planning Code-required number of bicycle and carshare spaces or more, and would meet the requirements regarding dimensions of parking and loading spaces. Although motorcycle spaces would be provided, the Planning Code does not specifically require motorcycle spaces.

None of the CPMC campuses are located in zoning districts that have vehicle parking maximums, and the Planning Department does not have any proposed changes to zoning districts in which the campus sites are located to specify maximum permitted parking requirements (for example, such as within the Eastern Neighborhood Mixed Use zoning districts), with the exception of legislation currently pending before the Planning Commission (File No. 110859) which would potentially establish a maximum permitted parking requirement applicable only to residential projects within the Van Ness Special Use District. While the total number of accessory parking spaces at the Cathedral Hill Campus would be within the maximum currently allowed under the Planning Code; the legislation (File No. 110859) currently pending before the Planning Commission would reduce amount of permitted accessory parking, which the Cathedral Hill Campus would exceed. If applicable to the CPMC LRDP, revisions to Draft EIR Table 2-3, “Project Approvals”, are included in Chapter 4, “Draft EIR Text Changes,” on page C&R 4-38, in which CPMC has requested an amendment to Planning Code Section 243 that would allow modification of accessory parking requirements here through a CU authorization, provided that the amount of parking at the Cathedral Hill Campus does not exceed the current accessory parking maximum of 150 percent of the number of spaces otherwise required by the Planning Code. If the pending legislation is applicable to the CPMC project, CPMC would seek a CU authorization to allow any spaces that would exceed the accessory use threshold as modified by the legislation.[22] This authorization could be denied or approved as part of the Planning Department and Planning Commission review of the project. At the St. Luke’s Campus, as part of the PUD approval process, CPMC would seek an exception to the Planning Code to provide fewer than the minimum required number of parking spaces, since parking is already provided on-site.

As part of the proposed CPMC LRDP, three of four existing campuses would have an increase in off-street parking supply. In addition, the proposed Cathedral Hill Campus will provide off-street parking. The estimated amount of off-street parking was based on the Planning Code requirements, the projected parking needs generated by the programs at each individual campus (based on existing experience), consideration of existing conditions related to parking supply and needs at the four existing campuses, and site constraints associated with each campus. The CPMC LRDP development process, including the determination of parking supply, was conducted in consultation with the Planning Department and with input from the community through various workshops related to the proposed LRDP.

It is reasonable to assume that the identified CMPC LRDP parking supply would be available for use by patients, visitors, staff, and doctors, and it would be speculative to assume that the off-street parking facilities leased by CPMC would be converted to other uses.

In addition to parking supply provided on the campuses, CPMC also has long-standing arrangements in place to lease parking spaces in nearby garages. To use the proposed Cathedral Hill Campus as an example; long-term leases are in place at the Japantown Center and 855 Geary Street (described in Response TR-56). CPMC has from time to time confirmed the presence and commercial availability of additional parking both in the neighborhood of the campus. More fully described in Response TR-86, a survey of available parking within walking distance of the Cathedral Hill Campus revealed approximately 480 spaces, over and above existing garage volumes, that were potentially available for lease. CPMC also has access to more distant reserves of parking., such as the Jazz Center, and the 12th /Kisling garage, at which CPMC has recently leased 375 spaces.If the spaces at the Japantown garage were no longer available, CPMC would contract a comparable amount of off-site parking in whatever the most convenient physical location and favorable lease terms were available.

Convenient and readily available off-street parking for patients and visitors is a critical component of any medical facility to ensure that the patient and visitor experience at the facility supports the patient and

[22] Under the current Planning Code provisions, per Section 204.5, accessory parking equivalent to 150 percent of the required supply could be provided without special authorization.

contributes to the patient's well-being (e.g., walking long distances between a garage and medical office or circling around the neighborhood to find on-street parking does not support a patient's or visitor's well-being). Similarly, providing parking for some physicians and staff, particularly when these individuals are on-call, also is required to support their ability to serve patients. In general at hospitals and medical facilities, however, parking is not provided for the majority of staff, primarily to encourage alternate modes of travel. Therefore, taking the City's Transit-First policy into consideration, each campus would provide parking for patients, visitors, and some staff and physicians. By policy, CPMC would provide the most convenient and nearest parking spaces to its patients and visitors, then to physicians, and lastly to staff.

3.7.8.2 PARKING – CATHEDRAL HILL CAMPUS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-17 TR, duplicate comment was provided in 30-17 TR]

"6. On Page S-4, are the 17 parking spaces on Level 1/P1 (connects to southeast corner of Geary & Van Ness) for hospital support uses or just the 14 van spaces?

7. What other parking spaces are reserved for hospital staff out of the 513 parking spaces at Cathedral Hill Hospital who will be working at this hospital?

8. On Page S-6, with the MOB having seven levels of parking with 542 parking spaces, how many of these are reserved for staff?

9. On Page S-6, the 1375 Sutter St. building currently has 172 parking spaces which will be kept and any additional parking needs of the 1375 Sutter MOB will be provided at the Cathedral Hill Hospital garage. How many staff people from 1375 Sutter MOB will use the parking spaces at the Cathedral Hill Hospital?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-25 TR, duplicate comment was provided in 30-25 TR]

"The counting of parking spaces is rather puzzling and vague in certain areas. If one looks at the drawings of the available parking spaces in the DEIR, e.g. 257 spaces on Level P3 (Page 2-69) at Cathedral Hill Hospital, one must deduct 24 spaces to net only 233 spaces for the regular general public and staff use because the 24 spaces are for disabled parking only. On Level P2 shows 239 spaces but 22 are disabled spaces. On LeveI1/P1, the DEIR shows 31 spaces but 14 are for vans/loading spaces, 4 spaces for motorcycles, and 2 spaces for disabled parking. So on Level 1/P1, there will be only 11 parking spaces for regular vehicle parking. In fact, the 14 van parking spaces are NOT included in the CU authorization for parking in addition to that allowed under Planning Code Section 157 for accessory parking (Page S-24). The CPMC project asks ONLY for 513 spaces under CU and it should be 527 spaces which will then include the spaces for their 14 vans. See Cathedral Hill Hospital parking summary in the chart below:

Level	*Total Parking*	*Disabled*	*Vans*	*Motorbikes*
P3	*257*	*24*		
P2	*239*	*22*		
1/P1	*31*	*2*	*14*	*4*
Total	*527*	*48*	*14*	*4*

Total = 527-14 van spaces = 513 spaces per

Page 2-28 for Cathedral Hill Hospital parking.

Of the 513 spaces, 4 are motorcycles so 509 vehicle spaces left

Of the 509 spaces, 48 are disabled spaces so 461 spaces are left for regular parking.

TOTAL regular vehicle parking is **461** spaces."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-26 TR, duplicate comment was provided in 30-26 TR]

"The 'Project Description' for the Cathedral Hill MOB parking states that there will be 542 parking spaces on seven levels (Page 2-31). Are the 2 loading spaces be included in these parking spaces? Also, on Page 2-95, there is a diagram (Figure 2-31) which gives a 'typical parking level (G5)' for the MOB. This DEIR does not provide diagrams of all the parking levels in the Cathedral Hill MOB -- how many disabled spots, how many motorcycle spots, how many van slots and how many slots for regular vehicles?

Per Page 2-217, Figure 2-69, St. Luke's replacement hospital has 4 levels of parking. The DEIR shows only 2 levels of parking, Level Pi and Level 1 on Page 2-219 (Figure 2-70) and on Page 2-220 (Figure 2-71), respectively. Figure 2-70 shows 43 regular parking spaces and 10 disabled spaces. Figure 2-71 shows 8 disabled parking spaces. I do not see that the total available structured and surface parking spaces required by staff and visitors to the Cathedral Hill Hospital will be adequate.

With info from the Administrative documents for the CPMC DEIR, more thoughts as below in Items 71 and 72 below in this document."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-27 TR, duplicate comment was provided in 30-27 TR]

"18. On various pages in this DEIR, the number of parking spaces is stated for the existing and proposed CPMC campuses. Page 2-14, Table 2-3, 'Required Project Approvals' states that a 'conditional use' authorization will be required for 513 Cathedral Hill Hospital parking spaces (again, per Item 17 above, I believe this should be 527 on conditional use) and 542 parking spaces at the Cathedral Hill MOB. On Page 2-16, St. Luke's Replacement Hospital and its MOB/Expansion Building together will provide 450 parking spaces. The Planning Code requires 559 spaces. On Page 2-21, 1375 Sutter Street Medical Building will retain its 172 parking spaces after conversion. The Cathedral Hill project on all levels (Hospital, MOB, 1375 Sutter) will have a total of 1,227 parking spaces. The Cathedral Hill MOB will have 542 parking spaces per Page 2-31 but it is not broken down as to how many besides the 2 loading/service spaces are for disabled, motorcycle, van or regular spaces. Although on Page 2-95 and 2 96, there are drawings of the parking for the MOB, the DEIR gives only a diagram for 'Level G1' (Page 2-96) and 'Typical Parking Level (G5)' on Page 2-95. I do not see any disabled parking spaces marked out and all the spaces appear to be for vehicles vs. motorcycles. The Cathedral Hill project will have no spaces available as surface parking."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [37-3 TR]

"5. The CPMC DEIR analyzes **transportation circulation impacts** in the immediate vicinity -- intersections located at very short distances from the project sites -- but when the proposed CPMC campuses project alters the number of parking spaces at these newly built buildings and continues to use the existing parking spaces at various other CPMC owned sites and leases parking spaces from neighborhood garages, it has an impact in all the neighborhoods with these facilities.

In the Richmond District, we have impacts on the Laurel Village Shopping Center because currently there are not enough parking spaces at CPMC garages and nearby lots. This spills over into the Jordan Park residential neighborhood and the Laurel Heights neighborhood. Then you have CPMC using the Geary & 16th Avenue

Garage by the Rite-Aid. When CPMC takes the parking spaces in that garage as they have been for years, nobody can shop along Geary and this hurts the Geary Blvd. Merchants. And, the residents are circling since they cannot even find parking as far away as 21st Avenue and as far north as Fulton and as far south as Lake Street sometimes when CPMC uses up the spaces at this 16th & Geary garage. CPMC is mitigating its parking problems by infiltrating these neighborhood garages and putting additional burdens on the residents. Why are the neighbor-residents in the Richmond having to suffer parking and congestion issues for a hospital that cannot meet its parking demand? And the idea of taking away residential parking zones by SFMTA will hit even harder on the Richmond residents with CPMC people parking all day in 'free zones' in the Richmond."

(Diane and Richard Wiersba, October 11, 2010) [49-2 TR]

"Traffic in this area is already extremely heavy as it includes the intersection of Van Ness and Geary Street and also inbound Post Street and southbound Gough. We gave up our car about 15 years ago in part because traffic is so heavy and parking is so difficult. To bring such a structure as the originally proposed CPMC to this area, even with adequate parking for the large number of employees necessary to operate such a medical center, would make a dangerous situation much worse, especially considering this area has the highest density of seniors in San Francisco. No parking for hospital employees (which we understand is proposed) is foolhardy; parking is already difficult to find in this area."

(Carol and Michael Stack, October 17, 2010) [62-5 TR]

"Parking for guests and visitors will become essentially impossible in one of the few areas of the City where parking is generally reasonably obtained – either on the street or in public garages. The quality of life for residents in terms of their social lives will be adversely affected. This is a not unimportant consideration for the substantial elderly and handicapped community living here."

(Linda Chapman, October 19, 2010) [76-18 TR, duplicate comment was provided in 111-18 TR]

"Where seemingly insignificant temporary conditions (like rain, illegal parking, or holiday events) cause paralyzing congestion, the result shows how vulnerable the Van Ness Corridor is to traffic disruption. Inadequate impact analysis could saddle the area with permanent results from hospital development.

Drivers converging on the campus will circulate through surrounding streets, some hoping to park at offsite garages or curbside, others navigating the one-way street patterns to reach hospital and MOB entries. The more drivers depend on campus garages, the more those garages will tie up traffic when cars waiting for entry back up into the street, and the more drivers will circle surrounding streets when unable to stop in traffic waiting for garage entry. A Polk Gulch resident recounted this condition at an existing CPMC garage, which results in his circling through the neighborhood. Absent other evidence, it is reasonable to assume that conditions at a location *already* more congested than CPMC's problem garage will be worse."

(Linda Chapman, October 19, 2010) [76-21 TR, duplicate comment was provided in 111-21 TR]

"Converting Cedar Alley to access for the MOB garage cannot be allowed.

Alternative 3 proposes reducing the Cathedral Hill campus- essential for traffic impacts. However, with proposed garages, traffic impacts will inevitably remain significant. Traffic impacts can be reduced by limiting CPMC parking, on-site and off-site. CPMC proposes spaces for 1,055 cars at the Van Ness/Geary site-- where the existing hotel and office building total 405. Two large garages are not needed, in addition to spaces for CPMC at the Sutter Street MOB."

(Linda Chapman, October 19, 2010) [76-24 TR, duplicate comment was provided in 111-24 TR]

"For the Cathedral Hill campus, there should be no approval to build parking, beyond replacing spaces from the hotel and office site. If CPMC wants suburban amenities, they cannot locate a campus in the central city.

Attracting autos disrupts not just transit and circulation, but the pedestrian environment and living environment of residents already subjected to urban density and commute traffic.

CPMC articulated a desire to relocate to a transit-rich area. They need to encourage customers and staff to use this amenity. CPMC argues (inconsistently) that people need auto transport to get medical care. The reality for this transit-rich area is that residents found about two-thirds of Nob Hill households had no vehicle. People living in such areas take public transit to medical providers- including Kaiser and CPMC, where garages invite car owners to drive regardless of need (like that Polk Gulch resident who described circling all over another neighborhood when he uses a CPMC garage).

Parking to serve Cathedral Hill construction must not exceed 405 spaces. Further reduction is desirable, to reduce adverse impacts in the overburdened Van Ness Corridor and surrounding neighborhoods. Compared to hotel and office use, auto traffic to CPMC garages could drive through our neighborhood many more times (for patient appointments all day, for staff turnover day and night). In contrast to this intense use for round-the-clock medical operations, commuters are likely to enter and leave the neighborhood once a day, hotel guests may just store cars overnight, hotels rarely rent rooms to capacity, and garage spaces rented for evening events likely won't turn over like CPMC garages."

(Beth Pewthur, October 19, 2010) [80-1 TR]

"I support the position of the Unitarian Church and as a member of that church am very concerned about the hospital plan which does not provide enough off street parking for it's activities."

(Linda Chapman, September 23, 2010) [PC-285 TR]

"so we don't need to have a lot of extra parking there, which will only bring in more cars."

(Paul Grech, September 23, 2010) [PC-329 TR]

"As far as so-called Bureau of Traffic problem, the one-way streets have worked flawlessly in the 37 years that I've been here. The hospital will have their five-story underground parking system, and that will take care of the parking problem. The Kaiser parking system on Geary and Divisadero works fine whenever I go to the Kaiser on Geary and Divisadero, I never have encountered a problem. And, again, I urge you to approve the proposed hospital project. Thank you."

Response TR-70 (Parking – Cathedral Hill Campus)

The comments summarize information contained in the Draft EIR regarding parking supply, express concern related to the parking supply and accommodation of demand, and request provision of fewer or more parking spaces at the CPMC campuses. The comments also suggest that the problem of vehicle queuing at garages needs to be addressed.

Detailed engineering plans for the campus were not developed, nor are they required to be developed, as part of the environmental review analysis. The plans included for the below-grade levels of the proposed structures are illustrative, with sufficient detail developed to ensure that adequate circulation space is provided and that the proposed number of parking spaces could be accommodated. Precise floor-by-floor designation of parking spaces have not been finalized, and will be included in the construction plans when submitted for building permit approval. With implementation of the proposed CPMC LRDP, the proposed Cathedral Hill Campus would provide a total of 1,227 parking spaces, including 513 spaces at the proposed Cathedral Hill Hospital, 542 spaces at the proposed Cathedral Hill MOB, and 172 spaces at the 1375 Sutter MOB. Of the total of 1,227 parking spaces, 620 would be reserved for patients and visitors, 260 would be reserved for physicians, and 347 would be reserved for staff.

Approximately 161 of the 513 vehicle parking spaces in the proposed Cathedral Hill Hospital garage would be reserved for staff, and an additional 107 spaces would be reserved for physicians. The proposed hospital garage would include 316 full-size parking spaces, 144 compact spaces, 46 wheelchair-accessible spaces, and 7 van-accessible spaces. In addition, 18 motorcycle parking spaces and 150 bicycle parking spaces (100 staff bicycle spaces and 50 public bicycle spaces) would be provided. Precise floor-by-floor designation of parking spaces have not been finalized, and will be included in the construction plans when submitted for building permit approval.

The 17 vehicle parking spaces (13 standard and 4 handicapped-accessible) proposed to be provided on Level 1/P1 of the Cathedral Hill Hospital garage would be available for patients and visitors, and not for hospital support uses. The van parking spaces identified on Level 1/P1 would be part of the 161 parking spaces that would be provided for staff, and would be part of the 513 parking spaces proposed for the Cathedral Hill Hospital garage that would be included as part of the CU authorization. Truck loading spaces are also not included as part of the 513 vehicle parking spaces proposed for the Cathedral Hill Hospital garage.

Approximately 113 of the 542 parking spaces in the proposed Cathedral Hill MOB garage would be reserved for staff, and an additional 114 spaces would be reserved for physicians. This MOB garage would include 244 full-size parking spaces, 269 compact spaces, 25 wheelchair-accessible spaces, and 4 van-accessible spaces. In addition, 18 motorcycle parking spaces and 66 bicycle parking spaces (34 staff bicycle spaces and 32 public bicycle spaces) would be provided.

The 1375 Sutter Street garage currently contains 172 parking spaces, and these spaces would be retained. Approximately 73 of the 172 parking spaces in the 1375 Sutter Street garage would be reserved for staff, 39 spaces would be reserved for physicians, and 60 would be available for patients and visitors. No staff from the 1375 Sutter MOB would be accommodated at the proposed Cathedral Hill Hospital garage. However, as indicated on page 4.5-163 of the Draft EIR, some visitors to the 1375 MOB who were unable to find parking in the building would likely park at the proposed Cathedral Hill Campus MOB garage and walk to the 1375 Sutter MOB.

Table 4.5-34 in the Draft EIR, page 4.5-164, presents a comparison of the proposed supply to the estimated parking demand by population, including physicians and employees as well as patients and visitors. At buildout, the peak parking demand would be about 1,389 spaces, compared with a total supply of 1,227 spaces. At the proposed Cathedral Hill Campus, an overall parking shortfall of 162 spaces would occur, including a parking shortfall of 212 spaces for employees and an overall surplus of 50 spaces for patients and visitors (and would include a parking shortfall at the proposed 1375 Sutter MOB). It is anticipated that short-term visitors to the 1375 Sutter MOB who were unable to find parking within the building would likely park at the proposed Cathedral Hill Hospital and walk to the 1375 Sutter MOB, or park in any available on-street parking space around the campus, although some visitors also might choose to take public transit, use a bicycle, or walk instead of driving. Employees who were unable to park at the campus could take public transit, use a bicycle, walk to the campus, or park off-site at the Japan Center Garage at existing CPMC leased spaces. As analyzed, employees who chose to park at the Japan Center Garage would increase the demand for CPMC shuttle services. The effect of patients, visitors and staff accessing the proposed Cathedral Hill Campus garages on traffic operations was assessed as part of the traffic impact analysis. In addition, a queuing analysis was conducted for the three proposed Cathedral Hill Campus garages to determined whether vehicles accessing the garages would queue out into the adjacent travel lanes, and the potential impact from garage operations on traffic flow was determined to be less than significant (see discussion in Impact TR-5 on page 4.5-100 of the Draft EIR).

See Response TR-121(page C&R 3.7-200) regarding use of Cedar Street for access to the proposed MOB garage. As part of the proposed LRDP, Cedar Street would be converted to two-way operations west of the proposed MOB garage driveway.

3.7.8.3 PARKING – PACIFIC CAMPUS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-18 TR, duplicate comment was provided in 30-18 TR]

"10. 0n Page S-10, the proposed Webster St. / Sacramento St. Garage on the Pacific Campus, to be completed in 2018 will have 248 parking spaces. How many of these parking spaces will be used by staff on the Pacific Campus? How many of these parking spaces will be used by staff from the other campuses?

11. On Page S-11, the DEIR states that the North-of-Clay Above-ground Parking Garage will be 85 feet tall with 6 stories and will have 715 parking spaces (Webster/Sacramento + North-of-Clay = 688 plus 27 spaces on Buchanan St. surface lot - also Page 2-117). With 248 parking spaces at the Webster/Sacramento and 440 spaces at the North-of Clay structure, there still will not be enough parking spaces to accommodate the number of visitors that use the facility."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-19 TR, duplicate comment was provided in 30-19 TR]

"12. On Page S-11, it mentions that the parking spaces at Pacific Campus will total 1,587 spaces by 2020, '648 parking more spaces than under existing conditions.' Typo error -- please switch the words "spaces" and "more" in the sentence. How many of the 1,587 spaces will be used by staff at Pacific Campus? And by staff from other campuses?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-23 TR, duplicate comment was provided in 30-23 TR]

"Who from CPMC uses the Japantown Garage? Is it the staff at St. Luke's? at Davies? at Pacific? at California? or at all of the above?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-28 TR, duplicate comment was provided in 30-28 TR]

"The existing parking spaces at the Pacific Campus totals 847 spaces (411 at 2405 Clay St. and 400 at 2100 Webster St.) with 92 surface parking spaces (32 at 2333 Buchanan Hospital, 41 at 2300 California St., 9 at 2329 Sacramento St., and 10 for the Clay St. Tunnel). This total of 92 spaces will be lessened to 77 spaces of surface parking at the Pacific Campus. I would request a clarification of the distribution of these surface spaces across buildings at the proposed Pacific Campus. There will be 4 loading spaces all at the Pacific Campus ACC per Page 2-105. The total proposed structured parking spaces at Pacific Campus is 1,510 spaces per Page 2-109 of which 248 spaces will· be at the newly built Webster/Sacramento Underground Parking (mentioned again on Page 2-116), and 440 spaces at the North-of-Clay Parking Garage and 822 spaces to be retained in structured parking (on Page 2-109, Table 2-7b). On Page 2- 113, the DEIR breaks down the several parking lots that CPMC owns on the Pacific Campus:

- 32 parking spaces in the lot north of 2333 Buchanan St.
- How many parking spaces in the former Clay Street Hill parking lot (not shown in Fig. 2-39?)
- 41 parking spaces at 2300 California Street parking lot
- 11 parking spaces at the 2315 Sacramento St. Residential Building

As noted, and although not part of the Pacific Campus, as listed on Page 2-114, CPMC also has:

- 400 parking spaces at the Japan Center Garage leased at 1610 Geary Blvd., 1/2-mile south of the Pacific Campus. Where are the locations of the 822 spaces to be retained? It is not clear to me. Please explain. Also, on Page 2-114, the DEIR states that there are currently 930 off-street parking spaces around the Pacific Campus. How many will be left after the loading zones, bicycle racks, street trees, curb cuts, etc. are put in place?"

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-26 TR]

"Parking: Notwithstanding the policy that parking is a social, not environmental factor, we maintain that because of parking problems related to CPMC operations there is a quantifiable increase in unsafe driver behaviors in response to congestion problems. Furthermore, as noted in the Japantown Better Neighborhood Plan Organizing Committee e-mail (October 8, 2010), parking demand from CPMC's operations can have a significant and adverse impact on the viability of Japantown – a significant f cultural resource. ·Both of these are CEQA concerns, yet the DEIR fails to address these issues."

(Arthur and Jacqueline Cimento, October 19, 2010) [78-8 TR, duplicate comment was provided in 99-8]

"The draft EIR's analysis of the parking requirements and visitation patterns is inconsistent with the addition of 688 parking spots on the Pacific campus. On page 4.5-49, the draft EIR states that 1,095 parking spaces for CPMC employees and 410 parking spaces for visitors already exist. This parking supply is adequate for the existing use (pages 4.5-47 to 4.5-49).

In the traffic analysis, there is an estimated reduction in net new parking demand at the Pacific campus of 229 parking spaces (Table 4.5-13) and an expected reduction of trips by 4,700 as a result of the proposed change in usage (Table 4.5-10). Even at peak hours, there are only 71 new vehicle trips at the Pacific campus (Table 4.5-11). This analysis is used to support the premise that there will be little impact On surface street traffic from the project.

- The EIR cannot have it both ways. It is inconsistent to state that current parking provisions are adequate, there is a reduction in parking demand, and the proposed project reduces the number of trips, but then propose 688 additional parking spaces at the campus. Yet the project calls for excavation of two city blocks and construction of a seven story parking facility across an entire city block. We request that a revised EIR be issued that addresses a reduction, not an increase, in parking capacity to reflect the draft EIR's stated reduction in auto trips.

- We question whether the motive of the project sponsor is to support the medical mission of the campus or run a commercial parking business. There are no alternatives to this scheme considered in the EIR. Alternatives could include no parking facility at all or addition of additional underground parking which could eliminate the need for an above ground structure."

Response TR-71 (Parking – Pacific Campus)

The comments summarize information contained in the Draft EIR regarding parking supply, express concern related to the parking supply and accommodation of demand, and request provision of fewer or more parking spaces at the Pacific Campus.

The Pacific Campus currently contains 939 off-street parking spaces, 847 in structured parking and 92 in surface lots. With implementation of the proposed CPMC LRDP, a total of 1,587 off-street parking spaces would be provided: 715 spaces would be in the proposed Webster/Sacramento and North-of-Clay Parking Garages, 41 spaces in the existing 2300 California Street lot, 11 spaces in the existing 2323 Sacramento Street lot, nine spaces in the existing 2329 Sacramento Street lot, 411 spaces in the existing 2405 Clay Street garage, and 400 spaces in the existing 2100 Webster Street garage. Therefore, with the proposed CPMC LRDP, 61 parking spaces would be provided within surface lots (41 parking spaces at the 2300 California Street lot, 11 spaces at the 2323 Sacramento Street lot, and nine spaces in the 2329 Sacramento Street lot). The former Clay Street Hill parking lot (the Clay Street stub east of Webster Street) does not currently contain any parking spaces. The Clay Street stub is used for access to the off-street loading facilities, and staging for temporary loading activities.

As indicated in Table 4.5-34 on page 4.5-164 in the Draft EIR, approximately 721 of the 1,587 total spaces proposed at the Pacific Campus would be reserved for staff, and an additional 260 spaces would be reserved for physicians. In the proposed Webster/Sacramento and North-of-Clay Parking Garages containing a total of 715 spaces (248 spaces in the Webster/Sacramento Underground Parking Garage and 467 in the North-of-Clay Parking Garage), 341 spaces would be reserved for staff, and 374 spaces would be provided for patients and visitors. No other campuses would use the parking facilities at the Pacific Campus. The Pacific Campus would have a peak parking demand of about 1,577 spaces, compared with a total supply of 1,587 spaces. Overall, the Pacific Campus would have a small parking surplus of 10 spaces.

The increase in the number of on-site parking spaces under the proposed LRDP for the Pacific Campus is proposed to ensure that adequate on-site parking would be provided for patients, visitors, staff and physicians. Under existing conditions, the parking demand exceeds the existing parking supply, which results in patients, visitors and staff parking on-street where parking spaces are metered or subject to residential permit parking restrictions. Therefore, no inconsistency would exist between an increase in the parking supply to address an existing shortfall in on-site parking spaces and a minimal increase in vehicle trips to the area. The purpose of the additional parking supply at the Pacific Campus, whether it was aboveground or below grade, would be to accommodate the parking demand generated by the proposed LRDP uses at the Pacific Campus, and it would not be intended for use as a commercial parking business. An alternative that did not include additional parking supply would perpetuate the parking shortfall and, therefore, was not considered by CPMC. Also refer to Response ALT-1 on page C&R 3.22-11 regarding discussion of a reasonable range of alternatives addressed in the DEIR.

As indicated on page 4.5-167 in the Draft EIR, implementation of the Pacific Campus project would include changes to the street network in terms of new driveways and shuttle stops that would require the removal of nine on-street parking spaces. In addition, six on-street parking spaces on Buchanan Street would be converted to a time-limited (e.g., between 8 a.m. and 6 p.m.) curb-side passenger loading and unloading zone.

Also refer to Response TR-75 on page C&R 3.7-145 regarding a discussion of capacity utilization at the Japan Center Garage, and Response TR-129 (beginning on page C&R 3.7-227) regarding the impact of the proposed Cathedral Hill Campus on transportation conditions in Japantown.

Consistent with Comment 18-19, the paragraph below, which appears on page S-11 and page 2-117 of the Draft EIR, is revised to read as follows:

> A total of 715 new ~~structured~~ parking spaces (Webster Street/Sacramento Street Underground Parking Garage and North-of-Clay Aboveground Parking Garage combined, 688 spaces; Buchanan Street surface parking lot, 27 spaces)[23] would be <u>added</u> ~~provided~~ at the Pacific Campus by about 2020. Twenty-five (25) existing structured spaces (associated with 200 Webster) would be demolished. The project would ~~also~~ reduce the total number of surface parking spaces at the Pacific Campus by 15 spaces. ~~This~~ <u>These changes</u> would bring the parking total at the Pacific Campus to 1,587 spaces by 2020, 648 more parking spaces than existing conditions. In addition, six on-street parking spaces currently located on Buchanan Street, between Clay and Sacramento Streets, would be converted to a white-zone curb-side passenger loading and unloading zone.

[23] The existing Clay Street/Webster Street Parking Garage and the other surface parking spaces that would be retained at 2300 California Street (41 spaces) would not change.

3.7.8.4 Parking– California Campus

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-29 TR, duplicate comment was provided in 30-29 TR]

"For the California Campus, per Page 2-127, the following parking spaces exist currently:

- 7 structured parking spaces at 3700 Calif. St. Hospital
- 290 structured parking spaces at 460 Cherry St.
- 120 structured parking spaces at 3838 Calif. St. MOB
- 36 structured parking spaces at 3773 Sacramento St.
- 81 surface parking spaces at 3698 Calif. St. (Marshall Hale)
- 25 surface parking spaces at 3905 Sacramento St.
- 1 loading space at 3801 Sacramento St. Outpatient Research Building (OPR)
- 2 loading spaces at 3698 California St. (Marshall Hale).

This results in a total of 453 structured parking spaces and 106 surface parking spaces and 3 loading spaces for the California Campus.

On Page 2-132, the DEIR states that the parking garages at 3773 Sacramento and 460 Cherry will be kept. That means 36 structured parking spaces (3773 Sacramento St.) plus 290 structured parking spaces (460 Cherry St.) to equal 326 structured parking spaces to be retained at the California Campus."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [PC-150 TR]

"MS. HILLSON: Good afternoon, Commissioners, President Miguel, Director Rahaim, my name is Rose Hillson. I am a member of the Jordan Park Improvement Association, a long time resident of the Richmond District, and I am not going to go into all the bullet points, I have submitted a document and e-mailed them to you, as well, and to the Secretary, Ms. Linda Avery. I have a few points here. Let's start with the CPMC DEIR analyzes transportation circulation impacts in the immediate vicinity, intersections located at very short distances from the project site, but when the proposed CPMC campus project alters the number of parking spaces, totaling 3,890 spaces in the end, at these newly built buildings, and continues to use the existing parking spaces at various other CPMC20 sites, and leases parking spaces from neighborhood garages, it has an impact in all the neighborhoods with these facilities. In the Richmond District, we have impacts on the Laurel Hill Village Shopping Center because currently there are not enough parking spaces at CPMC garages and nearby lots. This spills over into the Jordan Park area, as well as the Laurel Heights neighborhoods. Then, you have CPMC using the 16th and Geary garage by the Rite Aid and Ross Stores. When CPMC takes the parking spaces in that garage, as they have been for years, nobody can shop along Geary and this hurts the Geary merchants. And the residents around that area are actually circling as far out as 21st Avenue, as far south as Fulton, and as far North as Lake. Why are the neighborhood residents in the Richmond having to suffer parking and congestion issues for a hospital that cannot meet its parking demand? The idea of taking away residential parking zones by SFMTA will hit even harder on the Richmond residents with CPMC people parking all day in so-called 'free zones.'"

Response TR-72 (Parking – California Campus)

The comments summarize information contained in the Draft EIR regarding parking supply, and express concern related to the parking supply and accommodation of demand at the California Campus.

As indicated on page 4.4-178 in the Draft EIR, as part of the proposed CPMC LRDP, the facilities and operations of the California Campus (in the vicinity of Jordan Park) would remain unchanged until 2015, when the majority of activities would be relocated to the Pacific Campus and the proposed Cathedral Hill

Campus. Once the California Campus, including on-site parking facilities, was sold and the majority of services were transferred to the proposed Cathedral Hill Campus and the Pacific Campus, the California Campus would no longer be considered part of CPMC. Analysis of any potential reuse of future redevelopment on the site would be speculative. Any future proposals at the site would require a project-specific, project-level environmental review.

The discussion on page 2-132 of the Draft EIR indicates that determining potential reuse of the California Campus facilities would be speculative; however, it notes that only modest changes and entitlements might be required for some buildings, including the 460 Cherry Street and 3773 Sacramento Street Parking Garages. The discussion in the Draft EIR does not indicate that parking spaces within these garages would be the only parking spaces retained for future uses.

As indicated on page 4.5-182 of the Draft EIR, with implementation of the proposed CPMC LRDP, vehicle trips to and from the California Campus, and associated parking demand, might decrease. Implementation of the proposed CPMC LRDP would not substantially change parking conditions in the California Campus vicinity.

SFMTA is not aware of any proposals to take away residential permit parking (RPP) zones in the vicinity of the California Campus or nearby Richmond neighborhoods.

3.7.8.5 PARKING – DAVIES CAMPUS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-21 TR, duplicate comment was provided in 30-21 TR]

"13. On Pages S-13-14, the Davies Campus surface parking lot of 206 spaces at Noe and Duboce will be demolished and a Neuroscience Institute Building erected in its place. Then on Page S-15, a MOB with 490 parking spaces will be built for the Davies Campus. How many of these spaces will be used by staff at Davies? How many of these spaces will be reserved for staff from other campuses?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-30 TR duplicate comment was provided in 30-30 TR]

"On Page 2-139, Per Table 2-11, 'Davies Campus: Project Summary Table,' the campus has 290 structured parking spaces (Castro St./14th St. Parking Garage) and will have 490 structured parking spaces at the proposed new Castro St. /14th St. MOB. The Davies Campus also has 206 surface parking spots at the North and South Towers of which 136 will be retained. Davies Campus currently has 3 loading spaces and 1 new loading space will be provided at the new Neuroscience Institute building."

Response TR- 73 (Parking – Davies Campus)

The comments summarize information contained in the Draft EIR regarding parking supply, and request clarification of parking supply at the Davies Campus.

The Davies Campus currently contains 496 off-street parking spaces, including 290 in structured parking and 206 in surface lots. With implementation of the proposed CPMC LRDP, a total of 626 parking spaces would be provided, including 490 spaces provided in the 14th Street/Castro Street MOB parking structure, and 136 spaces in Noe Street surface lots. Of the 626 parking spaces, 105 spaces would be reserved for physicians, 307 spaces would be reserved for staff, and 214 spaces would be available for patients and visitors. No other campus would use the parking facilities at the Davies Campus.

At buildout, the Davies Campus would have a peak parking demand of about 833 spaces, compared with a total supply of 626 spaces. Overall, a shortfall of 207 spaces would occur, including a shortfall of 171 spaces for employees and 36 spaces for patients and visitors. Short-term visitors to the Davies Campus who were unable to find parking on the campus would be likely to park in any available on-street parking space around the campus, although some might also choose to take public transit, use a bicycle, or walk instead of driving. Employees who were unable to park at the campus could take public transit, use a bicycle, or walk to the campus, or park in one of CPMC's other campus parking facilities or within other facilities such as the Japan Center Garage, where CPMC is anticipated to continue to lease 400 parking spaces. Employees who chose to park in off-site facilities might increase the demand for CPMC shuttle services.

3.7.8.6 PARKING– ST. LUKE'S CAMPUS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-22 TR, duplicate comment was provided in 30-22 TR]

"14. Pages S-17-18, in the new 5-story, 100-ft. tall St. Luke's MOB/Expansion Building, there will be 220 parking spaces on 4 below-ground parking levels. Of these, what is the number of spaces that will be used by St. Luke's staff? How many will be used by staff from the other campuses?

15. Page S-18, how many parking spaces of the 215 parking spaces at the Duncan Street Parking Garage will be used by St. Luke's staff?

16. Page S-18, 15 parking spaces will be available in surface parking elsewhere on the St. Luke's Campus, How many of these will be for staff at St. Luke's and how many for staff from other campuses?

17. Page S-18 states that there will be a total of 450 parking spaces at St. Luke's. The old count for St. Luke's parking capacity was 239. So with the new 5-story St. Luke's MOB/Expansion Building, having an addition of 121 spaces will be insufficient for staff and visitors at this place. In fact, on Page S-27, Planning Code requires 559 spaces."

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010) [101-27 TR]

"Page 4.5-210: The parking discussion identifies a shortfall in parking of 309 spaces (41 percent of demand), notes that on-street parking occupancy adjacent to the St. Luke's campus ranges between 80 and 100 percent during the day and 70 percent after 8:00 p.m., and states that '[e]mployees unable to park at the campus would take transit, bicycle or walk to the campus or park in one of CPMC's off-site parking facilities.' The DEIR also assumes that any secondary environmental impacts that might result from the shortfall in parking, such as traffic, air quality, noise and pedestrian safety impacts of drivers circling for parking, would be minor and are accounted for in the transportation, air quality arid noise analyses. However, elasticity of parking demand is relatively low for a hospital use. Whereas employees may more readily change their travel behavior, patients and visitors accompanying patients, as well as physicians, which together account for more than half the parking demand, may be less able to use alternate modes. The parking discussion and the secondary traffic, air quality and noise impacts of the shortfall in parking need to be reevaluated. In addition, given the existing nearly 100 percent utilization of on-street parking, the impact of the 309-space parking shortfall on neighborhood character and livability must be considered in the land use character/compatibility and plans and policies consistency evaluations."

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010)) [101-28 TR]

"Page 4.5-210: CPMC has acknowledged that the new medical office building may not be built due to the strong possibility of a lack of sufficient hospital use or market demand for medical office space at the St. Luke's Campus. However, the DEIR does not contain any analysis of the potential impacts of the LRDP without the new medical office building. Without construction of the new medical office building and associated underground parking garage, there would be a total of only 230 parking spaces provided at the St. Luke's Campus, compared to a parking demand of 759 spaces. (The DEIR does not indicate the portion of the St. Luke's Campus parking demand that would be generated by the new medical office building.) Thus, there would be a parking shortfall of 529 spaces, potentially including a shortfall of spaces for physicians. The parking discussion and the secondary traffic, air quality and noise impacts of the 529-space shortfall in parking must be reevaluated. The DEIR should also evaluate the impacts of a 529-space parking shortfall on neighborhood character and livability, land use character/compatibility, and plans and policies consistency."

(Francis Taylor, October 29, 2010) [117-1 TR]

"I am a neighbor of St. Luke's Hospital who has been working for several years on traffic calming on Cesar Chavez Street. I am the cochair of the community organization CC Puede, which has taken the lead on this effort, though I speak only for myself and not for the group.

The proposal for St. Luke's basically prioritizes parking over patients. The proposed 80-bed hospital will replace a facility currently licensed for over 200 beds, while the proposed 200-space parking garage will replace the current 80 or so surface parking spaces. So a third as many patients will share space with three times more cars! This turns the mission of a healthcare organization on its head."

Response TR-74 (Parking – St. Luke's Campus)

The comments summarize information contained in the Draft EIR regarding parking supply, demand, request clarification of the parking supply, and express concern related to the parking supply and accommodation of demand at the St. Luke's Campus.

As presented on pages 2-179 and 2-180 of the Draft EIR, under the proposed CPMC LRDP, St. Luke's Campus would contain an 80-bed hospital and a 201,000 square foot MOB. The proposed CPMC LRDP facilities would replace the existing hospital containing 229 licensed beds, 139 of which are operational. The proposed CPMC LRDP would result in an increase in the daily population at the St. Luke's Campus by about 1,260 persons (see Table 4.5-10 on page 4.5-76 in the Draft EIR), which would increase the parking demand at the campus. As shown on Table 4.5-10 on page 4.5-80 in the Draft EIR, parking demand would increase from about 520 spaces under Existing conditions (for the 229-bed hospital), to about 760 spaces under the proposed CPMC LRDP (80-bed hospital, plus 201,000 square feet of MOB)—an increase of 240 spaces.

The St. Luke's Campus currently contains 329 off-street parking spaces, including 215 parking spaces in the Duncan Street Garage, and 114 spaces in the existing surface lots and reserved on-street spaces. At buildout of the St. Luke's Campus, a total of 450 parking spaces would be provided. Of the total of 450 parking spaces, 98 spaces would be reserved for physicians, 165 spaces reserved for staff, and 187 spaces would be available for patients and visitors. As indicated in Response TR-69 (page C&R 3.7-129), which responds to comments related to the Planning Code, as part of the PUD process for St. Luke's Campus, CPMC would seek an exception to the Planning Code to provide fewer than the minimum required number of parking spaces (i.e., 450 parking spaces proposed, versus 559 parking spaces required).

- With implementation of the proposed CPMC LRDP, a new parking structure containing 220 spaces would be constructed under the proposed MOB/Expansion Building. About 29 spaces would be reserved for physicians, 50 spaces would be reserved for staff, and 141 parking spaces would be available for patients and visitors.

- Within the existing Duncan Street garage containing 215 parking spaces, 54 spaces would be reserved for physicians, 115 spaces would be reserved for staff, and 46 parking spaces would be available for patients and visitors.

- About 15 surface parking spaces would be reserved for physicians.

No other campus would use the parking facilities at the St. Luke’s Campus. In addition, to facilitate traffic flow within the garages and reduce around-the-block movements, CPMC would install electronic “FULL” signs near all garage entrances, and directional signage within the proposed MOB garage, directing drivers to use the Cesar Chavez Street exit for access to U.S. 101. To ensure that queues would not spill onto the street if the garage were to become full, an improvement measure, I-TR-5, has been developed which would require the operator of the garage to take appropriate actions to ensure that such queues would not occur. See Response TR-89 (page C&R 157).

At buildout of the St. Luke’s Campus, a peak parking demand of about 759 spaces would occur, compared with a total supply of 450 spaces. Overall, a parking shortfall of 309 spaces would exist, including 172 spaces for employees, and 137 spaces for patients and visitors. Since parking would be used by employees, visitors and patients, parking spaces would be used to meet both long- and short-term demand. Short-term visitors to the campus who were unable to find parking on the campus would be likely to park in any available on-street parking space in the campus vicinity, but because of the difficulty in finding on-street parking in the area, some also might choose to take public transit, use a bicycle, or walk instead of drive. On-street parking adjacent to the proposed LRDP site is currently well-utilized, with parking occupancy ranging between 80 and 100 percent between 1 p.m. and 5 p.m., and about 70 percent occupied at 8 p.m. However, transit lines in the St. Luke’s Campus vicinity (e.g., the 12-Folsom, 14-Mission, 27-Bryant, and the nearby BART lines) have available capacity to accommodate additional riders, and some patients and visitors may shift to transit to access the campus. Employees who were unable to park at the campus could switch travel modes to public transit, use a bicycle, or walk to the campus, or park in one of CPMC’s off-site parking facilities. Employees who chose to park in off-site facilities might increase demand for CPMC shuttle services.

As indicated in Response TR-69, changes in parking conditions are considered to be social impacts rather than impacts on the physical environment. The transportation analysis accounts for potential secondary effects on the physical environment, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the St. Luke’s Campus and then would seek parking farther away if convenient parking was unavailable. Moreover, the secondary effects of drivers searching for parking typically would be offset by a reduction in vehicle trips because of others who would be aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which might result from a shortfall in parking in the vicinity of St. Luke’s would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably address potential secondary effects.

The proposed LRDP for St. Luke’s Campus would include a new hospital and medical office space, as well as a new underground parking structure containing 220 spaces. The medical office space is a component of the proposed LRDP at the St. Luke’s Campus, and the Draft EIR does not state, as implied in Comment 101-28, that “the new medical office building may not be built due to the strong possibility of a lack of sufficient hospital use or market demand for medical office space at the St. Luke’s Campus.”As discussed in the Draft EIR, the peak parking demand would be 759 spaces and a supply of 450 spaces, resulting in a shortfall of 309 spaces. The parking supply that would be provided if the proposed MOB was not constructed would include the 215 parking spaces in the Duncan Street Garage and a portion of the 114 spaces on existing surface lots. As indicated in the comment, if the proposed parking garage was not constructed, the parking shortfall would increase from 309 spaces to approximately 360 spaces. The reason for this modest increase is that if the parking garage was not constructed the new medical office building also would not be constructed. This would reduce total parking demand at the campus because the parking demand associated with the new medical office building doctors, staff, and patients would be removed from the demand equation.

3.7.8.7 PARKING – OFF-CAMPUS PARKING FACILITIES

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-119 TR, duplicate comment was provided in 30-119 TR]

"Also, when the shuttles select a garage such as the Japantown Garage, it is not only the taking up of the spaces for merchant and Japantown users but also a problem because all the shuttles will be frequently circling to and from Cathedral Hill and the BART station. The Japantown garage, a City-owned garage, should not be assisting a private company (CPMC) with running its business at the detriment of the private businesses at Japantown who have been able to sustain business despite past development impacts. Some other garages and lots owned by the City such as those listed below should be considered that are underutilized:

- Yerba Buena Gardens Garage - maybe 50% utilized
- Ellis-O'F arrell Garage
- Sutter-Stockton Garage
- Union Square Garage
- Other City-owned surface parking lots
- Port properties
- City public school parking lots (when not being used)

If the City wants to assist CPMC in their project, it would only be fair that the City provide parking in places that do not impact the financial viability of the merchants in the nearby areas of the projects."

Response TR-75 (Parking – Off-Campus Facilities)

The comment expresses concerns related to the continued use of the Japan Center Garage as a off-campus parking facility for staff, and suggests use of other City-owned facilities.

The 623 off-campus parking spaces identified in Table 4.5-34 in the Draft EIR, page 4.5-164, would be dedicated to CPMC uses. CPMC currently has a lease at the Japan Center Garage for 400 parking spaces through 2015, and a lease at the 855 Geary Street Garage for 180 parking spaces through 2020. CPMC intends to continue these leases and staff would continue to park at these two facilities. The 2105 Steiner Street facility, containing 43 parking spaces, is owned by the Sutter Pacific Medical Foundation, a non-profit organization affiliated with CPMC. Therefore, 623 off-campus spaces would be available for exclusive CPMC use. Staff at the proposed Cathedral Hill Campus and the Davies Campus could park at the Japan Center Garage. However, the St. Luke's Campus would have a staff parking shortfall of 172 spaces, and some St. Luke's staff also might choose to park at these facilities.

The CPMC shuttle currently makes stops at the Japan Center Garage and, therefore, its operations are reflected in existing conditions. Based on information contained in the Japantown Better Neighborhood Plan, capacity is available throughout the day in the garage to accommodate additional vehicles and, therefore, consideration of leases by CPMC at alternate facilities would not be warranted. Because capacity would be available within the Japan Center Garage, parking demand generated by private businesses in Japantown would be adequately accommodated. CPMC does not have plans to lease more than 400 spaces at the Japan Center Garage, and if additional off-site parking was needed, CPMC would seek to lease additional facilities elsewhere. The use of other City-owned parking facilities would not be practical because parking supply would be available at the nearby Japan Center Garage and other City-owned facilities would be located substantially further away. Because most facilities would be smaller than the Japan Center Garage, it is unlikely that 400 parking spaces in City-owned facilities would be available for CPMC use on a daily basis. Also refer to Response TR-129 (beginning on page C&R 3.7-227) regarding the impact of the proposed Cathedral Hill Campus on transportation conditions in Japantown.

3.7.8.8 AVAILABILITY OF JAPAN CENTER GARAGE

Comment

(Hiroshi Fukuda, September 23, 2010) [PC-160 TR]

"This, in effect, will have almost the same kind of impact as the plan to build 400 condos on the Japan Center. That would close, demolish the garage for several years – two to five years. This will be somewhat similar unless CPMC has adequate and satisfactory mitigations on the parking issue. One of the mitigations was to reserve 400 spaces in the Japan Center, well, they already have 400 spaces in the Japan Center, that is for staff presently. So, I don't quite understand how they could have another 400 unless they have plans to redirect the workers there, the staff, to another site. That hasn't been explained, and it needs to be."

Response TR-76

The comment requests clarification regarding CPMC's use of the Japan Center Garage. CPMC currently has a lease for 400 parking spaces (of the 920 parking spaces in the garage) through 2015. Additional parking spaces beyond the 400 parking spaces would not be leased. An overlap of parking at the Japan Center Garage by construction workers and staff at the Pacific Campus is not anticipated. The Construction Worker Transportation Program (CWTP) prepared by CPMC in December 2010, following publication of the Draft EIR outlines measures that would be required by the construction contractors to encourage construction workers to carpool and take public transit, and to discourage the use of private auto. Thirteen parking facilities in the vicinity of the proposed Cathedral Hill Campus and two satellite parking facilities were identified for use by construction workers driving to the site. Also refer to Response TR-106 (page C&R 3.7-185) for information regarding the use of area parking facilities during construction.

Please refer to Response TR-69 (page C&R 3.7-129) for a discussion of other potentially available parking within the vicinity of the Cathedral Hill Campus that CPMC could seek to contract with if the parking spaces in the Japan Center Garage were no longer available.

3.7.8.9 NORTH-OF-CLAY GARAGE

Comments

(Arthur and Jacqueline Cimento, October 19, 2010) [78-1 TR, duplicate comment was provided in 99-1 TR]

"We are responding to the invitation for public comment on the draft Environmental Impact Report (EIR) for the California Pacific Medical Center (CPMC) Long Range Development Plan.

For over 20 years, my family and I have owned our home on Washington Street which shares the northern property line of CPMC's Pacific campus. In reviewing the draft EIR, there appear to be glaring inconsistencies between the facts presented and the intentions of the project. In particular, there is a disconnect between the size of the proposed North of Clay aboveground parking facility and its stated usage. Given the primary (construction-related) and secondary (long term project induced) impacts of this parking structure, we request that further alternatives be considered. It is not apparent whether the purpose of the parking facility is to support the hospital's staff and patients or introduce a commercial development in violation of existing land use policies for our neighborhood. Further, the project as currently defined fails to achieve the CEQA requirement of reducing impacts to the point of insignificance."

(Arthur and Jacqueline Cimento, October 19, 2010) [78-4 TR, duplicate comment was provided in 99-4 TR]

"The draft EIR does not adequately address any induced development from the project. Such development could arise from a shift from inpatient to outpatient care (discussed above) and the addition of 688 new parking spots in the middle of a residential neighborhood (Table 2-7b).

The project is located two blocks off of the commercial district of Fillmore Street, which sees many visitors on most weekends and evenings. The availability of a large parking facility close to this district will undoubtedly attract more traffic into the neighboring streets, well above what is required for the medical facility. Also, it is of concern that the character of this traffic may differ from the traffic associated with an in-patient facility, since many users of the facility will be patronizing bars and restaurants at night. In addition, the facility is located on transit lines that are convenient to downtown, making the parking facility a magnet for commuter automobiles. The EIR is inadequate in that it does not consider such changed usage patterns."

(Arthur and Jacqueline Cimento, October 19, 2010) [78-7 TR, duplicate comment was provided in 99-7 TR]

"We would also request additional mitigation measures such as limiting the parking facility's hours of operation to exclude evenings and weekends or restricting its use to bona fide users of the medical facility."

Response TR-77

The comments request information regarding the North-of-Clay parking facility at the Pacific Campus, express concerns regarding potential induced development, ask about the purpose of the parking facility, and also request mitigation measures. The purpose of the North-of-Clay Parking Garage would be to serve as an accessory parking facility to the medical services provided at the Pacific Campus. Providing adequate on-site parking supply would reduce the number of visitors and staff parking on-street, where parking spaces are metered or subject to residential permit parking restrictions. Similar to existing conditions, CPMC would continue its commitment to adjacent residents and nearby businesses and would allow use of the parking spaces at night and on weekends. Visitors to the area would be able to park within the North-of-Clay garage. CPMC would not intentionally limit the hours of operations at the facility or have garage users prove that they were destined to CPMC-related uses. Although CPMC-related overnight parking demand would be substantially lower than during the day, the parking facility would need to remain open to accommodate the demand.

The shift from inpatient to outpatient medical care or the provision of parking spaces to serve the Pacific Campus uses are not anticipated to result in substantial economic changes or induced development in the area. In response to the specific concerns raised in the comment:

- As indicated in Table 4.5-34 in the Draft EIR, page 4.5-164, the Pacific Campus parking demand of 1,577 spaces would be adequately accommodated within the proposed supply of 1,587 spaces. Because the demand would be met within the supply, with a limited surplus of 10 spaces, the proposed supply would not exceed what would be needed by anticipated uses.

- Visitors parking at the proposed North-of-Clay Garage would likely be similar to those currently using the 2405 Clay Street Parking Garage that is located on the southwest corner of the intersection of Clay/Webster. The change from a hospital and inpatient facility to providing predominantly ACC would not substantially alter the evening parking demand at the existing and proposed facilities, and no reason exists to presume that it would alter the character of the visitors using the parking garage during the evening hours.

- The parking rates at the proposed North-of-Clay garage would be similar to those at the existing 2405 Clay Street garage (currently a maximum daily rate of $20 per day), and it is unlikely that a substantial number of commuters to downtown would pay that rate to park and then take a bus downtown. No supporting evidence indicates that the existing garage is used for commuter parking.

Please also see Response PH-25 (page C&R 3.5-82) regarding the discussion of indirect and induced employment and development resulting from the proposed CPMC LRDP.

Mitigation measures are warranted when a project results in a significant impact. As described in Response TR-69 (page C&R 3.7-129), San Francisco does not consider parking supply as part of the permanent physical environment and, therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Therefore, mitigation measures are not required. In general in San Francisco, parking deficits are considered to be social impacts. The social inconvenience of parking deficits, such as having to hunt for scare parking spaces, is not an environmental impact, but secondary physical environmental impacts might occur, such as increased traffic congestion at intersections, air quality impacts, safety impacts, noise impacts caused by congestion, or transit impacts associated with a shift in mode. Because the Pacific Campus demand would be adequately accommodated within the proposed supply, secondary physical environmental impacts would not result and, therefore, mitigation measures would not be required.

3.7.8.10 CPMC Off-Campus Parking Facilities

Comment

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-31 TR]

"From Footnote 1 to Table 4.5-34, the 623 'off-campus' parking spaces include 400 spaces at the Japan Center Garage, 180 spaces at 855 Geary Street Garage, and 43 spaces in the garage at 2015 Steiner Street. The discussion in this portion of the Draft EIR does not disclose if the 'off-campus' parking spaces at the three locations have been leased by CPMC and would therefore be available to make up a portion of the overall parking shortage. To consider these 'off-campus' spaces as part of the parking supply, the Draft EIR must require that CPMC guarantee that the 623 spaces are available and that adequate shuttle service to and from their campuses will be provided."

Response TR-78

The comment requests information regarding the status of off-campus parking facilities. The 623 off-campus parking spaces identified in Table 4.5-34 in the Draft EIR, page 4.5-164, would be dedicated to CPMC uses. CPMC has a lease at the Japan Center Garage through 2015, and a lease at the 855 Geary Street Garage through 2020. Presumably the leases at these two facilities would be extended before expiration, and CPMC employees would continue to park at these facilities. The 2105 Steiner Street facility is owned by the Sutter Pacific Medical Foundation, a non-profit organization affiliated with CPMC and, therefore, the 623 off-campus spaces are available for exclusive CPMC use. The existing CPMC shuttle serves the Japan Center Garage, and the 855 Geary Street and 2015 Steiner Street facilities are within walking distance of the proposed Cathedral Hill Campus site and the Pacific Campus, respectively.

As part of its "Transit First" policy, the City and County of San Francisco do not require the supply of parking spaces to equal the demand. If the proposed LRDP were not to include provision for these off-campus parking facilities, a parking shortfall would result. However, this shortfall would not be considered a significant environmental effect because it would be considered a social impact and, therefore, no mitigation measures would be required under CEQA.

3.7.8.11 CONSTRUCTION WORKER PARKING

Comment

(Gloria Smith/Tom Brohard & Associates —California Nurses Association, October 19, 2010) [92-32 TR]

“In the parking discussion for the individual campuses, the Draft EIR notes that on-street parking nearby is not available during most hours. In conflict with this, the Draft EIR then suggests that motorists can locate parking on these streets. Available off-street parking at certain campuses will also be limited during construction, and the Draft EIR does not provide mitigation for these significant impacts.”

Response TR-79

The comment suggests a conflict in the Draft EIR regarding availability of on-street parking during construction. Although on-street parking in the vicinity of a number of the proposed CPMC campuses would be well-utilized, many of the parking spots would be time limited (either metered or with residential permit parking restrictions), which would result in turnover of parking spaces. Although parking spaces might be difficult to find, they would generally be available, although drivers might need to park further from their destinations.

The Construction Worker Transportation Program (CWTP) developed by CPMC would be required to be implemented by the construction contractors. The program outlines measures that would be required to encourage construction workers to carpool and take public transit, and to discourage the use of private autos. Also refer to Response TR-106 (page C&R 3.7-185) for information regarding the use of area parking facilities during construction.

As indicated on page 4.5-162 in the Draft EIR, San Francisco does not consider parking supply as part of the permanent physical environment and, therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. The parking analysis and discussion of the proposed CPMC LRDP is presented for informational purposes, and mitigation measures are not required.

3.7.8.12 REVOCABLE PERMITS

Comment

(Quevner Zabeles, October 19, 2010) [81-1 TR]

“My apologies, I have an additional comment on the CPMC EIR.

The EIR says that the Geary street driveways for both the hospital and the MOB are “revocable”. What does this mean? Who would revoke them, and under what circumstances? Does Cpmc waive it’s right to sue if the driveways are revoked?”

Response TR-80

The comment requests clarification regarding revocable permits. Because of concerns regarding driveway operations on Geary Boulevard, the Planning Department specified on page 4.5-87 in the Draft EIR that the “Geary Boulevard parking garage curb cut permit would be revocable, and this condition would be recorded as a Special Restriction on the deed of the Hospital.” All permits issued by the Department of Public Works are revocable at the will of the Director of Public Works.

If the Geary ingress driveway for the hospital were to be revoked, the ingress driveway would become an emergency-only ingress driveway (similar to the adjacent emergency-only egress driveway). Access would be restricted by a gate or similar mechanism, and non-emergency ingress and egress to the hospital garage would continue to be provided via Post Street. If the Geary ingress driveway for the MOB were to be revoked, DPW would request the project sponsor to return the sidewalk and curb in the public right-of-way to conditions that existed before the permit.

Should the City pursue revocation of one or both of the Geary Street driveways and driveway permits at the proposed Cathedral Hill Campus, CPMC could appeal this decision. However, CPMC is expected to proactively work to ensure that conflicts with transit, traffic, and pedestrians would be minimized at these driveways.

3.7.8.13 Hospital Parking Supply Requirements

Comment

(Linda Chapman, October 19, 2010) [76-22 TR, duplicate comment was provided in 111-22 TR]

"The legislative Analyst found that Manhattan limits hospitals to 100 parking spaces. Therefore: What is the rationale for this city to require many times more spaces for any hospital campus? What medical need could justify outsized garages in a transit-rich area with severe traffic impacts? What conditions made it possible for hospitals in other cities to offer less public parking?"

Response TR-81

The comment states that the off-street parking requirements in New York City limit parking for hospitals to 100 spaces, and the comment poses questions regarding similar restrictions for the proposed CPMC LRDP. While it is correct that the New York City Zoning Resolution specifies that for hospitals in Manhattan community districts, a maximum parking supply of 100 spaces is permitted, the requirements for community districts outside of Manhattan (e.g., in Brooklyn or Queens which both have a population density that is greater than San Francisco) are similar to the *San Francisco's Planning Code* requirements. Manhattan has very unique conditions related to density, daytime population, and availability of public transit that are not found in any other city in the United States. Therefore, comparisons in parking requirements between Manhattan and San Francisco are not appropriate.

The New York City Zoning Resolution's off-street parking requirements for hospitals outside of Manhattan community districts range between one space per five beds to one space for 10 beds, depending on the commercial district in which the hospital is to be located.[24] The San Francisco Planning Code requirement for hospitals is one space for each eight beds or one for each 2,400 square feet of gross square feet devoted to sleeping rooms, whichever results in the greater requirement. The Planning Code requirements for hospitals are therefore comparable to New York City, outside of Manhattan.

3.7.8.14 Cathedral Hill Nearby Religious Services and Community Activities

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-139 TR, duplicate comment was provided in 30-139 TR]

"And, when the demolition and construction phases are in full swing, will there be enough parking for the church members? Even though the churches have parking lots, some of them may have used street parking which will be eliminated during the CPMC project. Has this been taken into consideration? Will people from churches/synagogues from Cathedral Hill Hospital project area migrate to the north and take street spaces away from church-goers in the northern streets such as at the Buddhist Church of San Francisco bounded by Pine, Gough, Austin and Octavia (Page 4.1-11)?"

[24] City of New York, Zoning Resolution, Off-Street Parking for Hospitals.

(Galen Workman, October 14, 2010) [55-2 TR]

"[The plan] fails to address the impact on street parking in the area - especially for religious services on Sunday mornings and in the evenings when our community activities occur at the church."

Response TR-82

The comments question the impact (on-going and construction-related) of the proposed Cathedral Hill Campus project on existing parking conditions on Sundays and weekday evenings. Similar to existing conditions at the proposed site, the off-street parking facilities at the proposed Cathedral Hill Hospital and MOB would be available for use by residents and visitors to the area during operating hours. The discussion on page 4.5-163 in the Draft EIR identifies the effect of the proposed Cathedral Hill Campus project on the on-street parking supply. Proposed sidewalk widening and other pedestrian improvements would result in the displacement of 26 standard metered spaces, one wheelchair-accessible space, and 10 commercial loading spaces. The parking demand associated with the permanent displacement would be accommodated on other streets in the campus vicinity and would result in increased parking occupancies (the parking occupancy of the existing on-street spaces adjacent to the project sites varies throughout the day, ranging between 57 percent in the mid-afternoon to about 77 percent at 8 p.m.). Some residents and visitors to the area would have to walk further between their parking spaces and destinations.

Additional field surveys were conducted in December 2010 and January 2011 on Sunday mornings to assess on-street parking utilization. During field surveys, on-street parking spaces were readily available on the east-west streets (e.g., Geary Boulevard, Post Street, O'Farrell Street, Ellis Street) between Van Ness Avenue and Gough Street, and along Van Ness Avenue. Before church services, some on-street parking spaces also were available on Franklin Street (LCW Consulting, 2011). CPMC hospital-related parking demand on Sundays and evenings would be substantially lower than on weekdays, and would be accommodated by the on-site parking supply. Some visitors might park on a street, which would reduce the on-street supply that would be available for religious services and other community activities; however, as indicated above, parking supply would be available in the proposed hospital and MOB garages in the evenings and on weekends.

Although construction of the proposed Cathedral Hill Campus project would not occur on Sundays when services were held at nearby churches/synagogues or at the Buddhist Church on Pine Street, construction activities would require the use of parking lanes adjacent to the proposed hospital (as described on pages 4.5-152 and 4.5-153 in the Draft EIR). The parking demand on Sundays, currently accommodated by these spaces, would need to be accommodated elsewhere in the area and would increase the parking utilization of on-street parking on Sundays, which, based on field surveys described above, would be lower than on weekdays. Visitors who drove to the area for Sunday services might have a longer distance to walk from their parking spaces to their destinations.

3.7.8.15 TENDERLOIN-LITTLE SAIGON CONDITIONS

Comments

(Lower Polk Neighbors, October 19, 2010) [103-27 TR, duplicate comment was provided in 113-27 TR]

"H. Help fund an additional parking garage within the neighborhood (or within a few blocks from the LPN boundaries, but at least 4 blocks away from the hospital and MOB.)"

(Lower Polk Neighbors, October 19, 2010) [103-17 TR, duplicate comment was provided in 113-17 TR]

"F. Because we will be in a heavily-visited hospital zone, parking for our residents and businesses will be very difficult to come by which will deter potential customers from coming to our area. especially for 'pick up' items. (an economic and livelihood issue)"

(Hiroshi Fukuda, September 23, 2010) [PC-162 TR]

"Alternative parking mitigations need to be explored more fully, the need to explore the downtown garages, the Port of San Francisco, Candlestick Park, Cow Palace, possibly the Presidio, etc."

Response TR-83

The comments state a need and recommend additional mitigation for parking in the Tenderloin-Little Saigon and Lower Polk neighborhoods. As described in Response TR-69 (C&R 3.7-129), San Francisco does not consider parking supply as part of the permanent physical environment and, therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Table 4.5-34 in the Draft EIR, page 4.5-164, presents the parking supply and demand for the proposed CPMC LRDP facilities. Overall, the projected parking demand would be accommodated within the proposed parking supply. At the proposed Cathedral Hill Campus, the parking shortfall associated with employees that drive could be accommodated at off-campus parking facilities (i.e., the Japan Center Garage) and additional parking facilities would not be required. Furthermore, the CPMC TDM Plan would encourage employees to take public transit or other modes, and would discourage auto use. The parking supply for visitors at the proposed Cathedral Hill Campus would be adequate to meet the demand and, therefore, it is not anticipated that visitors would need to rely on on-street parking. Because the campus parking supply would accommodate the demand, it is unlikely that other parking facilities in the vicinity would be affected or that potential customers to neighborhood businesses would be discouraged from driving to the area. Therefore, the need, as a result of the proposed LRDP, would not exist for additional public parking facilities in the area, or the need for the project to help fund additional public parking. Employees of and visitors to the proposed Cathedral Hill Campus would likely patronize businesses in the vicinity of the campus, and these potential customers would be walking to the businesses.

As part of its "Transit First" policy, the City and County of San Francisco does not require the supply of parking spaces to equal the demand. If the Cathedral Hill Campus were to provide fewer parking spaces, a parking shortfall would result. This shortfall would not be considered a significant environmental effect because it would be considered a social impact and, therefore, no mitigation measures would be required under CEQA.

3.7.8.16 LAUREL VILLAGE AND JORDAN PARK CONDITIONS

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [37-4 TR]

6. The **California Campus**, depending on the extent of the remodel options, will cause more traffic congestion for the Laurel Village shopping center, Laurel Heights and Jordan Park if the parking is not remedied.

Response TR-84

The comment states concerns related to parking and traffic conditions in the Laurel Heights/Jordan Park area. As indicated on page 4.4-178 in the Draft EIR, as part of the proposed LRDP, the facilities and operations of the California Campus (in the vicinity of Jordan Park) would remain unchanged until 2015, when the majority of existing activities would be relocated to the Pacific Campus and the proposed Cathedral Hill Campus. Once the California Campus was sold and the majority of services were transferred to the proposed Cathedral Hill Campus and the Pacific Campus, the California Campus would no longer be considered part of CPMC. Analysis of any potential reuse of future redevelopment on the site would be speculative. Any future proposals at the site would require a project-specific, project-level environmental review. With no planned changes in facilities or operations, transportation travel demand at the California Campus would be expected to remain similar to existing conditions until 2015, and then gradually would decrease between 2015 and 2020. The proposed LRDP would not result in any new vehicle trips, and, therefore, would not add to existing traffic congestion as within the Laurel Heights or Jordan Park areas.

3.7.8.17 POLK STREET CONDITIONS

Comment

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-29 TR, duplicate comment was provided in 114-29 TR]

"F. We currently have two parking spaces in front of our building. It is proposed that one of these spaces be eliminated, for visibility reasons. This will be a negative impact on our business due to reduced client parking availability."

Response TR-85

The comment states concern regarding displacement of one on-street parking space on Polk Street and negative impact to business at 1033-1037 Polk Street. As indicated on page 4.5-165 in the Draft EIR, to improve sight distance for drivers exiting Cedar Street eastbound at Polk Street of southbound bicyclists, one metered parking space immediately north of Cedar Street on the west side of Polk Street would be removed and converted into a sidewalk extension. On Polk Street between Post Street and Geary Street, four metered and three unmetered parking spaces are on the west side of the street, and five metered parking spaces are on the east side of the street. Displacement of one parking space to improve sight distances would reduce the parking supply, and the demand would need to be accommodated elsewhere, thereby increasing the occupancy of other spaces. However, because on-street parking spaces are available to all drivers and not just to those patronizing the businesses in front of which the parking spaces are located, the displacement of one space on Polk Street would not substantially reduce client parking availability over existing conditions for businesses at 1033–1037 Polk Street.

3.7.8.18 JAPANTOWN CONDITIONS

Comment

(Nihonmachi Terrace, October 18, 2010) [75-1 TR]

"We, the residents of Nihonmachi Terrace Apartments, write this letter to raise concerns about the deficiencies of the draft CPMC EIR. Our major concerns are in regards to traffic, parking, air quality, and noise pollution to our residents. The DEIR only addresses peak commute period impacts during demolition and construction. We have an objection to the increase in traffic as well as the parking impact after construction to our neighborhood.

Traffic is already a serious problem with regard to speed and inadequate yielding from the drivers. Pedestrian right of way is too often ignored at the intersections of Octavia/Sutter and Octavia/Post Streets. We believe that the CPMC must make every effort to mitigate these affects. Although we have some off-street parking for our residents, many visitors to our community will be seriously impacted in their quest for parking. The garages in this neighborhood are already at capacity and will be severely stressed during demolition and construction. There must be a serious look at mitigation measures that will address some kind of off-site parking for the Construction Company and sub-contractor as they come to work and return home in the evenings. Sub-contractors in particular are most insensitive to neighborhood concerns. The general contractor must establish an enforceable agreement from all sub-contractors that require them to abide by traffic and parking mitigation measures."

Response TR-86

The comment states concerns related to traffic impacts on Japantown streets, and location of construction worker parking, and incorrectly states that the transportation impact analysis only addresses peak commute impacts during demolition and construction. The Draft EIR includes an assessment of construction-related transportation impacts as well as operation impacts of the proposed LRDP. The transportation analysis conducted for the Draft EIR included analysis of traffic and transit conditions for 2015 Modified Baseline and 2030 Cumulative conditions, both with and without the proposed CPMC LRDP. The impacts associated with intersection operations are presented in Impact TR-1 through Impact TR-23 for 2015 conditions (Draft EIR, pages 4.5-93 through 4.5-115), and Impact TR-99 through Impact TR-124 for 2030 Cumulative conditions (Draft EIR, pages 4.5-216 through 4.5-232). The impacts on traffic operations during the peak of the construction activities are described in Impact TR-55 (Draft EIR, pages 4.5-147 through 4.5-160). Also please refer to Response AQ-27 (page C&R 3.9-71) for air quality, and Response NO-36 (page C&R 3.8-45) for noise.

Concerns regarding unsignalized midblock crosswalks and the request in Comment 45-6 TR in Response TR-67 (page C&R 3.7-124) to provide a flashing yellow light at the unsignalized midblock crosswalk on Post Street between Gough Street and Laguna Street (at former Octavia Street) was forwarded to SFMTA for its review, which would address the issue identified in the comment regarding existing failure to yield to pedestrians at this location. As indicated in Response TR-129 (page C&R 3.7-227), the majority of vehicle trips destined to and from the proposed Cathedral Hill Campus would use major arterials to access the site, including Van Ness Avenue, Franklin Street, Gough Street, and Geary Boulevard. West of Gough Street, Sutter and Post Streets are local streets, and CPMC LRDP-generated vehicles would be dispersed over multiple streets. The nominal increase in vehicles on local streets in Japantown would not substantially affect operating conditions at the two unsignalized midblock crossings on Post Street and Octavia Street. SFMTA has reviewed the community request for flashing yellow lights, in-street pedestrian crossing signs, STOP signs, and consolidation of crosswalks, and has indicated that installation of a solar-powered, push button-activated flashing beacon on existing poles would be possible. SFMTA is exploring funding possibilities for installation of the flashing beacon. The pedestrian impact analysis for the Cathedral Hill Campus, as presented in Impacts TR-40 through TR-42 on pages 4.5-130 to 4.5-136 of the Draft EIR, did not identify any significant pedestrian impacts along Post Street. Therefore, providing a flashing yellow light at the existing midblock crosswalk is not required as a mitigation measure.

CPMC and its contractors would develop the CWTP to ensure that the parking demands for construction workers were met without impacting parking availability for patients, employees, visitors, or other local merchants and residents near each campus. The goal of the CWTP would be to reduce the number of workers driving to construction sites and to manage the use of available parking supply so as to not unreasonably impact parking availability for patients, employees, local merchants, residents, and visitors. Workers would be encouraged to use public transportation, carpool, or vanpool, or use shuttles to access construction sites, consistent with the City’s Transit-First policy. The implementation of the CWTP would minimize the potential that construction workers would park in residential neighborhoods. CPMC has indicated that all construction personnel would be instructed not to park on-street, and penalties would be assigned where this was not followed.

Following publication of the Draft EIR, CPMC identified and contacted 13 parking facilities within walking distance of the proposed Cathedral Hill Campus to determine parking availability during construction of the campus. In aggregate, the facilities contained about 480 available spaces, of which approximately 75 percent, or 360 spaces would be pursued for construction parking use.[25] CPMC would work with garage management to monitor overall garage occupancies, and if maximum capacities were exceeded, CPMC would redirect its parking demand to other facilities, further from the campus site.

[25] EIR Construction Data Report (Revised 2011), Sheet CO-5- Parking Locations, prepared by Herrero Boldt.

CPMC envisions the use of parking passes to be issued to individual drivers with staggered start times between 6:30 a.m. and 8:30 a.m., spreading out arrivals. Any lot within walking distance but greater than a 10-minute walk from the construction site would be linked to the site by shuttle service, provided by CPMC. Two satellite parking facilities have been identified to supplement facilities closer to the proposed Cathedral Hill Campus. The Performing Arts Garage and the 12th Street/Kissling Garage have a combined capacity of 1,400 spaces, and approximately 800 of these spaces were identified by the operators to be available on a regular basis. CPMC has long-term leases at these facilities for use in its operations as well as for construction projects. In the event that these facilities would need to be used, shuttles between these facilities and campus sites would be provided.

3.7.8.19 CATHEDRAL HILL CAMPUS PARKING SUPPLY AND VEHICLE TRIPS

Comments

(Jack Scott, September 23, 2010) [19-3 TR, duplicate comment was provided in 40-3 TR]

"The current plan proposes to construct 2 separate parking garages one for the hospital and one for the medical office building. Combined they would represent +/- 1,000 spaces. 1,000 spaces equal 1,000 cars and approximately 10,000 ADDITIONAL vehicle trips per day to the already congested Van Ness corridor."

(Lois Scott, September 23, 2010) [PC-7 TR]

"The current plan proposes to construct two separate parking garages, one for the hospital, and one for the medical office building; combined, they would represent plus or minus a thousand parking places. A thousand parking places equates to a thousand cars, which equate to 10,000 daily automobile trips. The already congested Van Ness corridor, Franklin Street, Post Street, and Geary Blvd. would be further impacted with these garages and these numbers of cars."

Response TR-87

The comments state concern over the supply of off-street parking spaces at the proposed Cathedral Hill Campus and the number of vehicle trips generated by the proposed campus project. The Cathedral Hill Campus project would provide a total of 1,227 off-street parking spaces, including 513 spaces at the Hospital, 542 spaces at the MOB facility, and 172 spaces at 1375 Sutter Street. The Cathedral Hill Campus project would displace 405 parking spaces at 1133 Van Ness Avenue that are part of the existing Cathedral Hill Hotel uses on the project site. The Cathedral Hill Campus project, including the 1375 Sutter MOB, was estimated to create 8,220 net new daily vehicle trips (inbound and outbound). The proposed Cathedral Hill Campus project would generate 593 a.m. peak hour vehicle trips, and 609 p.m. peak hour vehicle trips. The impact of the additional vehicle trips for the project and variant access options is presented in Impact TR-1 through Impact TR-26 on pages 4.5-93 to 4.5-116 in the Draft EIR.

The proposed Cathedral Hill Campus project would result in significant and unavoidable impacts at the intersections of Van Ness/Market and Polk/Geary, and feasible mitigation measures have not been identified. At six intersections that would operate poorly under 2015 No Project and 2015 plus Project conditions, the project contributions to the poor operating conditions would be less than significant. At 18 of the 26 study intersections, operating conditions would remain at LOS D or better under 2015 plus Project conditions. Therefore, although the proposed Cathedral Hill Campus project would increase the number of vehicles and average delay per vehicle at nearby intersection, the majority of the intersections would continue to operate at acceptable levels of service.

3.7.9 Loading

3.7.9.1 Passenger Loading

Cathedral Hill Hospital Parking Structure—Loading Area

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-115 TR, duplicate comment was provided in 30-115 TR]

"On Page 4.5-84, Table 4.5-15 ('Peak Hour Passenger Loading/Unloading Zone Demand by Campus'), it shows that the peak-hour demand in the AM would be 60 linear feet and the loading demand is 75 feet. If the vehicles arrive on the Geary side, the vehicles may start to queue up in the hospital 'drop-off' zone depending on the activity going on in the drop-off zone. Sometimes a disabled person is dropped off and these people require more time than others so the 'drop-off' zone itself appears to be a total of about 200 feet for both sides of the island (Page 2-75). How long is it? This area needs to be very well-lit, have pedestrian-triggered lights and sound and a vibrating pole or other device for people who are both deaf and blind.

Are there disabled ramps in this 'passenger drop-off' zone (Page 2-75)?"

Response TR-88

The comment states concerns regarding the internal passenger loading/unloading facilities at the proposed Cathedral Hill Hospital. The passenger loading demands for the proposed hospital, presented in Table 4.5-15 in the Draft EIR (page 4.5-84), would be 60 linear feet during the a.m. peak hour and 75 linear feet during the p.m. peak hour. An analysis of the passenger loading is also presented in Section 4.7.2 on pages 104–105 of the *Cathedral Hill Transportation Impact Study*, which is on file and available for public review at the San Francisco Planning Department. The length of the proposed passenger drop-offs are shown in Figure 19, on page 117 of the study. As shown in Figure 19, the passenger drop-off would be located approximately 150 feet from the entrance at Geary Street and the dedicated passenger drop-off area would have 125 linear feet of curb, which would exceed the projected peak demand of 75 linear feet. Drop-offs would not be allowed on the median island that would separate the drop-off area from the parking circulation lanes. The drop-off area would have two lanes so that vehicles could exit once their passengers were dropped off. This design would improve the efficiency of drop-offs. Furthermore, CPMC proposes to use attendants at their drop-off areas, to manage vehicles that would be loading and unloading patients as well as to provide assistance to patients once they were dropped off. If drop-offs took more time and a queue formed, CPMC would be required to address any queue issues to meet the requirements of Improvement Measure I-TR-5 (Queue Abatement). For more information on this Mitigation Measure, see Response TR-89. The proposed hospital design would conform to the American with Disabilities Act (ADA) design standards; therefore, the loading areas would be designed with the appropriate lighting and safety and include ADA ramps. The final configuration of the passenger loading area would be submitted to the City, and ADA compliance would be part of the plan review process. Also see Response TR-65 (page C&R 3.7-122), which addresses concerns regarding hearing- and visually impaired individuals.

Cathedral Hill Hospital Geary Access—Queue Spillback

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-116 TR, duplicate comment was provided in 30-116 TR]

"In addition, a vehicle may block the proposed Geary BRT lane which is located closest to the hospital if it queues into the lane. The BRT will have to wait for the vehicle to get out of the BRT lane before proceeding so there could be a transit impact. If the BRT is blocking the entrance to the hospital 'drop off' zone, the vehicles will start to double up next to a 38/38l-Geary bus until it passes. This will cause the traffic in the lane the vehicle is in to come to standstill because it will become a double-parked vehicle for the time it takes for the bus to clear. For these instances, the 3 lanes of Geary will turn into 1 lane and cause traffic to back up across the intersection of Geary and Van Ness. One must also account for the right turning vehicles off of Van Ness onto Geary who want to go to the hospital. They will also be affected in that they will not be able to turn so the backup grows on Van Ness down to Post St. and possibly farther north to Hemlock St. and Sutter St. This is similar to the commuter traffic at Laguna and Geary where there is a 'no right turn' sign so the traffic southbound on Laguna and the traffic turning from Post St onto southbound Laguna gets backed up. I think this hospital traffic scenario will be even worse than that on Laguna. The other example of how this will not work occurs today at Kaiser Permanente Hospital at Geary and Divisadero. The drop-off lanes are filled with parked vehicles so that the shuttles cannot use them and nobody enforces the white zone. So the shuttles double park on Geary Boulevard westbound and the 38/38L-Geary has to maneuver around the double-parking and swerve almost to the Number 1 (closest to the median) lane and back to the Number 3 lane (closest to the curb). Vehicles are jockeying for position to get around the traffic congestion simultaneously."

Response TR-89

The comment states concerns related to queue spillback from the proposed Cathedral Hill Hospital Parking Garage that could impact local street operations. The transportation analysis considered the potential of queuing at the ticket dispensers and at the passenger loading area as shown in Figure 4.5-19, page 4.5-101 of the Draft EIR, and how these activities could affect traffic operations on the adjacent streets. The detailed analysis summarized in the Draft EIR, of the ticket dispenser operations is included in the *Cathedral Hill Transportation Impact Study* (Section 4.6.4, "Queuing at Parking Garage Entrances due to Ticket Machine," pages 119–121). The ticket dispenser analysis indicated that a maximum of three vehicles would queue behind the ticket dispenser at the hospital parking structure. Because the ticket dispenser would be located on Level P-1(first parking level below grade) of the parking structure (more than 450 feet within the hospital building), queue spillback from the ticket dispensers would not encroach onto Geary Boulevard. As summarized in Response TR-88 (page C&R 3.7-156), the passenger loading area would have sufficient space to accommodate the loading/unloading demand, and thus, no queue spillback would occur from the hospital passenger loading area that would cause a spillback onto Geary Street. Although some vehicles might encounter interruptions because of pedestrian activity, they would be short in duration and then the vehicle would be free to enter the parking structure without further delay. Therefore, the Draft EIR properly concluded that the traffic impact of spillback into adjacent traffic lanes from garage operations would be less than significant. To further insure that queuing would not adversely affect traffic operations on adjacent streets, the an improvement measure is proposed, which identifies specific actions that would be taken in the event that queues form on adjacent public streets.

Page 4.5-102 of the Draft EIR is revised to include the following the text and improvement measure related to Impact TR-5:

<u>Although the impact of queuing (queue spillback) from the Cathedral Hill parking garages would be less than significant, implementation of Improvement Measure I-TR-5 below would further reduce the less-</u>

than-significant impact by specifying actions that would be required should queues form on adjacent streets.

Improvement Measure I-TR-5 – Off-Street Parking Queue Abatement

It shall be the responsibility of the owner/operator of any off-street parking facility primarily serving a non-residential use, as determined by the Planning Director, with more than 20 parking spaces (excluding loading and car-share spaces) to ensure that recurring vehicle queues do not occur on the public right-of-way. A vehicle queue is defined as one or more vehicles blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.

If a recurring queue occurs, the owner/operator of the parking facility shall employ abatement methods as needed to abate the queue. Suggested abatement methods include but are not limited to the following: redesign of facility layout to improve vehicle circulation and/or on-site queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; travel demand management strategies such as additional bicycle parking, customer shuttles or delivery services; and/or parking demand management strategies such as parking time limits, paid parking or validated parking.

If the Planning Director, or his or her designee, suspects that a recurring queue is present, the Department shall notify the property owner in writing. Upon request, the owner/operator shall hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant shall prepare a monitoring report to be submitted to the Department for review. If the Department determines that a recurring queue does exist, the facility owner/operator shall have 90 days from the date of the written determination to abate the queue.

Cathedral Hill Campus Emergency Department Passenger Loading Area

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-128 TR, duplicate comment was provided in 30-128 TR]

“69. On Page 4.5-143, Franklin St. has 3 curb cuts, one for Emergency Department Drop-off, one service entrance for trucks that use the loading dock and an additional service exit for these trucks. A ‘porte cochere’ is shown on Page 2- 101. I do not see how the vehicular and pedestrian circulation will work here in the porte cochere area at the Emergency Drop-off even when looking at Page 2-77, Figure 2-19. Will there be pedestrian islands? With all the traffic on this Franklin Street side, I am concerned with this area. Even the shuttles would be allowed in the Emergency Drop-off area per Page 4.5-143. Would there be a more detailed diagram of the pedestrian and vehicle flow?”

Response TR-90

The comment requests clarification related to proposed Cathedral Hill Hospital operations along Franklin Street. As stated in the comment, three driveways would be located along on Franklin Street between Geary Boulevard and Post Street. The two southern driveways would provide access and egress to the off-street truck loading area. The northern-most driveway would provide public access by private vehicles to the Emergency Department. Emergency vehicles (ambulances) would have a separate loading area that would be accessed via Post Street (see Figure 4.5-16 on page 4.5-91 in the Draft EIR).The CPMC intercampus shuttles would utilize the shuttle loading area located within a recessed passenger loading bay on Post Street, and would not therefore be utilizing the Emergency Department loading area. Figure

4.5-21 on page 4.5-143 in the Draft EIR is revised to clarify the types of activities allowed in each loading area and the emergency vehicle (ambulance) loading area is added to the figure. The revised figure shows that the Emergency Department drop-off area would have five angled parking spaces, one accessible drop-off space along the curb, and room for two additional vehicles to allow drop offs at the curb. CPMC would have an attendant monitor the loading area to maintain access for patients. A sidewalk would be provided for pedestrians to access the Emergency Department lobby directly from Franklin Street.

In addition to this drop-off area, the Emergency Department would have 10 dedicated parking spaces located on Level 1 in the parking structure (see Figure 2-17 on page 2-73 in the Draft EIR). These spaces would be located immediately below the Emergency Department, which would be easily accessible via a nearby elevator. These spaces would be used by private vehicles; emergency vehicles would use the Post Street access. Two of the spaces would be designated for 5-minute parking for drop-off and pick-up of patients. The other eight spaces would be designated for Emergency Department use only, without specific time restrictions.

3.7.9.2 Service Loading

Pacific Campus Truck Loading Peak

Comment

(Paul Wermer—CPMC Neighbors Coalition and Pacific Heights Residents, October 18, 2010) [67-18B TR]

"5) TRANSPORTATION AND CIRCULATION:

Unfortunately, the PM commute period is not when the worst traffic impacts are felt in the hospital vicinity. In the case of Pacific site, for example, there are interactions with delivery of goods to the site as well as interactions with school drop-off and pick-up. These occur outside of the peak commute periods, yet have significant adverse impacts - notably in the increase of unsafe driver behaviors, which threaten pedestrians and other drivers."

Response TR-91

The comment expresses concern that the worst traffic impacts at the Pacific Campus occur at times other than the p.m. peak hour. The comment is correct that the peak truck loading activity at the Pacific Campus, similar to city-wide conditions, would occur outside the p.m. commuter peak. Based on truck loading surveys conducted at the Pacific Campus (*Pacific Campus Transportation Impact Study*, Appendix C5), and as described under Impact TR-63, page 4.5-173 of the Draft EIR, the existing peak loading demand (13 percent of daily activity) occurred between 10 a.m. and 11 a.m., outside the commuter morning and evening peak periods and school peak periods. During the afternoon school peak periods of 2 p.m. to 4 p.m., 10 percent of the daily activity occurs between 2 p.m. to 3 p.m. and 8 percent of the daily trips occur between 3 p.m. and 4 p.m. The truck loading analysis for the Pacific Campus considered the number of daily trucks that would access the site, based on the *SF Guidelines* and the size of the project. The daily truck trips were used to determine that the maximum number of trucks at the site would be nine trucks during the peak hour and that the average hourly truck loading demand would be seven vehicles per hour. For the overall transportation network, the p.m. peak hour is generally considered the time period when maximum use and the most traffic congestion occurs and, therefore, generates the greatest number of potential traffic impacts. See Response TR-10, page C&R 3.7-26, for additional information on the p.m. peak-hour analysis period.

A new truck loading area would be constructed as part of the proposed renovations to the campus. A total of nine commercial parking spaces would be provided, either within the loading area or on the street. Additionally, with the change in services at the facility, it was estimated that fewer large trucks would need to access the facility and deliveries could be performed with smaller trucks. CPMC currently maintains receiving facilities off-site to serve the CPMC campus system. The off-site facilities accommodate large truck loading/unloading and warehousing. Many deliveries to the CPMC campuses would be consolidated at the receiving center and loaded onto smaller, single-unit trucks (35 feet long) for delivery.

The creation of a new off-street loading area with nine loading spaces and the use of smaller trucks would reduce the potential for interactions between CPMC trucks and private autos on the public streets during the afternoon school pick-up period.

Truck Entry Maneuvers Blocking Traffic

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-11 TR, duplicate comment was provided in 30-11 TR]

“5. And overall, on a programmatic level, there appears to be a significant impact with transportation and circulation in and about the new Cathedral Hill proposed development of the new 15-story, up to 265-ft. tall (excluding 16-ft. tall exhaust stacks on roof, 269 ft. to top of mechanical screens per Page 2-27), 555-bed hospital and 9-story above grade (excluding mechanical roof level), 130-ft. tall medical office building (MOB) as well as for the other campuses. I think there needs to be a better traffic study not only in the limited area shown in the DEIR, e.g. for Cathedral Hill Campus, on Pages 4.5-96 and 4.5-97, but also in the area to the west towards Japantown which will be impacted by diverted traffic when the Loading Dock deliveries are made and traffic tries to go around them onto a street that will continue northbound or when there are problems on the Post St. entrance or on Geary. Comments on this issue will also appear later on in this document.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-42 TR, duplicate comment was provided in 30-42 TR]

“22. For the same reason, there could be pedestrian and vehicle conflict at the Loading Dock on Franklin St. On Page S-47, Impact TR-44 (Implementation of the Cathedral Hill Campus project and subsequent operation of the Cathedral Hill Hospital off-street loading facility could result in potentially hazardous conditions on Franklin Street.). The mitigation measure, MM-TR-44 (Loading Dock Restrictions and Attendant) that places restrictions on trucks longer than 46 feet to use the Loading Dock only between 10 p.m. and 5 a.m. and for CPMC to monitor and document truck deliveries between 10 p.m. and midnight for 6 months after full building occupancy and to have an attendant present to stop oncoming traffic for delivery trucks to maneuver into the Loading Dock will cause all three lanes of northbound Franklin St. to come to be blocked and people will start cutting through the neighborhood to get around. Traffic may flow down Laguna St. next to the Japantown Peace Plaza, the first northbound street west of Franklin and continue north on Laguna or a right turn made at Post Street eastbound back to Van Ness to bypass the ‘loading dock gridlock.’ It is not likely that the traffic will divert east since Geary only goes westbound at that location. Westbound Geary traffic may also start to pile up if vehicles do not go around to Laguna St. Laguna will start to back up into the Geary/Laguna intersection until the drivers start cutting through the other streets in Japantown I think this mitigation measure will impact Japantown businesses and residents along Laguna St. and Post St. and does not take into account that due to the one-way (in the wrong direction) nature of the streets adjacent to Franklin, people will go west towards Japantown when the Loading Dock blocks traffic on Franklin. The mitigation measures do not address how the traffic will be resolved going into Japantown.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-45A TR, duplicate comment was provided in 30-45 TR]

“According to Page S2-77, the Loading Dock is in the southwest corner of the proposed hospital building at Geary St. / Franklin St. The loading dock door is also located at the most southerly portion of the Loading Dock, closest to the Geary/Franklin corner. I think having this loading dock door at the very southwest location closest to the Geary/Franklin corner is worse than having the loading dock door farther north on Franklin because vehicles that want to make a right turn off of westbound Geary will be blocked by the truck getting into or out of the Loading Dock and cause Geary to get congested as well as Franklin at the same time. Moreover, if the Geary BRT is running westbound in the lane closest to the Hospital, it can be blocked by a truck maneuvering into or out of the Loading Dock. An unsafe situation is probable where the vehicular traffic flows around the stuck BRT or those who want to make a right off of Geary onto northbound Franklin."

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-7 TR, duplicate comment was provided in 72-7 TR]

"<u>TR-43: Implementation of the Cathedral Hill Campus project would not result in a loading demand during the peak hours of loading activities that could not be accommodated within the proposed loading supply or within on-street loading zones.</u>

TR-43 Comment: The length, slow moving nature, and wide turning radii, of the anticipated delivery trucks pulling in and out of the loading docks at Franklin was not analyzed for significant impacts to the flow of traffic on Franklin during peak traffic hours. We are concerned this will cause major delays and recommend that CPMC is restricted from having deliveries occur during peak traffic times. In addition, a traffic controller should be required to be stationed in the area to facilitate the safe entry and exit of such trucks at all times."

Response TR-92

The comments state concerns about the operations of the proposed Cathedral Hill Hospital off-street loading area located off Franklin Street. The centralized truck loading area on Franklin Street would contain one loading space for trucks up to 55 feet in length, and three spaces for trucks up to 45 feet in length. In addition, 14 spaces for vans and smaller vehicles 20 feet or shorter would be provided in the Level 1 parking garage. The Franklin Street loading area also would include two dedicated trash loading docks. Mitigation Measure MM-TR-44 on page 4.5-139 of the Draft EIR requires that trucks longer than 46 feet would only be allowed to access the loading area during the off-peak hours between 10 p.m. and 5 a.m., when traffic volumes on Franklin Street would be lower. This mitigation measure would reduce the number of large vehicles at the loading area during peak traffic periods on Franklin Street and Geary Street. Mitigation Measure MM-TR-44 also would require that CPMC provide attendants at the loading area on a 24-hour basis to monitor truck loading activity and report to the City on loading operations.

The Franklin Street loading area was designed to allow trucks of all sizes to enter the loading area from Franklin Street cab first. Therefore, slower backing maneuvers would only occur once the truck was inside the loading area and not on Franklin Street, where trucks could potentially block traffic on Franklin and Geary Streets. CPMC provided a summary of the proposed Cathedral Hill loading dock operations that included turning templates, showing how trucks of various sizes would access the loading docks. (Memorandum from CHS Consultants, April 14, 2010, *CPMC LRDP Transportation Impact Study*, Appendix I.)

Because trucks would be able to enter cab first and turn around within the loading area, the amount of time that a large truck would block the flow of traffic on Franklin Street or Geary Street would be minimized. CPMC would staff the loading area 24 hours per day and would have an attendant available to control traffic on Franklin Street when a large vehicle entered or exited the loading area. Because of the anticipated short durations of traffic interruption and the relatively low traffic volume on Franklin Street during the off-peak hours, a relatively small number of vehicles using Franklin Street, if any, might choose to take an alternate route because of the presence of a truck entering or exiting the proposed Cathedral Hill Hospital loading area. Therefore, no impact would occur to Japantown because of the CPMC truck activity at the Franklin Street loading area.

Oxygen Tank Access/Recharging

Comment

(Hisashi Sugaya—Planning Commission, October 15, 2010) [116-1 TR]

"1. Pg. 2-53, Figure 2-4 and Pg. 2-77, Figure 2-19. The O2 Tank is shown as being on Level 3. Please clarify how the O2 tank will be refilled/replenished. At St. Francis Hospital a truck with oxygen (liquid?) routinely blocks Pine Street. Any such 'deliveries' should not take place on either Geary Street or Franklin Street; please clarify O2 deliveries at this site."

Response TR-93

The comment requests clarification on how deliveries of oxygen would occur at the proposed Cathedral Hill Campus. The oxygen delivery truck would occupy the right lane of Franklin Street near the corner of Geary Boulevard. Oxygen replenishment delivery would occur at most twice each week. The complete process would takes less than an hour, with pumping taking place for approximately 20-25 minutes. CPMC would be notified 72 hours in advance of a needed delivery and would restrict delivery and filling to the hours when church activities do not typically take place. Restricting this activity to times when church activities do not typically take place, and outside peak travel periods would limit local vehicle and transit disruptions at this location. For further information on truck loading hours, see Response TR-94, below.

Truck Loading Hours

Comment

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-28 TR, duplicate comment was provided in 72-28 TR]

"TR-43. The mitigation measure for TR-55 also requires CPMC to coordinate temporary and permanent changes to the transportation network within the City of San Francisco. The proposed loading docks for the Cathedral Hill Hospital are located on Franklin Street. After completion of construction and during normal operations of the hospital, truck deliveries to these loading docks will continue to have an impact on the flow of traffic on Franklin Street. Therefore, the hours for truck deliveries to the hospital should be restricted to occur between 8 AM and 5 PM to minimize the traffic impacts to the project vicinity."

Response TR-94

The comment states that after construction activities, normal operational deliveries to the proposed Cathedral Hill Hospital should be restricted. The Truck Management Plan for the proposed Cathedral Hill Campus was designed to minimize the impact of truck operations on the adjacent streets. The description of the plan is included as Appendix I, Loading Analysis in the *Cathedral Hill Transportation Impact Study*. The Truck Management Plan includes several key features; including maximizing the use of the loading areas, including 24-hour use when feasible; actively managing loading areas; and allowing evening deliveries of some services, including those from a centralized-CPMC distribution center.

In addition to the Truck Management Plan, Mitigation Measure MM-TR-44 would require that large trucks (longer than 46 feet) use the loading area between 10:00 p.m. and 5:00 a.m., to reduce the potential for interruptions of traffic on Franklin Street. By operating 24 hours per day and restricting many of the deliveries to the evening hours, the Truck Management Plan would minimize the number of trucks accessing the campus during commuter peak periods or in the middle of the day when traffic volumes on the adjacent streets would be at their highest levels. Restricting deliveries to between 8 a.m. and 5 p.m., as suggested by the comment, would concentrate the truck activity and increase the traffic impacts on the adjacent roadways during the peak travel periods.

Truck Loading Operations Mitigation

Comments

(Donald Scherl, October 18, 2010) [74-17 TR]

"Impacts-44 and 48: Last but by no means least, implementation and operation of the project at Cathedral Hill could 'result [in] potentially hazardous conditions on Franklin St.' In an attempt to mitigate this potential hazard, CPMC is to conduct an unsupervised study the results of which will be reported to the Planning Department and the SFMTA. Given no city on-site supervision, there is no reason to believe the results of such a 'study.'"

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-33 TR, duplicate comment was provided in 108-33 TR]

"Even assuming that these reductions in truck deliveries can be achieved, the analysis does not fully analyze all potential impacts. At the Cathedral Hill site, for instance, the DEIR indicates that trucks longer than 46 feet entering the loading dock from Franklin Street have the potential to significantly disrupt traffic, but provides no analysis of the impacts of smaller trucks, which undoubtedly will also slow down traffic considerably, especially during the peak demand when 19 trucks at one time will be loading and unloading. No analysis is provided of delays when trucks must wait for other trucks to enter or leave the facility. Mitigation Measure MM-TR-44 both creates new impacts and improperly defers mitigation. It requires only that CPMC submit a report on deliveries by large vehicles to the City, and neither provides a commitment to mitigation nor any performance standards that the mitigation must meet; nor does it provide alternative approaches to mitigation. Requiring that deliveries by large trucks occur between 10 pm to 5 am creates additional noise impacts, which are not analyzed in the DEIR."

Response TR-95

The comments state concerns regarding assessment of loading impacts and Mitigation Measure MM-TR-44 in the Draft EIR, page 4.5-139. Impacts of increased noise in the vicinity of the proposed Cathedral Hill Campus are discussed in Impact NO-2 on pages 4.6-57 and 4.6-68 in the Draft EIR. Regarding the analysis of the impacts of small and single unit trucks entering and exiting the loading facility at the proposed Cathedral Hill Campus, the Truck Management Plan is designed to minimize the number of trucks that would make deliveries during normal weekday commute peak periods. Based on surveys at the existing CPMC campuses, the peak delivery periods tend to occur in the late morning or early afternoon. Although the peak loading demand is 19 vehicles, these vehicles would typically arrive and depart at different times within a given hour. Therefore, although some interruption of traffic could occur when these delivery vehicles entered or exited the facility, the level of interruption would be considered normal occurrence in an urban environment.

The proposed Truck Management Plan also would allow CPMC to manage when their vehicles arrive from the central warehouse locations. Therefore, although the peak demand was determined to be 19 vehicles based on the current conditions at existing facilities, the arrival patterns could be altered in the future to reduce the number of peak truck deliveries. It is estimated that 60 percent of the truck traffic would be less than 20 feet in length. The remaining 40 percent of the vehicles would be between 25 and 55 feet in length.

Mitigation Measure MM-TR-44 would require CPMC to limit hours of delivery for large trucks (greater than 46 feet in length) and to monitor deliveries between 10:00 pm and midnight. The required monitoring of deliveries between 10:00 p.m. and midnight is not a deferment of mitigation. The restriction of large truck deliveries between 10 p.m. and 5 a.m. was selected based on existing evening traffic patterns measured on Franklin Street, which were found to substantially decrease after 10 p.m., and even more after midnight. Additional monitoring of deliveries between 10 p.m. and midnight was added to the mitigation to further document deliveries that occur, effects on travel lanes, and operations of the Franklin/Geary intersection between the hours of 10 p.m. and midnight. The City, on review, might further limit delivery times. If the City desired, independent monitoring of the truck activity could be included in the Mitigation Monitoring Program. The Mitigation Monitoring Program would be used by the City to track the compliance of the proposed CPMC LRDP in terms of the mitigations identified in the Final EIR. Considering the restricted hours, provision of an attendant, and monitoring, the impacts from truck deliveries would be mitigated.

Cathedral Hill MOB Delivery Truck Parking

Comment

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-26 TR, duplicate comment was provided in 114-26 TR]

"This problem [MOB deliveries shown to be next to the parking entry] will be magnified because the DEIR identifies that the loading space demand for the MOB is 4 spaces and the available supply is only two spaces. The DEIR asserts, with no data to support the assertion that this situation will be mitigated by scheduling deliveries and by parking on street when necessary. The on street parking will only further amplify the traffic and exhaust impacts near our property."

Response TR-96

The comment states that the number of loading spaces for the proposed Cathedral Hill MOB would not be adequate to meet the demand, further amplifying the associated traffic, noise and exhaust effects. With the proposed Cathedral Hill Campus project, two off-street loading spaces would be provided within the MOB parking structure and two on-street loading spaces would remain on Cedar Street. As discussed under Impact TR-43, page 4.5-136 of the Draft EIR, during the peak delivery period, trucks could meet demand through the use of available on-street loading areas for their delivery or, if no on-street spaces were available, these deliveries could use the two off-street spaces in the MOB parking structure. For more information on the noise and air quality analyses, please also see Response TR-50 (C&R 3.7-73) and Sections 4.6 "Noise" and 4.7 "Air Quality" of the Draft EIR, respectively.

Cathedral Hill Trash Pickup

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-113 TR, duplicate comment was provided in 30-113 TR]

"60. How often will trash be picked up between 4AM and 5AM at Cathedral Hill (Page 4.5-82)? What is the difference between 'trash pickup' and 'trash haulers' who would be scheduled before 7a.m. or after 7 p.m. (Page 4.5-82)?"

Response TR-97

The comment requests information related to waste pickup. Trash haulers are flat bed trucks that lift a trash compactor onto the bed and drive it to a transfer station, empty it, and return it to be refilled. Trash pickup is collected using tipper trucks that are commonly used in residential areas. The proposed Cathedral Hill MOB would require trash pickup only. Both trash hauling and trash pickup (composting) would be required for the proposed Cathedral Hill Hospital. The area east of Franklin Street is considered a non-residential zone by the trash collection provider, Recology, and is not restricted by specific collection times. However, CPMC would have some flexibility in selecting pickup hours that would meet hospital needs and accommodate adjacent neighbors. Trash pickup would occur once daily, Monday through Saturday. Trash hauling (hospital only) would occur once daily, Monday through Saturday.

Truck Management Plan

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-45B TR, duplicate comment was provided in 30-45 TR]

"There are 4 building posts/piers within the Loading Dock parking area for the large trucks. Per Page 2-21, the DEIR states that there are going to be 6 spaces for the loading dock at the proposed Cathedral Hill Hospital in addition to the 14 spaces for vans and 2 loading spaces for the MOB. If all 6 spaces at the loading dock were to be occupied for deliveries, and another truck shows up at the Hospital, how will the traffic jam on Franklin St. be resolved? Will the trucks double-park on the nearby residential areas waiting for their turn to get into the loading dock? In addition, both the Two-way Post St. Variant and the MOB Access Variant of the Cathedral Hill Project will cause a "significant" and "potentially hazardous" condition on Franklin St. as described in Impact TR-46 and Impact TR-48. Both of these impacts are also suggested to be mitigated by hiring an attendant and having him/her direct the oncoming traffic when trucks are in the service loading area. The mitigation measure is also to possibly modify the deliveries of trucks longer than 46 feet in length (MM-TR-44, Page S-47)."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-112 TR, duplicate comment was provided in 30-112 TR]

"59. Page 4.5-81 speaks of service vehicles and truck loading and unloading demand. It states in Item 3 that 'some service deliveries would be eliminated due to operational changes at the campuses.' Yes, where the campus would be closed or operations moved to Cathedral Hill, e.g., that is true. But when the operations get moved to Cathedral Hill, would the number of trucks be more? Would there be larger service trucks to accommodate larger deliveries since there will be a heavier concentration of departments in one building?"

(Barbara Kautz—CHNA and Bernal Heights Neighborhood Center, October 19, 2010) [87-32 TR, duplicate comment was provided in 108-32 TR]

"At each proposed CPMC campus, there will be extensive loading and unloading activities on busy streets. At the proposed Cathedral Hill campus, during the peak loading period, up to 19 trucks will be loading and unloading at one time; at the Pacific campus, up to 9 trucks. However, these projections are based on implementation of a proposed master delivery plan designed to reduce the number of trucks that would otherwise enter the sites based on current use patterns. Such a plan has not been implemented by CPMC, and its success cannot be accurately predicted. A more conservative analysis should be provided indicating the impacts if delivery patterns mirror existing conditions at CPMC's existing campuses."

Response TR-98

The comments request clarification regarding the proposed Truck Management Plan and loading operations at the proposed Cathedral Hill Hospital loading area accessed from Franklin Street. This centralized loading area would include four loading docks for large trucks (greater than 25 feet in length) and two dedicated trash loading docks. In addition, 14 spaces for vans and smaller vehicles 20 feet long or shorter would be provided within the first below-grade level of the hospital garage. The purpose of the proposed Truck Management Plan is to ensure that trucks, particularly large trucks, would have a loading dock or parking space available when they arrived at the proposed Cathedral Hill Campus. The proposed Truck Management Plan would also have CPMC manage when their vehicles arrived from the central warehouse locations. Therefore, the arrival patterns could be altered to ensure loading space availability and to reduce the number of peak truck deliveries. Implementation of this plan would minimize the number of trucks that would access the site during the hours between 7 a.m. and 7 p.m., when traffic on the adjacent street would be highest. With 24-hour management of the loading facility, trucks would not need to double-park on adjacent residential streets. As a part of the 24-hour management plan, and as required by Mitigation Measure MM-TR-44 (on page 4.5-139 of the Draft EIR), CPMC would provide an attendant who would control traffic when large trucks arrived or departed. The Truck Management Plan and a description of the truck loading operations at the Cathedral Hill Campus are summarized under Impact TR-43, page 4.5-136–139 in the Draft EIR and in more detail in Appendix I of the *Cathedral Hill Transportation Impact Study*.

To estimate future truck activity volume at the proposed Cathedral Hill Campus, CPMC provided an analysis of truck activity at the existing California and Pacific Campuses because the proposed Cathedral Hill Campus would combine functions that are currently performed at these existing campuses. These estimates were compared to the truck loading rates from the *SF Guidelines*. The Truck Management Plan (*CPMC LRDP Transportation Impact Study*, Appendix I) describes the analysis process used to estimate the demand and how many truck deliveries could be reduced with the creation of the proposed Cathedral Hill Campus. The following paragraph from the plan describes the analysis approach:

> "The CPMC Materials Management staff and its consultants reviewed the list of vendors who are currently serving the hospitals in the Pacific and California Campuses and identified A) potential vendors who could consolidate two separate trips into one trip to CH Hospital, and B) the deliveries that would be shifted to the West Bay Distribution Center in Burlingame and services that would no longer be needed at the CH Campus because of operational changes. Such vendors in the "A" category included FedEx, Office Depot, Ownes Minor, and Aramark, and the trips generated by these vendors were reduced by half and were subtracted from the total truck trips. The vendors in the "B" category included USPS, Stericycle and Angenlica, and their trips were removed from the total truck trips. It should be noted that the USPS mail deliveries to the CH Hospital would be directed to the West Bay Distribution Center in Burlingame where many of the hospital deliveries would come from."

The truck analysis assumed the needs of all the functional departments and operations that would be located in the proposed hospital and MOB. The results of this process reduced the combined deliveries at the existing Pacific and California Campuses from a total of 206 average daily trips to 113 average daily trips that would be needed to access the proposed Cathedral Hill Campus. The 113 average daily trips would be nine trips fewer than the current 122 average daily trips to the Pacific Campus. Consolidation of loads would occur at the West Bay Distribution Center in Burlingame to minimize the number of truck trips and maximize the loads on each truck. The Truck Management Plan uses an analysis methodology that is based on available data for the CPMC operations. Therefore, no need exists for a more conservative approach to be developed.

One of the primary purposes of the Truck Management Plan is to reduce the need for, and number of, large trucks accessing the proposed Cathedral Hill Campus. The plan uses remote warehousing as a means to move only the needed medical supplies to the proposed Cathedral Hill Campus, which would minimize the load that individual trucks would carry. Therefore, no need would exist to use larger trucks for medical supply deliveries to the proposed Cathedral Hill Campus. Furthermore, Mitigation Measure MM-TR-44 would limit trucks larger than 46 feet to using the loading facility during evening hours.

In order to ensure that trucks larger than 46 feet would not arrive concurrently, CPMC would invest in a communication system (using cell phones and two-way radios) that would provide direct communication between the truck drivers and the Materials Management staff at the Cathedral Hill Campus site. If the loading dock area is unable to receive a truck larger than 46 feet, due to the unavailability of dock space, drivers would be informed in advance and would be instructed to stage at an off-site/available location until directed by the CPMC Materials Management staff to proceed to the Cathedral Hill Campus site. If for some reason, the communication system failed and a truck greater than 46 feet arrived at the Cathedral Hill Campus site and was unable to be received, the shuttle pick-up area on Post Street could be used as a temporary wait station until it could be received (with engines turned off for up to 45 minutes), since deliveries by trucks of this size would be limited to between the hours of 10 p.m. and 5 a.m (when shuttles are not in operation).

Truck Management Plan—Truck Loading Noise

Comment

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010) [101-22 TR]

"Pages 4.5-82 and 4.5-83: The DEIR indicated that on a daily basis approximately 66 trucks up to 55 feet in length would use the loading area; the loading dock would operate 24 hours per day; and CPMC deliveries, laundry services and trash haulers would be scheduled between 9:30 p.m. and 5:00 a.m. to minimize conflicts with other deliveries. These levels and hours of loading area activity would occur immediately adjacent to adjoining sensitive residential uses on the west, and in the more noise-sensitive evening and early morning hours. However, they are not, and must be, described and analyzed in the noise (Section 4.1) and land use character (Section 4.1) analyses."

Response TR-99

The comment states concern about the effects of truck loading noise on sensitive residential uses near the St. Luke's Campus and specifically mentions the number of trucks (66) that are expected at the St. Luke's Campus each day, as noted in Table 4.5-14 on page 4.5-83 of the Draft EIR. Noise impacts associated with loading activities at the St. Luke's Campus are addressed on page 4.6-76 of the Draft EIR. The St. Luke's Replacement Hospital would have an enclosed loading dock located off Cesar Chavez Boulevard. To reduce the impact of large trucks accessing the loading area during commute hours, large trucks would be scheduled for deliveries in the evening hours and would enter an enclosed loading area. The discussion also addresses noise impacts associated with the Alternative Emergency Department Location Variant, which would locate the loading area adjacent to 25th Street (see page 4.6-78 of the Draft EIR). Under both the proposed LRDP and the Variant, all truck maneuvering and loading/unloading would occur within the enclosure. This would reduce the impacts of noise on the adjacent residents. See Response NO-75, page C&R 3.8-80, for additional information regarding noise impacts associated with loading activities at the St. Luke's Campus.

3.7.10 Emergency Access

3.7.10.1 Emergency Vehicle Access and Traffic Congestion

Comments

(Marvis Phillips—Alliance for a Better District 6, August 6, 2010) [4-3 TR]

"2) Emergency vehicle access during evening and morning commute periods.

(Diane and Richard Wiersba, October 11, 2010) [49-4 TR]

"Even those being driven to hospital treatment will cause problems, partly due to the confusion of the one-way streets which intersect and parallel Van Ness. Ambulances will no doubt run into traffic snarls as they try to reach CPMC, also."

(Linda Chapman, October 19, 2010) [76-29 TR, duplicate comment was provided in 111-29 TR]

"Supporters of the current proposal argued prompt medical intervention for birthing and emergency conditions as justification for locating a campus in the Van Ness Corridor. In view of congestion impacts described above, public safety could be the best reason to decentralize emergency and critical care units.

Transportation impediments between the Cathedral Hill campus and the city's southern sector include long Muni trips, traffic delays and meltdowns like an experience described above, which would equally affect patients (or all the important doctors) heading for Cathedral Hill from Marin."

(Patrick Carney, October 19, 2010) [83-6 TR]

"Traffic is already grid locked on Van Ness. Gough and Franklin are not much better. It will not be easy to get there quickly when traffic is frequently at a standstill. O'Farrell already has a great deal of traffic to the point it is often a standstill (especially with the new 38 Geary dedicated traffic lane) and more than its share of ambulance noise."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-24B TR]

"For example, the DEIR did not analyze how the increased traffic around the Cathedral Hill Campus will affect access for ambulances, labor and delivery vehicles and others urgently trying to reach the hospital. During gridlock traffic conditions which are much of the time around Van Ness Avenue, emergency patients may face life threatening delays while waiting in traffic. The DEIR failed to consider these and other critical circumstances in the traffic analysis."

(Gloria Smith—California Nurses Association, October 19, 2010) [90-83 TR]

"Similarly critical intersections in the vicinity of the Cathedral Hill Campus currently operate at LOS E or LOS F under existing conditions in one or both peak traffic hours. The DEIR also indicated additional critical intersections in the vicinity of the Cathedral Hill Campus would degrade to LOS E or LOS F in 2015 and in 2030 with the addition of Project traffic. For capacity conditions at LOS E and under gridlock conditions at LOS F, vehicles will be queued back significant distances in all traffic lanes on the approaches to congested signalized intersections. Stopped vehicles will not be able to simply 'maneuver out of the path of the emergency vehicle' as the adjacent lanes on the approaches to the gridlocked traffic signals will already be occupied by other vehicles. This is a significant impact for a hospital project and one that must be fully evaluated and mitigated.

Given that the proposed Project is a ***hospital***, with numerous dispatched and private emergency vehicles requiring access each day, the City cannot simply find that these impacts are unavoidable. Instead, in a revised EIR, the City must fully explain and support the DEIR's broad statement that '... the proposed Cathedral Hill Campus project emergency vehicle access impact would be less than significant.' A revised EIR must show that the City has analyzed both LOS E and gridlock conditions at LOS F all around the vicinity of the Cathedral Hill Campus and has mitigated these impacts to significantly reduce or eliminate health and safety risks resulting from delays to emergency and labor and delivery vehicles."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-8 TR]

"This issue is particularly critical for a hospital project. For example, the Draft EIR does not analyze how the increased traffic around the Cathedral Hill Campus will affect access for ambulances and labor and delivery vehicles. During gridlock traffic Conditions which are much of the time on Van Ness Avenue, emergency patients could face life threatening delays while waiting in traffic."

(Gloria Smith—California Nurses Association, October 19, 2010) [96-20A TR, duplicate comment was provided in 110-20 TR]

"The Draft EIR does not adequately analyze how the increased traffic around the Cathedral Hill Campus will affect access for ambulances, patients being transferred to and from other Sutter hospitals, patients attempting to reach the emergency room, and labor and delivery vehicles. The traffic engineer Tom Brohard concludes in his comments on the Draft EIR:

> Many of the intersections studied in the Draft EIR already operate at LOS F[23] in peak hours under existing conditions, and the number of these failing intersections will significant increase [in future years] ... Adding [LRDP] ... trips to these failing intersections will increase vehicle delay beyond what is already being experienced, with no relief in sight. This issue is particularly critical for a hospital project. For example, the Draft EIR does not analyze how the increased traffic around the Cathedral Hill Campus will affect access for ambulances and labor and delivery vehicles. During gridlock traffic conditions which are much of the time on Van Ness Avenue, emergency patients could face life threatening delays while waiting in traffic.[24]

In other words, due to the location of the Cathedral Hill Campus as it sits in a high-density neighborhood at the intersection of two major traffic corridors experiencing heavy use and congestion and the fact that most patients and employees would be concentrated at one campus rather than being spread out across several campuses, chances are that in a bad traffic jam on Van Ness Avenue babies will be born in traffic and patients will die trying to get to the emergency room. Such patient safety hazards will be a daily event during rush hour, and potentially worse in the event of an accident, construction, or other disruption as occurred last year one block away.[25] This cannot be the intention of a health care provider for providing optimal care for its patients.

[23] Level of Service ("LOS") F is the lowest measurement of efficiency for a road's performance. Flow is forced; every vehicle moves in lockstep with the vehicle in front of it, with frequent slowing required. Facilities operating at LOS F generally have more demand than capacity.

[24] Letter from Tom Brohard and Associates to. Law Offices of Gloria Smith, Re: Review of Draft Environmental Impact Report for the California Pacific Medical Center Long Range Development Plan Transportation and Circulation Comments, October 18, 2010.

[25] San Francisco Chronicle, PG&E Says 1920s Power Line Sparked SF Fire, July 16, 2009; http://artjcles.sfgate.com/2009-07-16/bay-area/17217311 1 power-line-pg-e-underground-fire."

(Merle Easton, October 18, 2010) [66-1 TR, duplicate comment was provided in 73-1c TR])

"In case of a disaster cars and buses will be unable to get to the hospital and the rest of the traffic won't be able to get around the hospital."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-26 TR]

"7) <u>Emergency Vehicle Access Will Be Significantly Impacted</u> - Impact TR-52 on Pages 4.5-145 and 4.5-146 of the Draft EIR lists various streets that would be used by emergency vehicles to transport patients to the Cathedral Hill Campus and states 'These streets are multi-lane arterial roadways that allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Because Franklin Street, Van Ness Avenue, Post Street, and Bush Street have multiple lanes, vehicles would be able to yield to emergency vehicles destined to the proposed Cathedral Hill Campus. Given the above, the proposed Cathedral Hill Campus project emergency vehicle access impact would be less than significant.'

Several critical intersections in the vicinity of the Cathedral Hill Campus currently operate at LOS E or LOS F under existing conditions in one or both peak traffic hours as reported in Tables 4.5-17 on Page 4.5-94 and 4.5-18 on Page 4.5-95 of the Draft EIR. These tables also show that additional critical intersections in the vicinity of the Cathedral Hill Campus will degrade to LOS E or LOS F in 2015 and in 2030 with the addition of Project traffic.

Under capacity conditions at LOS E and under gridlock conditions at LOS F, vehicles will be queued back significant distances in all traffic lanes on the approaches to congested signalized intersections. Stopped vehicles will not be able to simply "maneuver out of the path of the emergency vehicle" as the adjacent lanes on the approaches to the gridlocked traffic signals will already be occupied by other vehicles. This is a significant impact for a hospital project and must be fully evaluated and mitigated. In this instance, the City cannot simply find that these impacts are unavoidable. Instead, in a revised EIR, the City must fully explain and support the Draft EIR's broad statement that "the proposed Cathedral Hill Campus project emergency vehicle access impact would be less than significant." A revised EIR must show that the City has analyzed both LOS E and gridlock conditions at LOS F all around the vicinity of the Cathedral Hill Campus and has mitigated these impacts to significantly reduce or eliminate health and safety risks resulting from delays to emergency and labor and delivery vehicles."

(Margaret Kettunen Zegart, October 20, 2010) [97-18 TR]

"Emergency vehicles cannot meander - or speed - through present traffic jams."

(Hossein Sepas, October 19, 2010) [82-6 TR, duplicate comment was provided in 107-4 TR]

"Traffic is already grid locked on Van Ness. Gough and Franklin are not much better. It will not be easy to get there quickly when traffic is frequently at a standstill. O'Farrell already has a great deal of traffic to the point it is often standstill (especially with the new 38 Geary dedicated traffic lane) and more than its share of ambulance noise."

(Peggy Lindrod, September 23, 2010) [PC-99 TR]

"MS. LINROD [phon]: Good afternoon. My name is Peggy Linrod [phon]. I am also – I am at Ground Zero at this project where it would impact traffic. I live right on the corner of Geary and Larkin. I've seen all the time when there was emergencies, and they had accidents where cars actually ran over residents right there on Geary and Larkin, it took exactly 20 to 30 minutes for any EMTs any ambulance to get to them, and that is very important that they take that into consideration, even though the hospital might be right down the street, it might be a problem getting to it."

(Gloria Smith—California Nurses Association, March 8, 2011) [121-3 TR]

Transportation gridlock is particularly critical for a hospital project. Access for ambulances and for labor and delivery vehicles to the proposed Cathedral Hill Campus will be adversely impacted by the severe congestion. Intersections and roadways near the Cathedral Hill Campus, located in a high-density neighborhood at the intersection of two major traffic corridors, already experience heavy use, congestion and lengthy delays. Adding hospital patients and employees concentrated at one very large hospital campus, rather than spreading medical services across several campuses, would present unnecessary health risks for patients stuck in traffic on Van Ness Avenue trying to reach the emergency room or labor and delivery. Excessive delays for patients requiring immediate care could be a daily event during rush hour, and potentially worse in the event of an accident, routine construction, or other disruption. Such circumstances pose unacceptable and avoidable health and safety risks and should have been examined in the Draft EIR.

Response TR-100

The comments state concern that patient and emergency vehicle access to the hospital would be compromised because of existing and future traffic conditions on the roadways surrounding the proposed Cathedral Hill Campus. As described in Impact TR-52 in the Draft EIR (page 4.5-145), development of the proposed Cathedral Hill Campus would not result in a significant emergency vehicle access impact. Patients that required emergency transport typically would be delivered to the nearest emergency room provided the receiving hospital has available space and capability to address that patient's need for medical care (e.g., burn victims divert almost exclusively to St. Francis Memorial Hospital because of that hospital's capability to treat that type of injury). The proposed Cathedral Hill Campus site is centrally located along major routes to many neighborhoods, and these roadways would facilitate access from any point in the City, should a patient require care at the proposed Cathedral Hill Hospital. Patients in the Richmond District would continue to be served by emergency rooms at St. Mary's Hospital, Kaiser Medical Center, and UCSF Parnassus Campus. Patients in the southeastern portion of the City would be served by emergency rooms at San Francisco General Hospital and UCSF Mission Bay Medical Center, as well as the St. Luke's Campus. The Davies Campus would also retain its emergency room.

In the event of an emergency or natural disaster, which are by their nature not predictable, protocol exists to prioritize the use of roadways. Emergency services, such as the Fire Department, Police, or other first responders use of roadways are prioritized. Patients needing emergency care would be taken to the closest available emergency room. Emergency vehicles typically choose travel routes based on several factors, including congestion, speed, and terrain. As described in the Draft EIR and *Cathedral Hill Transportation Impact Study*, emergency vehicles coming to the proposed Cathedral Hill Campus would likely use Franklin Street, Gough Street, or Van Ness Avenue as north-south routes and Geary Street, O'Farrell Street, Pine Street, or Bush Street as east-west routes. These streets are multi-lane arterial roadways that typically allow emergency vehicles to travel at higher speeds because roadway width allows other vehicles to move out of their paths. The California Vehicle Code, Section 21806, requires that vehicles yield to emergency vehicles and remain stopped until an emergency vehicle passes with active sirens and emergency lights, as follows:

> 21806. Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following:
>
> (a) (1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed.
>
> (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety.
>
> (b) The operator of every street car shall immediately stop the street car, clear of any intersection, and remain stopped until the authorized emergency vehicle has passed.
>
> (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed."
>
> (Amended Sec. 68, Ch. 1154, Stats. 1996. Effective September 30, 1996.)

In addition, as stated in the TransOptions report,[26] the San Francisco Fire Department (SFFD) staff does not have preferred routes to minimize the traffic impact of 911 ambulances; however, they do follow a general route selection process, but crews could and would vary the streets used. SFFD's basic tenet is that they "…dynamically deploy, and then converge over the route of least impedance to the hospital emergency department of choice."

During peak times of the day (7:00 a.m.–9:00 a.m., 4:00 p.m.–6:00 p.m.), major arterials near the proposed Cathedral Hill Campus, such as Geary Boulevard, Van Ness Avenue, Franklin Street, and Gough Street, are sometimes congested. If an emergency vehicle was en route to the proposed Cathedral Hill Campus when congestion was most severe, it would likely use less congested, parallel routes, such as Polk Street (north-south) and Post Street, Sutter Street, or Ellis Street (east-west).

Additionally, according to California Vehicle Code ,Section 21055, when responding to an emergency , authorized emergency vehicles are exempt from California Vehicle Code, Section 21657, which governs that vehicles travel in the proper direction of the roadway. This exemption allows emergency vehicles to

[26] TransOptions, 2010, *City of San Francisco Fire Department 911 Emergent Transports to CPMC Campuses*, Cathedral Hill Campus Transportation Impact Study, Appendix J, available on file at the San Francisco Planning Department as part of Case File No. 2005.0555, 1650 Mission Street #400, San Francisco, CA 94103.

travel opposite the flow of traffic to bypass congestion. For example, if southbound Van Ness Avenue became too congested, emergency vehicles could travel southbound in the northbound lanes. Emergency vehicles also could travel contraflow on a one-way route. For example, emergency vehicles could travel westbound on Post Street to bypass congestion on Geary Street.

With the grid street layout around the proposed Cathedral Hill Campus, emergency vehicles would have multiple routes to access the proposed hospital and would be able to avoid the most congested routes. The TransOptions report also addresses the approach followed by SFFD crews in selecting a route to the site of a 911 call and the follow-up transport to the hospital Emergency Department, is generally guided by these basic principles:

- Routes with the least traffic and fastest travel time—this differs based on time of day, day of week, and whether it is a holiday or shopping day as determined by each crews' personal knowledge of the City, because GPS systems do not address these issues on a dynamic basis;
- Flatter streets are preferred over hilly streets to minimize the effect of gravitational forces on patients—for example, despite California Street being a fast east-west route to the Pacific Campus, alternate streets such as Turk Street or Clay Street are preferred for Code 2 transports;
- For Code 3 emergency light and siren transports crew prefer streets with more traffic lights, major thoroughfares over residential streets, and the least amount of travel time possible—this is done to reduce the risk of harming anyone in the oncoming path of the ambulance;
- Less turns are preferred and left-hand turns in front of oncoming traffic are always avoided—patient safety and comfort are critical; and
- SFFD crew prefer easy flow of traffic, less lights, and short-cuts that avoid traffic and shorten drive time—less eventful and less challenging transport routes are always preferred. Additional information on how emergency services would be provided is included in Major Response HC-5, page C&R 3.23-20.

3.7.10.2 EMERGENCY ACCESS—TRAVEL DISTANCE

Comment

(Gloria Smith—California Nurses Association, October 20, 2010) [96-20B TR, duplicate comment was provided in 110-20 TR]

"In other words, due to the location of the Cathedral Hill Campus as it sits in a high-density neighborhood at the intersection of two major traffic corridors experiencing heavy use and congestion and the fact that most patients and employees would be concentrated at one campus rather than being spread out across several campuses, chances are that in a bad traffic jam on Van Ness Avenue babies will be born in traffic and patients will die trying to get to the emergency room. Such patient safety hazards will be a daily event during rush hour, and potentially worse in the event of an accident, construction, or other disruption as occurred last year one block away.[25] This cannot be the intention of a health care provider for providing optimal care for its patients.

To mitigate access problems at the Cathedral Hill Campus, Mr. Brohard recommends:

> To reduce these impacts and better serve the community, CPMC should spread the proposed development to several other campuses including to the St. Luke's Campus rather than concentrating services at the Cathedral Hill Campus. Access to and from St. Luke's Campus is closer to Highway 101 for vehicles and to major transit facilities such as the 24th Street BART Station for transit patrons. Moreover, the St. Luke's Campus is the most accessible CPMC facility for those Sutter patients traveling from San Mateo and Santa Clara counties. From a transportation perspective, a Project alternative that distributes patients and services equally across the City should be evaluated in a revised EIR.

Since more patients come to CPMC from San Mateo County than from Marin County, shifting services to St. Luke's Hospital would reduce this traffic impact. A bigger St. Luke's Hospital also makes more sense for CPMC's patient population and would reduce the above discussed health care access issues for patients currently frequenting St. Luke's Hospital.

[25] San Francisco Chronicle, PG&E Says 1920s Power Line Sparked SF Fire, July 16, 2009; http://artjcles.sfgate.com/2009-07-16/bay-area/17217311 1 power-line-pg-e-underground-fire."

Response TR-101

The comment states concerns related to the location of the proposed Cathedral Hill Campus and provision of emergency health care in San Francisco. As described in Impact TR-52 on page 4.5-145 in the Draft EIR, development of the proposed Cathedral Hill Campus would not result in a significant emergency access vehicle impact. With implementation of the proposed CPMC LRDP, the Emergency Department at the proposed Cathedral Hill Hospital would replace existing emergency care services at the California and Pacific Campuses. However, St. Luke's and Davies Campuses would continue to provide emergency care. Therefore, patients coming from San Mateo County could continue to receive emergency services at St. Luke's.

Patients in emergency transport are typically delivered to the nearest emergency room with available space and capability to address a patient's need for medical care. For example, not all hospitals can treat trauma, neurological, or stroke patients. The proposed Cathedral Hill Campus site is centrally located along major routes to many neighborhoods, and it would be accessible from any point in the City, should a patient require care at the proposed Cathedral Hill Hospital Emergency Department. Response TR-100, page C&R 3.7-170 provides additional information on emergency vehicle access to the proposed Cathedral Hill Campus.

Although the proposed Cathedral Hill Hospital Emergency Department would replace or relocate some existing emergency care services, it would not reduce access to emergency care facilities. The proposed Cathedral Hill Hospital would be slightly less than three-quarters mile from the existing Pacific Campus Emergency Department, which it would be functionally replacing. Patients in the Richmond District would continue to be served by emergency rooms at St. Mary's Hospital, Kaiser Medical Center, and UCSF Parnassus Campus. Patients in the southeastern portion of the City would be served by emergency rooms at San Francisco General Hospital and UCSF Mission Bay Medical Center. Both the Davies Campus and St. Luke's Campus also would retain their emergency care services. Additional information on how emergency services would be provided is included in Major Response HC-5, page C&R 3.23-20.

3.7.10.3 EMERGENCY DEPARTMENT ACCESS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-44 TR, duplicate comment was provided in 30-44 TR]

"Having the ambulances drive to the Emergency Department on Franklin also poses a threat to pedestrians and to possible stacking up of ambulances in the emergency zone that may cause blockage of the easternmost traffic lane of Franklin."

(Sister Elaine Jones, September 23, 2010) [PC-29 TR]

"If you take your time and sit out there, or walk down Van Ness, that's one of the busiest streets other than Market Street, and I just don't understand it, you know, where are you going to put the ambulance? Where are you going to put the people? Where are you going to put the trucks and all this stuff? Where are you going to put them?"

Response TR-102

The comments request clarification regarding Emergency Department operations at the proposed Cathedral Hill Hospital, and expresses concerns for emergency and other traffic on Franklin Street and Van Ness Avenue. The Emergency Department would be located in the northwest quadrant of the proposed hospital, as shown in Figures 2-4 and 2-19 in the Draft EIR (pages 2-53 and 2-77, respectively). The private vehicle (public) drop-off and parking area would have inbound access from Franklin Street and outbound egress to Post Street. Ten parking spaces on Level 1 of the proposed parking garage would be designated for the Emergency Department use, with access via an elevator. Emergency vehicles would have a separate loading area, accessed via their own driveway located on Post Street. This design would eliminate the potential for conflicts between pedestrians, private vehicles, and emergency vehicles at the Emergency Department driveways on both Franklin Street and Post Street. Emergency vehicles would have their own loading area off Post Street with a separate access driveway; therefore, emergency vehicles would not use the Franklin Street driveway to access the hospital Emergency Department. Therefore, queuing of emergency vehicles on Franklin Street when accessing the ambulance loading area would not occur. Response TR-100, page C&R 3.7-170 provides additional information on emergency vehicle access to the proposed Cathedral Hill Campus.

3.7.11 Construction

3.7.11.1 Method Used to Support Findings of Significance

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-6 TR, duplicate comment was provided in 30-6 TR]

"Also, what are the transportation congestion impacts when the generators and chillers are put into place by crane or helicopter (e.g. traffic congestion during the operation of placing the large equipment atop the roof). Also, when the 2 tower cranes are used for the installation of structural steel (per Administrative document for 'Biology, #7'), would the lanes that will be closed be in addition to the following during the Hospital construction?

- Geary Boulevard parking lane 400 ft. x 19 ft.
- Post Street parking lane 400 ft. x 18 ft.- 4 in.
- Franklin Street one lane 300 ft. x 10ft.
- Van Ness Avenue one lane 300 ft. x 10 ft.

(2 lanes when installing the fuel tank ... per this document, emergency generator fuel storage tanks are "proposed to be beneath the Geary Boulevard parking lane ... 22 ft. (on west end towards Franklin St) to 17 ft. deep (on east end towards Geary/Van Ness Avenue) by 15 ft. wide (edge of hospital property line)) From the Administrative documents to the DEIR, only the above lanes will be closed."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-130 TR, duplicate comment was provided in 30-130 TR]

"70. Per Page 4.5-149, Figure 4.5-22, when one lane of Geary westbound will be closed (the bus-only lane), all the traffic will try to get around the construction activity using only 2 available lanes left."

(Donald Scherl, October 18, 2010) [74-18 TR]

"The list of unavoidable and serious problems continues:

Impact-55: Refers to project impact from construction vehicle traffic and construction activities on the transportation network in the vicinity. Although enumerated as “SU” (significant and unavoidable impact), there is a lengthy ‘mitigation’ procedure. Essentially, CPMC is to develop a Construction Management plan (TMP) which would ‘inform’ contractors, require use of best practices, coordinate with and require approval of SFMTA, SFDPW, and the Planning Department.

However, the point is that the Dept. of Planning has NOW already determined that there are NO mitigation measures that will actually deal with the real world problem, hence the assignment of an ‘SU’ code (significant and unavoidable impact). Under these circumstances, it would be poor public policy to approve this project with these severe adverse impacts on the community and the city.”

(Donald Scherl, October 18, 2010) [74-20 TR]

“Impact TR-152 summarizes that construction of the Cathedral Hill Campus, all variants, ‘would contribute to cumulative construction impacts in the project vicinity.’”

(Sheila Mahoney and James Frame, October 19, 2010) [88-11 TR]

“Too often the DEIR says that impacts are substantial and unavoidable even with mitigation, but that it doesn’t matter because they are ‘short-term.’ The cumulative effect of the 20+ years of construction proposed for our neighborhood is not ‘short-term.’”

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010) [101-26 TR]

“Impact TR-94 concludes that, because potential construction traffic and parking impacts would be temporary, they would be less than significant. It is not correct under CEQA to conclude that any impact, no matter how severe, would not be significant only because it would be temporary. In other sections of Chapter 4, the DElR correctly finds temporary construction noise, construction dust, construction criteria air pollutants; and construction toxic air contaminants impacts to be significant and to require mitigation, despite being temporary. In addition, the temporary construction period for the four St. Luke’s campus projects is proposed to begin in 2011 and last for seven years and, like many major construction projects, could experience delays and last even longer. This impact conclusion must be changed and the DEIR must be recirculated.”

(Marianna Ferris, September 23 2010) [PC-18 TR]

“MS. FERRIS: President Miguel and Commissioners, thank you for this opportunity to make public comment. My name is Marianna Ferris, F-e-r-r-i-s. I live at 3631 Caesar Chavez, next to the proposed St. Luke’s Hospital site. I am here today representing a coalition of neighbors and neighborhood groups surrounding the St. Luke’s Hospital campus. I represent the Lost Block Association, Tiffany Neighbors, and the San Jose Guerrero Coalition to Save our Streets. Many of the families in our Coalition live adjacent to the hospital campus and along the proposed truck routes that wind their way through our residential streets. All of our lives will be impacted both during construction and after the building is finished.”

(Marianna Ferris, September 23 2010) [PC-20 TR]

“We are particularly concerned because there are very young, elderly and infirm residents who live in the buildings that border the proposed construction site, truck routes, and in the immediate neighborhood surrounding both.”

Response TR-103

The comments question the conclusion of the Draft EIR to identify construction-related transportation impacts at the proposed Cathedral Hill Campus as “significant and unavoidable,” while impacts at St. Luke’s Campus are labeled as less than significant. In San Francisco, construction-related impacts generally would not be considered significant because of their temporary and limited duration. However, depending on a project's location and timing, in circumstances involving large development plans where construction occurs over long periods of time, construction-related impacts may be considered significant. Transportation impacts related to construction at the proposed Cathedral Hill site were identified as significant and unavoidable because of the complex transportation environment around the proposed Cathedral Hill Campus; the proposed 54-month construction period (approximately 4.5 years); the nighttime lane closures related to the construction of the pedestrian tunnel; and because construction would require the entire campus (one city block for the hospital and a quarter of a city block for the MOB) to be constructed simultaneously.

As described in Impact TR-55 (in the Draft EIR, beginning on page 4.5-147), the transportation system surrounding the proposed Cathedral Hill Campus would be significantly impacted during simultaneous construction of the hospital and MOB. The analysis presented in this impact statement is based on intersection operations during the excavation phase of construction—the phase that would experience the greatest number of truck trips. As shown in Table 4.5-31 in the Draft EIR, page 4.5-151, the construction site would generate an average of 185 trucks during each shift, or about 28 trucks per hour. As identified in Impact-55, the construction project would result in significant impacts at nine study intersections.

In addition, Impact TR-55 identified that the sidewalk closures required for construction would result in a significant impact to pedestrians; that transit-only lane closures near the construction site would result in significant impacts to Muni transit lines on Geary Street and Post Street; and that parking lane closures on Geary Street, Post Street, Franklin Street, and Van Ness Avenue would impact parking in the area.

Although the traffic impacts identified in Impact TR-55 would be a result of truck trips generated by project construction activities, the sidewalk closures and lane closures that would result in impacts to pedestrians and public transit would be required to maintain a safe worksite for both construction workers and nearby residents. Closure of sidewalks and parking lanes would not impact mixed-flow traffic (or congestion as noted in Comment 30-6). Closure of transit-only lanes would require buses to use a mixed-flow lane for one block as they passed the construction site. This was described in Impact TR-55 as a significant impact. Although closure of a transit-only lane would impact transit in the area, it would not have a substantial impact on vehicle traffic in the area because this traffic already uses two mixed-flow lanes on Geary Street.

Therefore, as per the mitigation measures described in the Construction Transportation Management Plan, no feasible mitigation exists that would result in a less-than-significant impact at the Cathedral Hill Campus construction site.

As described in Impacts TR-66, TR-73, TR-83 and TR- 94 (on pages 4.5-175, 4.5-182, 4.5-192, and 4.5-208, respectively, of the Draft EIR), construction at the Pacific, California, Davies, and St. Luke's Campuses would result in less-than-significant impacts. Construction of the Pacific Campus would be phased to occur over 4 years and would be required to develop a construction management plan as part of a project-level environmental document (Impact TR-66). No construction would occur at the California Campus; therefore, no construction-related impacts would occur in the area surrounding the campus (Impact TR-73). Construction at the Davies Campus would occur in two separate phases (Impact TR-83). The first phase would be construction of the Neuroscience Institute on the northeast quadrant of the campus. This construction would occur over a 2-year period and construction staging would be contained within the campus boundaries. Construction of the Castro/14th Street MOB would occur on the southwest quadrant of the campus after construction of the Neuroscience Institute and would last approximately 2 years. Construction of the St. Luke's Campus would occur in separate phases over 7 years (Impact TR-94). Construction on these four campuses would be contained primarily to CPMC property; except where sidewalks and/or parking lanes would need to be closed for safety reasons. Pedestrian detours around these campuses would be signed and in place during construction, as described in the Herrero-Boldt construction management plans for each campus. No vehicular traffic detours, lane closures, or emergency access issues are anticipated with construction of these projects. Because construction of these campuses would occur in phases; and only portions of each campus would be under construction at any given time; and because construction would be contained on site except for the adjacent sidewalk closures for safety purposes, impacts at other campuses, including St. Luke's Campus, would be less than significant.

3.7.11.2 CUMULATIVE CONSTRUCTION IMPACTS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [37-7 TR]

"9. **Cumulative effects** of Pacific Hts & Cathedral construction on J-town; cumulative effects for Richmond area with other campus buildouts, Bernal Heights area, Castro areas impacted."

(Bob Hamaguchi—The Japantown BNP Organizing Committee, October 8, 2010) [47-6 TR, duplicate comment was provided in 50-6 TR]

"3) The DEIR also fails to consider the cumulative impact of construction projects affecting transit to, and parking in, Japantown. In addition to CPMC's construction activities detailed in the DEIR, there is likely to be construction on any or all of the following large projects: Geary BRT (2013 to 2014?); Van Ness BRT (2012 - 2013?); 1481 Post. Each of these activities will aggravate the problems related to construction parking and roadway obstructions. This is a significant omission in the current DEIR."

(Lisa Carboni (Caltrans (Regional)), September 9, 2010) [6-6 TR, duplicate comment was provided in 7-6 TR]

"Under 5.3 Construction Issues on page 189 of the TIS, it states the construction of the Bus Rapid Transit projects can overlap with the construction of the Cathedral Hill Campus and CPMC would be required to coordinate with the City and County of San Francisco to minimize disruption from two major construction projects. Please discuss potential mitigation measures to minimize impacts to Van Ness Avenue. Specifically, what measures will be taken so construction activity will not exacerbate already poor LOS operation on Van Ness Avenue?"

(Sue Hestor, October 19, 2010) [89-6 TR]

This EIR, as part of its analysis, must do the analysis for tieing mandatory construction of the Van Ness BRT and the Geary BRT (at least as far west as Divisadero so that Geary busses can connect with the north-south lines that connect to other campuses) to the massive work CPMC contemplates for their own benefits.

Response TR-104

The comments express concern about the effect of simultaneous construction at CPMC campuses, construction of other nearby proposed projects, and the cumulative impacts of construction on the surrounding neighborhoods.

As described in Impact TR-98 on page 4.5-213 of the Draft EIR, construction at Cathedral Hill Campus, Davies Campus, and St. Luke's Campus might overlap with one another. However, because each of these campus locations is in relative isolation from the others, each one would rely on different access routes for construction vehicles. Therefore, overlapping construction at these campuses is considered to be less than significant. The proposed Cathedral Hill Campus and the existing Pacific Campus are located near one another and would share access routes; however, construction at the Pacific Campus would not begin until after construction at the Cathedral Hill Campus was complete and inpatient acute care and emergency services could be transferred from Pacific Campus to the Cathedral Hill Campus. Construction at these two campuses would not overlap, nor would construction staging areas be shared.

Comments 47-6 and 6-6 refer to the potential for the construction projects at the proposed Cathedral Hill and existing Pacific Campuses to overlap with Van Ness BRT and Geary BRT project construction as well as construction at 1481 Post Street. The non-CPMC projects have not yet been approved, nor have their construction plans been identified. If these projects were to overlap, all project sponsors, including CPMC, would be required to coordinate with SFMTA and the Planning Department to ensure that elements of each construction TMP was effective and that coordination would occur to ensure that construction impacts, including construction worker parking, on surrounding areas would be minimized. Construction worker parking management at the Cathedral Hill Campus is discussed further in Response TR-79 (page C&R 3.7-149).

To maintain traffic flow on Van Ness Avenue during construction, three travel lanes would be maintained in each direction except during hours when trenching is done for the subterranean pedestrian tunnel, as discussed in Response TR-105 (page C&R 3.7-180). The unacceptable levels of service at intersections near the Cathedral Hill Campus during construction would be the result of construction trucks arriving to and departing from the site. To minimize this impact, the Construction Transportation Management Plan proposes to coordinate truck deliveries, as described below in Response TR-105 (page C&R 3.7-180).

3.7.11.3 Construction Transportation Management Plan

Comments

(Lisa Carboni (Caltrans (Regional)), September 9, 2010) [6-4 TR, duplicate comment was provided in 7-4 TR]

"The proposed project will cause significant impacts during the 54 month construction period. In particular, it will cause significant delays on Van Ness Avenue. We recommend that the project provide additional mitigation measures to reduce these impacts. For example, provide signage to vehicles users to use parallel roadways."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-57 TR, duplicate comment was provided in 30-57 TR]

"For the 4 variants of the Cathedral Hill Project mentioned -- Impact TR-55 on Page S-48 and Impacts TR-56 through TR-58 on Page S-50 - there will be a 'significant and unavoidable' (SU) impact due to 'construction vehicle traffic and construction activities that would affect the transportation network.' In order to bring this impact to a 'less-than-significant' impact, the DEIR states that Mitigation Measure TR-55 will be implemented. This calls for a "Construction Transportation Management Plan (TMP) which will 'disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation ... pedestrian, transit, and bicycle program would supplement and expand, rather than modify or supersede, any manual, regulations, or provisions set forth by Caltrans, SFMTA, DPW, or other City departments and agencies.'

It goes on to say that the remedy would include, 'identifying ways to reduce construction worker vehicle trips through transportation demand management programs and methods to manage construction work parking demands,' 'identifying best practices for accommodating pedestrians, such as temporary pedestrian way-finding signage or temporary walkways,' 'identifying ways to accommodate transit stops located at sidewalks slated for closure during construction,' 'identifying ways to consolidate truck delivery trips, including a plan to consolidate deliveries from a centralized construction material and equipment storage facility,' and 'identifying best practices for managing traffic flows on Van Ness Avenue during the nighttime hours for the period when tunnel construction would involve surface construction activities.'"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-63 TR, duplicate comment was provided in 30-63 TR]

"As part of the effort to assist pedestrians during construction, way-finding signage may be OK for the sighted, but how will the blind and deaf be guided in this area? I suggest any way-finding signs to be posted at a good distance away from the construction site so that people do not end up walking unnecessarily only to find that the sidewalk is closed or that they have to walk out into traffic."

(Alan Wofsy—Emeric-Goodman Associates, September 23, 2010) [26-2 TR]

"Following are examples of the absence of mitigation measures from 3 of the chapters and my proposals to include real mitigation measures in the Final EIR:

DEIR

4.5 TRANSPORTATION AND CIRCULATION

Construction Workers by Shift-During construction of the Cathedral Hill Campus the maximum worker population would range between 80 (during demolition) and 735 workers (during interior finishing). A majority of these workers (about 80 percent) would be working on the Cathedral Hill Hospital. Work shifts would occur 7 a.m. to 4 p.m. and 4 p.m. to midnight on weekdays, and between 7 a.m. and 5 p.m. on Saturdays. 4.5-147

The proposed Cathedral Hill Hospital and Cathedral Hill MOB would be constructed over approximately 54 months. Construction activities would take place generally between 7 a.m. and midnight on weekdays and between 7 a.m. and 5 p.m. on Saturdays, depending on the phase of construction, and whether rafter-hour construction permits, when required for work after 8 p.m., are approved by the City. 4.5-147

Construction Truck Delivery Schedule-Table 4.5-30, 'Cathedral Hill Campus-Average Trucks per Day and per Shift by Construction Phase' (page 4.5-151), summarizes the average number of trucks needed to haul excavated materials and for equipment and materials deliveries to the Cathedral Hill Campus during construction. Trucks would only arrive at the campus during construction shifts. As indicated in Table 4.5-30, between 100 and 320 trucks would travel to the Cathedral Hill site per day, with the greatest number of trucks arriving during the excavation and foundation phases. 4.5-148

Approximately 185 trucks per shift [= 370 per day] would arrive at the construction site during the excavation phase, and assuming that 15 percent of these trucks would arrive during the peak hours, a total of 28 trucks would arrive during the peak a.m. and p.m. peak hours. Since a significant portion of the construction vehicle trips would be via large and heavy vehicles, the number of vehicles added to the intersection analysis was adjusted to reflect the impact of larger trucks on roadway capacity. 4.5-151

Because of the number of temporary closures of sidewalks adjacent to the project sites necessitating pedestrian detours, the proposed project would result in a significant impact on pedestrians during construction. 4.5-155

DISCUSSION

The massive impacts of the proposed project are well summarized in Section 4.5.

The DEIR adduces the following statistics during construction:

1. Up to 735 workers.
2. Construction between 7AM and midnight weekdays (17 hours per day) and 7 AM to 5 PM on Saturday during 54 months of construction.
3. Up to 370 truck arrivals and departures between 7 AM and Midnight, or more than one truck every 3 minutes for 17 hours per day.

The DEIR does not analyze the environmental and health impacts on the resident and businesses in our building as a result of these overwhelming statistics. It is likely that many will be unwilling to live or work in the building during the 54 months of construction and the DEIR should have proposed a method to compensate the property owner for lost income due to the impacts of the project and/or to have to compensated tenants who are willing to remain in the building during the construction period."

(Sue Hestor, October 19, 2010) [89-9 TR]

"Coordinating construction so that it occurs in the shortest amount of time possible will reduce construction impacts on nearby residents and businesses, on MUNI and other transit lines, and on traffic. [The EIR should discuss the impacts of serial construction of CPMC, then BRT(s) later."

Response TR-105

The comments state concerns with Mitigation Measure MM-TR-55 (Construction Transportation Management Plan) in the Draft EIR, page 4.5-159. Mitigation Measure MM-TR-55 was developed in response to the finding that construction activity at the proposed Cathedral Hill Campus would result in several significant impacts (Impact TR-55 in the Draft EIR, beginning on page 4.5-147), including impacts to traffic, pedestrians, and public transit. Given the magnitude of the proposed construction activities and the location of the project, construction impacts of the proposed Cathedral Hill Campus would be significant and unavoidable. To reduce these impacts to the extent possible, CPMC and its contractors would be required to develop a Construction Transportation Management Plan (TMP). As stated in Mitigation Measure MM-TR-55:

"CPMC shall develop and implement a Construction Transportation Management Plan (TMP) to anticipate and minimize impacts of various construction activities associated with the Proposed Project."

The Plan would disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation is maintained to the extent possible, with particular focus on ensuring pedestrian, public transit, and bicycle connectivity. The program would supplement and expand, rather than modify or supersede, any manual, regulations, or provisions set forth by Caltrans, SFMTA, DPW, or other City departments and agencies.

Specifically, the plan would:

- Identify construction traffic management best practices in San Francisco, as well as others that, although not being implemented in the City, could provide valuable information for the project. Management practices include, but are not limited to
  - Identifying ways to reduce construction worker vehicle trips through transportation demand management programs and methods to manage construction work parking demands.
  - Identifying best practices for accommodating pedestrians, such as temporary pedestrian wayfinding signage or temporary walkways.
  - Identifying ways to accommodate public transit stops located at sidewalks slated for closure during construction. This may include identifying locations for temporary bus stops, as well as signage directing riders to those temporary stops.
  - Identifying ways to consolidate truck delivery trips, including a plan to consolidate deliveries from a centralized construction material and equipment storage facility.
  - Identifying best practices for managing traffic flows on Van Ness Avenue during the nighttime hours for the period when tunnel construction would involve surface construction activities. This may include coordination with Caltrans on appropriate traffic management practices and lane closure procedures.

- ► Describe procedures required by different departments and/or agencies in the city for implementation of a Construction TMP, such as reviewing agencies, approval processes, and estimated timelines. For example,

  - CPMC shall coordinate temporary and permanent changes to the transportation network within the City of San Francisco, including traffic, street and parking changes and lane closures, with the SFMTA. Any permanent changes may require meeting with the SFMTA Board of Directors or one of its sub-Committees. This may require a public hearing. Temporary traffic and transportation changes must be coordinated through the SFMTA's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) and would require a public meeting. As part of this process, the Construction Plan may be reviewed by SFMTA's Transportation Advisory Committee (TASC) to resolve internal differences between different transportation modes.

  - Caltrans Deputy Directive 60 (DD-60) requires TMP and contingency plans for all state highway activities. These plans should be part of the normal project development process and must be considered during the planning stage to allow for the proper cost, scope and scheduling of the TMP activities on Caltrans right-of-way. These plans should adhere to Caltrans standards and guidelines for stage construction, construction signage, traffic handling, lane and ramp closures and TMP documentation for all work within Caltrans right-of-way.

- ► Require consultation with other Agencies, including SFMTA and property owners on Cedar Street, to assist coordination of construction traffic management strategies as they relate to bus-only lanes and service delivery on Cedar Street. CPMC should proactively coordinate with these groups prior to developing their Plan to ensure the needs of the other users on the blocks are addressed within the construction TMP for the project.

- ► Identify construction traffic management strategies and other elements for the project, and present a cohesive program of operational and demand management strategies designed to maintain acceptable levels of traffic flow during periods of construction activities. These include, but are not limited to, construction strategies, demand management activities, alternative route strategies, and public information strategies.

- ► Develop a public information plan to provide adjacent residents and businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and other lane closures.

The Construction Transportation Management Plan shall be submitted to SFMTA, SFDPW, and the Planning Department for review and approval."

Several elements of this Construction TMP have already been developed by CPMC and its construction management company, Herrero-Boldt. Based on the construction plan prepared by Herrero-Boldt,[27] the Construction TMP would include the following elements that specifically relate to comments about construction work hours, truck management, pedestrian way-finding signage, and vehicle signage:

- ► Construction on both the Hospital and MOB would occur during one shift between 7 a.m. and 7 p.m. on Monday through Friday and between 7 a.m. and 5 p.m. on Saturday. Work extending past 7:00 p.m. will be limited to activities such as concrete finishing, steel detailing, and general production preparation, and will be communicated with the neighbors on a weekly basis. Second shift work (work occurring between 4:00 p.m. and Midnight) is anticipated, pursuant to City approval, only during the interior build out phase of the hospital. Second shift work is not anticipated on the MOB project. Excavation of the Van Ness pedestrian tunnel would occur between 7 p.m. and 5 a.m.,

[27] Revised Construction Plan prepared by Herrero-Boldt dated February 2011 on file with the Planning Department.

pursuant to Caltrans approval, to reduce impacts associated with lane closures required to complete the work.

- CPMC and Herrero-Boldt have developed a truck management plan to coordinate truck deliveries to and from the construction site. In summary, up to eight trucks could be accommodated within the construction site. If delays occur, a logistics manager would be in communication with off-site trucks and would request any trucks not able to enter the construction site to hold at or return to their construction yard. The logistics manager would be in constant communication with both trucks and the construction job site.

- Construction would require the closure and pedestrian detours on all sidewalks immediately adjacent to the construction site. To accommodate pedestrians, temporary covered pedestrian walkways would be constructed within the parking lane along both sides of Van Ness Avenue. Wayfinding signage and required pedestrian facilities would be provided. As mentioned in Response TR-123 (page C&R 3.7-203), although some pedestrians might have special needs, the SFMTA is not aware of special technologies that could further aid these pedestrians, and these pedestrians typically would have devices that would aid them in navigating city streets, including poles and trained guide dogs.

- During construction of the hospital, one parking lane would be closed and all travel lanes on Van Ness Avenue would remain open, and construction of the Van Ness Avenue pedestrian tunnel would require closure of up to two travel lanes in addition to the parking lane. As discussed in Impact TR-55, the closure of the peak hour travel lane/parking lane on Franklin Street between Geary Street and Post Street would result in increased delay at Franklin/Geary and Franklin/Post intersections. Construction of the pedestrian tunnel under Van Ness Avenue would require sequential lane closures of two lanes at a time between 7 p.m. and 5 a.m., when traffic is typically lighter. As discussed in Impact TR-55, vehicle delay would increase at the intersections of Van Ness/Post and Van Ness/Geary. No other vehicle travel lanes would be closed during construction. CPMC and Herrero-Boldt would work with the City of San Francisco to identify appropriate locations for signage alerting drivers to these construction closures.

- The transit-only lane on Post Street between Franklin Street and Van Ness Avenue would be closed during construction for safety reasons. As a result, Muni would be required to share a mixed-flow travel lane for one block. Muni’s overhead wires would be relocated to the north side of the street. Conflicts between construction vehicles and Muni vehicles would be minimal because construction vehicles would enter the construction site from the southern-most lane on Post Street. This mitigation measure would be coordinated with Muni to ensure that impacts to public transit would be minimal.

Several comments refer to the potential for construction of the proposed Cathedral Hill Campus to overlap with other major projects in the area, including the Van Ness Avenue BRT and Geary Corridor BRT routes. These projects have not yet been approved, nor have their construction plans been identified. CPMC and Herrero-Boldt would be required to consult with the SFMTA, DPW, SFCTA, Caltrans, and Planning Department during construction to ensure that the elements of the TMP would be effective, and any coordination between these projects and the proposed CPMC LRDP to minimize construction impacts would be addressed when a construction plan for the BRT projects was developed. These cumulative traffic impacts related to construction are addressed in Response TR-104 on page C&R 3.7-177.

The comment further states that the Draft EIR does not analyze the environmental and health impacts on the resident and businesses near the Emeric-Goodman Building. Please see Response INTRO-7 on page C&R 3.1-17 for further discussion of this issue.

3.7.11.4 CONSTRUCTION WORKER TRANSPORTATION PROGRAM

Comments

(Bernard Choden, September 20, 2010) [13-3 TR, duplicate comments were provided in 14-3 TR and 38-3 TR]

"**Demonstrated commitment and means of mitigation of interim construction phase impacts:** For example, construction parking and staging areas will very likely impair each site's livability and commercial viability. Japan town could face commercial disaster."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-59 TR, duplicate comment was provided in 30-59 TR]

"In these same Administrative documents that supplement the CPMC DEIR, the table mentioned in this 'Biology Section, #7, shows that there will be a maximum of about 680 workers from July/August 2012 through October 2014 with an average of about 550 workers from July 2012 through October 2014 to build the Cathedral Hill Campus Hospital; and for the MOB the 'maximum number of workers on site per day' is 158 from May 2013 through August 2014 with an average of about 100 workers from October 2011 through August 2014. Will they park other than at 1375 Sutter, 855 Geary, 1600 Geary and CH MOB? If so, how many more parking spaces will be leased as part of this 'transportation demand management program'?"

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-120 TR, duplicate comment was provided in 30-120 TR]

"Also, in the Administrative documents that accompany this CPMC DEIR, the consultant, Herrero-Boldt, indicates that 70-75% of the construction workers on the Cathedral Hill Hospital and MOB projects are lone drivers. And these drivers will be parking in one of the 400 parking spaces at Japantown and the merchants cannot get customers who arrive from the East Bay, Peninsula and North Bay communities to visit and shop at Japantown because of the lack of parking in this historical resource area. It is difficult to get construction workers to 'truck-pool' but perhaps this needs to be done for these workers to leave their vehicles outside of San Francisco. This would be one mitigation measure. (See also Item 20 above.)"

(Rose Hillson—Jordan Park Improvement Association, September 23, 2010) [18-131 TR, duplicate comment was provided in 30-131 TR]

"71.ln looking at Table 4.5-29, Page 4.5-150, how many construction workers will be parking at the Japantown Garage? Based on the workers expected to be on site per day at the Cathedral Hill Hospital, MOB and Tunnel projects, and according to the "Biology Section, #7" report in the Administrative documents, if the maximum workers at the site per day is per the following:

- 680 at Hospital
- 158 at MOB
- 35 at Tunnel

The total of workers maximum per day equals 873 workers."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-132 TR, duplicate comment was provided in 30-132 TR]

"72. Table 4.5-29 lists only 1375 Sutter, 855 Geary, 1600 Geary and the Cathedral Hill MOB as potential parking areas for the workers. The 'Biology Section, #7' report states the following number of parking spaces for the above:

- 1375 Sutter 175 parking stalls for the construction workers
- 855 Geary 200 parking stalls for the construction workers
- 1600 Geary 400 parking stalls for the construction workers

This gives a total of 775 parking stalls for the construction workers with almost 100 spaces short. Even if, as the Administrative document shows, CPMC will be running 4-5 shuttles to hold 30-workers and be running continuously for 2 hours, the workers will still bring their private vehicles as close to the shuttle pickup places as possible; and that would indicate that they will be parking at the above 3 bulleted addresses. If we assume that 400 workers will use, e.g., the 1600 Geary garage in Japantown, people who want to visit the Japan Center will not shop because at least 400 spaces are taken by construction workers who are not conducting business or shopping in Japantown; and during construction, people cannot park on street either since there will be displaced vehicles that will encroach into the onstreet parking spaces around Japantown."

(Bob Hamaguchi—The Japantown BNP Organizing Committee, October 8, 2010) [47-4 TR, duplicate comment was provided in 50-4 TR]

"Specific issues that need to be addressed include:

1) Use of the 1610 Geary (aka Japantown) garage for construction parking, as proposed by the DEIR and the HerreroBoldt analysis (CPMC Cathedral Hill Hospital and Medical Office Building Environmental Impact Report, Construction Data, Version 2.x - February 5, 2010).

This document references the existing 400 spaces CPMC has reserved at this location as available for construction use. However, they are already in use by CPMC staff at the Pacific Campus, and are not available for construction parking. Due to overwhelming demand, CPMC has had to create a waiting list for this popular program. The Japantown merchants have experienced the loss of parking spaces from other construction projects - reaching premature capacity, and as a result customers cannot find parking during peak afternoon especially on Fridays and Saturdays. The resulting drop in customers has an immediate and adverse impact on revenues, and hence threatens the future financial viability of Japantown merchants.

We urge you to consider mitigations that focus on leasing space in underutilized garages (e.g. For the month of August 2010, 5th &Mission Garage has 2,585 parking spaces and averaged only 45% peak occupancy Mondays through Fridays; San Francisco Port may well have pier parking available and Candlestick Park may be another resource). We feel that there has not been enough research performed on parking alternatives. San Francisco MTA has data relating to capacity, and perhaps is a resource to help find solutions. San Francisco's Transit First policy is .aggressively applied in Planning 's review of projects once occupied and operational. We urge that this same diligence in reducing passenger vehicle traffic be applied to the construction phase of projects. In applying the 'Transit First' policy to the construction phase, CPMC could consider shuttles from locations outside of San Francisco."

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010) [101-24 TR]

"Page 4.5-209. Impact TR-94: The conclusion of less-than-significant construction traffic impacts is not supported by sufficient evidence. This is another instance of the project level DElR relying on ambiguous and inadequately detailed description of important components of the proposed project to conclude an impact would be less than significant. The DElR states that '[c]arpooling and transit use by construction workers would be encouraged throughout the construction to reduce parking demand,' and '[e]xisting offsite public parking garages and lots would be utilized.' The DElR acknowledges that, '[specific locations of these off-site facilities have not been, identified by CPMC. A shuttle service would be provided between the St. Luke's construction site and the offsite public parking garages and lots.' Are lots with sufficient unused capacity available within a reasonable distance? What parking supply impacts would the project cause in the vicinity of those lots? Under CEQA, the DEIR needs to provide sufficient evidence to support the feasibility and effectiveness of such an approach. Accordingly, the DElR must be revised to include this information and analysis."

(Bernard Sherman, September 23 2010) [PC-11 TR]

"A demonstrated commitment in means of mitigation of interim construction phase impacts, for example, the construction of parking and staging areas will likely impair each site's livability and commercial viability. Japantown, on whose organizing committee I serve, could face commercial disaster."

Response TR-106

The comments state concerns about the adequacy of transportation demand management measures developed by CPMC and Herrero-Boldt to address construction worker parking needs. The comments also request clarifications regarding the number of construction workers that would be on site during construction. Herrero-Boldt, in conjunction with CPMC, would develop a CWTP to ensure that the parking demands for construction workers would be met without impacting parking availability for patients, employees, visitors, or other local merchants and residents near each campus. The goal of the CWTP would be to reduce the number of workers driving to construction sites and to manage the use of available parking supply so as to not unreasonably impact parking availability for patients, employees, local merchants, residents, and visitors.

Workers would be encouraged to use public transportation, carpool, or vanpool, or use shuttles to access construction sites, consistent with the City's Transit-First Policy. To encourage this behavior, the CWTP would:

- Provide subsidized or reduced-cost public transit passes to workers who use public transportation, bicycle, or walk;
- Provide secure bicycle parking on job sites;
- Designate special priority parking areas for carpools and vanpools;
- Provide a rideshare matching program operated by the project sponsor to match drivers and riders;
- Fully or partially subsidize tolls, gas, and parking for carpools or vanpools based on the number of occupants per vehicle;
- Provide lunch vouchers to workers using public transportation or who walk or bike; and
- Provide a shuttle between off-site parking lots and the job site at 15 minute headways between 6 and 9 a.m. and 2 and 4 p.m.

Parking for construction workers driving or participating in a carpool or vanpool would be provided in off-site public parking lots within the vicinity of each job site and, if necessary, in satellite parking lots served by shuttles at times scheduled with phases and shifts of the construction activities. The off-site parking lots identified for construction workers would be separate from the parking lots used by CPMC employees. Construction workers who drove, carpooled, or vanpooled would be given parking passes for these off-site garages.

All personnel (administrative, skilled trade, and labor) would be instructed that available on-street parking near campus was not to be used during the day, and that penalties would be assigned if anyone was found to be parking on the street. All proposed CPMC campuses would be located within residential parking permit zones or surrounded by on-street metered parking. Therefore, any construction worker who chose to park on the street would remain subject to any posted parking regulation in effect during that worker's shift.

At the proposed Cathedral Hill Campus, the maximum number of workers at the construction site during the 54-month construction period is expected to be 735 workers. One comment notes that the sum of the maximum number of construction workers would exceed 735; however, because of project phasing at the proposed Cathedral Hill Campus, the maximum number of workers for the proposed hospital, MOB, and tunnel would not occur simultaneously. Exclusive of the Japan Center Garage and the 1375 Sutter garage, CPMC has identified 13 parking lots containing a total of 480 available monthly spaces, within walking distance of the construction site that could be used for construction worker parking. Construction workers would not be permitted to use parking areas, including the Japan Center Garage that would be reserved for CPMC employees. Approximately 360 spaces would be used initially for construction worker parking. The construction site also would have about 20 on-site spaces reserved for essential personnel.

At the St. Luke’s Campus, the maximum number of construction workers at the construction site during the phased 4-year construction period is expected to be about 150 workers. CPMC has identified 50 available monthly parking spaces within walking distance of the St. Luke’s Campus at 3500 Cesar Chavez Street that could be used for construction worker parking. Approximately 35 spaces would be used initially for construction parking. The construction site also would have about 10 on-site spaces reserved for essential personnel.

At the Davies Campus, the maximum number of workers at the construction site during construction of the Neuroscience Institute building is expected to be about 105 workers. CPMC has identified 190 available monthly parking spaces within walking distance of the Davies Campus that could be used for construction worker parking. Approximately 70 spaces would be used initially for construction parking. The construction site also would have about 10 on-site spaces reserved for essential personnel.

CPMC would negotiate with garage management at the off-site parking garages where it would lease spaces to monitor overall garage occupancies, and would determine if maximum capacities would be exceeded. If demand exceeded supply, CPMC would redirect its construction workers to other parking lots with available supply. Any lot within walking distance but greater than a 10-minute walk from the jobsite would be linked to the jobsite by a shuttle, contracted by the project sponsor. When not in use, shuttles would not park at the jobsite but would be stationed in the contractor’s shuttle yard.

In additional to the parking garages located near each campus, satellite parking garages at the intersections of 12th Street/Kissling and Franklin/Grove (Performing Arts Center Garage) have capacity to provide up to 800 additional spaces for construction worker parking. CPMC already maintains leases with these facilities, and a shuttle could be provided to construction workers parked at them. Because of these existing leases, CPMC would not need to pursue additional parking leases at the 5th and Mission Garage, Candlestick Park, or the Port of San Francisco.

The construction phases of the proposed LRDP are expected to occur over multiple years, and no phase where the maximum number of workers for each campus would be reached is anticipated to occur simultaneously. Even if construction on the campuses did overlap, CPMC would operate or lease approximately 1,265 parking spaces exclusively for construction workers. If the most intense construction period on all the campuses occurred simultaneously, approximately 990 construction workers would be on CPMC property. Therefore, although the CWTP would provide measures to reduce the number of workers driving to construction sites, CPMC would be able to accommodate all construction workers without displacing patient, visitor, employee, or local merchant or resident parking.

Construction of the Pacific Campus and the 14th Street/Castro Street MOB at the Davies Campus would be long-term projects that would occur only after completion and occupation of the proposed Cathedral Hill Campus, the St. Luke’s Campus, and the proposed Neuroscience Institute building at the Davies Campus. Given that those projects would be long-term projects, the availability, pricing, and supply of parking available during their construction phases would be different, and an analysis at this time would be speculative and would not necessarily represent an accurate assessment.

As described in the Draft EIR, supply and lack of parking is not considered a significant impact; however, information about parking is provided for informational purposes.

3.7.11.5 VAN NESS AVENUE TUNNEL CONSTRUCTION LANE CLOSURES

Comments

(Lisa Carboni (Caltrans (Regional)), September 9, 2010) [6-5 TR, duplicate comment was provided in 7-5 TR]

"On page 145 of the TIS, it states that the tunnel construction work will be limited to 7PM to 5AM daily for a 10 month period. Would the lane closure only occur during these hours and fully reopen (three travel lanes) or would the closure be continuous throughout the day and only tunneling work be limited to those hours? The Department is particularly concerned with a lane closure that will significantly impact AM and PM peak hour traffic."

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-10 TR, duplicate comment was provided in 72-10 TR]

"Van Ness Tunnel: Given the levels of traffic volume on Van Ness that remain after 7 PM (Table 4.5-32), lane closure for construction of the tunnel should occur after 9 PM, when traffic volume is shown to decrease significantly."

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-30 TR, duplicate comment was provided in 72-30 TR]

"Construction of the Van Ness tunnel will require lane closures on Van Ness. To minimize the impact, these lane closures will be required to be performed at night. Currently, the lane closures are proposed to begin at 7 pm. However, in looking at the average midweek traffic volumes on Van Ness (table 4.5-32), it can be seen that the traffic volumes for both the northbound and southbound directions remain very high during the 7 pm to 8 pm time period and drop modestly from 8 pm to 9 pm. Due to the continued high volume of traffic at this time of day, it is recommended that the lane closures begin no earlier than 9 pm to minimize the impacts to the neighborhood."

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-29 TR]

"Open cutting of Van Ness Avenue to construct the tunnel together with the lane closures outlined in Table 4.5-33 on Page 4.5-158 will result in significant congestion and traffic impacts during construction of the tunnel over 10 months. To mitigate these significant traffic impacts, the Draft EIR must confine the lane closures and construction activities to hours that meet the San Francisco's LOS D standard (no lane closures northbound before 10 PM and no lane closures southbound before midnight). The Draft EIR must also consider mitigating traffic impacts of the tunnel construction by boring underground to avoid lane closures rather than open cutting of Van Ness Avenue."

Response TR-107

The comments state concern regarding the impact and timing of travel lane closures on Van Ness Avenue during construction of the proposed pedestrian tunnel. Construction of the proposed underground pedestrian tunnel between the proposed Cathedral Hill Hospital and Cathedral Hill MOB would be a "cut and cover" project and would occur over a period of 18 months, with only 10 months of work affecting Van Ness Avenue. Tunneling using boring techniques was considered and rejected because of site constraints and the soils and geology in the tunnel area.

At the proposed pedestrian tunnel location, Van Ness Avenue has three travel lanes and a parking lane in each direction. Construction of the proposed pedestrian tunnel would require sequential closures of no more than two lanes at a time in 100-foot segments of the lane along Van Ness Avenue, between 7 p.m. and 5 a.m. All travel lanes on Van Ness Avenue would reopen at 5 a.m. each day, and construction would not recommence until the end of the p.m. peak traffic period at 7 p.m. The interior tunnel work would occur between 7 a.m. and 7 p.m.;[28] however, the interior work would not require any lane closures along Van Ness Avenue.

Comments 71-10, 71-30 and 92-29 suggest that, based on the Van Ness Avenue traffic volumes presented in Table 4.5-32 of the Draft EIR, construction of the underground tunnel be restricted to later hours (ranging from after 9:00 p.m. to after midnight), to minimize impacts to surrounding neighborhoods. As shown in Table 4.5-32 on page 4.5-157 of the Draft EIR, traffic volumes between 7:00 p.m. and 8:00 p.m. are 86 percent of traffic volumes during the p.m. peak hour. Seven p.m. was chosen because it is the earliest hour in which traffic on Van Ness Avenue substantially decreases compared to the peak hour. As shown in Table 4.5-33 on page 4.5-158 of the Draft EIR, when construction occurred on the northbound side of Van Ness Avenue, the intersections of Van Ness/Geary and Van Ness/O'Farrell would operate at LOS F and the intersection of Van Ness/Post between 7:00 p.m. and 8:00 p.m. The intersection of Van Ness/Geary would operate at LOS F until 9:00 p.m. in the northbound direction. After 9:00 p.m., all intersections impacted by construction would operate at acceptable levels of service. When construction occurred on the southbound side of Van Ness Avenue, the intersection of Van Ness/Geary would operate unacceptably until midnight. The intersection of Van Ness/Post would operate at LOS E until 8:00 p.m. The other intersections along Van Ness Avenue would not be substantially impacted by the construction of the tunnel, and as shown in Table 4.5-33, Van Ness/Bush and Van Ness/Sutter intersections would operate at LOS B after 7:00 p.m. The tunnel's construction would only impact one side of Van Ness at any given time and would be localized to the segments immediately adjacent to the construction site. Although restricting certain construction activities such as material deliveries to after 9 p.m., 10 p.m., or midnight could improve later evening traffic operations at some intersections, the construction impacts identified in the EIR would not substantially change the significant and unavoidable impact identified in Draft EIR. Through the City review of the CMP, the TASC may further reduce construction hours or activities.

Construction-related impacts of the pedestrian tunnel construction were identified as significant and unavoidable in the Draft EIR, with Mitigation Measure MM-TR-55 (on page 4.5-159 of the Draft EIR) identified, and the Construction Transportation Management Plan would include the best management practices for overseeing this localized traffic impact.

The proposed construction hours and lane closure periods would be subject to City and Caltrans review and approval. In general, lane and sidewalk closures as a part of construction activity must meet *City's Requirements for Working in San Francisco Streets* (SFMTA Blue Book) and are subject to review and approval by the City's Transportation Advisory Staff Committee (TASC) which is chaired by an SFMTA Traffic Engineering staff member and consists of representatives of other City departments (including Public Works, Fire, Planning, Police, Public Health, Port and the Taxi Commission).

3.7.11.6 Truck Management

Comments

(Charles Freas, October 19, 2010) [79-3 TR, duplicate comment was provided in 100-3]

"Construction impacts are particularly challenging, such as the proposed 185 truck trips per day which averages over 20 trucks per hour or 3 minutes per load time - an efficiency I have never seen in my over 30 years of

[28] Revised sheets submitted for Construction Plan prepared by Herrero-Boldt dated December 13, 2010 and January 11, 2011 on file with the Planning Department

engineering and construction management - is fiction. Particularly true for such a congested and compact construction site."

(Alan Wofsy, September 23, 2010) [PC-300 TR]

"During part of the project, there's going to be 370 trucks coming during that 17-hour period, which means one truck every three minutes, for 17 hours a day."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-61 TR, duplicate comment was provided in 30-61 TR]

"For the Cathedral Hill Hospital project, with 55 trucks per day during demolition, 220 trucks per day during excavation, 152 trucks for the foundation work, 110 trucks per day for the building of the structure, and 25 trucks each per day for the exterior and interior work, there will be a problem with trucks queuing up at the site. These trucks need to be told in advance of approaching the work site that no more trucks can get into the area until a truck has left or the gridlock in the area will be exacerbated. In fact, adding the Cathedral Hill MOB project at the same time, for each of the above categories (e.g. demolition, excavation, etc.), there will be a total of 95 trucks per day for demolition, 320 trucks for excavation, 312 trucks for foundation work, 240 trucks to build the structure, 50 trucks for exterior work and 40 trucks for interior work per Page 4.5-151.

With the sheer number of trucks coming and going, and with just the one statement on Page 4.5-152 – 'if trucks begin to stack, other trucks would be advised to return to their construction yard by the contractor's logistics superintendent' - it did not seem like a good plan was in place. However, after reading the Administrative document by Herrero-Boldt dated May 27, 2009, 'CPMC Cathedral Hill Hospital EIR - Construction Data Version 2.x,' it appears that a better explanation was given to allay any issues with the smooth operation of the arrivals and departures of the construction trucks that will be at this site. Per this document, the 'Logistics Superintendent will be in constant radio contact with the jobsite to coordinate deliveries continuously during all hours of operation.' It explains that 'there is planned room for a total of 8 trucks at the site while only 3 are planned to be offloaded at a time. This will allow for 3 trucks to be offloaded while 5 are queued. If a truck cannot reach the site in a reasonable amount of time or not at all, the truck will return to the construction yard by the most plausible alternate route based on the current circumstances. The use of technology (GPS, traffic reports, police scanners) and constant communication between construction yard, drivers, and construction site will help to reduce difficulties in trucking.'

In addition, this document states that 'schedules for the cranes and hoists will be coordinated with the delivery schedule in order to make the most efficient use of the equipment.' When, according to this document, the construction yard locations will be at:

- 550 Townsend
- 450 Toland
- 2020 Cesar Chavez
- 2065 Oakdale Avenue
- 955 Cesar Chavez

And the materials will be trucked in from warehouses in:

- Mission Bay
- Central Waterfront.
- Bayview District"

Response TR-108

The comments address concerns about the amount of construction truck trips and how the construction site would manage trips to and from the site. Comments 79-3 and PC-300 suggest that truck deliveries to the proposed Cathedral Hill Campus would occur every 3 minutes; however, this is not correct. The planned frequency of truck deliveries to the campus is discussed below.

The Construction Transportation Management Plan indicates that the proposed Cathedral Hill Campus construction site would generate 185 truck trips per day—135 to the Cathedral Hill Hospital construction site and 50 to the MOB construction site. Although an average of over 20 trucks would travel to both sites during each hour, it is incorrect to estimate 3 minutes per load time because some trucks would be traveling to the hospital construction site and others would be traveling to the MOB construction site.

The hospital construction site would generate 135 truck trips over a 9-hour day, or 15 truck trips per hour. The hospital construction team would require use of two loaders for the hospital. Each loader would load an average of 7.5 trucks per hour (15 trucks/two loaders); therefore, the duration for a truck on the hospital construction site would be 8 minutes per load (60 minutes/7.5 trucks).

The MOB construction site would generate 50 truck trips over a 10-hour day, or five truck trips per hour. If one loader was used for the MOB, the loader would load an average of five trucks per hour, and the duration for each truck on the MOB construction site would be 12 minutes per load (60 minutes/five trucks).

To maximize the efficiency of each truck's run and prevent queuing of trucks outside the construction site, as Comment 18-61 notes, a logistics superintendent would be in constant radio contact with the construction site to coordinate truck routes. This person would be responsible for monitoring truck locations, traffic reports, and GPS to reduce delays, and for maintaining communication between construction yards, the site, and truck drivers. In the case of unforeseen delays, the site would be designed to accommodate up to eight trucks. Any trucks that could not make it to the site in the appropriate scheduled slot would be redirected back to the construction yard. This logistics support would be an element of the Construction Transportation Management Plan (Mitigation Measure MM-TR-55 summarized on page 4.5-159 of the Draft EIR and in Response TR-105, page C&R 3.7-180).

3.7.11.7 OTHER SPECIFIC COMMENTS

Comment

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-9 TR, duplicate comment was provided in 72-9 TR]

The intersection at Franklin and Post is reported to deteriorate from LOS B to LOS F during the five year construction phase, which is the largest deterioration among all of the intersections analyzed. However, TR-55 asks for a Transportation Management Plan in which CPMC identifies for themselves the best practices that might address construction traffic issues, without listing any tangible restrictions or modifications and without requiring proof from CPMC that such measures are working. We recommend the following additional mitigation measures:

- In order to relieve the significant impacts of construction related traffic on all nearby areas, restrict the following construction operations to occur only during non-peak hours, 9 AM – 5 PM weekdays: concrete pours (staging/queuing of concrete trucks), material deliveries, excavation import/offhaul, fire proofing (staging of pump trucks) and demolition (staging of debris trucks).

- In order to relieve the significant impacts of construction related traffic on the heaviest hit intersection of Franklin and Post, the following activities should be restricted on Post during non-peak hours: staging/queuing of concrete trucks and demolition debris trucks, material deliveries, and excavation import/offhaul site access entry/exit. Displacement of trips would be spread out to intersection that, according to the DEIR, would be operating at or above LOS D. In addition, displacement would occur during non-peak hours.

- The DEIR reports that an average of 135 trucks per shift will be accessing the Cathedral Hill Campus during excavation. For a nine hour shift, this equates to an average of 15 trucks per hour. However, the construction site is planned to have room for parking only eight trucks. Therefore, it is highly likely that trucks will be queuing around the block and causing more traffic than anticipated in the analysis. Truck trips were considered but truck queuing was not. Therefore, in order to avoid queuing and misrepresentation of the actual impacts in the DEIR per the study, the mitigation measure should require that all trucks accessing the site, for all operations, be controlled and staged at a remote location and dispatched to the site only when space onsite is available.

- CPMC plans on closing both the southern parking lane and Muni lane on Post. The Muni lane will be relocated to the northern normal traffic lane. In addition, CPMC plans on using the last remaining normal traffic lane as their truck route (135 trucks per shift). These changes to the transportation network will have a devastating impact to Post Street, evidence in part by the study's finding of a significant deterioration in LOS at Franklin and Post. In order to mitigate these impacts, construction vehicle traffic should be required to use the bus lane on Post that the Project already plans to take for its own uses, instead of using the normal traffic lanes.

- Given the anticipated congestion in the area of Franklin and Post (LOS B to F), CPMC should be required to station a flagman at the intersection to facilitate smooth traffic flow throughout the work day, even for operations that do not require flagmen per encroachment permits.

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-29 TR, duplicate comment was provided in 72-29 TR]

"TR-55 TR-55 states that the construction activities for the project will have a transportation impact on the project vicinity that will affect the transportation network. The mitigation measure requires the implementation of a Construction Transportation Management Plan (TMP) that contains a number of specific action items.

The greatest impact from construction will be experienced on the streets immediately adjacent to the project. The intersection operating conditions for Franklin/Post are projected to deteriorate from LOS B to LOS F during the A.M. and P.M. peak hours, which is the largest deterioration of all of the intersections analyzed. There are a number of construction operations that will contribute to this traffic impact such as large, slow moving trucks that require wide turning movements and obstruct more than one lane. In addition to construction work vehicles, material delivery trucks, and excavation import/offhaul trucks that were considered in the DEIR's evaluation, the construction operations will require staging and/or queuing of concrete pumping trucks, fire proofing pump trucks, demolition debris carrying trucks, and various other operations. We request that MM TR-55 be amended to include further practical measures which will reduce the impact the construction operations will have to nearby traffic flow, including:

- Prohibit the following construction operations during the busiest commute hours of 6 am to 8 am, and from 5 pm to 8 pm on weekdays: staging/queuing of concrete trucks, material deliveries, excavation import/offhaul, and staging of fire proofing pumps and demolition debris trucks.

- In order to relieve some of the impact on the intersection of Franklin and Post, prohibit the following activities from being conducted on Post during non-peak hours: staging/queuing of concrete trucks, material deliveries, excavation import/offhaul, and staging of fire proofing pumps and demolition debris trucks. Displacement of trips to other intersections will be spread out to intersections that, according to the study, would be operating at their current LOS or at least above D. Also, displacement would occur during non-peak hours.

- Table 4.5-30 states that an average of 135 trucks per shift will travel to the Cathedral Hill Hospital site during the excavation phase (averaging 220 trips per day over two shifts). For the 9-hour daytime shift, this equates to 15 trucks per hour. In addition, the MOB will average another 50 trips per shift (100 per day). The EIR also states that the Cathedral Hill Hospital site would have room for 8 trucks to queue on site. Since a truck will arrive to the hospital site on the average of every three minutes during excavation, it is very evident that there will not be sufficient staging onsite. Therefore, the mitigation measure should require that all truck activity (concrete, material deliveries, import and offhaul, etc.) be controlled and staged at a remote location and dispatched to the site as-needed, and when space is available onsite to provide for a managed truck staging that avoids truck staging on the surrounding streets and facilitates the flow of local traffic. .

- Since CPMC plans on closing the parking lanes and bus lanes on Post Street and Geary, construction vehicle traffic should be required to use the bus lanes on Post and Geary instead of using the normal traffic lanes. This will remove the slow moving construction traffic (and right turn movements) from the normal traffic lanes which will help minimize the significant and unavoidable impacts of construction on the local traffic.

- Given the anticipated congestion in the area (from LOS B to F), we recommend that at a minimum, CPMC provide a flagman to be stationed at the corner of Franklin and Post to facilitate all traffic movement during construction hours (not just for operations that require flagmen per encroachment permits)."

Response TR-109

The comment states that the Construction Transportation Management Plan should include tangible requirements for proof that the plan is working. The comment also lists alternative mitigation measures.

As discussed in Response TR-105 (page C&R 3.7-180), the Construction Transportation Management Plan includes a list of action items that CPMC would have to address. Because of the complexity of constructing a medical facility in a dense urban environment, after being prepared by CPMC's construction management company, Herrero-Boldt, the plan would be submitted to the SFMTA, SFDPW, and Planning Department, among other departments for review and approval. During this review, City departments would ensure that plan elements addressed safety and traffic concerns and are consistent with City requirements. As discussed in the Draft EIR and the *Cathedral Hill Transportation Impact Study*, the plan details the hours of work, truck management plans, lane and sidewalk closures, and lane and sidewalk detour plans, including wayfinding signage. At the time of approval, City departments could require that the project sponsor submit monitoring reports that document specific traffic flow or safety concerns.

The following bullets respond directly to each of the mitigation measures proposed in the comment.

- **Restricting construction hours for truck activities to non-peak hours (9 a.m. to 5 p.m.):** Although restricting certain construction activities such as material deliveries to off peak hours, such as 9 a.m. to 5 p.m. could improve the peak operations at some intersections, overall truck trips nor other vehicle traffic, or related vehicle/parking lane closures would not be reduced or altered and would therefore not substantially change the significant and unavoidable impact identified in TR-55 of the Draft EIR. Staging of trucks on the site would occur in the parking or transit lanes proposed to be closed as part of the Construction Transportation Management Plan, and barricades closing these lanes would remain in place during the duration of construction (i.e., parking lanes would still be closed when construction was not occurring). Through the City review of the CMP, the TASC may further construction hours or activities.

- **Restricting construction traffic and activities on Post Street to occur during non-peak hours to reduce the construction impact to Franklin/Post and dispersing construction traffic to intersections operating at LOS D or better:** The intersection that the comment references is located immediately adjacent to the construction site and would operate at LOS F during the peak hours under construction conditions. Restricting truck activity along Post Street to non-peak hours would require all trucks to enter or exit the site via Geary Street, Franklin Street, or Van Ness Avenue.

Unacceptable operations at this intersection primarily would be caused by the closure of the peak-hour tow-away lane on the east side of Franklin and adjacent to the construction site. This lane closure would be required to accommodate construction activities on the site and would already be in place during non-peak hours, irrespective of whether or not trucks were entering or exiting the site.

- **Dispatching trucks from a central staging facility to avoid truck queues:** As discussed on page 4.5-152 of the Draft EIR, the Construction Transportation Management Plan includes a logistics superintendent who would be responsible for coordinating truck deliveries to and from the construction site. This person would be responsible for monitoring truck locations, available space, and for maintaining communication between construction yards, the site, and truck drivers. In the case of unforeseen delays, the site would be designed to accommodate up to eight trucks. This logistics support is summarized in Mitigation Measure MM-TR-55 on page 4.5-159 of the Draft EIR and in Response TR-105, page C&R 3.7-180).

- **Requiring trucks to use the closed transit-only lane on Post Street, rather than mixed-flow travel lanes:** The comment requests clarification regarding the use of the closed transit-only lane on Post Street. The comment suggests that the closed transit-only lane on the south side of Post Street be used for truck traffic and not construction staging. The transit-only lane on Post Street would be utilized by construction truck traffic during construction, however trucks proceeding to this block would still use other vehicle travel lanes, so truck traffic patterns outside the immediate vicinity of the project site would remain and the impacts identified in the EIR would not change.

- **Requiring a flagman at the intersection of Franklin/Post:** It is unclear how this measure would improve operations at the intersection of Franklin/Post Streets. The signal timing at this intersection is coordinated with the Franklin Street corridor and optimized to make movements as efficient as possible during the p.m. peak period. As indicated in the Draft EIR discussion, unacceptable operations would primarily be caused by closure of a peak-hour tow-away lane on Franklin Street. Although a flagman could ensure that potential queuing would not block the intersection during peak hours, no basis exists to assume that queuing from downstream intersections would occur. The intersections of Franklin/Bush and Van Ness/Post are expected to operate at acceptable levels of service during peak hours under construction conditions.

Comment

(Rachel Sater—Lost Block and Save Our Streets, October 19, 2010) [101-25 TR]

“The DElR notes that construction deliveries may cause congestion on 27th Street. The existing emergency department and ambulance access is on 27th Street, The DEIR states that, ‘[c]onstruction deliveries would be scheduled and coordinated to not hinder emergency vehicle access.’ How is it possible to schedule emergencies? Again, insufficient evidence is provided to conclude a less than significant impact.”

Response TR-110

The comment questions whether the Construction Transportation Management Plan in place at St. Luke’s Campus would schedule construction deliveries in such a way that would minimize the impact construction traffic would have on emergency access to the hospital. Although the comment correctly states that emergencies are never scheduled, construction deliveries and traffic would be scheduled and managed to maintain emergency access at all times, including ground personnel directing traffic on 27th Street and scheduling of deliveries during times of day with fewer on average emergency admissions (TransOptions, 2009). The construction team and the hospital operations staff would have regularly scheduled meetings to address and correct any issues that might occur during construction.

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-7 TR, duplicate comment was provided in 30-7 TR]

"How many existing on-street parking spaces from Post Street will be eliminated for the 400 ft. closure? How many existing on-street parking spaces from Geary Blvd. will be eliminated for the 400 ft. closure? The reason for these questions is that vehicles that used to park in these spaces will be shifted elsewhere, possibly to Larkin, Polk, Japantown streets."

Response TR-111

The comment requests clarification regarding the impact of parking lane closures on Post Street and Geary Boulevard during construction. Six existing metered parking spaces and four existing metered loading zone spaces on the south side of Post Street would be impacted by the 400-foot closure. On Geary Boulevard, the construction closure would remove eight metered parking spaces. Existing parking demand resulting from the temporary loss of these fourteen (plus four loading zone) spaces could be accommodated on adjacent streets. Although some people could shift to parking on Polk and Larkin Streets, it is unlikely that they would park on Japantown streets because Japantown, west of Octavia Street, is over a quarter-mile away from the campus. This would not be considered to be a reasonable walking distance to the Van Ness corridor.

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-65 TR, duplicate comment was provided in 30-65 TR]

"On Page S-50, there is mention of 'consultation with other Agencies, including Muni/SFMTA and property owners on Cedar Street, to assist coordination of construction traffic management strategies as they relate to bus-only lanes and service delivery on Cedar Street. CPMC should proactively coordinate with these groups prior to developing their Plan to ensure the needs of the other users on the islands addressed within the construction TMP for the project.' What islands?"

Response TR-112

The comment identifies a misprint in the text of the Draft EIR. Consistent with this comment, Mitigation Measure MM-TR-55 is amended to revise the following bullet on pages S-50 and 4.5-160 of the Draft EIR as shown below:

> Require consultation with other Agencies, including Muni/SFMTA and property owners on Cedar Street, to assist coordination of construction traffic management strategies as they relate to bus-only lanes and service delivery on Cedar Street. CPMC should proactively coordinate with these groups prior to developing their Plan to ensure the needs of the other users on the ~~Islands~~ blocks addressed within the construction TMP for the project.

Comment

(Helene Dellanini—DBC Master Owner's Association, October 18, 2010) [71-8 TR, duplicate comment was provided in 72-8 TR]

"TR-55: Implementation of the Cathedral Hill Campus project would result in a transportation impact in the project vicinity resulting from construction vehicle traffic and construction activities that would affect the transportation network. (Significant and Unavoidable with Mitigation)

According to page 2-40, construction of the interior improvements to CPMC's MOB at 1375 Sutter will occur coincident with the construction of the main hospital building and the MOB on Van Ness Avenue. However, trips from that part of the construction were not factored into the analysis of the overall construction traffic impact."

Response TR-113

The comment questions the construction phasing used in the traffic analysis. The proposed Cathedral Hill Campus project would include renovations to the existing medical office building at 1375 Sutter Street. However, this facility would undergo a phased renovation, and CPMC-affiliated physicians and their practices would occupy space in the building as existing tenants vacated. The new tenant improvements and interior renovations proposed would not require extensive demolition or excavation. No substantial changes to the exterior of the building, beyond routine maintenance and window systems, are anticipated. Because of the low level of construction activity anticipated at any one time at 1375 Sutter Street, construction traffic to the building is not expected to result in any significant impacts not identified as part of Impact TR-55 in the Draft EIR, page 4.5-147. Any construction activity at 1375 Sutter Street that would require work within the public right of way, including lane and sidewalk closures as a part of construction activity, would meet the *City's Regulations for Working in San Francisco Streets (SFMTA Blue Book)* and would be subject to review and approval by the Department of Public Works (DPW) and the City's TASC.

Comment

(Donald Scherl, October 18, 2010) [74-19 TR]

"Impact-58: With respect to the pedestrian tunnel under Van Ness Ave., the EIR correctly notes the unavoidable and severe impact this would have on transportation in the project vicinity. This tunnel is a CPMC convenience luxury that offers little if any public benefit compared to the construction chaos it would create."

Response TR-114

The comment states that the pedestrian tunnel connecting the proposed Cathedral Hill Hospital and MOB is not essential, and that traffic impacts associated with its construction would be severe. The comment is noted. The comment does not raise issues regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment will be transmitted to and may be considered by the decision-makers as part of their deliberations on the project. The pedestrian tunnel would be used by patients, visitors, physicians, and CPMC staff, allowing them direct connection between the two buildings, particularly during inclement weather. It also would be used for the movement of records and materials. Although the pedestrian tunnel would primarily serve patients, visitors, and employees of CPMC, the tunnel would reduce the pedestrian demand at the intersection of Van Ness/Geary. Without the tunnel, CPMC patients, visitors, and employees would cross at street-level at the intersection of Van Ness/Geary, which would increase the number of pedestrians within the crosswalk.

Comment

(Lisa Carboni (Caltrans (Regional)), September 9, 2010) [6-7 TR, duplicate comment was provided in 7-7 TR]

"Please continue to coordinate with the Department for the Highway Improvement Agreement (HIA) for the proposed pedestrian tunnel. Please note the HIA must be approved by the Department prior to the tunnel construction."

Response TR-115

The comment suggests that approval from Caltrans would be required before construction of the proposed pedestrian tunnel under Van Ness Avenue. This approval process was noted in Table 2-3 on page 2-15 of the Draft EIR.

Comment

(Sheila Mohoney and James Frame, October 19, 2010) [88-3 TR]

"Construction Truck Route

At a recent neighborhood meeting a CPMC representative informed us that they hoped to underground their utilities on Duncan (excavating to a depth of 23') and that Duncan would be the route for all the construction trucks. which they estimated at 70 a day. Even excluding Alternative 3A, which would place more years of intensive construction literally on our doorstep, the impacts of the proposed-but not mentioned--construction circulation pattern will be significant and should have been studied from a Duncan Street perspective."

Response TR-116

The comment suggests that the Draft EIR should analyze construction-related circulation impacts on Duncan Street. The proposed underground work for Duncan Street includes:

- sewer relocation due to abandoned San Jose Avenue street section;
- relocation of electrical lines due to abandoned San Jose Avenue street section; and
- new AT&T service for new hospital (starts at manhole in front of the Monteagle Medical Center).

As proposed in the St. Luke's Campus Construction Management Plan, trucks would primarily access the construction site via Cesar Chavez Street, Guerrero Street, and 27th Street. Construction material will also be delivered off Guerrero and 27th Streets, as indicated in the Material Delivery and Offloading Plan (Sheet M1 of the St. Luke's Construction Management Plan). CPMC has indicated that trucks will be split between 27th and Duncan Streets, subject to review and approval by the Department of Public Works.

As described in the Construction Management Plan, the site would generate a maximum of 35 trucks per day during the excavation phase and exterior phase construction (13 weeks) of the hospital and 80 trucks per day during the excavation phase construction (13 weeks) of the MOB. Even if half of the trucks used Duncan Street during the day, this would equate to about one truck every 30 minutes during construction of the hospital and one truck every 15 minutes during construction of the MOB. The site would generate fewer trucks during other phases of construction. The proposed route for construction vehicles will not be limited to Duncan Street and will be reviewed and approved by DPW and the City's TASC before the start of construction.

Comment

(Gloria Smith/Tom Brohard & Associates—California Nurses Association, October 19, 2010) [92-27 TR]

"8) Significant Construction Impacts Can Be Mitigated - Page 4.5-154 of the Draft EIR states 'for the 4-month period when there is overlap in excavation between the proposed Cathedral Hill Hospital and MOB, Level of Service would be LOS E or LOS F at up to nine of the study intersections. Thus, the project's construction impacts on intersection operations at these nine study intersections would be significant' To reduce or eliminate the significant traffic impacts at nine intersections, the Draft EIR must analyze traffic impacts that would occur without any overlap in construction of the Hospital and MOB."

Response TR-117

The comment states that the Draft EIR must analyze traffic impacts that would occur without any overlap in construction of the proposed hospital and MOB, to reduce or eliminate the significant traffic impacts. As noted in the comment, the transportation analysis of construction activities at the proposed Cathedral Hill Campus focuses on a 4½ -month construction period when an overlap would occur in excavation between the proposed Cathedral Hill Hospital and MOB, consistent with the construction schedule proposed by CPMC. This period also represents the most conservative scenario with respect to potential traffic impacts. If the hospital and MOB were excavated separately, the number of truck trips that would result from excavation of just the proposed hospital site or the MOB site individually would be less than what was analyzed in the Draft EIR; however, they would still be considered significant and unavoidable because of the other construction-related impacts occurring for the duration of construction.

Comment

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-14 TR, duplicate comment was provided in 114-14 TR]

"Even with shuttles being available for construction workers, they will need to drop off their equipment and tools at the site. This additional traffic noise, vehicle exhaust, and dirt will be a burden placed on our office, the employees, and our residence."

Response TR-118

The comment states concerns regarding the need for construction workers to drop off their equipment and tools at the proposed Cathedral Hill Campus construction site. Construction workers generally would not be allowed to drop off equipment at the construction site before proceeding to off-site parking areas. Because of the complex nature of medical center construction, most tools and equipment would be kept in secure storage on site permanently during the various phases of construction. When work was occurring inside the building, the garage levels and loading docks would be utilized for the movement of tools and equipment. Additional information related to construction worker parking at the Cathedral Hill Campus and Construction Transportation Management Plan as it relates to construction worker travel patterns and impacts is provided in Response TR-79 and Response TR-105, respectively.

3.7.12 CEDAR STREET

3.7.12.1 MAINTAINING ACCESS AND ROAD CONDITION

Comments

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-9 TR, duplicate comments were provided in 103-5 TR, 113-5 TR, and 114-9 TR]

"C. The access to our parking is in Cedar Street [bordering the MOB site]. Our access to and from will be limited and interrupted due to construction material, deliveries, trucks, etc. [work and living issue]"

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-17 TR, duplicate comment was provided in 114-17 TR]

"As construction progresses, Cedar Street will become blocked at times and the paving will become torn up. This is our only means to get to our garage. We will have to endure five years of delays and accelerated wear and possible damage to our car."

(Lower Polk Neighbors, October 19, 2010) [103-9 TR, duplicate comment was provided in comment 113-9 TR]

"LPN is concerned that as construction progresses the streets and alleys will become somewhat torn up causing wear and tear to our own vehicles. (work and living issue)."

Response TR-119

The comments state concerns regarding the use of Cedar Street during construction of the proposed Cathedral Hill MOB, and the potential damage to the Cedar Alley and other adjacent streets because of construction activity.

As stated on pages 4.5-132 of the Draft EIR, construction activities would likely require sidewalk, parking lane, and bus-only lane closures during construction. The comments state concern with access to garage/storage areas on the north side of Cedar Street (the opposite side of construction). As discussed on page 4.5-133 in the Draft EIR, the construction plan calls for the closure of the southern side parking lane and sidewalk of Cedar Street for the duration of construction activity, leaving the northern portion of the street open to eastbound vehicular traffic. The MOB construction site would feature four gates through which materials or deliveries might access the site, two on Cedar Street, and two on Geary Street. Should any construction-generated delivery truck hinder the access of garage/storage area on the north side Cedar garage, a trained flagman, whose duty would be to assure the safety of workers and movement of material and equipment into and out of the project site, would coordinate the movement of the truck to an alternate location on Cedar Street or into the site via a construction site gate. The combination of having the northern portion of Cedar Street open to vehicular traffic and having a trained flagman at the construction site would allow users access to the garage in question at all times.

CPMC would be responsible for following the rules established in the SFMTA Blue Book, the City's manual for City agencies, utility crews, private contractors, etc. while working in City streets. As such they would be responsible for repairing any damage to city streets or sidewalks in accordance with the policies outlined in the Blue Book caused directly by construction of the proposed Cathedral Hill Campus, including on Cedar Street.

3.7.12.2 INADEQUATE QUEUING ANALYSIS

Comments

(Nick Mironov—Gayner Engineers , September 27, 2010) [43-1 TR]

"Gayner Engineers is a business located at 1133 Post St. with the rear access at 140 Cedar St. (between Van Ness and Polk). Our rear access includes a garage which houses 17 vehicles. I estimate that we have 40 to 60 daily in/out trips on a typical day, and sometimes more.

I have reviewed the CPMC LRDP Draft EIR. The emphasis of my review was on the MOB garage Cedar Alley traffic effect on Gayner Engineers' business. Although I saw the two Cedar alley traffic options, I did not see any detailed analysis how either option will affect the two delivery truck locations (Concordia Club and the homeless shelter) as well as Gayner Engineers' garage access and the other 7 garages along the north side of Cedar."

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-19 TR, duplicate comment was provided in 114-19 TR]

"A. With entry and exit of the MOB parking less than 50 feet away from our parking entry we will experience long waits and traffic congestion to get in and out of our own garage. The garage is use throughout the day and evening. This problem will be greater if the queue areas for cars entering the MOB parking garage on Cedar are inadequate. The DEIR fails to contain an adequate analysis of the required queuing space for the Cedar entrance.

If the MOB parking is open in the evenings we will experience this problem continually."

(Lower Polk Neighbors, October 19, 2010) [103-11 TR, duplicate comment was provided in 113-11 TR]

"II. Comments directed at the long term affects to our Neighborhood and Community (Once Hospital and MOB are occupied):

A. For Post, Polk, and Cedar Street residents and businesses with new two-way Cedar Street entry and exit lanes to access the MOB parking entry on Cedar Street, we will experience long waits and traffic congestion to get in and out of our own garages. Our garages are used throughout the day and evening. If the MOB parking is open the evenings we will experience this problem continually."

Response TR-120

The comments state concerns about the proposed Cathedral Hill MOB project's impact on Cedar Street. A queuing analysis of the proposed MOB Cedar Street Parking Garage entry is shown on Figure 4.5-19, page 4.5-101 of the Draft EIR, and details provided in Section 4.6.4 of the *Cathedral Hill Transportation Impact Study*. To summarize a worst-case scenario 95th percentile vehicle queue analysis was performed for all garage entry points based on the speed with which tickets would be processed, location of entry ticket machines (approximately 100 feet from vehicle entry), and number of entering vehicles during the a.m. peak period. The a.m. peak period was selected as it represents the time when the most vehicles would enter the MOB garage. The analysis for the Cedar Street entry showed that more than enough storage length would exist internal to the garage to prevent any queue from forming external to the entry, on Cedar Street. As stated, this analysis was for a worst-case scenario in which all vehicle trips associated with the Cathedral Hill Campus were assumed to enter CPMC garages, when it would be likely that a percentage would be patients/visitors who would be dropped-off/picked-up external to CPMC garages.

As stated on page 4.5-142 in the Draft EIR, the Cedar Street passenger loading/unloading zone would be actively managed, and if demand exceeded supply, drivers would be instructed to enter the MOB garage on Cedar Street to avoid a queue or block of access to other Cedar Street garages.

Although the queuing analysis shows that vehicle queues into the parking garages on the proposed Cathedral Hill Campus would not back up into the public right of way, CPMC would be subject to a condition of approval requiring them to address any queue that continually extended into the public right-of-way. If such a queue occurred, CPMC would be required to institute measures that would reduce the queue length, including but not limited to actively managing the queue (as is already proposed), to instituting measures that would discourage driving to the proposed Cathedral Hill Campus, including adjusting the price of parking.

3.7.12.3 MOB Garage Access Options – Cedar Traffic Metering Mitigation

Comments

(Nick Mironov—Gayner Engineers, September 27, 2010) [43-3 TR]

"I am further led to believe that the only MOB entry/exit option that the City is interested in is the one where all MOB garage traffic is via the Cedar Alley (no entry/exit at Geary)."

(Patricia Rosenberg—Concordia Argonaut, October 18, 2010) [64-1B TR]

"The Concordia Argonaut is a private membership club located at 1142 Van Ness Avenue (southeast corner of Van Ness and Post). The club has been at this location since 1891.

While we are in support of the opportunity to introduce a state of the art medical facility into our area, we encourage the city to allow CPMC to have both an entry and exit along Geary in order to more evenly distribute the number of cars entering and leaving the garage to their proposed medical office building. This will maximize the opportunity for a more pedestrian-oriented environment to be created along Cedar Street."

Response TR-121

The comments reference information related to proposed MOB garage access options at the Cathedral Hill Campus. These options (proposed CPMC LRDP and MOB Access Variant) are described on pages 4.5-88 and 4.5-90of the Draft EIR.

The proposed CPMC LRDP would provide vehicle ingress to the Cathedral Hill MOB from Geary Street and Cedar Street and egress onto Cedar Street. As part of the proposed LRDP, Cedar Street would be converted to two-way operations west of the MOB garage access point, allowing egress towards both Polk Street and northbound Van Ness Avenue. The Post Street Variant described in the Draft EIR would not change the access to the Cathedral Hill MOB. The MOB Access Variant would allow ingress and egress from both Geary Street and Cedar Street. As part of this variant, Cedar Street would remain one-way eastbound, as under existing conditions. Each of these variants, as well as their corresponding impacts, are addressed in the Draft EIR. Therefore, City decision-makers would be able to approve either the access proposed by the CPMC LRDP or the MOB Access Variant without further environmental review.

Comment 63-1B suggests that the MOB Access Variant would be superior to the proposed LRDP access plan because it would more evenly distribute vehicle traffic exiting the site, and that less vehicle traffic on Cedar Street would make the street more pedestrian friendly. Although the MOB Access Variant would reduce the number of vehicles exiting the site using Cedar Street, it would result in a significant and unavoidable impact (Impact TR-17) and traffic hazard, including pedestrian-vehicle conflicts on Geary Street at the project's driveway. Neither the proposed LRDP nor the MOB Access Variant would have a significant impact on pedestrians along Cedar Street because both the proposed LRDP and the MOB Access Variant would provide similar pedestrian accommodations along Cedar Street.

Cedar Street Analysis

Comments

(Nick Mironov—Gayner Engineers, September 27, 2010) [43-2 TR]

"During previous presentations to the community by CPMC and the design team, I understood that a number of mitigation measures were being considered, such as stacking incoming cars within the MOB garage (to minimize backing up into the street), metered intersection stoplight controls at Post/Polk, Cedar/Polk, Geary/Polk to maintain flow and avoid street jams, not allowing a left turn from Cedar onto Polk, diversion to the Geary exit if the Cedar exit is backed up, etc., but I did not find these mitigation measures mentioned, analyzed, or discussed in the EIR."

(Nick Mironov—Gayner Engineers, September 27, 2010) [43-4 TR]

"Having all MOB garage entry/exit via the Cedar Alley, no analysis of the effects on the Concordia Club and homeless shelter delivery truck locations, no analysis of the traffic effects on Gayner Engineers' garage access and the remaining 7 garages, no analysis of the MOB loading dock/delivery effects, no mitigation measures of how traffic is to be managed at the MOB garage entry/exit and street intersections, and no mitigation measures of the MOB loading dock effects, is not acceptable to Gayner Engineers, This will surely result in a significant negative impact on Gayner Engineers to effectively do business from our location."

(Nick Mironov—Gayner Engineers, September 27, 2010) [43-5 TR]

"Gayner Engineers insists that a complete analysis of the Cedar Alley traffic (during construction and in the finished configuration) be performed and that appropriate mitigation measures that meet Gayner Engineers' and our neighbors' needs be studied, reviewed with and approved by Gayner Engineers and our neighbors, and approved mitigation measures be implemented into the project."

Response TR-122

The comments reference potential impacts to Cedar Street and state concerns regarding business access along Cedar Street. As described on page 4.5-89 of the Draft EIR, the proposed LRDP includes construction of raised sidewalks at the unsignalized intersections of Cedar at Van Ness Avenue and Polk Street and the removal of one parking space on Polk Street north of Cedar Street to improve sight distances for vehicles exiting Cedar Street. As described in the Draft EIR, these project elements are designed to benefit pedestrians, bicyclists and vehicles at Cedar Street intersections.

The comments mention potential "stacking" of vehicles within the MOB Parking Garage to address potential queues onto nearby streets. As discussed in the Draft EIR, the ticket gate would be located 100 feet from the vehicle entry and under the worst-case scenario, the 95th percentile queue into the MOB would not extend back to the street at the entrance, and the impact would be less than significant.

The comments identify the potential for metered lights in lieu of traffic signals at the intersections of Polk/Post, Cedar/Polk, and Polk/Geary to reduce the possibility of vehicle queues on Cedar Street: The stop-controlled intersection of Polk/Cedar was analyzed during the a.m. and p.m. peak hours for all access scenarios and was found to operate at an acceptable level of service (LOS C). This analysis included some vehicles making a left turn; however, the analysis determined that most vehicles would make a right turn because of the configuration of the intersection and because of the proposed LRDP's trip distribution. As stated previously, the intersection of Polk/Cedar was analyzed during the a.m. and p.m. peak hours for all access scenarios and found to operate at LOS C. Because the intersection of Cedar/Polk is anticipated to operate at an acceptable levels of service, no further mitigation was identified.

However, in the event that queuing did occur on Cedar Street, a condition of approval/improvement measure has been developed that would require the garage operator to abate any reoccurring vehicle queues blocking driveways and access to businesses on Cedar Street. A revision to page 4.5-102 of the Draft EIR, includes Improvement Measure I-TR-5 – Offstreet Parking Queue Abatement, in which CPMC would be required to abate any reoccurring queue of one or more vehicles blocking Cedar Street for three minutes or longer on a daily or weekly basis. CPMC would be required to hire a qualified transportation consultant to evaluate the conditions occurring on the site, develop and implement a set of abatement strategies within 90 days of being notified that a reoccurring queue is blocking the public right of way. CPMC would also be required to submit monitoring reports to the Planning Department for review. Potential abatement methods for queues exiting the garage include installing metering lights at the exit gate that hold vehicles in the garage until queues on Cedar Street clear the right of way. If non-CPMC vehicles could not use designated loading spaces remaining on Cedar Street, the abatement plan would need to address alternative loading areas, such as relocating the spaces onto Van Ness Avenue or Polk Street. See Response TR-89 on page C&R 3.7-157 for the added Improvement Measure I-TR-5.

The comments note a diversion of exiting vehicle traffic from the Cedar Street exit to Geary Street exit if queuing occurred on Cedar Street: This would only be possible under the MOB Access Variant because egress onto Geary Street would be prohibited under the proposed LRDP and the Post Street Variant. As noted previously, the MOB Access Variant was analyzed in the Draft EIR.

The comments are concerned that the proposed LRDP did not analyze and would impede access to parking garages on Cedar Street. As discussed in Response TR-121 (page C&R 3.7-200) and on page 4.5-

88 of the Draft EIR, the proposed LRDP would convert Cedar Street to two-way operations west of the MOB garage entrance and maintain one-way access east of the garage entrance to Polk Street. Therefore, the proposed LRDP would not prohibit or change how visitors or employees would access the Gayner Engineers' garage because access from Van Ness Avenue would be maintained as a public right-of-way.

The comments are concerned that changes to Cedar Street may affect existing on-street loading and unloading operations on Cedar Street. Cedar Street currently includes one wide eastbound travel lane with some parking, including commercial parking on the south side of Cedar Street. Existing deliveries on Cedar Street were observed to both use the commercial loading spaces (for smaller vehicles) and park within at least part of the existing travel lane and/or north sidewalk to load/unload. While it is not legal to block a vehicle travel lane or sidewalk, the current alley width does allow for this activity since traffic can traverse this activity. Continuation of this type of loading activity (blocking travel lanes and/or sidewalks) is not recommended and would be far more difficult without blocking vehicle traffic and/or the sidewalk after the proposed Cedar Street conversion to two-way operations west of the MOB garage. However, other commercial loading parking spaces are available (several on Van Ness Avenue and one on adjacent Polk Street block). As discussed under Impact TR-43 beginning on page 4.5-136 of the Draft EIR, the MOB loading demand shortfall was a less-than-significant impact, with active management and availability of other commercial spaces in the area. The MOB would have two loading spaces located interior to the parking garage. The proposed LRDP includes a Truck Management Plan for the Cathedral Hill Campus to manage loading facilities and ensure that demand would be accommodated. As identified in the plan, a majority of service deliveries would occur at the hospital's loading dock off Franklin Street; CPMC distributions (to and from the central distribution facility) would be consolidated and would occur only between 7:00 p.m. and 7:00 a.m., and loading zones would be actively managed to ensure that loaded vehicles would not remain in loading spaces for an extended period of time so as to impact nearby streets.

Because impacts to Cedar Street and at proposed LRDP driveways are expected to be less than significant, mitigation measures are not required. Mitigation measures, reviewed by City decision makers as part of the CEQA review process, are only required in the event that a significant impact would result from the proposed LRDP. The comments do not identify any significant impact that would require mitigation measures. The recommendations contained in the comments will be transmitted to and may be considered by the decision-makers as part of their deliberations on the project.

Traffic Impacts

Comments

(Patricia Rosenberg—Concordia Argonaut, October 18, 2010) [64-1A TR]

"The Concordia Argonaut is a private membership club located at 1142 Van Ness Avenue (southeast corner of Van Ness and Post). The club has been at this location since 1891.

We are in support of the proposed new hospital and medical office building being proposed by California Pacific Medical Center at Van Ness and Geary. CPMC has presented its plans to our membership and continues to keep us informed of its progress. While the project will result in a high-quality medical center in our neighborhood, we want to ensure that the operation of our facilities will not be negatively impacted by its interim construction and the on-going operations.

One of the features to the development described to us was the improvement of Cedar Street into a pedestrian-oriented area with a vehicular drop-off serving the proposed medical office building. Our understanding was that vehicles would be able to enter and exit the building on both Geary and Cedar Streets and that Cedar would continue to be one-way (eastbound). Improvements to Cedar including enhanced paving materials, street trees and other features would have greatly improved the area and continued to easily accommodate deliveries through our existing rear door.

In reviewing the Draft EIR, we were disappointed to see that the plans for the project now reflect Cedar as a two-way street serving as the primary vehicular access to the garage of the office building. Such a design would from our perspective, make Cedar a much more congested street; limiting our loading and delivery access and would create a safety hazard for pedestrians crossing the “plaza” area. This design would also in our view, add to congestion at the intersections of Polk Street and Cedar (across a bike lane), Polk and Geary and Geary and Van Ness as people exiting the proposed building garage who would like to go westbound would be required to exit onto Polk Street before turning right onto Geary.

While we are in support of the opportunity to introduce a state of the art medical facility into our area, we encourage the city to allow CPMC to have both an entry and exit along Geary in order to more evenly distribute the number of cars entering and leaving the garage to their proposed medical office building. This will maximize the opportunity for a more pedestrian-oriented environment to be created along Cedar Street.”

(Linda Chapman, October 19, 2010) [76-20 TR, duplicate comment was provided in 111-20 TR]

“Converting Cedar Alley to garage access creates traffic conflicts. This street is narrow, now lightly used-and accessed from two transit preferential streets that are sometimes congested, without added traffic from a CPMC campus. Cars turning east from the garage would enter Polk at midblock, interrupting traffic flow (including buses) on a relatively narrow street. Results could be delays, and unexpected conflicts confusing drivers, as cars emerge in mid-block. Drivers exiting on Polk intending to head east or north would circulate among one-way streets in Polk Gulch.

Similar conflicts are predictable if significant numbers of cars use the mid-block alley at Van Ness for garage access. Alleys running between Van Ness and Polk are little used for auto traffic.”

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-27 TR, duplicate comment was provided in 114-27 TR]

“D. The amount of car and truck traffic next to our building, stopping and starting, trying to pull out on to Polk Street, will, overtime damage our exterior finishes [roof, walls and windows.”

(Carolynn Abst and Ron Case—Case + Abst Architects LLP, October 19, 2010) [102-28 TR, duplicate comment was provided in 114-28 TR]

“E. As with all hospital campuses, there will be cars circling the neighborhood waiting to pick up, drop off, and/or looking for parking. A major part of the neighborhood circling will be down Cedar Street, at our building. The situation will be exacerbated by the significant and unavoidable impact at intersection of Polk and Geary near our office. Again, a major health and noise issue.”

Response TR-123

The comments state concerns (traffic, congestion, loading access, pedestrian and bicyclist safety) related to the proposed Cathedral Hill MOB access. The proposed Cathedral Hill MOB’s initial vehicle access plan included full access via Geary Street and via one-way eastbound Cedar Street. As part of the transportation impact analysis of the proposed LRDP, the San Francisco Planning Department completed an analysis and recommended a series of project design changes intended to (1) address potentially significant pedestrian/vehicle conflicts on Geary Street; (2) address potential conflicts to future transit operations on Geary Street; and (3) address potential conflicts associated with the LRDP’s egress and ingress. In response to this analysis, CPMC altered access to the MOB, including restricting egress from Geary Street and converting Cedar Street to two-way operations.

As stated on page 4.5-132 of the Draft EIR, the proposed LRDP would include several improvements to address pedestrian safety including improvements at the crosswalk on Van Ness Avenue, crossing Cedar Street, as is noted in the comment. The crosswalk would be shortened by installing bulb-outs, the sidewalk would be raised to increase drivers' ability to see pedestrians, and the sidewalk would be widened into what is now an adjacent parking lane.

As stated in Impact TR-37 on page 4.5-129 of the Draft EIR, the proposed LRDP would include the removal of one on-street parking space on the west side of Polk Street immediately north of Cedar Street, to ensure visibility for drivers and bicyclists at the intersection of Polk/Cedar. This project feature would minimize the potential for vehicle-bicycle conflicts.

Vehicles exiting the MOB garage onto Cedar Street and intending to proceed west on Geary Street would not add to congestion at the intersection of Van Ness/Geary, in a way that would otherwise not occur if egress was permitted from Geary Street as the comments state, because under both scenarios they would be approaching Van Ness Avenue from Geary Street. The operation of Van Ness Avenue/Geary Street does not substantially improve under the MOB Access Variant (where similar to the project it is a less than significant impact).

As stated previously, the stop-controlled intersection of Polk/Cedar was analyzed for a.m. and p.m. peak hour conditions for all access scenarios (including the MOB Access Variant which allows for egress onto Geary Street), and intersection operations were LOS C. Similarly, as discussed in Impact TR-13 on page 4.5-108 of the Draft EIR, a significant unavoidable impact would still occur at the intersection of Polk Street/Geary Street under the MOB Access Variant.

With respect to the comment that Cedar Street would bear the brunt of any vehicle queuing, no evidence suggests that this situation would occur. However, as stated on page 4.5-162 in the Draft EIR, the transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking was unavailable. In addition, the associated air quality and noise analyses reasonably address potential secondary effects associated with cars circling and looking for parking in the area; the same traffic assignments used in Section 4.5, "Transportation and Circulation" in the Draft EIR were used for air quality and noise modeling. Additional information about traffic circulation on Cedar Street, including existing loading operations and the parking garage exit is provided in Response TR-122 (page C&R 3.7-201). In summary, a condition of approval has been developed for the project that requires CPMC to implement measures that eliminate any reoccurring vehicle queue from its parking structure that blocks the public right of way, including access to any existing vehicle loading spaces on Cedar Street.

3.7.13 TENDERLOIN-LITTLE SAIGON

3.7.13.1 SUPPLEMENTAL ANALYSIS

Comments

(Sandra Manning, September 23, 2010) [31-1 TR]

"The E.I.R's ignores the project's traffic impacts in the Uptown Tenderloin. CPMC plans turn the Tenderloin streets into speedways, bringing thousands of cars rushing through the community each day to reach the new hospital."

(Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-32 TR]

"**II. The DEIR needs to be substantially amended to take into account the project's transportation and circulation impacts on the Tenderloin.**

A. The geographic scope of the transportation and circulation analysis is too narrow.

The DEIR neglects to analyze or even mention the Tenderloin as a neighborhood in the vicinity of the proposed Cathedral Hill Campus, One particularly glaring consequence is that the DEIR fails to address the onerous traffic volume that already exists on Tenderloin streets, especially those leading to Van Ness Avenue. This omission defies common knowledge that traffic going to and from South of Market flows through the Tenderloin.

A DEIR is required to discuss significant impacts that the proposed project will cause in the area affected by the, project.[54] CEQA guidelines require the DEIR to "define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used."[55] The San Francisco Transportation Impact Analysis Guidelines ("SF Guidelines") provide that the normal vicinity is a radius between two blocks and a quarter-mile. However, these mechanical figures are simply guidelines and a larger area needs to be used when reasonable to account for well-known traffic patterns.[56] The DEIR's overall transportation study area for the Cathedral Hill Campus for some purposes is a somewhat larger circular area with a half-mile radius and a perimeter marked by Webster, Fulton, Jones and Washington :Streets.[57] These boundaries too are formalistic and exclude an analysis of traffic leading into the circumscribed area. However, in examining congestion levels, the scope of analysis uses the narrow two-block benchmark. As a consequence, the DEIR does not examine congestion at traffic intersections east of Polk Street thereby eliminating almost entirely consideration of transportation and circulation impacts of major concern to Tenderloin residents. The DEIR provides no explanation for its virtual exclusion of the Tenderloin, a neighborhood directly abutting the proposed Cathedral Hill Campus., from its transportation and circulation analysis.

By limiting the analysis area, the DEIR fails to analyze how streets in the Tenderloin currently function as arterials or quasi-arterials for moving traffic through the Tenderloin. The City's Congestion Management Program (CMP) defines Golden Gate Avenue and Hyde Street as arterials.[58] Arterials are defined as "cross-town thoroughfares whose primary function is to link districts within the city and to distribute traffic from and to the freeways; these are routes generally of citywide significance; of varying capacity depending on the travel demand for the specific direction and adjacent land uses."[59] Tenderloin streets specifically designated as arterials and additional streets that function as arterials (*e.g.*, Leavenworth Street) are not identified by the DEIR. Several freeway exits lead cars through the Tenderloin as a means of entry and departure for Van Ness Avenue, especially when there are high traffic volumes on Van Ness Avenue. To illustrate, cars originating from the East Bay and South Bay regularly exit 7th Street from 101 and then drive to Leavenworth Street, where they will take one of the Tenderloin's one way streets to Van Ness Avenue. Instead of using a formulaic quarter- or half-mile radius for the boundaries of analysis, the DEIR should examine the actual flow of traffic on arterial and quasi-arterial Tenderloin streets. This analysis would provide the community and decision makers with a much more complete picture of the potential traffic impacts of the project on the Tenderloin.

[54] CEQA Guidelines 15126.2 (a).
[55] CEQA Guidelines 15130 (b)(3).
[56] San Francisco Planning Dept., Transportation Impact Analysis Guidelines 6 (2002).
[57] DEIR 4.5-2.
[58] 2007 CMP Report, Appendix III. See www.sfcta.org/content/view301/147
[59] General Plan, Transportation Element."

(Stephanie Barton, et al.,—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-37 TR]

"**2. The DEIR's traffic analysis is incomplete and inadequate because it fails to examine the potential traffic impacts oil the Tenderloin as well as traffic impacts midday;**

The DEIR fails to examine the traffic impacts that the Cathedral Hill Campus will have on Tenderloin streets, even though the site borders the neighborhood. San Francisco's General Plan calls for discouraging "excessive automobile traffic on residential streets by incorporating traffic-calming" measures.[79] The Little Saigon Report is the latest of at least nine separate studies conducted by public and private organizations in the Tenderloin since 1997 that recommend traffic-calming measures due to negative impacts from current traffic conditions.[80] Most streets in the Tenderloin are designed to move cars through as quickly as possible.[81] Because of problems caused by over-prioritizing traffic flow ahead of other neighborhood needs, the Little Saigon Report focuses on traffic calming recommendations. One example is convening Ellis/Eddy and Leavenworth/Jones to two-way streets.[82] San Francisco public agencies are now in the process of implementing various Little Saigon Report recommendations.[83]

Yet the DEIR does not study vehicular routes east of Polk Street and north of Market Street that go through the Tenderloin, even though the Tenderloin is clearly a neighborhood "in the vicinity" of the Cathedral Hill Campus.[84] As-a result, the DEIR fails to consider to what extent traffic generated by the Cathedral Hill Campus complicates implementation of the Little Saigon Report's recommendations; which aim to improve Tenderloin neighborhood development and liability, Conversely, it also fails to consider the extent to which traffic calming measures to be implemented as part of the Little Saigon Report's recommendations, like the two-way conversion of Ellis and Eddy, may affect the DEIR's previous traffic estimates by increasing traffic on other thoroughfares.

[79] General Plan, Transportation Element, Policy 15.1
[80] SFTCA, Tenderloin-Little Saigon Area Study, Summary of Past Studies 2-5 (2005) (attached hereto as Appendix B).
[81] Little Saigon Report, at 3-4.
[82] *Id* at 5-2.
[83] *Id* at 6-5 & 6-6.
[84] CEQA Guidelines 15125 (a).
[85] Transportation Impact Analysis Guidelines, at 10.
[86] DEIR 4.5-215 to 4.5-232."

(Stephanie Barton, et al.—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-47 TR]

"The cumulative effect of traffic from the proposed Cathedral Hill site would exacerbate the pedestrian safety, traffic, parking, and transit problems that already plague the residents of the Tenderloin. More traffic and pedestrian collisions create an unsafe environment for residents, specifically the elderly, the disabled, and children."

(Sandra Manning, September 23, 2010) [PC-120 TR]

"MS. MANNING: Hello, I am Sandra Manning. This is Joe Brown. We are residents of the Pier Hotel that is in the Tenderloin, 540 Jones Street. The EIR ignores the project's traffic impacts in uptown Tenderloin. CPMC plans to turn the Tenderloin streets into speedways, bringing thousands of cars rushing through the community each day to reach the new hospital."

(Nella Manuel, September 23, 2010) [PC-133 TR]

"Additionally, traffic impacts in the Tenderloin will be huge because of the CPMC."

(Mike Williams, September 23, 2010) [PC-136 TR]

"Good afternoon, Commissioners. I would like to thank you for your time. My name is Mike Williams. I have been a resident of the Tenderloin Neighborhood since 2001 and, as a resident, of course, I'm very familiar with the neighborhood and pretty much everything that goes on in it, and I'm very active in the neighborhood, also. CPMC, there is no question that there is going to be – that this hospital is going to be built, okay, the questions that I have regarding it is, or some of the things I'd like to see is,…"

(Mike Williams, September 23, 2010) [PC-137 TR]

"Some of the things I'd like to see is, 1) that they actually recognize that there are people living in Central City, that being the Tenderloin where I live. There will be an impact, definitely, on traffic, there already is an impact on traffic, believe it or not, because I live at the corner of Eddy and Taylor, and there are constant crashes there, pedestrians are run over, cars are constantly slamming into each other, in other words, a lot of car wrecks and so forth. A lot of people currently that come into the City use that whole area where I live as a – it's like a speed zone, okay? And people just fly through there. I feel that this hospital basically is going to increase that problem, okay, so the notion somehow that it's not going to be impacted, our neighborhood, is a false one."

(Magdalena Marcias, September 23, 2010) [PC-165 TR]

"MS. MAGDALENA MARCIAS [phon]: [Spanish] TRANSLATOR: Hi, my name is Magdalena and I have eight years living in the Tenderloin. I am a mother with three children, of which my children go to Redding Elementary over there by Pine and Post. And as you know, we walk a lot through the neighborhood, and we are walking in the area where you are planning to build the hospital. And that's one of our concerns, is that it's going to generate a lot more traffic, which is going to be much more dangerous for pedestrians, particularly families walking in that area. I just want to share with you, I've had a lot of bad experiences with cars in the Tenderloin, and various times I feel like cars often don't respect pedestrians or respect stop lights, or respect the velocity in the neighborhood. And, actually, just yesterday I was actually walking, picking up my children from school, and the driver did not want to respect my green light and the right for me to walk at the crosswalk, so I just want to share with you that I'm just really concerned about the traffic issue."

(Commissioner Olague, September 23, 2010) [PC-374 TR]

"Also, as Commissioner Moore pointed out, there are no LOS calculations for many of the Tenderloin intersections, even though most streets are configured as one-way streets to hasten traffic through the neighborhood, including to and from Van Ness, so I think there are a lot of the outer arterials that are considered, but some of the more interior ones aren't. I guess there was comment here by many members of the public about the Saigon Tenderloin Study."

Response TR-124

The comments state concerns regarding the impact of the proposed Cathedral Hill Campus project on the Tenderloin-Little Saigon neighborhood. In response to written and oral comments regarding the depth of analysis as related to the Tenderloin and Civic Center neighborhoods included in the Draft EIR, a supplemental transportation impact analysis was conducted. This supplemental analysis was performed for traffic, pedestrian, and bicycle conditions using the same analysis scenarios (project and variants for 2015 Modified Baseline and 2030 Cumulative conditions) analyzed in the Draft EIR. The supplemental analysis is documented in the "*Supplemental-Sensitivity Transportation Impact Analyses for the California Pacific Medical Center Cathedral Hill Campus in San Francisco, CA*," which is located in Appendix E of the C&R document.

In the original analysis for the Draft EIR, traffic was assumed to pass through the Tenderloin Neighborhood consistent with trip distribution methodology in the *SF Guidelines*. Similarly, analysis intersections were selected based on the proposed project's diffusion of traffic. Due to their location farther from the Cathedral Hill Campus, no intersections in the Tenderloin Neighborhood were therefore, selected for analysis. In general, impacts to intersections east of or more distant than those analyzed in the Draft EIR would be anticipated to be less due to the further diffusion of project related traffic. However, in response to comments received and for informational purposes, as part of the supplemental analysis, seven additional study intersections located in the Tenderloin and Civic Center neighborhoods were analyzed. The specific intersections that were studied were: Polk/Ellis, Larkin/Geary, Hyde/O'Farrell, Leavenworth/Geary, Larkin/Grove, Ninth/Larkin/Market, and Seventh/Market.

The supplemental analysis did not revise the vehicle trip distribution or assignment assumed in the Draft EIR; rather, it included additional intersections further from the project area, but along routes by which project-generated vehicle trips to and from the freeway and the southeastern quarter of San Francisco might travel. Approximately 10 and 18 percent of project-generated vehicle trips during the a.m. and p.m. peak hours, respectively, are expected to travel through the Tenderloin-Little Saigon neighborhood. A separate analysis was performed to alter and determine the sensitivity of the trip distribution of the project trips and is described in TR-125, page C&R 3.7-214.

The supplemental traffic analysis evaluated the operational characteristics during the weekday a.m. (between 7 and 9 a.m.) and p.m. (between 4 and 6 p.m.) peak hours at the seven additional study intersections. Weekday a.m. and p.m. peak hour intersection turning movement counts and pedestrian and bicycle condition observations were conducted at the additional study intersections in October and November 2010. It is standard procedure in San Francisco to perform analysis of transportation impacts during the p.m. peak hour, as this time period would best represent when the maximum use of the transportation network occurs. The a.m. peak hour was also analyzed because of the proposed campus's location next to a state facility (U.S. 101) and the large conversion of land use that the project would represent on the site. Care was taken to select days during which conditions would best be described as "normal." As such, no traffic counts were collected on days coinciding with the Major League Baseball playoffs games or events in San Francisco.

A comparison of intersection turning movement counts between those conducted in 2006 and November 2010 at the intersection of Eighth/Market shows that the total number of eastbound vehicles has decreased approximately 15 and 40 percent in the a.m. and p.m. peak hours, respectively. Additionally, an increase was observed in eastbound vehicles turning right at Eighth Street, and a decrease in southbound vehicles turning left onto Market Street from Hyde Street, particularly during the a.m. peak hour.[29] These changes are likely the direct result of SFMTA's actions to reduce the number of vehicles traveling eastbound on Market Street through a number of forced right turns.

Levels of service were calculated at each supplemental study intersection for the weekday a.m. and p.m. peak hours for Existing, 2015 Modified Baseline (with and without the project), 2015 Modified Baseline plus Post Street Variant, and 2015 Modified Baseline plus MOB Access Variant scenarios.

As noted, the existing pedestrian and bicycling environment near the supplemental study intersections was observed. Pedestrian facilities include sidewalks, crosswalks, curb ramps, and pedestrian signals and countdown timers. Bicycle facilities include bike routes, bike lanes, and sharrows. Pedestrian and bicycle facilities and conditions were qualitatively analyzed for the supplemental study area. The original Draft EIR describes three bike routes that pass through the study area: Route 16, 20, and 25.However, the two following bicycle routes were identified for consideration as part of the supplemental analysis:

[29] It should be noted that at the time that the original existing conditions for the Draft EIR were completed, the SFMTA had not instituted an effort to discourage private vehicle traffic on eastbound Market Street on a trial basis. The trial started in December 2009. As part of the trial, eastbound drivers are required to turn right at Tenth Street, and vehicles entering eastbound Market Street between Tenth Street and Seventh Street are required to turn right at Sixth Street. This effort is not expected to alter westbound Market Street or cross Market Street traffic. The trial is expected to become a permanent installation in 2011.

- *Route 23* on Eighth Street (southbound) and Seventh Street (northbound) south of Market Street (Class II facility)

- *Route 50* on Market Street between 17th Street–Steuart Street.
  Between Van Ness Avenue and Ninth Street–Larkin Street this route is a Class II facility (painted green); between Ninth Street–Larkin Street and Eighth Street–Hyde Street it is a Class II facility on the north side and Class III facility on the south side of Market Street; east of Eighth Street–Hyde Street it is a Class III facility.

The following observations were made at the supplemental study intersections during the a.m. and p.m. peak hours:

Polk/Ellis: This intersection has crosswalks on all four sides of the intersection and no pedestrian countdown signals. At the time of field observations, the curb ramps on all four corners were being reconstructed with new directional ramps and truncated dome sections. In general, pedestrian volumes were low to moderate, with about zero to 10 pedestrians crossing per traffic signal cycle during both a.m. and p.m. peak hours. Polk Street has Class II bike lanes in both directions, and about five cyclists were observed traveling through the intersection during each traffic signal cycle. Vehicles yielded to pedestrians and bicyclists, and no substantial conflicts were observed.

Geary/Larkin: This intersection has crosswalks on all four sides of the intersection and countdown pedestrian signals on all approaches. A bus stop is located on the west side of the intersection. In general, pedestrian volumes were low to moderate, with about 5 to 10 pedestrian crossings per traffic signal cycle. Very few cyclists were observed (along Geary Street). Vehicles yielded to pedestrians and bicyclists, and no substantial conflicts were observed.

Hyde/O'Farrell: This intersection has crosswalks on all four sides of the intersection and countdown pedestrian signals on all approaches. A bus stop is located on the east side of the intersection. In general, pedestrian volumes were moderate, with about 10 to 15 pedestrians crossing per traffic signal cycle. Vehicles yielded to pedestrians, and no substantial conflicts were observed.

Leavenworth/Geary: This intersection has crosswalks on all four sides of the intersection and countdown pedestrian signals on all approaches. In general, pedestrian volumes were moderate during both the a.m. and p.m. peak hours, with about 10 to 15 pedestrians crossing each side of the intersection during each traffic signal cycle. Bus stops on south and west legs of the intersection increased the amount of foot traffic. Vehicles yielded to pedestrians; however, some conflicts were observed when pedestrians would cross outside of the crosswalk on the west side of the intersection, after exiting a bus at the stop on that corner.

Larkin/Grove: This intersection has wide crosswalks on all four sides of the intersection and countdown pedestrian signals on all approaches. In general, pedestrian volumes were moderate during both the a.m. and p.m. peak hours, with about 10 to 15 pedestrians crossing each side of the intersection during each traffic signal cycle. Grove Street has a Class II bike lane in the eastbound direction at this intersection. The intersection had several bicyclists headed eastbound during each traffic signal cycle during the a.m. peak hour. Vehicles yielded to pedestrians and bicyclists, and no substantial conflicts were observed.

Ninth/Larkin/Hayes/Market Street: This intersection has wide decorative crosswalks on all four sides of the intersection and countdown pedestrian signals on all approaches. In-lane bus boarding islands are on both the east and west sides of the intersection. In general, pedestrian volumes were moderate during both the a.m. and p.m. peak hours, with about 15 to 20 pedestrians crossing each side of the intersection during each traffic signal cycle. This intersection also had a substantial number of bicyclists headed eastbound during the a.m. peak hour and westbound during the p.m. peak hour along Market Street. During the a.m.

peak hour, up to 15 bicyclists would travel through the intersection during certain traffic signal cycles. In general, vehicles yielded to pedestrians and bicyclists. Eastbound, private vehicle traffic is temporarily restricted between Tenth Street and Ninth Street as part of the temporary forced right turns discussed earlier; therefore, bicyclists tended to use the entire lane when heading eastbound. During the p.m. peak hour, vehicles turning right from Market Street onto either Hayes Street or Larkin Street tended to block bicyclists who were proceeding westbound on Market Street, causing the cyclists to weave through queued vehicles at the approach.

Seventh/Market: This intersection has wide decorative crosswalks on all four sides of the intersection and countdown pedestrian signals on all approaches. In-lane bus boarding islands are on the east, west, and south sides of the intersection, and a bus bulb-out is on the north side of the intersection. In general, pedestrian volumes were moderate to high during both the a.m. and p.m. peak hours, with about 20 pedestrians crossing each side of the intersection during each traffic signal cycle. This intersection also had a substantial number of bicyclists heading eastbound during the a.m. peak hour and westbound during the p.m. peak hour along Market Street. During the a.m. peak hour, up to 15 bicyclists would travel through the intersection during certain traffic signal cycles. Bicyclists tended to use the entire curbside lane when heading eastbound or westbound though the intersection. In general, vehicles yielded to pedestrians and bicyclists and no substantial conflicts were observed. Bicyclists tended to advance into the crosswalk before stopping; however, most yielded to pedestrians in the crosswalk.

Traffic: In general, with the addition of project-generated vehicle traffic, only minor changes in the average delay per vehicle at the supplemental study intersections resulted, and all study intersections continued to operate at the same acceptable level of service as under 2015 Modified Baseline and 2030 Cumulative No Project conditions, resulting in no significant project impacts. Under 2015 Modified Baseline conditions for the project and project variants, all seven of the supplemental study intersections operate at LOS C or better during both the a.m. and p.m. peak hours.

One of the supplemental study intersections, Seventh/Market, would operate at LOS E during the p.m. peak hour under 2030 Cumulative No Project and Cumulative plus Project Conditions. The critical northbound through movement operates at LOS E. The project would add one vehicle trip to the critical northbound through movement at the intersection during the p.m. peak hour, which represents 0.1 percent of the movement's volume. Therefore, the project's contribution to this critical movement would not be considered significant. The critical westbound through movement operates at acceptable levels of service. Therefore, the project's impact at this intersection would be considered *less than significant*. As stated earlier, a separate analysis was performed to determine the sensitivity of the trip distribution of the project trips which is described in Response TR-125, page C&R 3.7-214.

Bicycle: As presented in the Draft EIR, the proposed Cathedral Hill Campus project would have a significant impact to bicycles if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas. The proposed Cathedral Hill Campus project would add vehicle trips to the supplemental study intersections. As discussed earlier, some cyclists travel through these intersections, particularly along Polk Street. Aside from the additional trips through the intersections, the vehicle-bicycles conflict would be similar to existing conditions. Along the bicycle routes with the heaviest observed bicycle volumes—Market Street and Polk Street—the proposed Cathedral Hill Campus project would increase traffic volumes less than three percent, which would not be considered significant. Specifically, during the a.m. and p.m. peak hours, the project would add vehicle trips to the following streets with designated bicycle facilities:

- approximately 85 vehicle trips to Polk Street south of O'Farrell Street;
- approximately 100 vehicle trips to Polk Street north of Sutter Street;
- approximately 15 vehicle trips to Sutter Street west of Polk Street;

- approximately 55 vehicle trips to Post Street east of Polk Street; and
- approximately 20 vehicle trips to 8th Street south of Market Street

The project would add vehicle trips primarily to the major through movements at the supplemental intersections (e.g., northbound on Ninth Street, southbound on Eighth Street, and northbound or southbound on Polk Street) and would not necessarily increase the number of vehicles turning right or left into a bicycle lane or route.

Class II bicycle lanes and Class III bicycle routes are already provided on designated streets per the San Francisco Bike Plan, and no other specific bicycle improvements were identified in the Little Saigon Report. Therefore, the proposed Cathedral Hill Campus project would have a less-than-significant impact to bicyclists in the supplemental study area.

Pedestrian: As presented in the Draft EIR, the proposed Cathedral Hill Campus project would have a significant impact on pedestrians if it would result in substantial overcrowding of sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site or adjoining areas.

C&R Table 3.7-13
Existing, Modified Baseline, and Cumulative Intersection LOS – Supplemental Intersection Analysis

Intersection	Peak Hour	Existing		Modified Baseline No Project		Modified Baseline Plus Project		Cumulative No Project		Cumulative Plus Project	
		Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]
A. Polk Street/Ellis Street	a.m. p.m.	14.2 16.3	B B	13.7 17.8	B B	13.8 19.2	B B	13.6 32.8	B C	13.7 33.7	B C
B. Larkin Street/Geary Street	a.m. p.m.	13.8 15.3	B B	14.1 16.8	B B	14.1 16.9	B B	15.0 20.1	B C	15.1 20.2	B C
C. Hyde Street/O'Farrell Street	a.m. p.m.	12.6 13.1	B B	12.5 13.3	B B	12.5 13.4	B B	12.7 13.9	B B	12.7 14.0	B B
D. Leavenworth Street/Geary Street	a.m. p.m.	12.4 14.1	B B	12.5 14.2	B B	12.5 14.3	B B	12.5 15.1	B B	12.5 15.1	B B
E. Larkin Street/Grove Street	a.m. p.m.	13.4 13.5	B B	13.8 13.9	B B	13.8 13.9	B B	15.1 16.5	B B	15.2 16.6	B B
F. 9th Street/Market Street	a.m. p.m.	14.0 21.3	B C	14.3 23.5	B C	14.3 23.7	B C	15.6 39.2	B D	15.7 39.5	B D
G. 7th Street/Market Street	a.m. p.m.	16.7 22.2	B C	17.2 25.6	B C	17.4 25.8	B C	20.1 **61.7**	C **E**	20.5 **62.3**	C **E**

C&R Table 3.7-13
Existing, Modified Baseline, and Cumulative Intersection LOS – Supplemental Intersection Analysis

Intersection	Peak Hour	Existing		Modified Baseline No Project		Modified Baseline Plus Project		Cumulative No Project		Cumulative Plus Project	
		Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]

Notes:

Bold font indicates deficient LOS of LOS E or LOS F

1. LOS = Level of Service
2. For signalized intersections and all-way stop-controlled intersections, LOS based on average intersection delay, based on the methodology in the *Highway Capacity Manual*, 2000 Edition. For stop-controlled intersections, the delay of the worst performing approach is presented.
3. At some of the study intersections, the average delay per vehicle would remain the same or slightly decrease with the addition of project-related traffic. Using the HCM methodology, the level of service is calculated based on an average of the total vehicular delay per approach, weighted by the number of vehicles at each approach. Increases in traffic volumes at an intersection usually result in increases in the overall intersection delay. However, if there are increases in the number of vehicles at movements with low delays, the average weighted delay per vehicle may remain the same or decrease

Source: Fehr & Peers, 2011

As discussed under existing conditions, the supplemental study intersections have low to moderate levels of pedestrian activity and vehicles generally yielded to pedestrians as required by the California Vehicle Code. Aside from the general increase in vehicle traffic that would result from the proposed Cathedral Hill Campus project, it would not create unsafe conditions for pedestrians at these intersections. Furthermore, with the proposed LRDP, traffic volumes would increase at the supplemental study intersections by less than 5 percent. Therefore, the proposed Cathedral Hill Campus project would result in a less-than-significant impact to pedestrians.

Polk/Ellis is the only supplemental study intersection that does not currently have pedestrian countdown signals; however, new ADA-mandated curb ramps were being installed at the time of field observations. Although additional pedestrian improvements, such as bulb-outs, leading pedestrian intervals, or “NO RIGHT TURN ON RED” restrictions could be installed along Geary Street or O’Farrell Street, these improvements would need to be coordinated with the Geary BRT project to ensure that these improvements do not preclude future transit or traffic lane improvements. The Geary BRT project is currently considering several options for public transit stops along these streets and would improve public transit service and pedestrian conditions through the Tenderloin. The additional traffic generated by the project that would pass through the Tenderloin Neighborhood would not preclude the implementation of the improvements proposed in the Little Saigon Report.

In summary, the analysis in the Draft EIR assumed that trips destined to and from the Cathedral Hill Campus would travel through the Tenderloin neighborhood. However, this was not readily apparent because the Draft EIR did not include any study intersections through this neighborhood. In response to comments made during the Draft EIR public review period, the Planning Department added seven supplemental study intersections to the original 26 Cathedral Hill Campus study intersections. The inclusion of these intersections allowed Planning Department staff to illustrate that the Cathedral Hill Campus would increase vehicle trips through the Tenderloin neighborhood study area and as a result, could increase the number of conflicts between vehicles, pedestrians, and bicyclists. However, as the discussion above indicates, this increase would not result in significant impacts. Nevertheless, examples of improvements at the study intersections were identified that could reduce conflicts between various modes (see C&R Response TR-64). Although the impacts on pedestrians (Impact TR-40 identified in the

Draft EIR) were determined to remain less than significant, as part of implementation of Improvement Measure I-TR-40, the project sponsor could provide funding for the study and possible implementation of additional streetscape, pedestrian, and related improvements in the vicinity of the Cathedral Hill Campus that would improve the less-than-significant impacts to the pedestrian and bicycling environment. The City would have sole authority to determine whether to proceed with the Tenderloin and Little Saigon neighborhood area improvements and to issue required permits and authorizations. The City would also retain the discretion to modify or select feasible alternatives to the improvements to avoid any identified impacts or concerns that arise in connection with their further review, including any required environmental review under CEQA.

Further, the analysis of the intersections revealed that under 2015 Modified Baseline plus Project conditions, all seven study intersections would operate at an acceptable level of service. Under the 2030 Cumulative plus Project conditions, one intersection (Seventh/Market) would be expected to operate at an unacceptable LOS E during the p.m. peak hour; however, the proposed project's contribution to the failing conditions at this intersection would not be considered cumulatively significant. The six remaining supplemental intersections would operate at acceptable levels of service during the 2030 Cumulative plus Project conditions.

Trip Distribution Sensitivity Analysis

Comments

(Jeff Buckley, September 23, 2010) [PC-64 TR]

"So, we take issue with two parts of the Draft EIR. The first is in terms of the way that the EIR assesses traffic flow and the impact that traffic is going to have within the Tenderloin area. The EIR assumes that those coming to CPMC from Mission Bay, SOMA, or Potrero Hill will take Van Ness to reach the facility, and it projects a big traffic impact at Van Ness and Market. But the reality is that drivers know that the fastest route is either to go up Seventh Street, which becomes Leavenworth north of Market, or up Ninth, which becomes Larkin. Most avoid driving on Market, or they avoid driving on Van Ness whenever possible. So, the EIR's assumption that the Tenderloin will be spared from massive increased traffic really is ignorant of reality."

(Randy Shaw, September 23, 2010) [PC-94 TR]

"But now we face a situation where they are going to route several thousand cars through the Tenderloin and have no mitigations and, in fact, the EIR doesn't even mention it. If you heard Mr. Buckley's testimony before mine, the EIR has – the people who wrote that never drive, apparently, because how would anybody coming from Mission Bay, Potrero Hill, the South of Market, and get off the Bay Bridge, somehow make a left turn on Market Street at 7th and 9th, and decide to go up Van Ness? That is exactly the opposite direction. What anyone who drives there, you guys know, you know, Dr. Antonini, you drive up 7th, and you make a left on Geary, or you drive up 9th and make a left on Geary, and then you go back down O'Farrell, that is logical. You won't find that in the EIR, no, there are no impacts at all, and that needs to be rewritten, and that's why we think CPMC needs to step up and actually mitigate these significant impacts."

(Retilah [phon] Patel, September 23, 2010) [PC-109 TR]

"I think I understand that there are going to be impacts that this EIR is not addressing, specifically traffic, and for me, as a business owner in the corridor with residential hotels and apartments, particularly Little Saigon, which there is a traffic report, a study that has been done, the traffic right now, the way it is set up is it's going to go down Geary and O'Farrell, and I'm a San Franciscan, born and raised, first generation, I travel in the City, I live in the inner Sunset for 20 years now, moved out to inner Richmond the last five, and I'll tell you, I try not to take O'Farrell and not try to take Geary. The only reason I do is I take my kids to school right there on O'Farrell and Franklin. But, to say that people from out of town that are going to be coming in to take the service of CPMC will just go up O'Farrell and Van Ness is not the truth; the truth is, they are going to go up Larkin with a straight shoot of three lanes, and that's the heart of Little Saigon, and there is a going to be Eddy, Ellis, as our exits and entrances to that corridor. People will also go up towards, I think, Bush and those other streets, and come wrap back around because people won't realize, with the new bus lanes that have been added in the recent years on both of those streets, Geary and O'Farrell, they have become very congested and, even through the 4:00 to 6:00 p.m. no parking time, there are a lot of businesses that utilize that lane for drop offs, deliveries, and I think that is a very important fact that San Francisco is a transit city first."

(Commissioner Antonini, September 23, 2010) [PC-357 TR]

"Certainly, traffic is a big issue, and I think that was really brought up very well by a number of speakers that made the point that people will cut through the Tenderloin and we have to figure out a way to route the traffic more, even without the new hospital on Cathedral Hill, I think it's an area that we have to look at because there are traffic problems already, and there might be ways that that could be dealt with and it's something the parking and traffic will have to try to deal with."

(Commissioner Antonini, September 23, 2010) [PC-362 TR]

"And I think that the issues that were raised with respect to the Cathedral Hill Hospital proposal and transportation through the Tenderloin, I've only read a portion of the transportation analysis, but I did notice there's a heavy emphasis on the use of Van Ness Avenue and, just to repeat what everybody else said, if I'm south of Market and I'm going north, I come up Ninth or Seventh, I would never use Van Ness, and so that analysis, I think, staff probably has all the notes on that already, so I don't need to go into that too much."

(Commissioner Moore, September 23, 2010) [PC-368 TR]

"I am concerned that traffic analysis does not fully address the secondary ripple effects of alternative routing beyond what is described for Larkin and Leavenworth. I know for a fact that the effects of people needing to go out to the new Van Ness, CPMC facility will also affect all streets coming up from the freeway and from the south part of the City, coming up Taylor, Mason, etc., Taylor, Mason, Powell, which even now are alternative routes for people to move across the City because, as far as I'm concerned, the level of service on Van Ness is – I call it – impossible, that is not even within the level of service descriptions anymore."

(Commissioner Miguel, September 23, 2010) [PC-383 TR]

"I've lived South of Market for 34 years now. I'm a driver, as is my wife. I must come north of Market probably eight or nine times a week, at least. I would have been out of my mind and have never taken Van Ness Avenue. We take Seventh Avenue or Ninth. You never take Van Ness Avenue. It's absolutely ridiculous. And to consider that as part of a traffic plan means someone doesn't look at the traffic patterns of the City."

Response TR-125

The comments state concerns regarding the number of vehicle trips routed on Van Ness Avenue and through the Tenderloin-Little Saigon neighborhood, and states that the Draft EIR vehicle trip assignment is not accurate. In response to written and oral comments regarding the transportation analysis included in the Draft EIR with respect to the South of Market (SoMa) and Tenderloin-Little Saigon neighborhoods, a trip distribution sensitivity analysis was conducted.

As described in Response TR-124 (page C&R 3.7-207), the Draft EIR transportation analysis assumed that traffic would use the roadways in the Tenderloin neighborhood consistent with trip distribution methodology in the *SF Guidelines*. Due to their location farther from the Cathedral Hill Campus, no intersections were analyzed within the Tenderloin neighborhoods. Response TR-124 describes the results of a supplemental analysis of vehicle, bicycle, and pedestrian traffic in the Tenderloin assuming the trip distribution used for the original analysis. While the Draft EIR trip distribution assumptions are reasonable for the original analysis, and consistent with trip distribution methodology in the *SF*

Guidelines, a sensitivity analysis was conducted to determine what effect, if any, would be generated if a higher percentage of motorists traveling to the proposed Cathedral Hill Campus from Superdistrict 1, Superdistrict 3, and the freeway were to use alternate routes, primarily through the SoMa and Tenderloin, rather than those assumed in the Draft EIR. The sensitivity analysis was prepared for informational purposes only; therefore, the trip distribution used in the Draft EIR was not changed because the analyses remains reasonable and accurate. The sensitivity analysis is located in the second half of the memo entitled, "*Supplemental-Sensitivity Transportation Impact Analyses for the California Pacific Medical Center Cathedral Hill Campus in San Francisco, CA*," which is included in Appendix E of the C&R document.

Based on the trip distribution and trip assignment used in the Draft EIR, approximately 9 percent of all northbound vehicle trips and 17 percent of all southbound vehicle trips generated by the campus were assigned to routes through the SoMa and Tenderloin neighborhoods to reach the Cathedral Hill Campus. This represents approximately 51 and 100 of project-generated vehicle trips in the a.m. and p.m. peak hour, respectively, assigned to routes through SoMa and the Tenderloin neighborhoods. For the sensitivity analysis, it was assumed that 25 percent of all northbound vehicle trips were assigned to the Tenderloin and SoMa roadways, an increase of 64 percent above what was assumed in the EIR. The reassignment was based on the general geographic areas of each Superdistrict or Region in relation to the SoMa/Tenderloin alternative routes and in such a way as to determine how sensitive the analysis is to the trip distribution and assignment. The result was an analysis in which 108 and 112 of all project-generated northbound and southbound vehicle trips in the a.m. and p.m. peak hour, respectively, were assigned to routes that traveled through SoMa and the Tenderloin neighborhoods.

Travel behavior is affected by several factors, including travel time, travel distance, and general knowledge of potential routes to and from a destination. For example, employees familiar with multiple routes to and from the proposed Cathedral Hill Campus area might be more likely to choose secondary routes to the campus to avoid congestion. Patients or visitors who might be less familiar with the area might be more likely to chose major roadways or rely on online directions which would direct drivers to major roadways. The percentages assigned to SoMa/Tenderloin streets for the purposes of the sensitivity analysis therefore, presents a reasonable scenario of the split of traffic between streets in the Tenderloin and other streets because many East Bay, South Bay, and out of region drivers would still use the Central Freeway, Van Ness Avenue, Franklin Street, and Gough Street to access the campus.

The sensitivity analysis was conducted and potential impacts assessed using the City of San Francisco significance thresholds, as described in the Draft EIR. The sensitivity analysis adjusted the proposed Cathedral Hill Campus net-new a.m. and p.m. peak hour vehicle trips as described above, which were then added to both Modified Baseline and Cumulative No Project intersection volumes to determine if the proposed campus would lead to intersection impacts using the adjusted traffic assignment for Tenderloin neighborhood study intersections. It should be noted that 2015 Modified Baseline and 2030 Cumulative No Project intersections volumes were developed consistent with the approach and methodology presented in the Draft EIR.

In general, the sensitivity analysis addition of project-generated traffic resulted in minor changes in the average delay per vehicle at the Tenderloin supplemental study intersections, and most of the study intersections continued to operate at the same levels of service as under the 2015 Modified Baseline and Cumulative No Project conditions, as shown in C&R Table 3.7-14. Under Modified Baseline No Project and Modified Baseline plus Project ten of the 13 study intersections (Franklin/Geary; Van Ness/Post; Polk/O'Farrell; Polk/Post; Larkin/Geary; Hyde/O'Farrell; Leavenworth/Geary; Larkin/Grove; 9th Street/Larkin/Market Street; and 7th Street/Market Street) operated at the same acceptable service level during both the a.m. and p.m. peak hours. Similarly the intersection of Polk Street/Geary Street would continue to operate unacceptably (LOS E during both the a.m. and p.m. peak hours).

C&R Table 3.7-14
Existing, Modified Baseline, and Cumulative Intersection LOS – Sensitivity Test Intersection Analysis

Intersection	Peak Hour	Existing		Modified Baseline No Project		Modified Baseline Plus Project		Modified Baseline No Project		Modified Baseline Plus Project	
		Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]	Avg. Delay	LOS[1,2]
5. Franklin Street/Geary Street	a.m.	8.7	A	9.1	A	9.2	A	10.5	B	10.7	B
	p.m.	22.1	C	28.8	C	26.1	C	47.7	D	44.4	D
15. Van Ness Avenue/Post Street	a.m.	15.3	B	15.0	B	15.1	B	15.9	B	16.1	B
	p.m.	14.4	B	14.8	B	15.6	B	16.7	B	17.5	B
20. Polk Street/O'Farrell Street	a.m.	18.6	B	19.0	B	22.3	C	20.6	C	25.6	C
	p.m.	18.3	B	20.0	B	28.7	C	21.1	C	30.4	C
21. Polk Street/Geary Street	a.m.	47.9	D	50.0	D	**77.4**	**E**	**59.1**	**E**	**>80 (1.04)**	**F**
	p.m.	28.6	C	34.4	C	**60.6**	**E**	54.8	D	**77.9**	**E**
23. Polk Street/Post Street	a.m.	18.3	B	17.2	B	19.0	B	17.2	B	18.8	B
	p.m.	15.9	B	16.1	B	16.9	B	17.9	B	19.1	B
25. 8th Street/ Hyde Street/Market Street	a.m.	**>80 (0.87)**	**F**	**78.8**	**E**	**79.6**	**E**	**76.4**	**E**	**77.2**	**E**
	p.m.	**70.0**	**E**	**>80 (1.18)**	**F**	**>80 (1.19)**	**F**	**>80 (1.28)**	**F**	**>80 (1.29)**	**F**
A. Polk Street/Ellis Street	a.m.	14.2	B	13.7	B	13.8	B	13.6	B	13.7	B
	p.m.	16.3	B	17.8	B	19.2	C	32.8	C	33.7	C
B. Larkin Street/Geary Street	a.m.	13.8	B	14.1	B	14.6	B	15.0	B	15.7	B
	p.m.	15.3	B	16.8	B	17.0	B	20.1	C	20.5	C
C. Hyde Street/O'Farrell Street	a.m.	12.6	B	12.5	B	12.5	B	12.7	B	12.7	B
	p.m.	13.1	B	13.3	B	13.4	B	13.9	B	14.0	B
D. Leavenworth Street/Geary Street	a.m.	12.4	B	12.5	B	12.6	B	12.5	B	12.6	B
	p.m.	14.1	B	14.2	B	14.3	B	15.1	B	15.2	B
E. Larkin Street/Grove Street	a.m.	13.4	B	13.8	B	14.3	B	15.1	B	15.8	B
	p.m.	13.5	B	13.9	B	14.0	B	16.5	B	16.7	B
F. 9th Street/Market Street	a.m.	14.0	B	14.3	B	14.5	B	15.6	B	15.9	B
	p.m.	21.3	C	23.5	C	23.8	C	39.2	D	40.1	D
G. 7th Street/Market Street	a.m.	16.7	B	17.2	B	17.5	B	20.1	C	20.7	C
	p.m.	22.2	C	25.6	C	25.9	C	**61.7**	**E**	**62.6**	**E**

Notes:

Bold font indicates LOS E or LOS F

1. LOS = Level of Service
2. For signalized intersections and all-way stop-controlled intersections, LOS based on average intersection delay, based on the methodology in the *Highway Capacity Manual*, 2000 Edition. For stop-controlled intersections, the delay of the worst performing approach is presented.
3. At some of the study intersections, the average delay per vehicle would remain the same or slightly decrease with the addition of project-related traffic. Using the HCM methodology, the level of service is calculated based on an average of the total vehicular delay per approach, weighted by the number of vehicles at each approach. Increases in traffic volumes at an intersection usually result in increases in the overall intersection delay. However, if there are increases in the number of vehicles at movements with low delays, the average weighted delay per vehicle may remain the same or decrease

Source: Fehr & Peers, 2010

The intersection of 8th Street/Hyde Street/Market Street, with the sensitivity analysis traffic assignment, would continue to operate unacceptably at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour and project's contribution to these unacceptable operating conditions under the sensitivity analysis traffic assignment would still be less than significant. Under the sensitivity analysis one intersection, Polk/Ellis Street, operations would degrade from LOS B during the p.m. peak hour to LOS C with a slight increase in average delay. However, this would still represent acceptable operating conditions at this intersection.

Under Cumulative No Project and Cumulative plus Project ten of the 13 study intersections (Franklin/Geary; Van Ness/Post; Polk/O'Farrell; Polk/Post; Polk/Ellis; Larkin/Geary; Hyde/O'Farrell; Leavenworth/Geary; Larkin/Grove; and 9th Street/Larkin/Market Street) operated at the same acceptable service level during both the a.m. and p.m. peak hours. The intersection of 8th Street/Hyde Street/Market Street, with the sensitivity analysis traffic assignment, would continue to operate unacceptably at LOS E during the a.m. peak hour and LOS F during the p.m. peak hour. The proposed project's contribution to these unacceptable operating conditions under the sensitivity analysis traffic assignment was therefore examined, and found to still be less than significant. Similarly the intersection of 7th Street/Market would continue to operate unacceptably (LOS E during the p.m. peak hour).

The proposed project causes the intersection of Polk Street/Geary Street to deteriorate from acceptable LOS D operations to unacceptable LOS E operations during the p.m. peak hour under 2015 Modified Baseline Plus Project and 2030 Cumulative Conditions with the Draft EIR trip assignment. As described under Modified Baseline and Cumulative Conditions in the Draft EIR, this was identified as a significant and unavoidable project impact (Impact TR-2 & Impact TR-101). Under Cumulative Plus Project Conditions with the sensitivity analysis trip assignment, the intersection would operate at LOS F during the a.m. peak hour and LOS E during the p.m. peak hour. Although a worsening of intersection operations, this would be a similar significant impact as identified in the Draft EIR, and the sensitivity analysis would therefore, not result in any additional impacts to the intersection.

The proposed project with the trip assignment presented in the sensitivity test would have a significant impact to bicycles if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas. The proposed project with the sensitivity test trip assignment would add vehicle trips to the supplementary study intersections. As discussed earlier, some cyclists travel through the supplementary intersections, particularly along Polk Street. Aside from the additional vehicle trips through the intersections, the vehicle/bike conflict would be similar to what occurs today. Along the bicycle routes with the heaviest observed bicycle volumes—Market Street and Polk Street—the proposed project would increase traffic volumes less than three percent, which would not be considered significant.

The proposed project with the sensitivity test trip assignment would add vehicle trips primarily to the major through movements at the supplementary intersections (e.g., northbound on 9th Street, southbound on 8th Street, and northbound or southbound on Polk Street) and would not necessarily increase the number of direct conflicts due to vehicles turning right or left into a bicycle lane or route.

Class II bicycle lanes and Class III bicycle routes are already provided on designated streets per the San Francisco Bike Plan, and no other specific bicycle improvements were identified in the Tenderloin-Little Saigon Transportation Plan.

Therefore, similar to the Draft EIR analysis, the proposed project with the sensitivity analysis trip assignment would have a less-than-significant impact to bicyclists in the supplemental study area.

The proposed project, with the sensitivity test trip assignment, would have a significant impact to pedestrians if it would result in substantial overcrowding of sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site or adjoining areas. As discussed, the supplementary study intersections have low to moderate levels of pedestrian activity and vehicles generally yielded to pedestrians as required by the California Vehicle Code. The proposed project with the sensitivity analysis trip assignment would add vehicle trips to the movements at the supplementary study intersections; however, its contribution would not expected to be significant . Although the project would only minimally increase traffic volumes on the streets through the neighborhood, the Better Streets Plan identifies several pedestrian safety improvements that could be used at intersections to which the Project adds vehicle traffic. Potential improvements include:

- Leading pedestrian intervals for pedestrian movements, which increases likelihood that turning vehicles will yield to pedestrians;
- Increase all-red signal phases, which enhances the transfer of right-of-way between vehicles and pedestrians;
- NO RIGHT TURN ON RED restrictions, which reduces conflicts between pedestrians in a crosswalk and turning vehicles;
- Red-light camera enforcement, which improves signal compliance;
- High-visibility crosswalks;

Any such improvements would need to be reviewed by SFMTA. The previously presented recommendations/improvements are not subject to change in light of the sensitivity test trip assignment.

In summary, the sensitivity analysis considered how a 64 percent increase in the number of northbound project vehicle trips routed through SoMa and the Tenderloin would impact traffic, bicycle and pedestrians. The adjustments tested in the sensitivity analysis only affect northbound vehicle trips because the location of the Project egress would not result in a substantial number of vehicles driving to the southeast through the Tenderloin or SoMa. The sensitivity test results indicate that the Project would still result in impacts to the intersection of Polk/Geary; however, the impact would be similar to impact identified in the Cathedral Hill Draft EIR. Impacts to bicycles and pedestrians are expected to be less than significant. The supplemental analysis did not result in any new significant project impacts at study intersections that are not already identified in the Draft EIR. Please refer to Response TR-64 (page C&R 3.7-119) for a detailed discussion regarding pedestrian safety and Improvement Measure I-TR-40 included in the Draft EIR.

3.7.13.2 TENDERLOIN-LITTLE SAIGON NEIGHBORHOOD TRANSPORTATION PLAN

Comments

(Sandra Manning, September 23, 2010) [31-4 TR]

“Funding the recommendations of the Tenderloin-Little Saigon Transit Study. This will not only slow traffic through the neighborhood, but also divert traffic away by reducing the time drivers can save by using Larkin and Leavenworth Streets rather than Van Ness.”

(Lower Polk Neighbors, October 19 , 2010) [103-25 TR, duplicate comment was provided in 113-25 TR]

“F. Along with Cedar Street fund alley enhancements for Hemlock, Alice B. Toklas/Myrtle, and Fern Streets (from Van Ness to Larkin Street). Enhances to include stamped concrete paving in lieu of current asphalt), bollards, trees (landscaping), play equipment where these can be located, better lighting, and; murals.”

(Stephanie Barton, et al.—Hastings Civil Justice Clinic for the Good Neighbor Coalition, October 19, 2010) [104-33 TR]

"**B. The DEIR fails to consider traffic plans for the Tenderloin including the plans proposed by the Tenderloin-Little Saigon Neighborhood Transportation Study.**

In 2004, the San Francisco County Transportation Authority ('SFCTA') in partnership with community organizations initiated a study to identify high priority transportation needs and develop conceptual designs and strategies for transportation improvements to the overlapping Tenderloin and Little Saigon neighborhood. The final report, published in March 2007, is entitled the Tenderloin-Little Saigon Neighborhood Transportation Plan Final Report ("Little Saigon Report").[60] Key among the issues identified by the Little Saigon Report were "the need for enhanced pedestrian safety" and measures "to slow and 'calm' traffic traveling through the neighborhood" and "improve transit reliability."[61] Projects proposed under this plan were adopted before notice of this DEIR's preparation, The DEIR has to consider the potential consequences of increased traffic in the Tenderloin attributable to the Cathedral Hill Campus on effectuating the implementation goals of the Little Saigon Report. While a number of the Little Saigon Report's project proposals have been implemented, several projects remain incomplete due to financial constraints.

The Better Streets Plan ("BSP") is a citywide effort implemented by the San Francisco Planning Department and the San Francisco Municipal Transportation Agency to develop street typology and determine what amenities should be provided, While the BSP is mentioned in the DEIR, the DEIR fails to address various aspects of the plan's implementation in the Tenderloin.[62] Recommendations of the Tenderloin-Little Saigon Report are now being implemented as part of the BSP. CEQA guidelines require EIRs to "discuss any inconsistencies between the proposed project and applicable general plans and regional plans."[63] Accordingly, the DEIR needs to analyze potential inconsistencies between the project's transportation and circulation impacts and the recommendations of the Little Saigon Report that are now part of the BSP.

[60] SFCTA, Tenderloin-Little Saigon Neighborhood Transportation Plan Final Report 1-1 (2007) (attached hereto as "Appendix A").
[61] *Id* at 3-1.
[62] DEIR 3-24.
[63] *CEQA Guidelines 15125(d)."*

(Jeff Buckley, September 23, 2010) [PC-63 TR]

"Hello. My name is Jeff Buckley. I am the Director of the Central City SRO Collaborative. We are a member of the Good Neighbor Coalition. So, I wanted to first give you each a copy of the Little Saigon Tenderloin Traffic Study so you can read it, it is going to be instrumental in what I am discussing in a moment."

(Jeff Buckley, September 23, 2010) [PC-68 TR]

"And so, I think what we'd ask is that they fund the recommendations of the Tenderloin Little Saigon transit study, this will not only slow traffic through the neighborhood, it'll also divert traffic away by reducing the time that drivers can save by using Larkin and Leavenworth, rather than Van Ness."

(Randy Shaw, September 23, 2010) [PC-95 TR]

"Fortunately, we have this Little Saigon transit plan that has already been done to address the already existing excess traffic with the one-way streets, which need to be two-way streets, with the wider sidewalks, really to improve the neighborhood, and we need CPMC to fund that study –- not fund the study -- implement the study, which can be done for a very small amount of money in light of a $2 billion project."

(Randy Shaw, September 23, 2010) [PC-96 TR]

"and it really allows CPMC to say, "Oh, no, we're not wrecking your community by building this, we're improving it." And I have copies of the study, there's a lot of interest – when the study was complete in 2007, the plan was implemented, but we've had a little bit of financial problems in the last few years, as you know."

(Retilah [phon] Patel, September 23, 2010) [PC-111 TR]

"but I think that they need to bring back and support this study in Little Saigon, specifically, for traffic needs and to make it a neighborhood, and remember that the Tenderloin is a neighborhood, and is one of the up and coming neighborhoods just like every neighborhood in San Francisco, and I would urge that anything passed would have to do with supporting and funding Little Saigon's traffic study, and I think you guys hold the power to do that, and I would appreciate that. Thank you."

(Sam Patel, September 23, 2010) [PC-112 TR]

"MR. PATEL: Good afternoon, Commissioners. My name is Sam Patel, I am a resident, an owner of a resident hotel in the Tenderloin on Ellis Street. I am also the President of a the Independent Hotel Owners and Operators Association. Several members of the Association own residential hotels in the area that, in the Tenderloin area. The residents of these hotels are going to be impacted by the traffic created by this project and I urge you to ask CPMC to fund the traffic calming and pedestrian safety improvements that are needed. Thank you."

(Sandra Manning, September 23, 2010) [PC-123 TR]

"CPMC can address these issues by funding the recommendations of the Tenderloin Little Saigon transit study. This will not only slow traffic through the neighborhood, but only divert traffic away by reducing the time that drivers can save by using Larkin and Leavenworth Street, rather than Van Ness."

Response TR-126

The comments state that CPMC should fund the recommendations of the Tenderloin-Little Saigon Neighborhood Transportation Plan, or other similar improvements, and that the Draft EIR does not identify inconsistencies between the project's impacts and the Tenderloin-Little Saigon Transportation Plan or Better Streets Plan. The need to improve the pedestrian, bicycle, and public transit user experience in the Tenderloin-Little Saigon area is also addressed in C&R Response TR-64.

As described in TR-124 and TR-125, two supplemental analyses of the Tenderloin Neighborhood were conducted to address comments received during the public review period of the Draft EIR. The first supplemental analysis added seven new intersections in the Tenderloin and Civic Center to the locations studied for potential project impacts. The second supplemental analysis tested the sensitivity of the local trip distribution and assignment assumptions used in the Draft EIR through the supplemental study area for potential project impacts to supplemental study intersections. Neither of these two supplemental analyses identified new project impacts related to vehicular traffic, pedestrians, or bicycles within the Tenderloin study area. Further, the development of the project does not preclude the implementation of the proposed Tenderloin-Little Saigon improvements, so the project is consistent with the current planning for the area. No CEQA nexus exists within the environmental report that could be used to require the project to pay for the improvements identified in the Tenderloin-Little Saigon Study as a mitigation measure. However, as discussed below, it is proposed as part of the CPMC LRDP Development Agreement that CPMC fund improvements within the Tenderloin area as a supplemental community benefit.

As background, the March 2007 the *Tenderloin-Little Saigon Neighborhood Transportation Plan Final Report* ("Little Saigon Report") was prepared by the San Francisco County Transportation Authority ("SFCTA"). The report's aim was to "prioritize community transportation needs and develop near and mid-term improvements in the Tenderloin and Little Saigon neighborhoods." The study area was generally bounded by Van Ness Avenue, Market Street, Powell Street, and Post Street, generally overlaps with the supplementary analysis area.

Through a process involving both community outreach and technical analysis, the Little Saigon Report identified a number of priority improvements and actions ranging in benefits and costs to improve pedestrian safety, calm traffic, improve public transit service, and enhance the streetscape. Some specific improvements or actions proposed in the plan included:

> **Improve pedestrian safety**: construct intersection bulb-outs to reduce crossing distances, make crosswalks more visible with improved markings, install red-light running cameras to reduce vehicle speeds, install pedestrian countdown signals at intersections, and install on-street Class II (separate bicycle lane) or Class III (within traffic lane) bicycle lanes when possible.
>
> **Calm traffic**: narrow traffic lanes, install designated bicycle or bus-only lanes, convert one-way streets to two-way streets, retime signal progressions to reduce average vehicle travel speeds, reduce the number of overall travel lanes, and plant trees at uniform distances within the parking lane (four per block).
>
> **Improve public transit service**: Install bus bulb-outs to decrease bus reentry times and improve reliability, add colored pavement for Geary Street and O'Farrell Street bus-only lanes, alter the street circulation network (one-way to two-way streets) to consolidate bus routes, and upgrade and improve bus stops.
>
> **Enhance the streetscape**: Install pedestrian-scale sidewalk lighting, widen sidewalks, plant trees at uniform distances within the parking lane (four per block), and install pedestrian-scale directional signs to improve wayfinding.

A list of the proposed improvements from the Little Saigon Report is provided in the supplemental analysis report, which is Appendix E to the C&R document. The list includes the specific improvements, categorized by near-term, mid-term, and long-term phases, that were proposed in the report.

The SFMTA confirmed the status of the following improvements, as identified in the Tenderloin-Little Saigon Study, which have been or are being implemented:

The following improvements identified in the Tenderloin-Little Saigon Study have been implemented:

- Curb extensions have been installed on the northwest corner of McAllister Street/Jones Street; and
- A bus bulb-out was installed on the east side of 7th Street between Market Street and McAllister Street

The following improvements are under construction as of March 2011:

- New curb extensions on all corners at the intersections of Ellis Street/Hyde Street, Eddy Street/Hyde Street, and Ellis Street/Mason Street;
- New curb extensions on the southeast and northeast corners of the intersection of Eddy Street/Jones Street;
- Eddy Street—A road diet (reduction from three to two travel lanes) from Mason Street to Larkin Street as part of the road resurfacing of Eddy Street;
- Ellis Street—A road diet (reduction from three to two travel lanes) from Mason Street to Polk Street as part of the road resurfacing of Ellis Street; and
- The installation of decorative crosswalks at selected locations along Eddy Street and Ellis Street.

Will require further transportation analysis/environmental review:

- The conversion of Eddy and Ellis Streets from a one-way couplet to two-way roadways

In connection with other near term projects, CPMC has offered to contribute to City's possible future implementation of some or all of the following types of public improvements in the vicinity of the Cathedral Hill Campus, including in the Little Saigon Neighborhood. CPMC and the City have been in negotiations regarding the terms and conditions of a development agreement, that would, among other things, provide certain assurances and benefits, subject to the terms and conditions of the development agreement, with respect to the delivery of health care services. Please see Section 3.23.1.2 "Development Agreement" on page C&R 3.23-41 for additional details regarding the development agreement.

- Corner pedestrian bulb-outs;
- Pedestrian lighting;
- Colored concrete "safe passages" pathways;
- Sidewalk widening and curb repairs or improvements;
- Landscape;
- Median extensions;
- Undergrounding utilities; and
- Select changes in one way to two way streets (such as on Ellis and Eddy Streets).

CPMC is not seeking environmental clearance for any of these possible improvements since they are not part of the project nor are these improvements required as mitigation for any impacts of the project. The City would be responsible for obtaining future environmental clearances and for the design, scheduling, and construction of the improvements, and for any necessary supplemental funding. The City would have sole authority to determine whether to proceed with the Tenderloin and Little Saigon neighborhood area improvements and to issue required permits and authorizations. The City would also retain the discretion to modify or select feasible alternatives to the improvements to avoid any identified impacts or concerns that arise in connection with their further review, including any required environmental review under CEQA.

The streetscape plan proposed for the Cathedral Hill Campus is consistent with many of the recommendations contained in the Little Saigon Report and conforms to the City of San Francisco's Better Streets Plan standards. As a result, the proposed CPMC LRDP would improve the pedestrian experience in the Cathedral Hill Campus area. Specifically, the proposed streetscape plan[30] identifies the following improvements:

<u>Geary Boulevard and Van Ness Avenue (Commercial Throughways)</u>

Standard Improvements for block faces and intersections directly adjacent to project site:

- Marked crosswalks with curb ramps

[30] WRT, 2010. Memorandum to Vahram Massehian Re Better Streets Plan Elements at CPMC Campus at Van Ness and Geary. This memo is on file with the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco 94103, and is available for review as part of the project file, in Case No. 2005.0555E.

- Pedestrian signals
- Corner curb extensions: provided wherever possible while meeting vehicular circulation needs
- Street trees
- Sidewalk planters: extensive "seasonal gardens" on Van Ness to also serve as stormwater management zones
- Site furnishings: on Van Ness, proposed extensive seating within the "seasonal garden" and "kiosk market" areas, and on Geary, a proposed bus shelter at the bus stop
- Pedestrian-scale lighting: building-mounted fixtures on Geary and historic-style, pole-mounted lights on Van Ness
- Special paving in furnishings zone: permeable paving proposed along the tree strip (i.e., furnishings zone)
- High visibility crosswalks at Geary/Van Ness: in addition to standard crosswalk markings across Geary, decorative concrete crosswalks proposed across Van Ness
- Extended bulb-out: extended bulb-out along the full length of the west side of Van Ness (i.e., the sidewalk would be widened) between Post and Geary and on the east side between Cedar Street and Geary
- Improvements to the existing center median on Van Ness
- Improvements to the existing pedestrian refuge island on Van Ness
- Transit bulb-out (on Geary, just west of Van Ness)

<u>Franklin Street (Residential Throughway)</u>

Standard Improvements (for block faces and intersections directly adjacent to project site):

- Marked crosswalks with curb ramps
- Pedestrian signals
- Street trees: street trees proposed to be planted in a trench with "structural soil" and permeable paving to support healthy root growth in the restricted sidewalk width.
- Stormwater control measures: permeable paving proposed along the tree-planting strip
- Pedestrian-scale lighting: building-mounted fixtures

<u>Post Street (Neighborhood Commercial)</u>

All of the standard improvements listed in the Better Streets Plan are proposed for block faces and intersections directly adjacent to project site:

- Marked crosswalks with curb ramps
- Pedestrian signals
- Corner curb extensions: provided at Van Ness but not feasible at Franklin because of required vehicular turning movements
- Street trees
- Sidewalk planters

- Stormwater control measures: all sidewalk planters proposed on Post also would serve as stormwater control zones; special paving also would serve as permeable paving
- Pedestrian-scale lighting: provided as building-mounted fixtures
- Special paving in furnishings zone: permeable paving proposed along the tree strip (i.e., furnishings zone)
- Site furnishings: seatwalls proposed in the shuttle drop-off area

Cedar Street (Alley)

Standard Improvements:

- Curb ramps
- Street trees
- Stormwater control measures: permeable paving proposed along the tree-planting strip
- Pedestrian-scale lighting: lighted bollards and pole-mounted fixtures proposed
- Special paving (entire roadway): unit pavers proposed

All of the standard improvements listed in the Better Streets Plan are proposed in the design, though corner curb extensions would be limited to locations where they would not affect traffic flow, per the City's requirements.

3.7.13.3 Cathedral Hill Campus Pedestrian Tunnel

Comments

(Linda Chapman, October 19, 2010) [76-31 TR, duplicate comment was provided in 111-31 TR]

"7. Pedestrian tunnel

The proposal conflicts with the long-range VNAP goal for a subway to reduce traffic conflicts and transit delays. The CPMC plan would divide the right-of-way and could post conflicts for the subway entries near the Van Ness/Geary intersection.

MTA's current proposal for 'Bus Rapid Transit,' is a cheaper, less effective alternative. The VNAP is still the planning document that identifies long-range goals for the corridor."

(Linda Chapman, October 19, 2010) [76-32 TR, duplicate comment was provided in 111-32 TR]

"The BRT alternative, still in the planning stage, is dismissed by some transportation planners, and observers of traffic conditions in the corridor. BRT cannot fix street networks paralyzed by congestion. A subway could avoid notorious problems transit riders face on Van Ness.

A pedestrian tunnel would affect a published goal for resolving conflicts affecting Highway 101, traffic in densely populated central city neighborhoods, heavily travelled arteries, Muni and Golden Gate Transit. CPMC's plan cannot be allowed to prejudice this outcome, when a published long-range goal was deferred for funding consideration."

(Linda Chapman, October 19, 2010) [76-33 TR, duplicate comment was provided in 111-33 TR]

"Tunnels for Muni Metro and BART make a subway now considered for Stockton Street expensive to build and less practical for users because a deep route is required to avoid underground structures. The same impediment to a VNAP goal is posed by a pedestrian tunnel."

(Commissioner Antonini, September 23, 2010) [PC-389 TR]

"A couple of other points that I neglected to bring up the first time, and I think are important, we've talked about traffic and I've also brought up the question before that, as we talk about this tunnel under Van Ness, which I think is very important for the project, that we also look at it with the future eye towards any subway that may go below Van Ness Avenue in the future, as well as perhaps one coming along Geary, because we had asked – I think that should be what the City is looking at in the future. But the law of physics is you can't put two objects in the same spaces and, you know, there's only on Van Ness Avenue and it is only so wide, and if you really want to improve traffic and safety, you've got to avail yourself of some other use of subterranean to at least move your transit down there and free up the surface level for other uses, so that would be a great thing, but we are a ways from that. It certainly doesn't have anything to do with this particular project but I think it's important that we at least take that into consideration when talking about where the tunnel is going to be."

Response TR-127

The comments state concerns related to potential conflicts between the proposed Van Ness Avenue pedestrian tunnel and a potential future Van Ness Avenue subway system, and references that such a subway system is called for the by the Van Ness Avenue Area Plan (VNAP). Specifically, the comments state that the proposed pedestrian tunnel could pose a conflict with a future entry point to a Van Ness/Geary subway station, that a Bus Rapid Transit (BRT) system on Van Ness Avenue, currently under study by the SFCTA and SFMTA, would be an inferior option for transit separation when compared to a subway system, and that the proposed pedestrian tunnel precludes any future subway system along Van Ness Avenue because of the required depth of the tunnel.

The VNAP stated that a subway option for Van Ness Avenue should be explored for feasibility and desirability. Currently, no known plans exist to conduct such a study; therefore, the statement that a pedestrian tunnel could conflict with an entry point to a future unplanned, or unstudied subway station is speculative. Further, presumably any subway entry point, should it ever be necessary, could be located south of Geary.

The comment that subway systems are superior to BRT systems is noted. The comment does not raise issues regarding the adequacy, accuracy, or completeness of the Draft EIR for the CPMC LRDP.

As noted on Draft EIR page 2-32, the bottom of the proposed pedestrian tunnel would be approximately 25 feet below ground level of Van Ness Avenue. As a point of reference, the top of the Muni Metro subway beneath Market Street is 25 feet below ground level. Similarly, the Central Subway tunnel design, currently under construction, would be 40 feet below ground level at its high point, descending in location to approximately 100 feet below ground level.

3.7.13.4 ORGANIZATION OF DRAFT EIR SECTION 4.5 TRANSPORTATION AND CIRCULATION

Comments

(Gloria Smith—California Nurses Association, October 19, 2010) [90-13 TR]

"The DEIR's structural and organizational flows render the document nearly incomprehensible. For example, the DEIR's Transportation and Circulation chapter is organized by topic such as roadway network, intersection operations, transit operations, bicycle facilities, parking, impact evaluations, and mitigation measures. Discussions of each campus are presented one after the other under the individual topic rather than continuously as a complete discussion of each campus. Such organization makes it extremely difficult and unnecessarily complex to follow the analysis of the individual projects proposed for each of the five campuses. This technique demonstrates nothing more than lazy drafting."

(Gloria Smith—California Nurses Association, October 19, 2010) [92-3 TR]

"Transportation Issues
Section 4.5 of the Draft EIR, Transportation and Circulation, is organized by topic such as roadway network, intersection operations, transit operations, bicycle facilities, parking, impact evaluations, and mitigation measures. Discussions of each campus are presented one after the other under the individual topic rather than continuously as a complete discussion of each campus. This organization of the Draft EIR makes it extremely difficult and unnecessarily complex to follow the analysis of the individual projects for each of the five campuses."

Response TR-128

The comments state that Section 4.5, "Transportation and Circulation" in the Draft EIR is difficult to understand and unnecessarily complex. Because the transportation assessment covers multiple topics, it was determined that the result of the analysis would be best presented by campus, rather than by topic. This organization was intended to make it easier for a reader interested in one particular campus to find the analysis of all modes or circulation issues related to a specific campus in one section rather than having to search for the discussion of a particular campus in each topic section. For example for the proposed Cathedral Hill Campus, traffic impacts are presented in Impacts TR-1 through TR-23, immediately followed by transit impacts (Impacts TR-24 through TR-36), bicycle impacts, etc.

3.7.14 JAPANTOWN

3.7.14.1 ANALYSIS WEST OF CATHEDRAL HILL

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-12 TR, duplicate comment was provided in 30-12 TR]

"If the study areas as represented on these pages go 5 blocks to the east as denoted by the dashed blue lines, there should be at least a study of 5 blocks to the west as well. Geary runs westward so people will try to find a street on the westward side through Japantown. A current traffic count of vehicles in Japantown on Octavia St., Laguna St., Buchanan St., Webster St., Post St., Sutter St., Bush St. and Pine St. (the "Japantown streets" I refer to later) needs to be initiated to see the impact on the residents and businesses in and around Japantown."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-14 TR, duplicate comment was provided in 30-14 TR]

"The Pacific Campus project and the Cathedral Hill/MOB projects, although they will not run concurrently, will run consecutively and will cumulatively impact the Japantown area as well the streets to the east within the blue dashed lines. On Page 4.5-218, the traffic impact on the intersections for the year 2030 is shown as deteriorated and therefore the Japantown streets will also have to be looked at as well as at least the 5 blocks east of Van Ness such as Larkin St., Hyde St., Leavenworth St. and Jones St.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-96 TR, duplicate comment was provided in 30-96 TR]

“53. Volume 3, Section 4.5: TRANSPORTATION AND CIRCULATION:

Page 4.5-1 indicates that 81 intersections over the 4 proposed project locations were studied for transportation impacts. On page 4.5-2, Figure 4.5-1 entitled “Cathedral Hill Campus - Study Area and Project Location” shows a 1/2-mile radius around the campus but the parking study area only extends from Eddy to Pine between Laguna and Hyde. The parking study needs to include the intersections that fall within the 1/2-mile radius so that Webster and Buchanan as well as Leavenworth and Jones between Washington and Fulton are included for cut-through traffic which may occur during construction and after full build-out.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-123c TR, duplicate comment was provided in 30-123 TR]

“People will try to park in Japantown and go to the hospital and take parking spaces in the Japantown garage and on-street in Japantown by people who are not going to help the Japantown businesses.”

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-125 TR, duplicate comment was provided in 30-125 TR]

“67. Per Page 4.5-93, the Cathedral Hill Campus project would result “in an increase of 593 vehicle trips during the a.m. peak hour (598 inbound and 85 outbound trips), and 609 vehicle trips during the p.m. peak hour (42 inbound and 567 outbound trips). On page 4.5-94, Table 4.5-17, and on Page 4.5-95, Table 4.5-18, the tables do not say what the LOS will be on Post or Sutter, e.g., in Japantown would be. The LOS grades are for the 26 intersections on the study but do not analyze the Japantown streets.”

(Bob Hamaguchi—The Japantown BNP Organizing Committee, October 8, 2010) [47-7 TR, duplicate comment was provided in 50-7 TR]

“4) In addition, the DEIR needs to assess whether or not there are potential impacts on Japantown from CPMC’s ongoing operations at all proposed CPMC projects from the issues identified above, especially when considered with the cumulative effects of other planned major projects within or adjacent to the Japantown Planning Area, such as the Geary BRT, Van Ness BRT, and 1481 Post Street.”

(Hiroshi Fukuda, September 23, 2010) [PC-159 TR]

“Public transit is not a good option for many of them, and if they cannot come visit and support Japantown merchants, they will be threatened.”

Response TR-129

The comments state that the Draft EIR fails to adequately analyze the impacts of the proposed CPMC LRDP (specifically, the proposed Cathedral Hill Campus) on Japantown, and that streets and intersections in Japantown should have been included in the traffic impact analysis. Comment 18-96 TR also refers to intersections on Leavenworth and Jones Streets. Intersections in this area were addressed in C&R Responses TR-124 and TR-125, related to traffic through the Tenderloin neighborhood. The 26 study intersections were selected for analysis for the proposed Cathedral Hill Campus project because they would be most likely to experience increases in peak-hour traffic associated with the proposed CPMC LRDP, and because they typically would be congested during peak periods. Franklin Street and Gough Street are major arterials that would serve as the primary north-south routes to the proposed Cathedral Hill Campus. The north-south streets to the west of Gough Street in Japantown are local streets, predominantly with one travel lane in each direction and, in some cases such as Octavia and Buchanan Streets, are not continuous; they would not be expected to serve longer distance traffic from north and south of the campus. Geary, Pine and Bush Streets are the major east-west routes, and intersections on these streets west of Gough Street operate at acceptable levels. Traffic associated with the proposed Cathedral Hill Campus on these east-west streets would be through trips, and because of signal progression on these streets, the additional trips would be accommodated without substantially altering intersection operations.

East of Gough Street, Post Street is one-way eastbound, with two mixed-flow lanes and one bus-only lane. West of Gough Street, Post Street is a local street and serves the Japantown commercial area. Traffic traveling southbound on Gough Street, or northbound on Franklin Street destined for the proposed Cathedral Hill Campus, would turn onto Post Street eastbound, and both of the intersections with Post Street are included in the traffic analysis. Similarly, vehicles leaving the proposed campus via Geary Boulevard and destined to the north would turn onto Franklin Street northbound, and this intersection is included in the traffic analysis. Because left turns are not permitted from Geary Boulevard westbound onto Gough Street southbound, vehicles destined to the south would travel on Van Ness Avenue or would access Gough Street north or south of Geary Boulevard.

During the a.m. peak hour, the transportation analysis assumed that the proposed Cathedral Hill Campus project would add 12 eastbound through vehicles on Post Street at the approach to Gough Street, and one westbound through vehicle on Sutter Street at the approach to Gough Street. During the p.m. peak hour, there would be two eastbound through vehicles on Post Street at the approach to Gough Street, and 11 westbound through vehicles on Sutter Street at the approach to Gough Street. During both the a.m. and p.m. peak hour, with the proposed Cathedral Hill Campus project increases in eastbound and westbound volumes (as well as southbound volumes on Gough Street), the intersections of Gough/Post and Gough/Sutter would continue to operate at LOS C or better under both 2015 Modified Baseline and 2030 Cumulative conditions. West of Gough Street, the project-generated vehicles would be more dispersed, and the nominal increase in project vehicle trips would not substantially alter intersection operating conditions. Based on the low number of project vehicle trips that would travel on streets within Japantown, additional analysis of intersections within Japantown is, therefore, not warranted.

The Japan Center Garage, containing 920 parking spaces, is a public parking garage owned by the City of San Francisco, open for all users. Because it is located about one-half mile from the proposed Cathedral Hill Campus, it is very unlikely that patients and visitors would park at the Japan Center Garage and walk or take the shuttle to the campus. Instead, visitors would likely park within the on-site parking garages at the proposed Cathedral Hill Hospital and MOB. These garages would provide a total of 620 spaces for visitors, 347 spaces for staff, and 260 spaces for physicians. As indicated in Table 4.5-34 on page 4.5-164 of the Draft EIR, the proposed Cathedral Hill Campus would experience a shortfall of 163 spaces, primarily because of a shortfall in employee parking spaces. Employees would likely continue to park at the Japan Center Garage, primarily during the daytime shift.

Visitors unable to find parking within the proposed hospital and MOB garages would likely park in any available on-street parking spaces around the campus, although some visitors might also choose to take public transit, use a bicycle, or walk instead of driving. Employees who were unable to find parking at the campus could take public transit, use a bicycle, or walk to the campus, or park off-site at the Japan Center Garage. CPMC has held a lease at the Japan Center Garage for 400 spaces for the past 6 years and has a lease through 2015. It can be presumed that the lease would be extended beyond 2015, and that employees would continue to park at the Japan Center Garage.

The loading facilities for the proposed Cathedral Hill Hospital on Franklin Street, ambulances, or the shuttle service are not anticipated to substantially affect operations on streets in Japantown. As noted above, multi-lane arterials in the immediate vicinity of the proposed Cathedral Hill Campus would be used to access the campus. CPMC shuttles currently travel to the Japan Center Garage, and operations would not change substantially from existing conditions. See Responses TR-90, TR-92, and TR-93 (pages C&R 3.7-158 through 3.7-161) regarding service loading.

CPMC's ongoing operations are included in the description of existing conditions, and CEQA does not require mitigation for impacts of existing operations that are part of the environmental baseline. The combined impacts associated with the development at multiple campuses under the proposed CPMC LRDP are presented for traffic, transit, shuttle service, and construction impacts on pages 4.5-211 and 4.5-212 in the Draft EIR. The combined impacts of overlapping construction activities and project travel demand on traffic and transit conditions were determined to be less than significant.

Future year 2030 cumulative impacts of the proposed CPMC LRDP for traffic, transit, and construction impacts are presented on pages 4.5-215 through 4.5-247 in the Draft EIR (the proposed Cathedral Hill Campus impacts are presented on pages 4.5-215 through 4.5-232 in the Draft EIR). The approach to the impact analysis, including the transportation improvements assumed for cumulative conditions, is presented on pages 4.5-55 through 4.5-86 in the Draft EIR.

3.7.14.2 CONSTRUCTION

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-97 TR, duplicate comment was provided in 30-97 TR]

"It should be noted that transportation and circulation will be impacted on the Japantown streets due to the one-way configuration of the streets around the Cathedral Hill project which also includes the MOB project and the pedestrian tunnel.

Another important note is that the Japantown streets will be impacted twice because of the Pacific Campus construction that is part of the long-term project list. I believe that because Japantown is within the ½ -mile radius of both projects and sits within both areas of the project radii, that Japantown will be cumulatively impacted. I thought cumulative impacts were a CEQA item and needed to be mitigated.

When the Pacific Campus project is done sequentially to the Cathedral Hill project, Japantown streets are impacted for a longer duration. The Cathedral Hill project (all levels) is estimated to go from 2011 through mid-2015 per Page 2.5, Table 2-1. Then the Pacific Campus project starts with renovations from the beginning of 2015 through 2019. In effect, the Japantown streets will be impacted to varying degrees from 2011 through 2019, a total of 9 years straight or possibly even up to 10 years per Page 4.7-29, "Near-Term Projects - Cathedral Hill, Davies, and St. Luke's Campuses." When the smaller residential streets in Japantown get clogged, such as Laguna, traffic will try to find alternate routes to avoid the congestion that was discussed earlier to be at a very bad level of service for transit and for congestion."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-98 TR, duplicate comment was provided in 30-98 TR]

"Furthermore, with the Van Ness BRT construction anticipated to be running by 2014 (Page 4.5-67), the construction of that project would impact the streets of Japantown. Consecutively to the Van Ness BRT, SFMTA will begin the Geary BRT construction and it is anticipated to be running by 2015-2016 (Page 4.5-67). The Geary BRT project occurring simultaneously with the Cathedral Hill Campus and Pacific Campus projects will further impact negatively the streets of Japantown. With the Van Ness BRT project coinciding with the CPMC project at Cathedral Hill and the Geary BRT following the Van Ness BRT project and also coinciding with the CPMC Cathedral Hill project, Japantown and the streets even a mile away from the construction sites will have very bad congestion problems. This will hurt the Japan Center area as well as traffic circling in surrounding streets. So there needs to be a study of the transportation and circulation impacts on the Japantown streets and how they are impacted from not only Cathedral Hill but also the Pacific campus and both the Van Ness and Geary BRT projects as that analysis is not in this DEIR."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-123b TR, duplicate comment was provided in 30-123 TR]

"This is going against the City's General Plan. The Plan says to keep the vehicle traffic on the major corridors but since during construction the corridors will be blocked up, people will go to the smaller arterial streets with negative impacts."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-135 TR, duplicate comment was provided in 30-135 TR]

"73. On Page 4.5-156, "Van Ness Avenue Tunnel Construction" is discussed. Since Post and Van Ness will also be affected during the tunnel construction, and if Post is turned into a 2-way street, Japantown may end up taking much of the traffic. There needs to be a mitigation measure for the Japantown street intersections between Geary and Pine. Even the analysis provided takes into consideration only the pm; hours of a mid-day of the week. I think the analysis for the streets already studied should also be done for a whole week rather than just one day mid-week. The sample week should be a week without a holiday in it and the study should go for a whole week."

(Bob Hamaguchi—Japantown BNP Organizing Committee, October 8, 2010) [47-5 TR, duplicate comment was provided in 50-5 TR]

"2) Japantown is a regional attraction, with many if not most Greater Bay Area residents driving to Japantown. The Cathedral Hill project introduces a significant bottleneck in the standard routes to Japantown, whether arriving from the East Bay or the Peninsula. The project calls for significant construction during evenings and on Saturdays - peak times and seasons for visits to Japantown, and hence peak revenue periods. Traffic and parking problems that discourage visitors have a direct impact on the revenues, and hence the viability, of this cultural and historic resource. This potential threat to Japantown's survival is not even considered in the DEIR. This requires analysis, and appropriate mitigations."

(Caryl Ito—Japantown Task Force, October 18, 2010) [70-1 TR]

"I am sending this email as a VP for the Japantown Task Force, whose mission is to preserve, and promote the cultural, historical and economic vitality of the oldest Japantown in this USA. I fully support the comments sent in my the Better Neighborhood Planning Committee.

I have been involved in this preservation process of our Japantown for over 10 years and wish to state that the CPMC EIR does not adequately address the parking/traffic impacts of their construction phase as well as when they actually open for business. Yes they are on a major transit corridor but there are many patients, employees and others who will need parking and the plans are Inadequate.

This will impact parking resources in the nearby Japantown garage and street parking and thus, impact the accessibility for the commercial areas general everyday patronage. The economic vitality of this vital 100 plus year old community will be severely impacted negatively unless these issues are addressed/amended in the plan."

Response TR-130

The comments state concerns regarding impacts during construction of the proposed Cathedral Hill and Pacific Campuses and suggest that cumulative construction impacts are not adequately analyzed. Impact TR-55, presented on pages 4.5-147 to 4.5-160 in the Draft EIR, provides the assessment of impacts associated with construction of the proposed Cathedral Hill Campus. Because of the magnitude of the proposed LRDP, and the duration of the construction period, the project's transportation-related construction impacts were found to be significant and unavoidable. Mitigation Measure MM-TR-55 on page 4.5-159 in the Draft EIR, development and implementation of a Construction Transportation Management Plan, would minimize impacts of various construction activities, but not to a less-than-significant level.

In general, construction impacts would be most noticeable in the immediate vicinity of the proposed hospital and MOB. Figure 4.5-22, “Cathedral Hill Campus—Construction Activity Summary” on page 4.5-149 in the Draft EIR, presents the sideway and travel lane closures as well as the truck routes to and from the sites. Trucks would arrive to the site from regional freeways and from within San Francisco via Van Ness Avenue northbound (rather than local streets such as Laguna Street), to Geary Boulevard or to Cedar Street, and would also leave the sites via Van Ness Avenue. Construction trucks would not travel through Japantown to access the project sites.

Impact TR-152 on page 4.5-247 of the Draft EIR presents the assessment of cumulative transportation-related construction impacts. The overlapping construction activities would increase the number of construction worker vehicles and trucks traveling to and from the vicinity of the proposed Cathedral Hill Campus. In addition, implementation of the BRT improvements on Van Ness Avenue would require travel lane closures that would temporarily and permanently affect roadway capacity. These impacts would be evaluated as part of the ongoing environmental review for the BRT projects. Impacts TR-95 through TR-98 on pages 4.5-211 to 4.5-215 of the Draft EIR present the assessment of the combined impacts associated with multiple campuses under the proposed CPMC LRDP related to traffic, transit, shuttle service, and construction activities. The combined impacts were determined to be less than significant, including those related to construction activities at the Cathedral Hill Campus and the Pacific Campus. Although the Pacific Campus and Cathedral Hill Campus are in relatively close proximity and would share some of the same construction vehicle access routes such as Geary Street and Van Ness Avenue, the construction schedules of work at these two campuses would not overlap; namely, the construction at the Pacific Campus would not begin until construction at the Cathedral Hill Campus was completed. Neither campus would share construction staging areas or have concurrent sidewalk or travel lane closures.

Implementation of Mitigation Measure TR-55 would minimize impacts associated with the proposed Cathedral Hill Campus project and reduce the project’s contributions to cumulative impacts in overlapping areas. However, given the magnitude of these projects, some disruption and increased delays would still occur, even with implementation of the mitigation measure, and it is possible that temporary, but significant construction-related transportation impacts on roadways in the vicinity of the proposed Cathedral Hill Campus would still occur. As noted above, the majority of impacts associated with the construction activity would be localized to the immediate vicinity of the proposed hospital and MOB sites; however, some diversion of vehicles could be anticipated to occur to other arterials, such as Pine Street, Bush Street, and Franklin Street. Through traffic using Geary Boulevard and Van Ness Avenue would not be anticipated to divert to local streets.

The localized congestion associated with temporary construction activities and potential diversion of vehicles to other corridors would not be considered to conflict with General Plan policies.

In San Francisco, traffic volume counts for an EIR analysis are typically conducted for a 1-day period and also are based on 2-hour counts to identify the peak hour. Intersection turning movement traffic volume counts are not conducted over a 7-day period for EIRs in San Francisco, but they could be if warranted for unusual conditions (such as at locations where, because of adjacent land uses, traffic volumes vary significantly from day to day); however, such conditions do not apply to the proposed LRDP. For further discussion of the logic behind using peak hour traffic counts see Response TR-10 (page C&R 3.7-26). Traffic volumes during the p.m. peak hour, the hour of analysis, vary throughout the week but are generally greatest and consistent midweek—Tuesday, Wednesday, Thursday—on the days that the SF Guidelines recommend that traffic counts be conducted for p.m. peak-hour analyses. The traffic volume counts are reviewed to ensure conservation of flow between adjacent intersections. Traffic volume counts conducted for the proposed LRDP were reviewed and determined adequate for the analysis by the San Francisco Planning Department.

3.7.14.3 REVOCABLE DRIVEWAYS

Comments

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-121 TR, duplicate comment was provided in 30-121 TR]

"65. Page 4.5-87 states that the 'Geary Boulevard parking garage curb cut permit would be revocable, and this condition would be recorded as a Special Restriction on the deed of the Hospital.' If the Geary Boulevard parking garage curb cut is revoked, all traffic to the hospital for drop off of visitors will be on the Post Street side. Post Street is one-way eastbound (inbound to downtown). For people to get to Post Street, they will cut through Japantown due to the traffic patterns in the area. See Figure 2-4 on Page 2-53 for the "Cathedral Hill Campus - Proposed Site Plan" which shows traffic directions around the Hospital but not the Japantown streets immediately adjacent to these streets. If or when Post Street is turned into a two-way street, there will be traffic congestion on the Post Street side. This will add to the congestion and air quality in this area. Again, this DEIR does not study the impacts on Japantown and it should."

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-122 TR, duplicate comment was provided in 30-122 TR]

"66. On Page 2-53, one also sees a potential traffic obstruction point at the Geary St. Parking Entrance of the MOB. On Page 2-101, Figure 2-37, the curb cut is shown with 3 lanes on Geary, the lane closest being the 'diamond bus only' lane. Figure 2-37 does not show the proposed Geary BRT lane. This BRT lane will be closest to the Hospital. If people are walking on the sidewalk by this curb cut, the vehicular traffic will have to stop for the buses and the pedestrians, potentially causing a traffic jam that could leave only one lane of westbound traffic moving because a second lane next to the BRT lane will have traffic stopped for the conflict. Not only would this curb cut be almost as bad as the one at the Hospital Geary Boulevard revocable curb-cut but this cut at the MOB will have traffic flowing out of it which will not be for emergency exits only. So with the additional vehicular traffic in and out of this opening, one may think that this cut would also be revocable; however, the traffic patterns will shift to Post Street if that is done and, again, the Japantown streets will likely see cut-through traffic. Polk Street will also see cut-through traffic due to the surrounding one-way streets in the area. And with the added off-street Loading Facility and Emergency Department, with ambulances using the Post Street entrance, it is likely that Post Street in the Japantown shopping area will become congested. The CPMC shuttles will also be using the Post Street driveway."

Response TR-131

The comments state concerns regarding impacts on Japantown in the event that the proposed Cathedral Hill Hospital's Geary Boulevard Parking Garage curb cut is revoked and vehicular access to the proposed Cathedral Hill Hospital garage would be provided only from Post Street. In addition, the comment notes that a similar situation would occur if the MOB's Geary Street parking curb cut was revoked.

The proposed Cathedral Hill Hospital is designed to allow for ingress-only on Geary Boulevard, and ingress and egress on Post Street. In the event that the Geary Boulevard driveway permit was revoked and access into the garage via Geary Boulevard was no longer permitted, traffic would need to access the garage via Post Street. For vehicles accessing the site from the east or from northbound or southbound Van Ness Avenue via Geary Boulevard, drivers would continue to Franklin Street northbound, to Post Street eastbound to access the site. Access from Franklin Street northbound, Gough Street southbound via Post Street would remain unchanged. If the driveway permit was revoked, the number of vehicles on Post

Street between Franklin Street and Van Ness Avenue and at the intersections of Geary/Franklin and Post/Franklin would increase; however, traffic volumes at intersections further away would remain similar to those analyzed for the proposed Cathedral Hill Campus project in the Draft EIR. An increase in traffic on streets in Japantown (i.e., on streets west of Gough Street) would not occur.[31]

A discussion of the revocable nature of the driveway/curb cut can be found in Response TR-80, page C&R 3.7-149. The proposed Cathedral Hill MOB Parking Garage entrance on Geary Street would be inbound only; all vehicles exiting the garage would exit onto Cedar Street. The traffic impact analysis of driveway operations did not indicate that entering vehicles would result in queues on Geary Street, nor would Geary Street operations be reduced to one westbound lane. If the Geary Street driveway was closed, drivers destined to the MOB garage would drive around the block (continue on Geary Street westbound to Van Ness Avenue northbound, to Cedar Street eastbound) to the Cedar Street entrance. Neither Post Street nor any streets in Japantown would be affected by closure of the Geary Street driveway, as the closure would only affect the streets directly adjacent to the MOB (i.e., Cedar Street, Polk Street, Geary Street, and Van Ness Avenue). As indicated in the transportation analysis, Polk Street would serve traffic generated by the proposed Cathedral Hill Campus, and impacts are discussed in Section 4.5, "Transportation and Circulation" in the Draft EIR.

3.7.14.4 POST STREET VARIANT

Comment

(Rose Hillson—Member, Jordan Park Improvement Association, September 23, 2010) [18-123a TR, duplicate comment was provided in 30-123 TR]

"When the shuttles start to stack up along with the vehicular traffic, ambulance traffic and the 38/38L-Geary buses in the BRT lane and the vehicles waiting to get in on the Geary Street side, one will get congestion on both Geary and Post. The 'Two-way Post Street Variant,' described on Page 4.5-89, may exacerbate the cut-through traffic if people are allowed to go into Japantown westbound on Post Street."

Response TR-132

The comment states concerns regarding operations on Geary Street and Post Street under the proposed Cathedral Hill Campus Project and the Two-Way Post Street Variant. Potential queuing of vehicles onto Geary Street from the Cathedral Hill Hospital garage under the proposed project is addressed in Response TR-88 (page C&R 3.7-156). Under the Two-Way Post Street Variant, Post Street between Van Ness Avenue and Gough Street would be revised from one-way eastbound to two-way operations. For vehicles exiting the site and destined to the north or south, drivers would be able to travel westbound on Post Street, and would turn on either Franklin Street to go northbound or to Gough Street to go southbound. Drivers destined to the west would be able to travel westbound on Post Street to Gough Street, turn left onto Gough Street, and then right onto Geary Boulevard westbound. Alternatively, drivers headed westbound could turn right onto Post Street, right onto Van Ness Avenue, and then right onto Geary Boulevard.

With the exception of local trips destined to Japantown, which would be facilitated under the Two-Way Post Street Variant, drivers would be unlikely to use Japantown streets to access their destinations. Under the Two-Way Post Street Variant, the number of vehicles on Post Street between Gough Street and Van Ness Avenue would increase; however, traffic volumes at intersections further away would remain similar to those analyzed for the proposed Cathedral Hill Campus project in the Draft EIR. An increase in traffic

[31] Fehr & Peers. 2011 (March 31). Technical Memorandum. Cathedral Hill Campus Revocable Driveways on Geary Street/Boulevard. This information is on file with the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, and is available for public review as part of the project file, in Case No. 2005.0555E.

on streets in Japantown (i.e., on streets west of Gough Street) is not anticipated. Similar to the Two-Way Post Street Variant, the proposed project and the MOB Access Variant would be unlikely to increase traffic on streets in Japantown. In fact, because Post Street would remain one-way eastbound in both scenarios, the likelihood of any increase in traffic in Japantown will be even less.

Under the Two-Way Post Street Variant, shuttles would continue to stop within the recessed passenger loading bay on Post Street west of Van Ness Avenue, and shuttles would not be anticipated to conflict with the operation of the adjacent travel lane. The Two-Way Post Street Variant would result in additional intersection impact at Gough Street/Geary Boulevard that is further described in Response TR-47 (page C&R 3.7-71).

JEWISH COMMUNITY CENTER (JCC) TRANSPORTATION STUDY

This report evaluates the existing transportation conditions and potential transportation impacts associated with the development of the Jewish Community Center (herein referred to as the "proposed project") in the City of San Francisco. The following transportation elements are addressed in this study:

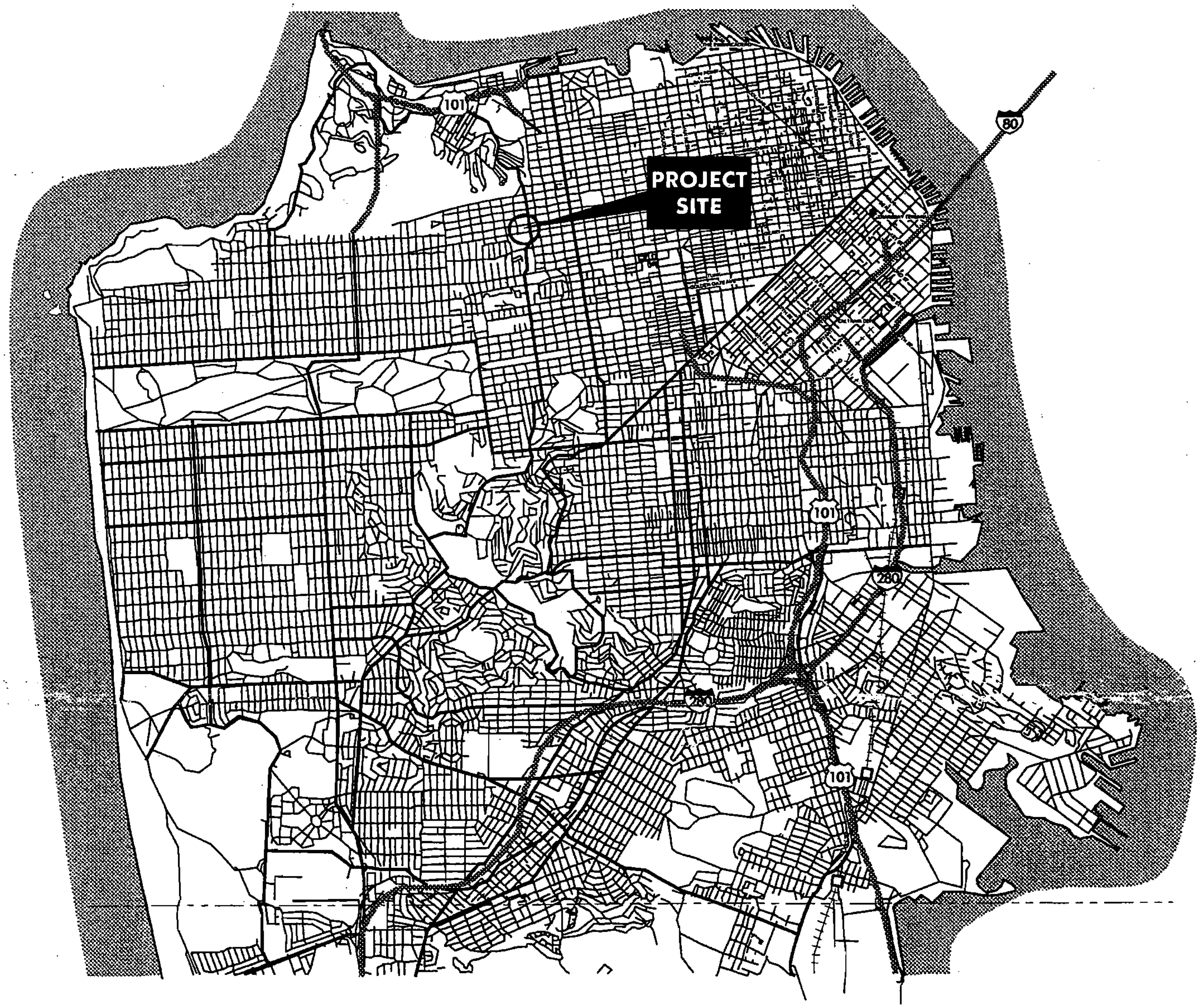
- Circulation impacts, in terms of intersection Level of Service (LOS)
- Parking supply, requirements, and demand conditions
- Transit impacts
- Pedestrian impacts
- Bicycle impacts
- Loading activities
- Construction impacts

The transportation analysis was conducted in accordance with the City of San Francisco's *Interim Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)*, January 2000. In addition, this study used data from the *JCCSF Transportation Survey Report* (prepared by Wilbur Smith Associates in June 1999), as approved by the San Francisco Planning Department.

The 1999 *JCCSF Transportation Survey Report* provided an overview of existing visitor activity at the JCC. Person counts were taken at the main facility entrance during operating hours (5:30 AM to 10:00 PM) and at other related service locations between 8:00 AM and 6:00 PM. Vehicle activity related to the facility was observed and recorded at two locations on California Street: curbside drop-off and pick-up activity at the main facility entrance, and activity at the drive-through entrance. In addition, a survey of visitors and employees was conducted to collect information related to travel characteristics, parking activity and trip origin.

1.1 PROJECT DESCRIPTION

The proposed project site is located at 3200 California Street, just west of Presidio Avenue. The project site is on the southeast portion of the block bounded by California Street to the south, Presidio Avenue to the east, Sacramento Street to the north, and Walnut Street to the west, as shown in Figures 1-1 and 1-4. The project site is approximately 52,460 square feet and occupies Lots 5, 6, 24, 25, 28, 29 and 31-37 in Assessors Block 1021. The project site is split-zoned. It is primarily in an RM-1 (Residential, Mixed, Low Density) Use District (along California Street), while the northeastern portion of the project site (along Presidio Avenue) is in the Sacramento



WSA WILBUR SMITH ASSOCIATES

Figure 1-1
PROJECT LOCATION

349740\LOCATION- 3/21/2000

Street Neighborhood Commercial District (NCD). The City of San Francisco Planning Department Major Environmental Analysis case file number for this project is 1999.812!.

The site is currently occupied by the existing two-to-four story Jewish Community Center building and adjacent buildings, totaling approximately 86,800 square feet. The JCC provides a wide variety of community, recreation and education services and programs, including: early childhood education; after-school daycare; day camp; teen programs; adult education; senior programs; émigré services; arts, crafts, music, and dance classes; and other cultural and social programs. The existing JCC building also contains a gymnasium and Pinnacle Fitness center. A total of seven parking spaces are provided on the existing site in connection with the condominium building at 3266 California Street.

The proposed project would demolish the existing JCC and the four other structures on the project site for the construction of a three-story community center building containing approximately 130,700 square feet[1] of program area. The new building would accommodate JCC community, recreational and educational uses which would be generally a continuation of its current programs. New or expanded space would include a theater/auditorium, additional meeting rooms and classrooms, a restaurant and a retail store. The fitness and recreation facilities would be expanded to contain a lap pool, recreational pool and new workout areas.

The project would include parking in a garage below the new building providing 181 spaces, including 151 individually accessible spaces and 30 tandem spaces.[2] The JCC would use the tandem spaces in conjunction with a garage operator, or reserve them for employee use. In general, parking would be designated for visitors and employees to the JCC site, but would be open to the general public should excess capacity be available (upon operation of the facility). There would be a charge for visitor parking.[3] The garage would also include one van-size loading space, and at least nine bicycle parking spaces. Underground parking would be located on three levels (LL1-LL3), totaling approximately 93,300 gross square feet. Access from each parking garage level to the building would be provided via an elevator to the first (ground) floor.

Figures 1-2 and 1-3 present ground-floor and second-floor plans for the proposed project (the complete set of plans is included in Appendix A). A new driveway on California Street at the west end of the proposed building would provide the only access to vehicles entering and exiting the underground parking garage (Figure 1-2). The new driveway would be located immediately east of an existing driveway on California Street, which serves as the entrance point to a drive-through drop-off for the Early Childhood Education (ECE) program, exiting on Walnut Street (Figure 1-3). The existing drive-through drop-off access would be retained, and the garage would provide an alternative ECE drop-off, allowing parents to park underground and escort children (via elevator) directly to the ECE program space.

[1] Total gross square footage (including mechanical and utility space).
[2] The 30 tandem spaces could also be converted to provide an additional 15 (total) independently accessible parking spaces.
[3] No fee is planned to be charged for short-term use. The period of free use has not yet been determined by the Project Sponsor.

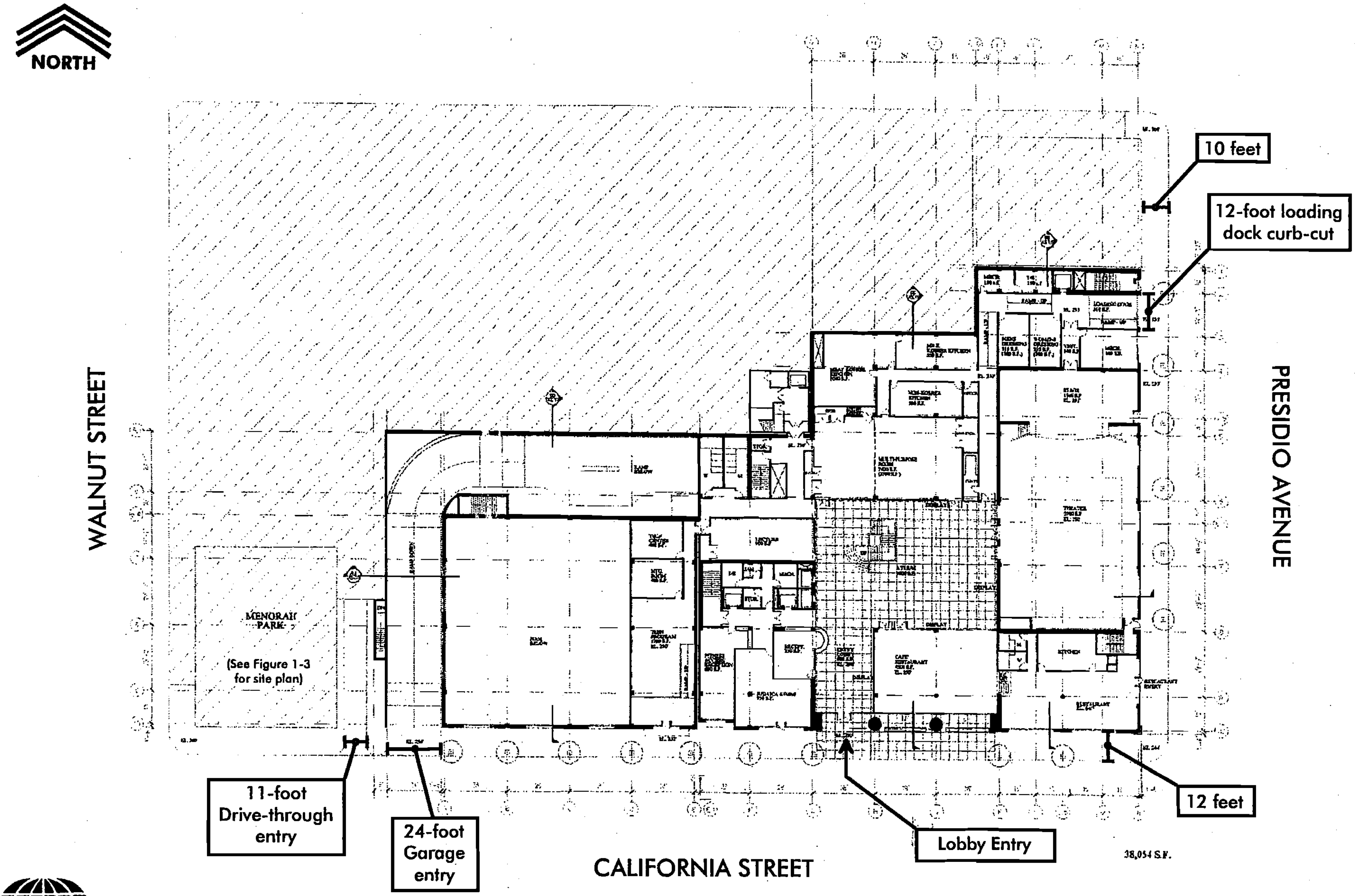


Figure 1-2
SITE PLAN, GROUND FLOOR

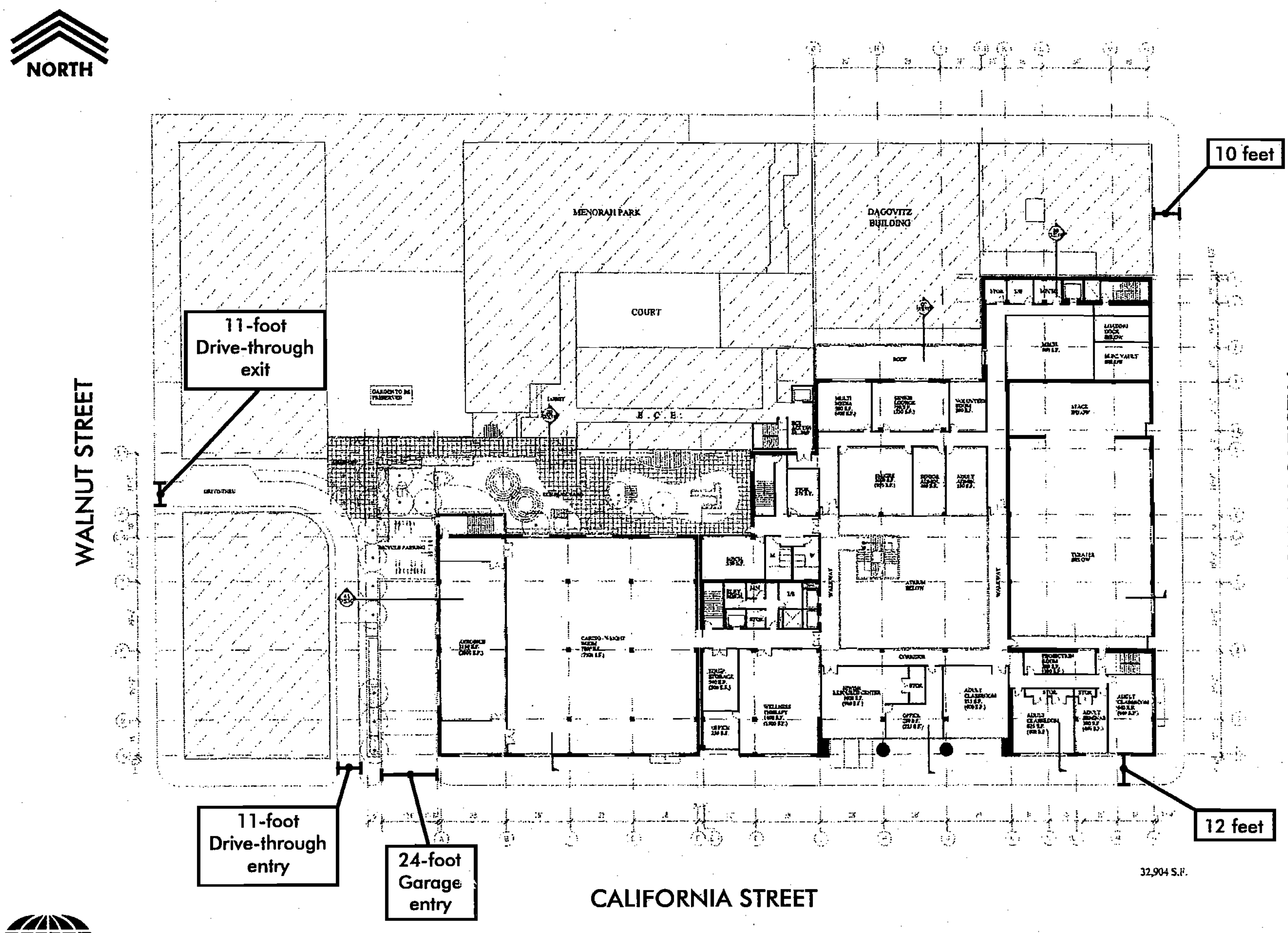


Figure 1-3
SITE PLAN, SECOND FLOOR

349740\SPSecond- 5/18/2000

Primary pedestrian access to the proposed project would be provided via an entrance and lobby on California Street. Additional entry to the proposed ground floor restaurant would be provided from Presidio Avenue.

Off-street loading for delivery vans and trucks would occur via a loading dock on Presidio Avenue, at the north end of the project site. The loading dock entrance would be located approximately 23 feet north of the existing MUNI bus zone on Presidio Avenue. The loading space would be 34 feet long and 14 feet wide with a 14-foot vertical clearance, and would accommodate the majority of truck deliveries to the proposed project. The loading space would also include an internal elevator connection to the building. Garbage facilities would be located within the building on LL1, and accessed through the loading dock on Presidio Avenue (using a service elevator).

1.2 Study Scope and Approach

This transportation study was prepared according to the scope of work approved by the City and County of San Francisco Planning Department on March 29, 2000 (see Appendix B). For the analysis of the Proposed Project, the following transportation scenarios were examined in this study.

- Existing Conditions
- Existing plus Project Conditions
- 2010 Cumulative Conditions

The following seven intersections in the vicinity of the project site, as illustrated in Figure 1-4, were analyzed for intersection Level of Service (LOS) during the weekday PM peak hour (generally between 5:00 to 6:00 PM):

- Sacramento Street / Presidio Avenue
- Sacramento Street / Walnut Street
- California Street / Presidio Avenue
- California Street / Walnut Street
- California Street / Laurel Street
- Pine Street / Presidio Avenue
- Masonic Avenue / Geary Boulevard

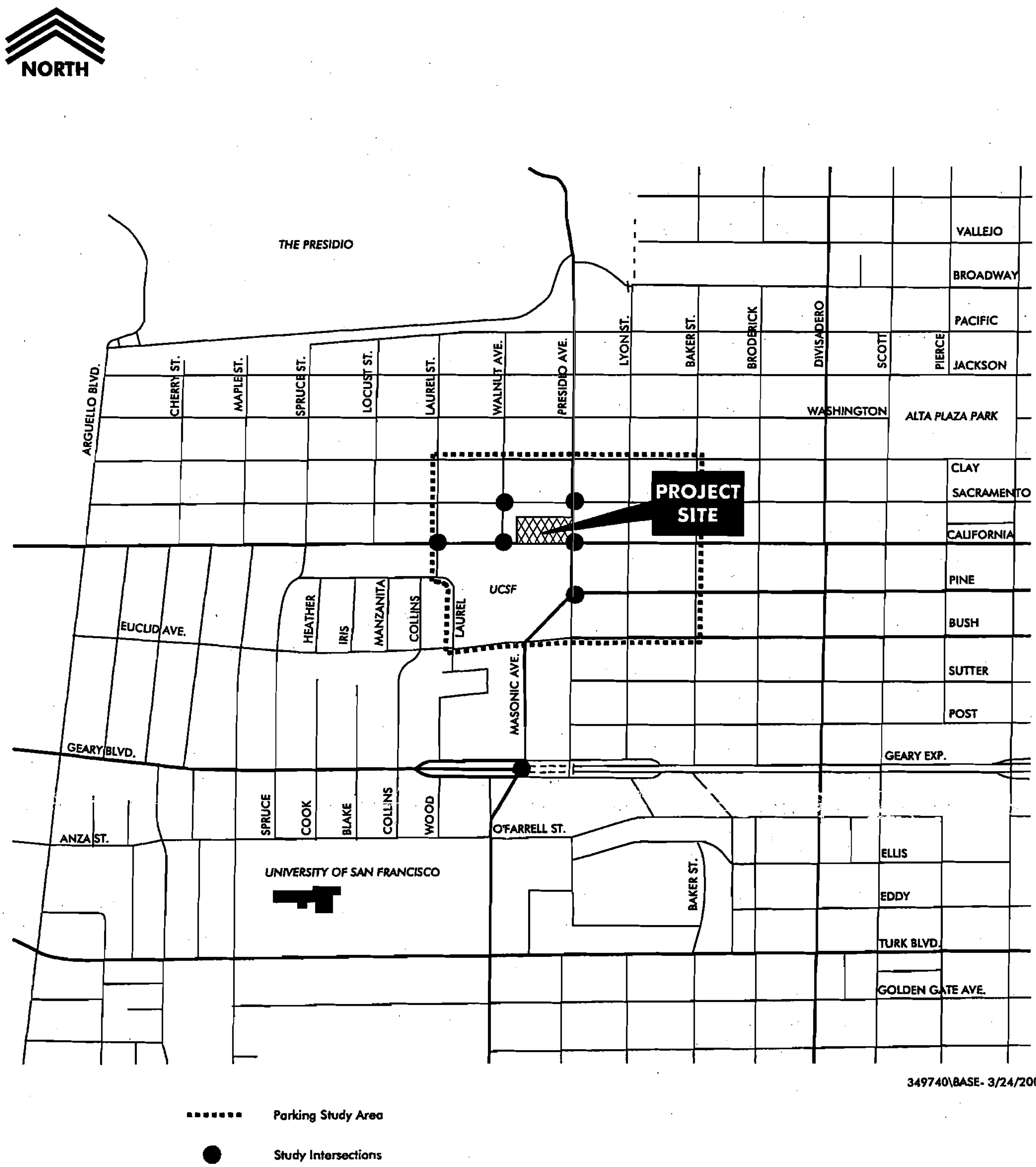


Figure 1-4
ANALYSIS LOCATIONS

Chapter 2
SETTING

This chapter provides a description of the existing transportation conditions in the vicinity of the Proposed Project. Included in this chapter are descriptions of the existing roadway traffic, transit, parking, loading, pedestrian and bicycle conditions within the vicinity of the project site. The study area is generally bounded by Clay Street to the north, Baker Street to the east, Bush Street to the south and Laurel Street to the west.

2.1 Study Area Roadways

Regional access to the vicinity of the site is provided by U.S. Highway 101 and I-80:

- **U.S. Highway 101:** U.S. 101 is a north-south freeway that provides regional access from San Francisco south to the Peninsula and beyond, and north across the Golden Gate Bridge to Marin County and beyond. U.S. 101 also connects with I-80 as it approaches the Bay Bridge.

  Traveling from the Peninsula, the most convenient access from U.S. 101 to the project site is via an off-ramp on Fell Street (at Laguna). Traveling to the Peninsula, the most convenient access to U.S. 101 from the project site is via an on-ramp on South Van Ness (at Duboce Avenue). Travel in either direction is possible via Divisadero Street or Masonic Avenue, major arterials which provide a convenient north-south connection to and from California Street and the project site.

  Traveling to and from Marin County (and beyond), the most convenient access to and from U.S. 101 and the project site is via Park Presidio Boulevard, to California Street.

- **Interstate 80 (I-80):** I-80 is an east-west freeway providing regional access between San Francisco and the East Bay. I-80 connects with U.S. 101 travelling west from the Bay Bridge, and can be most easily accessed from the project area via U.S. 101, using the Fell Street and South Van Ness Avenue off- and on-ramps listed above

A description of the existing roadway system in the vicinity of the project is given below:

- **California Street:** California Street is an east-west arterial, extending from Market Street (Downtown San Francisco) to Lincoln Park. Near the project site, it is a two-way roadway, with four travel lanes and metered and unmetered parking on both sides of the street. In the Transportation Element of the *General Plan*, California Street is designated as a Secondary Arterial between Van Ness and 29th Avenues. It is designated as a Primary Transit Preferential Street west of Presidio Avenue, and as a Secondary Transit Preferential Street east of Presidio Avenue. California Street is also designated as a Pedestrian Neighborhood Commercial Street west of Baker Street and east of Fillmore Street.

  Metered parking is located adjacent to the project site, and the sidewalk is approximately 12-feet wide. Four curb zones exist on California Street adjacent to the project site, including a 100-foot bus stop. Vehicular access to the existing site is provided via a one-way drive-through entrance on California Street at the western edge of the project site (exiting on Walnut Street). The single lane driveway is typically used for pick-up and drop-off for the ECE and HYC daycare programs, and can accommodate approximately 10 stacked vehicles.

- **Presidio Avenue:** Presidio Avenue is a north-south street which extends through The Presidio to Geary Boulevard. North of Sacramento Street, it is a two-way roadway with one travel lane in each direction and unmetered parking on each side of the street; south of Sacramento Street, it is typically a two-way roadway, with four travel lanes and metered and unmetered parking on both sides of the street. Between California Street and Geary Boulevard, Presidio Avenue is designated as a Primary Transit Preferential Street and Pedestrian Neighborhood Commercial Street. Through The Presidio to Geary Boulevard, Presidio Avenue is designated as part of the citywide bicycle route network (Route #55, Class III). On the block adjacent to the project site, Presidio Avenue has two southbound and only one northbound lane. One-hour metered parking is provided, and the sidewalk is approximately 10-feet wide. A 160-foot bus zone is located on Presidio Avenue adjacent to the project site.

- **Sacramento Street:** Sacramento Street is an east-west street which extends from The Embarcadero to Arguello Boulevard. Near the project site, it is a two-way roadway, with one travel lane in each direction and metered parking on both sides of the street. Sacramento Street is designated as a Pedestrian Neighborhood Commercial Street west of Lyon Street. In the vicinity of the project site, one-hour metered parking is provided and the sidewalk is approximately 12-feet wide.

- **Walnut Street:** Walnut Street is a north-south street, extending from Pacific Avenue to California Street. Near the project site, it is a two-way roadway, with one travel lane in each direction and two-hour unmetered parking on both sides of the street. On the project block, unmetered parking is provided and the sidewalk is approximately 12 feet wide. Walnut Street provides vehicular egress for a drive-through that enters the site from California Street.

- **Pine Street:** Pine Street is a westbound arterial which extends from Market Street (Downtown San Francisco) to Presidio Avenue. It is a one-way roadway, with three travel lanes and metered and unmetered parking on both sides of the street. From Market Street to Presidio Avenue, Pine Street is designated as a Major Arterial in the San Francisco County Congestion Management Program (CMP) network, and as a Freight Traffic Route. In the vicinity of the project site, two-hour unmetered parking is provided, and the sidewalk is approximately nine feet wide.

- **Masonic Avenue:** Masonic Avenue is a southbound arterial, extending from Pine Street to Frederick Street. Between Pine Street and Euclid Street, Masonic Avenue is a one-way roadway, with three travel lanes and unmetered parking on both sides of the street; south of Euclid Street, it is a two-way roadway, with two travel lanes in each direction and unmetered parking on both sides of the street. Masonic Avenue is designated as a Major Arterial in the CMP network and a Freight Traffic Route from Pine Street to Oak Street, and as CMP secondary arterial from Oak Street to Frederick Street. From Geary Boulevard to Oak Street, Masonic Avenue is designated as part of the citywide bicycle route network (Route #55, Class III). In the vicinity of the project site, unmetered (unregulated) parking is provided, and the sidewalk is approximately nine feet wide.

- **Geary Boulevard:** Geary Boulevard is an east-west arterial, extending from Market Street (Downtown San Francisco) to Sutro Heights Park (48th Avenue). It is a primarily a two-way roadway, with three travel lanes in each direction and metered and unmetered parking on both sides of the street. In the vicinity of the project site (from Gough to Wood Streets), Geary becomes a split-level roadway, incorporating a depressed, limited-access expressway (with two travel lanes in each direction and no on-street parking) with above-ground travel lanes. In the Transportation Element of the *General Plan*, the entire length of Geary Boulevard is designated as a Major Arterial in the CMP network, a Freight Traffic Route, a Primary Transit Preferential Street and a Pedestrian Neighborhood Commercial Street. In the vicinity of the project site, the grade-level roadway has two-hour unmetered parking, and the sidewalk is approximately 6 to 9-feet wide.

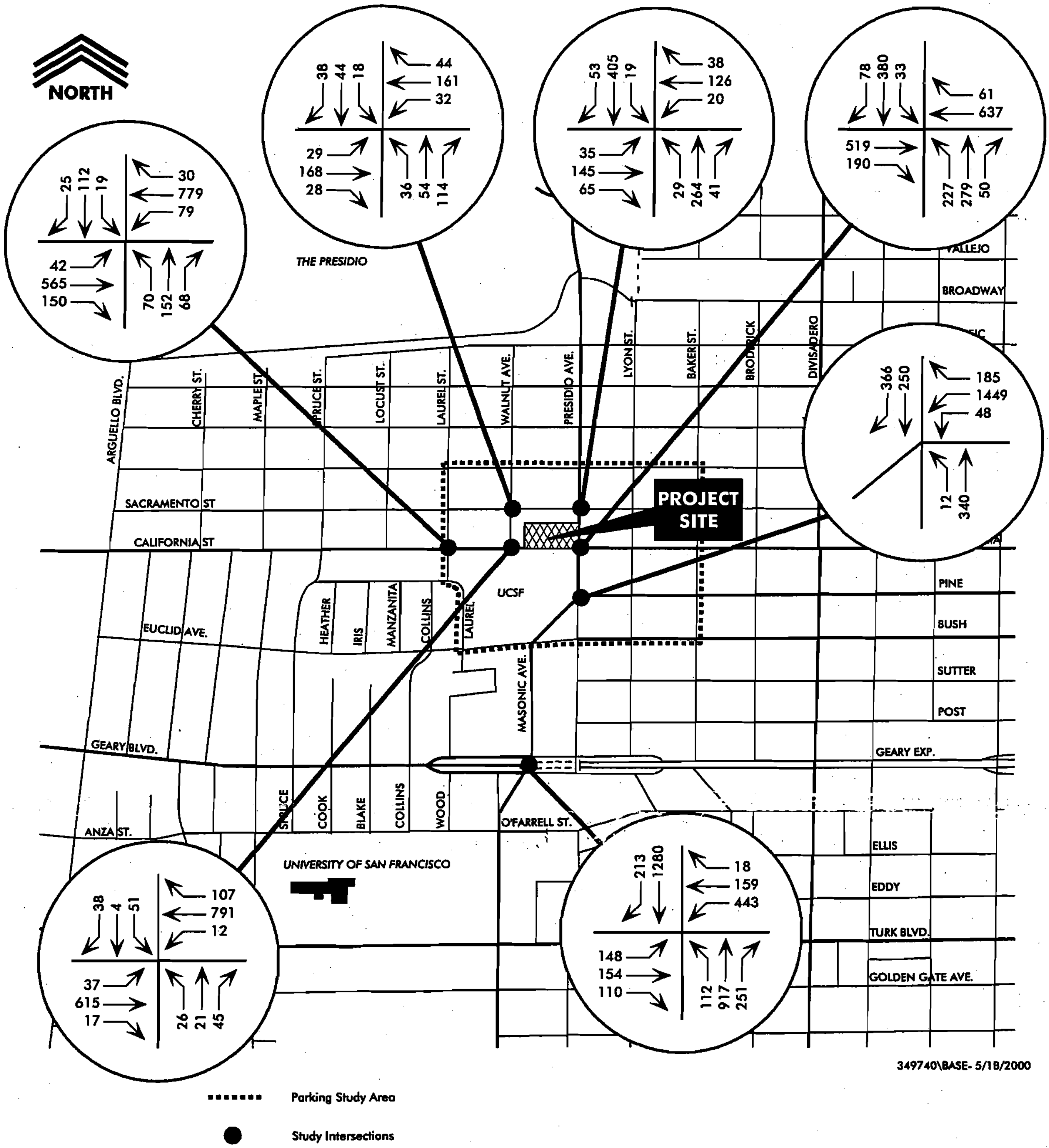
- **Laurel Street:** Laurel Street is a north-south street which extends from Pacific Avenue to Euclid Avenue. It is a two-way roadway, with one travel lane in each direction and unmetered parking on both sides of the street. South of California Street, a tow-away zone exists on the east side of the street during the PM peak period (4:00-6:00 PM). In the vicinity of the project site, two-hour unmetered parking is provided, and the sidewalk is approximately 12-feet wide.

2.2 Intersection Conditions

Existing operating conditions were evaluated for the weekday evening peak period (4:00-6:00 PM) at each of the seven study intersections. All of the intersection PM peak hour turning movement counts were made on Tuesday, February 8th and Tuesday, February 15th, 2000. Existing peak hour intersection turning movement volumes are illustrated in Figure 2-1.

It should be noted that the weekday evening peak period for which operating conditions were analyzed differs from the peak activity period of the existing JCC Community Center. The peak hour of person-trip activity at the existing JCC typically occurs between 12:00-1:00 PM, as observed in survey counts conducted as a part of the *JCCSF Transportation Survey Report* on March 3, 1999. The peak number of employees at the site also occurs during the midday, from approximately 10:00 AM to 5:00 PM.[1] However, the 4:00-6:00 PM weekday evening peak period is used in this report to evaluate roadway operating conditions (including transit, pedestrian and cycling conditions) because it is the time period when the maximum use of much

[1] C urrent JCC Employee Work Schedule, Memorandum from Nate Levine, JCC to Ron Foster, Wilbur Smith Associates, February 11, 2000.



WILBUR SMITH ASSOCIATES

Figure 2-1
EXISTING TRAFFIC VOLUMES- WEEKDAY PM PEAK HOUR

of the transportation system occurs. It is also the time when most of the transportation service system capacity and service is at a maximum.

The Level of Service (LOS) of an intersection is a measure of the ability of the intersection to accommodate traffic volumes. Intersection Level of Service ranges from LOS A, which indicates free-flow conditions with little overall delay, to LOS F, which indicates congested conditions with extremely long delays. LOS A, B, C, and D are considered excellent to satisfactory service levels. LOS E and LOS F conditions are unacceptable.

Signalized intersections were evaluated using the 1994 Highway Capacity Manual (HCM) operations methodology for intersection delay, outlined in Chapter 9 of the HCM. This method determines the capacity for each lane group approaching an intersection. The average delay is first calculated for each intersection approach. Then the weighted average of the delays for each approach is calculated to determine the average delay for the intersection, which is used to determine the overall LOS for the intersection. As defined by the City of San Francisco, the operational impact on intersections is considered significant when project traffic causes the service level to deteriorate from LOS D or better to LOS E or F.

The unsignalized intersection of Sacramento and Walnut Streets was evaluated using the methodology outlined in Chapter 10 of the HCM. This methodology determines the average total delay per vehicle, which is used to determine the LOS. Appendix D provides tables that show the LOS descriptions for both signalized and unsignalized intersections.

Table 2-1 shows the results of the intersection analysis for existing weekday PM peak hour conditions. The table indicates that five of seven intersections are currently operating at LOS B or better, with an average delay ranging between 4.0 to 9.0 seconds. The intersection of Presidio Avenue and California Street operates at LOS C, with an average delay of 17.7 seconds. The intersection of Masonic Avenue and Geary Boulevard currently operates at LOS E, with an average delay of 42.5 seconds per vehicle. Appendix C contains the detailed calculations of the intersection Level of Service analysis.

It should be noted that atypical conditions exist at two of the study intersections. At the intersection of Walnut Street and California Street, Walnut Street ends and all northbound traffic recorded at this intersection is generated from the UCSF Laurel Heights campus driveway entrance that forms the south leg of the intersection. At the intersection of Masonic Avenue and Geary Boulevard, the north-south travel distances across this intersection are considerably lengthened by the presence of the Geary Expressway, which runs at the center of Geary Boulevard in this location as it transitions to a depressed, limited access roadway.

TABLE 2-1 EXISTING WEEKDAY PM PEAK HOUR LEVELS OF SERVICE			
Study Intersections	Traffic Control	Weekday PM Peak Hour	
		LOS	Average Delay (sec/veh)
Sacramento Street and Walnut Street	4-way stop-controlled	A	4.0
Sacramento Street and Presidio Avenue	Signalized	B	9.0
California Street and Laurel Street	Signalized	B	6.4
California Street and Walnut Street	Signalized	B	6.5
California Street and Presidio Avenue	Signalized	C	17.7
Pine Street and Presidio Avenue	Signalized	B	8.6
Masonic Avenue and Geary Boulevard	Signalized	E	42.5[3]

Source: Wilbur Smith Associates, March 2000

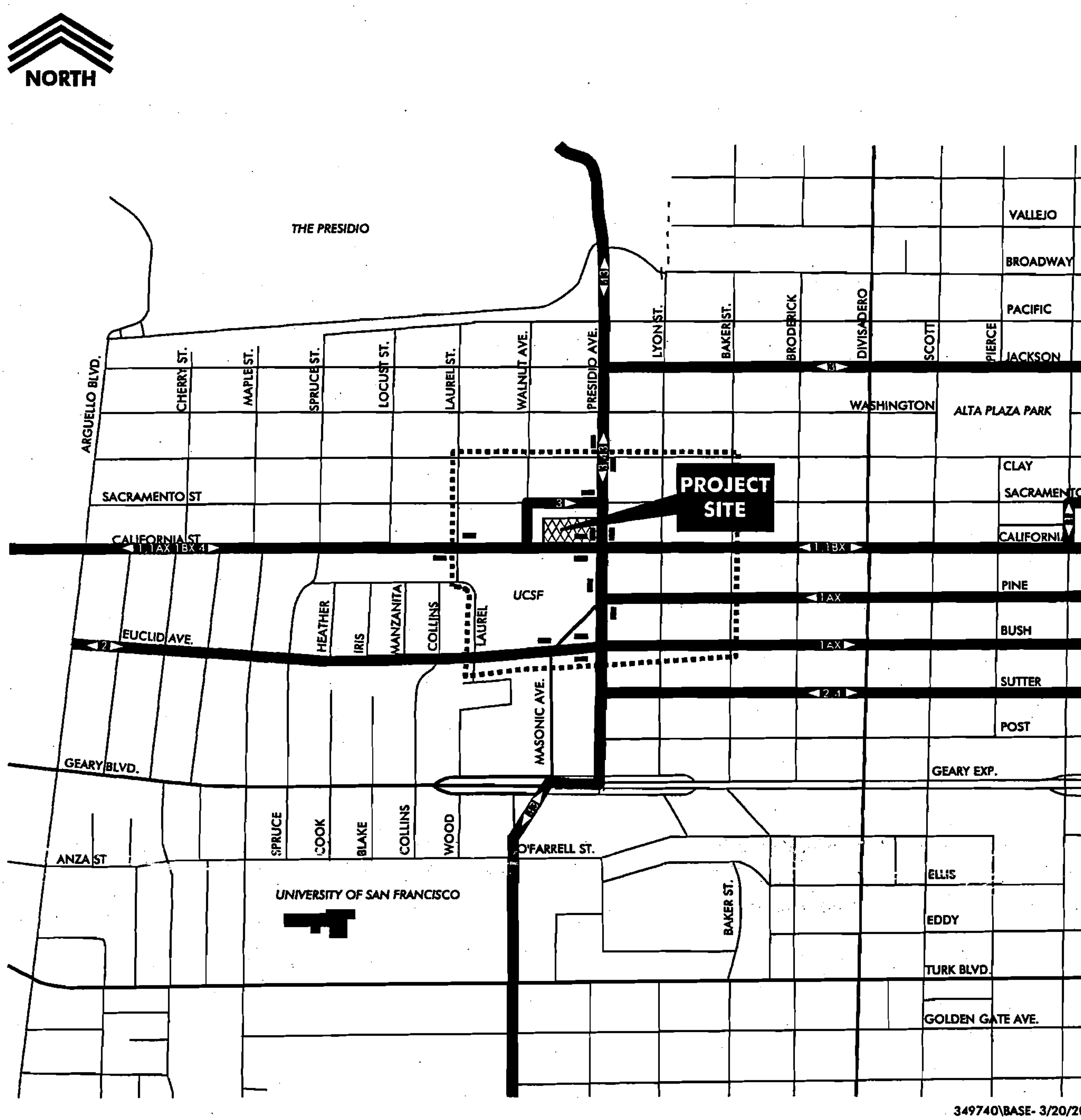
Notes:

1. The delay and level of service presented for the intersection of Sacramento and Walnut Streets represents the average delay per vehicle for all approaches.
2. The levels of service as defined for signalized intersections are different from those defined for unsignalized intersections, as shown in Appendix C.
3. A 1.01 volume-to-capacity (V/C) ratio.

2.3 Transit Service

San Francisco Municipal Railway (MUNI) provides public transportation services to the project area. MUNI operates six bus routes that provide service within reasonable walking distance of the project site, including the 1-California, 1AX-California Express, 1BX-California Express, 2-Clement, 3-Jackson, 4-Sutter and 43-Masonic lines, as shown in Figure 2-2. The 1-California and 1BX-California Express operate along California Street near the project site. The 1AX operates on both California Street and Presidio Avenue in the vicinity of the project. The 2-Clement operates on Sutter Street, Presidio Avenue and Euclid Avenue in the vicinity of the project site. The 3-Jackson operates on Jackson Street and Presidio Avenue, and loops around the block containing the project site as it approaches its route terminus on Presidio Avenue. The 4-Sutter operates on California and Presidio, and the 43-Masonic operates on Presidio Avenue in the vicinity of the site. Bus stops adjacent to the project site include a 100-foot zone on California Street (1, 1BX and 4 lines) and a 160-foot zone on Presidio Avenue (3 and 43 lines). Each of the transit routes in the vicinity of the project are described in further detail below:

MUNI Line 1-California operates between 33rd Avenue and Howard Street. Within the study area, it travels on California Street. Bus stops nearest to the project site are located on California Street west of Presidio Avenue, in each direction. On weekdays, the 1-Calfornia averages 3-8 minute headways during the AM and PM peak periods, 5 minute headways during the midday and 15 minutes headways during evening hours. On weekends, it operates approximately every 6 minutes during the midday and 15-20 minutes in the morning and evenings.



- Bus Stops (Parallel to Bus Routes)

Note: The 1AX-California Express does not stop in the vicinity of the project site

WSA WILBUR SMITH ASSOCIATES

Figure 2-2
EXISTING MUNI TRANSIT NETWORK ADJACENT TO PROJECT SITE

MUNI Line 1AX-California Express runs from 33rd Avenue to Davis Street, with an express area between Park Presidio Boulevard and Montgomery Street (including the study area). Within the study area, it travels on California Street; however, no bus stops are located in the vicinity of the project site. The 1AX-California operates in peak directions only during weekday AM and PM peak periods, at approximately 10 minute headways during the inbound AM peak and 12 minute headways during the outbound PM peak.

MUNI Line 1BX-California Express runs from 12th Avenue to Davis Street, with an express area between Fillmore and Montgomery Streets. Within the study area, it travels on California Street. Bus stops nearest to the project site are located on California Street west of Presidio Avenue, in each direction. The 1BX-California operates in peak directions only during weekday AM and PM peak periods, at approximately 6 minute headways during the inbound AM peak and 10 minute headways during the outbound PM peak.

MUNI Line 2-Clement operates between 32nd Avenue and the Ferry Terminal in downtown San Francisco. Within the vicinity of the project site, it travels on Sutter Street, Presidio Avenue and Euclid Avenue, with the nearest bus stops at Euclid and Presidio Avenues and at Euclid and Masonic Avenues (outbound only). Weekday headways are approximately 10 minutes during the AM and PM peak periods, and 20 minutes during the midday (service ends at 6:55 PM). Weekend headways are typically 15 minutes during the day and evening.

MUNI Line 3-Jackson operates between California Street and Sansome Street. Within the study area, it travels on Presidio Avenue, California, Walnut, Sacramento and Jackson Streets (it loops the project block to reach its terminus on Presidio Avenue north of California Street). Bus stops nearest to the project site are located on Presidio Avenue north of California Street (in each direction) and at Sacramento Street and Presidio Avenue (inbound only). Weekday headways are approximately 10 minutes during the AM and PM peak periods, and 20 minutes during the midday and evening. Weekend headways are typically 15-20 minutes during the day and evening.

MUNI Line 4-Sutter runs between 6th Avenue and Sansome Street. Within the study area, it travels on California Street, Presidio Avenue and Sutter Street. Bus stops nearest to the project site are located on California Street west of Presidio Avenue, in each direction. The 4-Sutter operates during the weekday daytime only, and headways are approximately 10 minutes during the AM and PM peak periods and 20 minutes during the midday.

MUNI Line-43 Masonic operates between Geneva Avenue (at Munich Street) and the Marina District (Lombard and Webster Streets). Within the study area, it travels on Presidio Avenue. Bus stops nearest to the project site are located on Presidio Avenue north of California Street, in each direction. Weekday headways are approximately 10 minutes during the AM and PM peak periods, and 20 minutes during the midday and evening. Weekend headways are typically 15-20 minutes during the day and evening.

In addition to transit service, it should be noted that MUNI operates the Presidio Division yard on Presidio Avenue, north of Geary Boulevard. The Presidio Division site occupies two blocks, and is primarily used for electric trolley bus maintenance and heavy repair, administrative and operational support offices.

Table 2-2 shows the PM peak hour load factors for each MUNI bus route serving the study area. The load factor is a measure of the average hourly number of passengers on board at the maximum load point (MLP) of the route compared to the capacity per hour of the route. It should be noted that the MLP for most of the nearby lines occurs some distance from the Proposed Project; therefore, additional capacity would be available in the vicinity of the project site.

Based on the latest MUNI ridership counts available (1998-1999), all bus lines except the 2-Clement have PM peak hour load factors below the maximum load standard of 1.00. The MUNI capacity figures are based on a high proportion of standees and the capacity ratios approaching 1.00 represent crowded conditions. It is possible for load factors to exceed 1.00, but such load factors represent extremely crowded conditions and are beyond MUNI's threshold for acceptable conditions. Thus, the 101% load factor on the 2-Clement MUNI line in the PM peak outbound direction would represent very crowded conditions. As shown in Table 2-2, however, the average passenger load during the two-hour PM peak is not greater than the vehicle capacity. This indicates that the 1.00 load factor was exceeded only during the PM peak hour, and not the entire two-hour peak period.

2.4 Parking Conditions

An off-street parking supply and occupancy survey of the study area was conducted on Tuesday, February 8, 2000, during the midday period between 1:00 PM and 3:00 PM. The parking study area is bounded by Bush Street to the south, Clay Street to the north, Laurel Street to the west, and Baker Street to the east.

Public off-street parking within the study area is limited to UCSF parking in Lot 3, which provides 61 publicly accessible spaces. The remainder of the UCSF parking supply is limited to permit holders, and other lots and garages in the area are also for private use only. The occupancy survey found that Lot 3 was approximately 51% utilized during the midday (1:00 PM to 3:00 PM), with 31 of 61 spaces occupied. UCSF visitor parking costs $2.25 per hour, to a maximum of $18.00 per day. During non-business hours, special events parking at the UCSF Laurel Heights campus is available for a $3.00 flat rate.

Observations of on-street parking conditions during the midday indicated that on-street parking is typically at or near 100% occupied. On-street restrictions surrounding the project site limit parking during the 6:00 to 8:00 AM period on selected weekdays (for street cleaning). The majority of spaces consist of one-hour metered parking and two-hour residential permit parking.

TABLE 2-2
EXISTING TRANSIT PM PEAK HOUR CAPACITY AND RIDERSHIP

Muni Line/Direction		Location of Maximum Load Point (MLP)	Capacity: Passenger Capacity per Vehicle	Capacity: Actual Number of Trips in 2-hour PM Peak Period	Capacity: Actual Trips in PM Peak Hour	Capacity: PM Peak Hour Capacity	Ridership: 2-hour PM Peak Period Average Load per Bus	Ridership: Actual Number of Trips in 2-hour PM Peak Period	Ridership: PM Peak Hour Ridership	Ridership: PM Peak Hour Average Load
1	Inbound	Clay (at Polk)	63	44.5	22.3	1402	21	44.5	561	40%
	Outbound	Sacramento (at Powell)		41	20.5	1292	49	41	1205	93%
2	Inbound	Post (at Polk)	63	10.5	5.3	331	18	10.5	113	34%
	Outbound	Sutter (at Powell)		11	5.5	347	53	11	350	101%
3	Inbound	Post (at Polk)	63	10.5	5.3	331	17	10.5	107	32%
	Outbound	Sutter (at Powell)		10	5.0	315	39	10	234	74%
4	Inbound	Post (at Polk)	63	8.5	4.3	268	21	8.5	107	40%
	Outbound	Sutter (at Powell)		11	5.5	347	30	11	198	57%
43	Inbound	Masonic (at Haight)	63	12	6.0	378	29	12	209	55%
	Outbound	Masonic (at Haight)		12.5	6.3	394	34	12.5	255	65%
1 BX	Inbound	n/a	63	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	Outbound	Davis (at Pine)		9.5	4.8	299	44	9.5	251	84%

Source: 1998/1999 Muni Ridership Data, Muni 2000 Short Range Transit Plan, Muni Ridership Projections to the Year 2015 (1997).
Note: 1AX-California Express has no stops in vicinity of project site and is not included in this table.

The current JCC provides no on-site parking for visitors or employees. As cited in the *JCCSF Transportation Survey Report*, visitors typically park at on-street metered spaces, or at available unmetered spaces that are not subject to residential parking permit restrictions. Employees who represent long-term parking demand tend to park several blocks from the site at curbside spaces.

Table 2-3 shows the breakdown of visitor parking locations in the area as presented in the *Transportation Survey Report*. The on-street response (84.1 percent) was interpreted as visitors primarily parking on California Street and other locations, including Sacramento, Walnut and Pine Streets; Presidio Avenue and other streets in the area. The Menorah Park garage provides approximately 40 private (permit) spaces for the Menorah Park Apartments (affordable housing for seniors), available only to residents, staff and visitors; UCSF parking at the Laurel Heights campus is primarily accessible to permit-holders only, although Lot 3 has 61 public spaces.

TABLE 2-3
JCCSF – Parking Location of Visitors

Location	Number of Responses	Percent
On-Street	158	84.1%
Menorah Park Garage	4	2.1%
UCSF	10	5.3%
Other	16	8.5%
Total	188	100.0%

Source: *JCCSF Transportation Survey Report*, Wilbur Smith Associates, June 1999

2.5 Bicycle Conditions

Bicycle conditions in the vicinity of the Proposed Project were qualitatively assessed during field observations. Bicycle activity is moderate on streets surrounding the project site. In general, during the weekday PM peak period, bicycle conditions were observed to be operating acceptably, with only minor conflicts between bicyclists, pedestrians and vehicles. Bicycle parking racks (for approximately seven bicycles) are located east of the existing main JCC building entrance on California Street.

The San Francisco Bicycle Plan includes two signed bicycle routes near the project, neither of which has striped bicycle lanes. Bicycle Route #55 is a shared (Class III) bicycle route, which extends from The Presidio south to the Golden Gate Park Panhandle on Presidio and Masonic Avenues. Bicycle Route #10 serves the project area as a wide curb lane (Class III) bicycle route on Clay Street, north of the project site. Each of these routes provides connections from the study area to other parts of San Francisco.

2.6 Pedestrian Conditions

Pedestrian activities in the vicinity of the project site were observed during the weekday PM peak hour. Overall, both sidewalk and crosswalk conditions were observed to be operating at free-flow conditions, with pedestrians moving at normal walking speeds and with freedom to bypass other pedestrians. Levels of pedestrian activity in the study area are highest on California Street, where sidewalks are approximately 12 to 15 feet wide. Pedestrian activity levels are generally low on other streets adjacent to the project site, with sidewalks ranging from 9 to 12 feet wide. In general, sidewalks in the project area are in good condition.

Crosswalks are provided at all major intersections in the study area. In addition, a refuge space is provided for pedestrians crossing California Street west of Presidio Avenue, to offset the extended crossing length created by a channelized right turn from eastbound California Street to southbound Presidio Avenue. In addition, many of the MUNI routes serving the project site stop immediately adjacent to the site (on California Street and Presidio Avenue), allowing transit riders to access southbound and westbound routes without crossing the roadway.

2.7 Loading Conditions

Loading activity for the existing JCC building occurs primarily on California Street. Four curb zones exist on California Street adjacent to the project site: a 100-foot MUNI bus zone, a 45-foot white (passenger) loading zone, a 45-foot blue (handicapped) parking zone and a 45-foot yellow (commercial) loading zone (zones are listed in order, east to west). There are no curbside disabled ramps at the existing blue (handicapped) parking zone.

The majority of commercial loading and unloading at the site consists of small delivery trucks and vans. Passenger loading and unloading includes drop-off and pick-up for the pre-school (ECE program) and after school daycare. Approximately 100 children participate in JCC after school programming, typically arriving by school bus (from 12:30 to 3:00 PM), and departing with parents in private vehicles (5:30 to 6:00 PM). Parents who drive to pick-up their children typically make use of the existing drive-through, entering on California Street and exiting on Walnut Street. Passenger loading activity associated with the JCC preschool (Early Childhood Education program) also typically occurs via the California/Walnut Street drive-through. Typically, children are met at the curbside by employees and escorted into the facility.

A survey of loading activity was conducted for the *JCCSF Transportation Survey Report*. Most vehicles engaged in drop-off and pick-up activities on California Street were observed to move quickly to and from the curbside with dwell times of under one minute. During periods of increased activity, some vehicles double-parked on California Street near the JCC main entrance. Vehicles accessing the drive-through entrance from California Street were also counted. Dwell time at this curb was observed to be generally short-term, with vehicles exiting onto Walnut Street in under one minute. Some vehicles were observed to park for longer periods (several minutes) while drivers escorted children into the center.

As stated in the *Survey Report*, during the 5:00-6:00 PM peak hour, 27 vehicles utilized the California Street curb and 30 vehicles utilized the drive-through for passenger pick-up and drop-off. Overall, no queuing or loading conflicts with MUNI buses were observed during the PM peak period.

Chapter 3
TRAVEL DEMAND ANALYSIS

Project travel demand refers to the new vehicle, transit and pedestrian traffic generated by the Proposed Project. This chapter provides an estimate of the travel demand that would be generated by the Proposed Project. Appendix D contains the weekday daily and PM peak hour trip travel demand calculations, distribution and mode split information.

3.1 Existing Use

The proposed project would include the construction of a three-story community center building, containing approximately 130,700 total square feet of consolidated JCC program space. Due to the multi-use nature of existing JCC programming and its integration into the proposed project, a two-step approach was used to determine the *net new* travel demand generated by the proposed project during the weekday PM peak hour. This approach differentiates between continued and new land uses, and is based on information contained in the *JCCSF Transportation Survey Report*.

As stated previously, the 4:00-6:00 PM weekday evening peak period (versus the project peak trip generation period) is used in this report to evaluate roadway operating conditions. This period is when the maximum use of much of the transportation system occurs, and is also the time when most of the transportation service system capacity and service is at a maximum.

3.2 Trip Generation

A two-step approach was used to determine the number of net new trips generated by the Proposed Project. Trips generated by both continuing and new land uses are described below.

3.2.1 Continuing Land Uses - For *continuing* land uses, the net number of new trips (both visitor and employee trips) was calculated by pro-rating the total number of existing trips (as documented in the *JCCSF Transportation Survey Report*), in accordance with the floor area increase or decrease of comparable JCC programs and/or facilities. The PM peak trip percentage was also derived by pro-rating new (continuing use) daily trips based on inbound/outbound trip ratios provided in the *JCCSF Transportation Survey Report*. These trips include both employees and visitors to the project site.

Table 3-1 presents the floor area calculation and weekday daily person-trip generation for continuing uses. As provided in the *JCCSF Transportation Survey Report,* land uses that comprise existing JCC community center programs currently generate approximately 5,477 daily person-trips. The total square footage of these uses (80,339 sq.ft.) was then compared to the total square footage of the Proposed Project's continuing programming uses (124,367 sq.ft., excluding new retail and restaurant components). The difference in total square footage was used to pro-rate existing daily person-trips, to estimate the total number of trips associated with the Proposed

Project's continuing uses. These uses would generate a total of approximately 8,479 daily person-trips (inbound and outbound), of which 3,002 would be new trips to the area.

TABLE 3-1
CALCULATION OF NET NEW JCCSF PROGRAM SPACE
CONTINUING USES – DAILY PERSON TRIP GENERATION

Lot	Location	Land Use	Size (Gross Sq. Ft.)	Daily Person Trips[4]
Existing Uses[1]				
Lot 5	425 Presidio Avenue	Teen Center	1,140	
Lot 6	3200 California Street	JCC	65,000	
Lot 24	419 Presidio Avenue	Family Services	7,233	
Lot 29	3272 California Street	Program Area	5,320	
Lot 31/37[2]	3266 California Street	Condominium Units	1,646	
Subtotal[3]	-	-	*80,339*	*5,477*
Proposed Uses				
Lots 5 – 31/37	3200 California Street	Main Community Center	130,737[5]	
Excluding new uses	-	Retail, Restaurant	-6,370	
Subtotal	-	-	*124,367*	*8,479*
Net New	-	-	**44,028**	**3,002**

Source: JCCSF; *JCCSF Transportation Survey Report*; Wilbur Smith Associates, March 2000

Notes:

1. Includes several individual programs (e.g. Parent's Place and Senior at Home) that will be relocated; however, these uses constitute a portion of the trips recorded in the 1999 survey data, and can be regarded as JCC programming space that will be reassigned to comparable programs or services in the proposed project.
2. Only the portion of Lot 31/37 currently occupied by the JCC (1 of 7 units) is included as existing program space.
3. Lot 25 (open space) and Lot 28 (play area) are not included as existing program space as neither is included in the square footage calculation of proposed programming space.
4. Daily person trips for existing uses taken from the *JCCSF Transportation Survey Report*; daily person trips for proposed uses based on existing use person trips and pro-rated by the net square footage increase (55%).
5. See Appendix E for a detailed presentation of proposed JCC programming and land uses.

Table 3-2 presents the weekday PM peak hour person-trip generation for continuing uses. During the PM peak hour, these uses would generate approximately 258 new person-trips. About 53 percent of PM peak hour trips would be inbound to the site, with 47 percent of trips outbound from the site.

TABLE 3-2 CALCULATION OF NET NEW JCCSF PROGRAM SPACE CONTINUING USES – WEEKDAY PM PEAK HOUR PERSON TRIP GENERATION					
Use	Daily Person Trips	Trip Rate (Percent of Daily Trips) [1]	PM Peak Hour Person Trips	Inbound[1]	Outbound[1]
Existing	5,477	8.6%	472	250	222
Proposed Net New[2]	**3,002**	8.6%	**258**	**137**	**121**

Source: *JCCSF Transportation Survey Report*; Wilbur Smith Associates, March 2000

Notes:

1. PM peak hour (5:00-6:00 PM) percentage of daily person trips, and Inbound/Outbound percentages (53%/47%) taken from the *JCCSF Transportation Survey Report.*
2. Excluding retail and restaurant uses.

3.2.2 New Land Uses - For the *new* restaurant and retail uses of the proposed project (which are not a part of existing JCC programs), the trip generation rate was based on the *SF Guidelines*, including a 70 percent linked trip factor (to account for visitors who would make use of multiple JCC programs and facilities during a single trip). Table 3-3 presents the weekday daily and PM peak hour person-trip generation for new land uses. These trips include both visitors and employees to the project site. New land uses of the Proposed Project would generate approximately 2,370 person-trips (inbound and outbound) on a daily basis, most of which would be from the proposed restaurant use. During the weekday PM peak hour, these land uses would generate approximately 310 person-trips, of which all but two would be generated by the proposed restaurant use. About 46 percent of PM peak hour trips would be inbound to the site, with 54 percent of trips outbound from the site.

TABLE 3-3 NEW USES – DAILY AND PM PEAK HOUR PERSON TRIP GENERATION								
					PM Peak Hour			
Land Use	**Size[1]**	**Linked Trip Factor[2]**	**Daily Person Trip Rate (Per Unit)[3]**	**Daily Person Trips**	**Trip Rate (Percent of Daily Trips)[3]**	**Person Trips**	**Inbound[4]**	**Outbound[4]**
Restaurant	5.40	.70	600	2268	13.5	306	141	165
Retail	.97	.70	150	102	4.0	4	2	2
Total	**6.37**	-	-	**2,370**	-	**310**	**143**	**167**

Source: *Interim Transportation Impact Analysis Guidelines for Environmental Review;* Wilbur Smith Associates, March 2000

Notes:

1. 1,000 Gross Square Feet.
2. A .70 linked trip factor is used to account for 30% of shared users (with other JCC programs and facilities).
3. *Interim Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)*, Appendix C, "Eating/Drinking: Composite Rate" and "General Convenience Retail" rates.
4. *SF Guidelines*, Appendix C, Non C-3 Districts, "Convenience Retail."

Table 3-4 shows the total weekday daily and peak hour person-trip generation for the proposed project. The project as proposed is estimated to generate a total of 5,372 net new daily person trips. During the PM peak hour, the proposed project would generate 568 net new PM peak hour person trips.

TABLE 3-4
TOTAL DAILY AND PM PEAK HOUR PERSON TRIP GENERATION

Use	Daily Person Trips	PM Peak Hour Person Trips	Inbound	Outbound
Continuing (Net New)	3,002	258	137	121
New (Restaurant/Retail)	2,370	310	143	167
Total (Net New)	**5,372**	**568**	**280**	**288**

Source: *JCCSF Transportation Survey Report*; Wilbur Smith Associates, March 2000

3.3 Trip Distribution

Trip distribution for all land uses were derived from information in the *JCCSF Transportation Survey Report*. The questionnaire asked respondents to provide the zip code of the origin of their trip to the JCC. Using this information, the project trips were distributed to the four quadrants of San Francisco (Superdistricts 1 through 4), in addition to the East Bay, North Bay and South Bay (see Appendix D for a map of Superdistrict locations). Table 3-5 shows the trip distribution percentages by place of residence to and from the JCC.

TABLE 3-5
TRIP DISTRIBUTION PATTERNS

Place of Trip Origin/Destination	All Land Uses Employee and Visitor Trips
San Francisco	
Superdistrict 1	7.0%
Superdistrict 2	64.0%
Superdistrict 3	11.0%
Superdistrict 4	8.0%
East Bay	4.0%
North Bay	2.0%
South Bay	4.0%
Outside of Region	0.0%
Total	**100%**

Source: *JCCSF Transportation Survey Report*; Wilbur Smith Associates, March 2000

The survey indicated that 90 percent (400) of the 444 total respondents' trips originated in San Francisco, with the majority (64 percent) originating from Superdistrict 2. The remaining respondents were fairly equally distributed between the North Bay, South Bay, and East Bay. The majority of visitor trips (86 percent) originated from home, while 13 percent were work-based and one percent originated from school. It should be noted, however, that the number of school based trips was underrepresented because survey forms were distributed only to persons age 15 years and older.

Corresponding distribution rates were used for both visitor and employee trips, based on the pro-rated trip generation calculation performed for the community center land use. This calculation provided a pro-rated net new number of daily trips as a composite figure, which did not differentiate between visitor and employee trips (employee trips included in the trip-generation analysis were assumed to represent the fluctuating ratio of visitors to employees needed to maintain the schedule of JCC programming, which varies on a daily basis). The *JCCSF Survey Report* composite distribution numbers were also used to analyze new trips associated with the retail and restaurant uses of the proposed project, both as the most accurate source of data available, and to maintain consistency within the report.

3.4 Modal Split and Average Vehicle Occupancy

The project-generated person-trips were assigned to travel modes in order to determine the number of auto, transit, walking and other trips. "Other" includes bicycle, motorcycle, taxi and additional modes. As with distribution rates, modal split information for all land uses was derived from the *JCCSF Transportation Survey Report*, and corresponding rates were used for both visitor and employee trips (see above). To determine the number of vehicle-trips generated by the number of auto person-trips, the average vehicle occupancy (AVO) was used, taken from the *SF Guidelines, Appendix E, Visitor Trips to SD-2 (All Other)*. It should be noted that the use of AVO rates taken from the *SF Guidelines* may be conservative, since the actual vehicle occupancy rates may be higher as a result of youth-based JCC programming during the PM peak hour.

Table 3-6 summarizes PM peak hour person trips by mode, respectively. The proposed project is estimated to generate a total of 568 net new person trips (280 inbound and 288 outbound trips), and 132 net new vehicle trips during the PM peak hour (65 inbound and 67 outbound trips).

TABLE 3-6 MODAL SPLIT SUMMARY PM PEAK HOUR PERSON TRIPS																		
Land Use	Person-Trips															Auto Vehicle Trips		
	Auto 47%			Transit 29%			Walk 23%			Other 1%			Total 100%					
	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Continuing	64	57	121	40	36	76	31	27	58	2	2	4	137	121	258	32	28	60
New (Restaurant/Retail)	67	78	145	42	49	91	32	38	70	2	2	4	143	167	310	33	39	72
Net New Total Trips	**131**	**135**	**266**	**82**	**85**	**167**	**63**	**65**	**128**	**4**	**4**	**8**	**280**	**288**	**568**	**65**	**67**	**132**

Source: Wilbur Smith Associates, March 2000

Chapter 4
PROJECT TRANSPORTATION IMPACT ANALYSIS

This chapter describes the transportation impacts of the proposed project on the local street network, transit system and parking supply during the weekday PM peak hour. Traffic generated by the proposed project was added to the background traffic under existing PM peak hour conditions.

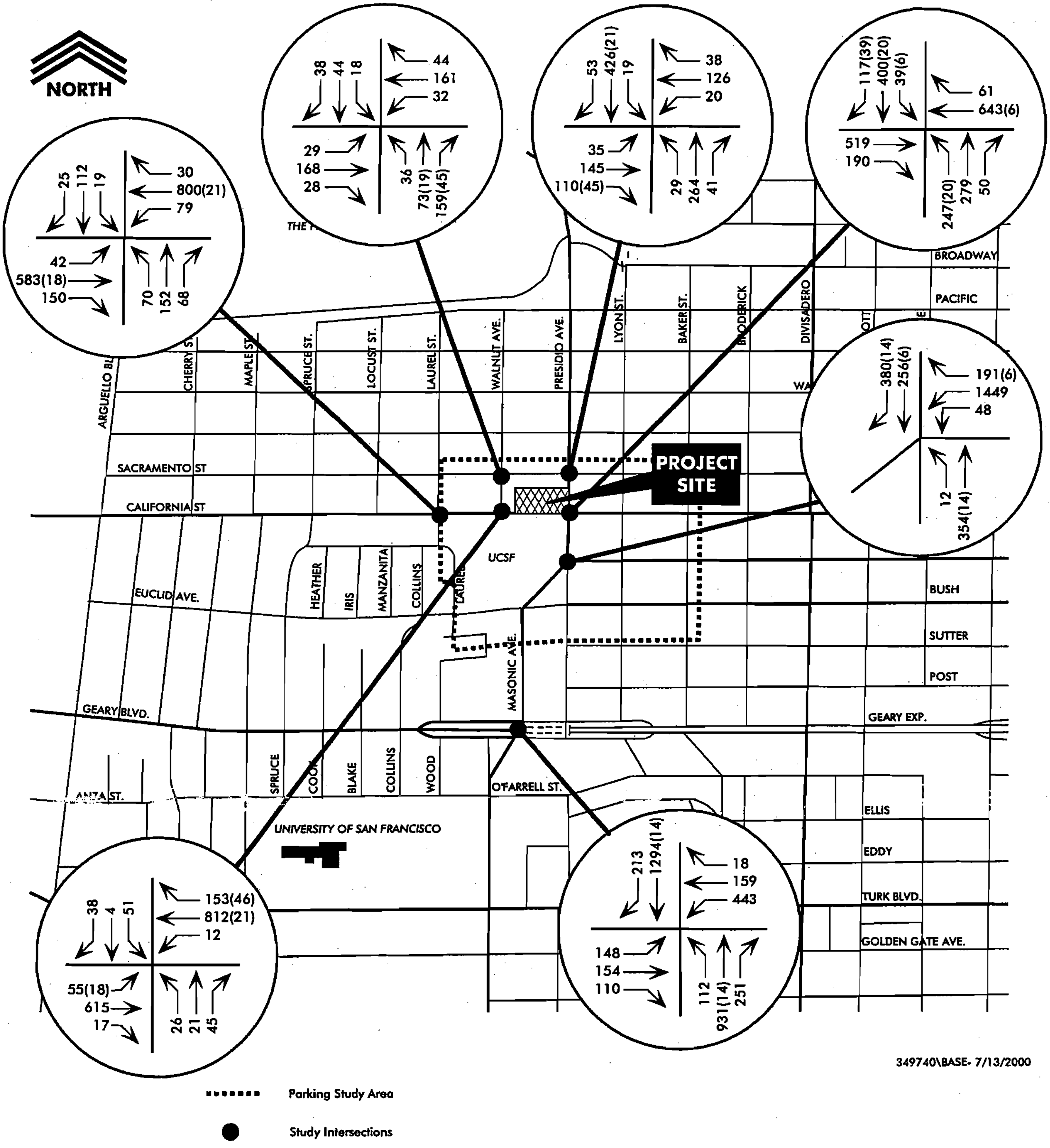
4.1 Existing Plus Project Traffic Impacts

As defined by the City and County of San Francisco, the operational impact on local intersections is considered significant when the project-related traffic causes the level of service to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. In addition, significant impacts would also occur if the traffic would interfere with existing transportation systems causing substantial alteration to circulation patterns or causing major traffic hazards or would contribute substantially to cumulative traffic increases at intersections that would otherwise operate at acceptable levels, causing degradation to unacceptable levels.

Traffic conditions were evaluated for the weekday PM peak hour conditions under the Existing Plus Project scenario. Study intersection analyses were conducted to assess potential traffic impacts generated by the addition of project traffic to existing traffic volumes.

Figure 4-1 illustrates the Existing Plus Project traffic volumes during the weekday PM peak hour at the study intersections. Table 4-1 presents a comparison of the Existing Plus Project intersection LOS analysis to existing conditions. Project-generated traffic would result in minor increases to average vehicle delay at six of the seven study intersections, but would not change the LOS at any of the study intersections. All but one of the study intersections would operate at acceptable service levels (LOS C or better) with the addition of project-generated traffic.

The intersection of Masonic Avenue and Geary Boulevard would continue to operate at LOS E under Existing Plus Project conditions, with the addition of project-generated traffic causing a 0.3-second increase in average vehicle delay. The effect of the project at this intersection would not be considered significant, and therefore would not warrant mitigation. Appendix C provides the detailed calculations of the intersection Level of Service analysis.



WSA WILBUR SMITH ASSOCIATES

Figure 4-1
EXISTING + PROJECT TRAFFIC VOLUMES- WEEKDAY PM PEAK HOUR

TABLE 4-1
EXISTING PLUS PROJECT
WEEKDAY PM PEAK HOUR LEVELS OF SERVICE

Study Intersections[1]	Traffic Control	Existing		Existing Plus Project	
		LOS	Delay (sec/veh)	LOS	Delay (sec/veh)
Sacramento Street and Walnut Street[2]	4-way stop-controlled	A	4.0	A	4.8
Sacramento Street and Presidio Avenue	Signalized	B	9.0	B	9.8
California Street and Laurel Street	Signalized	B	6.4	B	6.4
California Street and Walnut Street	Signalized	B	6.5	B	6.9
California Street and Presidio Avenue	Signalized	C	17.7	C	18.0
Pine Street and Presidio Avenue	Signalized	B	8.6	B	8.7
Masonic Avenue and Geary Boulevard	Signalized	E	42.5[3]	E	42.8[4]

Source: Wilbur Smith Associates, March 2000

Notes:

1. The levels of service as defined for signalized intersections are different from those defined for unsignalized intersections, as shown in Appendix C.
2. The delay and level of service presented for the intersection of Sacramento and Walnut Streets represents the average delay per vehicle for all approaches.
3. A 1.01 volume-to-capacity (V/C) ratio.
4. A 1.01 volume-to-capacity (V/C) ratio.

During the PM peak period (4:00 PM to 6:00 PM), at the California Street/Presidio Avenue intersection, left-turns from California Street are prohibited in both directions, allowing it to operate efficiently despite the large volume of traffic traveling through the intersection. The intersection of Masonic Avenue and Geary Boulevard has large volumes of left-turn traffic. The wide geometric configuration of the intersection requires more "ALL RED" time in the cycle to allow vehicles to safely clear the intersection before traffic from a conflicting turning movement begins.

4.2 Transit Impacts

The City and County of San Francisco has no formally adopted significance criteria for potential impacts related to transit. In San Francisco, a project is typically considered to have a significant effect on the environment if it would cause a substantial increase in transit demand that cannot be accommodated by existing or proposed transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in operating costs such that significant adverse impacts in transit service levels could result. The project would also have a significant effect on the environment if, when considering cumulative development in the area, it would contribute substantially to the deterioration of transit service to unacceptable levels.

The proposed project would generate approximately 167 net new PM peak hour transit trips (82 inbound and 85 outbound). Approximately 92 percent, or 154, of the transit trips to and from the project would be within San Francisco, and the remaining eight percent, or 13 trips, would be distributed between the East Bay, North Bay, and the South Bay.

Passengers traveling to and from the East Bay, North Bay, and South Bay would use MUNI to access regional transit providers such as BART, AC Transit, SamTrans, or Golden Gate Transit. BART and AC Transit would carry the trips between the East Bay and the project site. Golden Gate Transit would carry transit trips to and from the North Bay; these passengers would likely ride GGT Route 50 which stops at the intersection of Geary Boulevard and Masonic Avenue. SamTrans and Caltrain would share the transit trips to and from the South Bay. Caltrain passengers would likely ride either the 1-California, 3-Jackson or 4-Sutter to the Financial District and then transfer to a Caltrain Express route to reach the Caltrain Depot. SamTrans passengers would likely ride the 3-Jackson or 4-Sutter to Market Street and then walk one block to the Transbay Terminal. Transit riders traveling to or from other parts of San Francisco would likely ride the 43-Masonic to travel north or south and either the 1-California, 3-Jackson or 4-Sutter to travel east or west.

As noted previously, the project site has a high level of MUNI service from several lines. The 1-California serves the California Street corridor between Geary Boulevard/33rd Avenue and Main Street/Howard Street. The 1-California, 1BX-California Express, 2-Clement, 3-Jackson and 4-Sutter lines provide service to areas of Superdistricts 1 and 2. The 43-Masonic provides service between Superdistricts 2, 3 and 4.

The 1-California MUNI line currently has a PM peak hour load factor of 40 percent in the inbound direction and a load factor of 93 percent in the outbound direction, as shown in Table 2-2. The 1BX-California Express MUNI line currently operates at a PM peak hour load factor of 84 percent in the outbound direction. The 2-Clement MUNI line currently operates at a PM peak hour load factor of 34 percent and 101 percent in the inbound and outbound directions, respectively. The 3-Jackson line operates with a current load factor of 32 percent and 74 percent in the inbound and outbound directions, respectively. The 4-Sutter MUNI line currently operates with a PM peak hour load factor of 40 percent in the inbound direction and 57 percent in the outbound direction. The 43-Masonic currently operates with a PM peak hour load factor of 55 percent in the inbound direction and 65 percent in the outbound direction.

The proposed project would generate 167 net new total PM peak hour transit trips. Approximately 82 of these trips would be in the inbound direction and 85 trips would be in the outbound direction. Given that these trips would be spread among the various transit lines noted, it is not likely that the project would generate a sufficient number of transit trips to cause the PM peak hour load factors for MUNI 1-California, 1BX-California Express, 2-Clement, 3-Jackson, or 4-Sutter to exceed their respective thresholds. The 2-Clement line already operates with PM peak hour ridership loads that exceed capacity in the outbound direction. The proposed project would generate some additional trips on this line, but because the nearest 2-Clement bus stop is two blocks away at the intersection of Euclid Avenue and Presidio Avenue, and the 1-California, 1BX-California Express and 4-Sutter stop adjacent to the JCC at the intersection of California Street and Presidio Avenue, few project-generated transit trips would likely occur on 2-Clement. Furthermore, the maximum load point in the outbound direction in the PM peak occurs at the intersection of Sutter and Powell Streets (over twenty blocks from the 2-Clement bus stop nearest to the project site) and additional capacity would be available in the vicinity of the project site. Consequently, the proposed project would not create any significant transit impacts.

The project would not result in any conflicts between automobile traffic and transit operations near the site. The new driveway to the project parking garage would be located about 210 feet west of the bus zone on California Street, and would be adequately spaced from the bus zone to prevent conflicts. The white curb loading zone, blue curb handicapped parking zone and the yellow curb loading zone would be retained between the bus zone and the proposed new driveway to the underground parking garage.

There may be some conflict between trucks entering and exiting the proposed loading dock and the 3-Jackson and 43-Masonic buses stopping at the bus zone on the west side of Presidio Avenue, immediately north of California Street. The restaurant is estimated to generate 20 daily truck trips and the rest of the Community Center is estimated to generate about twelve daily truck trips, for a total of 32 daily truck trips, or 16 trucks traveling to and from the site on a typical weekday. Typically, 11 of these 16 trucks would actually be cars, pick-up trucks or vans, one service vehicle would be a small two-axle truck, three service vehicles would be large two-axle delivery trucks and one vehicle would be a large three-axle truck.[1] Many of the service vehicles would be small enough to easily negotiate into and out of the loading dock with minimal impact to vehicular traffic or MUNI operations on Presidio Avenue.

The proposed project would generate a total of 167 net new PM peak hour transit trips, with six of these trips traveling to and from the East Bay, two trips to and from the North Bay, and five trips to and from the South Bay. The small number of regional transit trips that would be generated by the project during the PM peak hour would not cause the ridership across any of the regional transit screenlines to exceed capacity.

4.3 Bicycle/Pedestrian Impacts

The City and County of San Francisco has no adopted significance criteria or policy for impacts related to pedestrian access and safety. For the purposes of this analysis, the project would be considered to have a significant effect on the environment if it were to result in substantial overcrowding on public sidewalks, create particularly hazardous conditions for pedestrians, or otherwise substantially interfere with pedestrian accessibility to the site and to adjoining areas.

The City and County of San Francisco has no adopted significance criteria or policy for impacts related to bicyclist access and safety. For the purposes of this analysis, the project would be considered to have a significant effect on the environment if it would create particularly

[1] Interim Transportation Impact Analysis Guidelines for Environmental Review, Table H-2: Percent Daily Service Vehicle Activity by Vehicle Type, January 2000.

hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and to adjoining areas.

The project is estimated to generate 128 (63 inbound/65 outbound) net new PM peak hour walk trips and eight "other" person trips, or trips taken by a mode other than an automobile, transit or walking. Many "other" trips are bicycle trips. Current pedestrian activity in the area is relatively heavy and bicycle activity is moderate during the PM peak hour. An additional 128 pedestrian trips and eight bicycle trips in the area during the PM peak hour would not increase pedestrian or bicycle activity in the area beyond unacceptable levels and would not result in congested sidewalks or bicycle routes.

The two bicycle routes in the immediate vicinity of the project would allow bicyclists to travel to the project site from other areas of San Francisco. The proposed project would provide secure bicycle parking in accordance with the San Francisco Planning Code in order to encourage bicycling to and from the site. The development of the project would not interfere with bicycle accessibility to the site. The proposed project would not create any bicycle-related significant impacts.

Pedestrians walking to and from the project site would approach the project site from all directions, so there would be pedestrian traffic on California Street, Presidio Avenue, Sacramento Street and Walnut Street. There are currently continuous sidewalks approximately 10 feet in width on both sides of Presidio Avenue, and a minimum of 12 feet in width on California, Sacramento and Walnut Streets. The proposed project would result in increased pedestrian volumes on all streets in the vicinity of the project, particularly on California Street, where the primary entrance to the JCC is located. However, the sidewalks in the area are of adequate width to accommodate the expected additional pedestrian traffic. Therefore, the project would not cause any significant impacts upon pedestrians.

Many of the MUNI routes serving the project site stop immediately adjacent to the site at the intersection of California Street and Presidio Avenue, including the 1-California, 1BX-California Express, 3-Jackson, 4-Sutter and 43-Masonic. Passengers traveling westward and southward on these lines would not have to cross the street to board these buses. Passengers traveling eastbound would cross California Street and board or alight the bus in the southwest quadrant of the intersection of California Street and Presidio Avenue. Passengers traveling northbound would cross Presidio Avenue to board or alight the 43-Masonic bus in the northeast quadrant of the intersection. Passengers bound for the 50-GGT or 2-Clement MUNI line would likely walk on the sidewalk on the west side of Presidio Avenue. Overall, existing crosswalk capacity would be sufficient to safely accommodate new transit-related roadway crossings. Potential conflicts between MUNI buses and pedestrians traveling to and from the site would be minimal.

4.4 Parking Impacts

The San Francisco *General Plan* policies emphasize the importance of public transit use and discourage the provision of facilities that encourage automobile use. Therefore, the creation of parking demand that cannot be met by existing or proposed parking facilities would not itself be considered a significant effect. However, the City would generally consider whether the unmet parking demand would result in other significant physical effects, such as a substantial alteration of neighborhood character or creation of hazardous conditions caused by illegally parked automobiles.

4.4.1 Project Parking Demand - Parking demand for the proposed project was estimated using the travel characteristic information from the *JCCSF Transportation Survey Report*, as well as information provided in the *SF Guidelines*. Parking demand was calculated for the PM peak hour (5:00-6:00 PM), which would coincide with the peak use of the exercise facility at the site.[2] Based on the *JCCSF Transportation Survey Report*, a 1.1 vehicle occupancy rate (V.O.R.) was used to account for the single-occupant vehicles which would utilize the proposed parking garage. It should be noted that the 1.1. V.O.R. is a conservative estimate.[3] Parking demand consists of both long-term demand (typically employee parking) and short-term demand (typically visitors and patrons). Appendix E presents the parking demand calculations.

Long-Term Demand: The parking demand for the existing employees was based on the work schedules of current employees, and was pro-rated per square footage of the community uses of the proposed project. The employee work schedules indicated that currently there is typically a maximum of 65 employees on-site at one time. Prorating this number of employees for the proposed square footage indicates that there would be a maximum of 101 employees at the JCC at any given time in the future. Parking demand for employees of new uses (retail and restaurant) was based on the employee density and auto occupancy provided for retail uses in the *SF Guidelines* and the mode split was derived from the survey. The long-term peak parking demand for the proposed project was calculated to be 51 spaces, consisting of 43 spaces of community center employee parking demand and 8 spaces of retail and restaurant employee parking demand.

Short-Term Demand: The parking demand for visitors to the community center uses was based on information contained in the *JCCSF Transportation Survey Report* (the number of daily visitors simultaneously on-site pro-rated per square footage of the new project) as approved by City staff. The March 1999 survey provides person entrance and exit counts in 15-minute increments. The data indicates that on a typical weekday, there are currently a maximum of 358 people on-site at one time. Employees are included in this count, so there is currently a maximum of about 293 visitors at JCC at any given time. With the proposed project, an estimated 454 community center visitors would be on-site at the same time. Parking demand for

[2] The *JCCSF Transportation Survey Report* showed that the peak use of the exercise facility occurred during the PM peak hour, that approximately 45% of these users traveled by auto (38% walked), and that almost all drivers were single occupant vehicles. The PM peak hour represents the peak parking demand for the proposed project (greater than midday demand that would occur during the peak hour of the community center generator).

[3] The 1.1 vehicle occupancy rate is based on the results of a survey conducted at the existing JCC for the *JCCSF Transportation Survey Report*. This survey did not target persons aged 15 years and younger, and the estimated V.O.R. (based on survey results) did not incorporate these vehicle passenger trips to the JCC. That is, the younger visitors may be passengers in other vehicles parking near the JCC, indicating a higher V.O.R. than 1.1, and a resulting lower parking demand per visitor.

the visitors to the retail and restaurant uses was calculated in accordance with the *SF Guidelines*, using the distribution and auto occupancy from the March 1999 survey to determine the number of daily vehicle trips. In accordance with the *SF Guidelines*, 92 percent of the daily vehicle trips were assumed to be non-work related and a turnover rate of 5 vehicles per space was assumed for the new retail store and restaurant. The short-term peak parking demand for the proposed project was calculated to be 242 spaces, consisting of 192 spaces of community center visitor parking demand and 50 spaces of retail and restaurant visitor parking demand. It should be noted that the short-term parking demand calculation for the retail and restaurant uses results in a conservatively high estimate. As currently planned, it is unlikely that these uses would generate a parking demand for 50 vehicles

Total Demand: The total weekday peak parking demand for the project's proposed uses was calculated to be 293 spaces, consisting of 51 spaces for long-term demand and 242 spaces for short-term demand. There would be a total demand for 235 spaces for the Community Center uses and 58 spaces for the new retail store and new restaurant (see Appendix E for detailed parking demand calculations). It should be noted that the future parking demand calculations are based on an existing demand of 152 spaces, including 28 spaces for community center employees and 124 spaces for community center visitors. As such, the net new demand for the proposed project would be 141 spaces. It should also be noted that this parking demand calculation accounts for existing shared use on the JCC site, and assumes that the percent of shared use would remain constant despite increases in JCC program space.

Table 4-2 indicates the parking supply provided on-site, the parking demand generated by the proposed uses, and the Planning Code parking requirements (discussed in Section 4.4.2).

TABLE 4-2
PARKING IMPACT SUMMARY

	Retail/ Restaurant	Community Center Uses	Total	(+) Surplus/ (-) Shortfall
Existing Demand	0	152	152	
Future Demand Calculation	58	235	293	-127
Code Requirement			236	-70
Proposed Supply (independently accessible spaces, including tandem conversions)			166	

Source: Wilbur Smith Associates, March 2000

As shown in Table 4-2, if the 30 tandem spaces proposed for the project were converted to standard spaces (equaling 15 independently accessible spaces), the project would provide a total of 166 independently accessible spaces to accommodate demand. The project's total parking demand of 293 spaces would not be met on-site by this proposed total parking supply of 166 independently accessible spaces, and would yield a total shortfall of 127 parking spaces. With regard to the existing 152-space parking demand at the JCC site, the 166 new spaces that would be provided by the project would accommodate the project's net new demand of 141 spaces, and relieve a small portion of the parking demand currently generated by the existing site.

Alternatively, if the proposed project were to provide 141 parking spaces (equivalent to the net new demand), the existing parking scenario should remain constant (i.e. the project would not reduce existing unmet parking demand, but would not add new parking demand to the area).

The proposed new driveways to the parking garage and loading dock would result in a total loss of approximately four on-street parking spaces (two on California Street and two on Presidio Avenue). The project's displacement of four vehicles to other on-street spaces in the study area would likely be offset by the provision of 166 new on-site parking spaces in the parking garage. Of the current employees and visitors traveling to JCC, 38 percent of survey respondents (72 persons) indicated that they park in nearby on-street spaces. Of the 38 percent of respondents that parked in on-street spaces, 15 percent (28 respondents) parked on California Street and three percent (6 respondents) parked on Presidio Avenue. These individuals would be accommodated in the proposed new parking garage.

Observations indicated that on-street parking spaces in the vicinity of the project site are typically 100 percent occupied during the midday weekday period. The proposed project would provide 166 new spaces on-site that would remove some vehicles from the on-street spaces in the area. However, because of the additional parking demand from the proposed project (including visitors to the JCC unwilling to pay for off-street parking) and latent parking demand from other uses in the neighborhood, the on-street parking occupancy level would likely remain at 100 percent. Due to other sources of latent parking demand in the neighborhood, much of the 127-space excess parking demand for the project could not be accommodated off-site within the study area. Although a shortfall of parking for the proposed project use would present an inconvenience, the effect would not be a significant environmental impact. Faced with parking shortages, drivers may seek alternate parking facilities (e.g. UCSF Lot 3) or shift modes of travel (e.g. public transit, bicycles, taxis).

4.4.2 Parking Requirements - Based on the San Francisco Planning Code (Sections 151 through 161), the proposed project would be required to provide a total of 236 independently accessible parking spaces, including 28 spaces for office/administration space, 65 spaces for the gymnasium, 29 spaces for the workout area,[4] 19 spaces for the swimming pool,[4] 20 spaces for the restaurant, 63 spaces for the theater/auditorium, and approximately 12 spaces for classroom and other uses (see Appendix E for parking requirement calculations). The proposed project would provide a total of 181 parking spaces (including 30 tandem spaces), of which 166 spaces would be independently accessible (151 independently accessible spaces plus 15 tandem-conversions). Thus, the proposed parking supply would fall short of the Planning Code requirement by 70 spaces and would require a parking variance under current zoning controls.

It should be noted that the project sponsor has proposed a special use district for the project site. Under the proposed California-Presidio Special Use District, controls would also include a provision allowing for a reduction in the off-street parking requirement. Under a special use district application, approval for the project may still be subject to a variance.

[4] Based on 1 space per 500 square foot *Planning Code* requirement, as determined by the SF Zoning Administrator.

Based on the San Francisco Planning Code (Section 155 (i)) the project would be required to provide one disabled accessible space per 25 off-street parking spaces. Thus, of the 166 proposed parking spaces, seven spaces would be required to be designated for handicapped persons. The project would provide these spaces to meet the Code requirement. The proposed project would also provide at least one van-accessible stall to meet ADA requirements.

Based on the San Francisco Planning Code (Sections 155 (j) and 155.3) the project would be required to provide one bicycle space per 20 off-street parking spaces, and four showers and eight lockers accessible to cyclists employed at the facility. In accordance with the Code, at least nine bicycle parking spaces would be provided. Shower and locker facilities would be provided within the building in the men's and women's locker rooms on LL1.

4.4.3 Parking Garage Operation - Parking would be designated for visitors and employees to the JCC site, but would be open to the general public should excess capacity be available (upon operation of the facility). There would be a charge for visitor parking.[5] Access to the garage would be provided from California Street. Two double yellow centerlines currently exist on California Street in front of the proposed garage entrance, and would prohibit left turns into the proposed garage and left-turns exiting the garage. The proposed project would include signage to inform drivers exiting the garage that right-turns only would be permitted. An attended parking booth and ticket machines would be located inside the garage near the parking control gate, located on Lower Level 1 at the bottom of the parking entry ramp (see Appendix A). This location would allow approximately ten inbound vehicles to be queued, which would minimize the potential for queues to spill back to California Street. In addition, an electronic FULL sign would be visible on California Street to discourage queuing on the street.

4.5 Freight Loading and Service Impacts

4.5.1 Loading Demand – Based on the freight delivery and service vehicle demand calculations in Appendix H of the *Transportation Impact Analysis Guidelines for Environmental Review*, the proposed project would generate 32 daily truck trips. The 5,400 square-foot restaurant would generate 19.4 daily truck trips, and the community center would generate 12.4 daily truck trips. See Appendix E for detailed loading demand calculations. The truck trips would travel on local streets as well as regional thoroughfares to and from the project site. Geary Boulevard, Pine Street and Masonic Avenue between Pine and Oak Streets are designated as freight traffic routes in the Transportation Element of the General Plan.

Trucks would likely travel on Pine and Bush Streets or Geary Boulevard between the project site and I-80 ramps in the South of Market area. Trucks traveling to and from the South Bay would likely use 19th Avenue and Geary Boulevard. Delivery trucks would also be traveling to and from other parts of San Francisco. These trucks would be using Geary Boulevard, Masonic Avenue, Pine and Bush Streets to access the site.

[5] No fee is planned to be charged for short-term use. The period of free use has not yet been determined by the Project Sponsor.

The peak period of loading activity generally occurs between 10:00 AM and 1:00 PM. Therefore, the majority of the 32 daily truck trips generated by the proposed project would not coincide with the PM peak commute hour chosen for traffic impact analysis. The proposed project would create a peak hour loading space demand of 1.8 spaces and an average hour loading space demand of 1.5 spaces. The proposed project would provide one off-street loading space (from Presidio Avenue); with the existing curbside loading zone on California Street, the proposed off-street loading space would generally be adequate to accommodate the expected demand.

Since the peak period of loading activities does not coincide with the peak hours of traffic generation, trucks would be able to load and unload materials curbside without causing impacts to traffic flow or transit operations on Presidio Avenue. The off-street loading space would be accessed from Presidio Avenue and would accommodate trucks approximately 34 feet in length. The relatively low traffic volumes expected during peak loading activities would minimize the conflict of loading activities with traffic on Presidio Avenue.

4.5.2 Loading Requirements - Based on the San Francisco Planning Code (Section 152), the proposed project would be required to provide one off-street loading space. The proposed project proposes one off-street loading space (34 feet long and 14 feet wide, with a 14-foot vertical clearance) and would meet Code requirements. Because the proposed project meets off-street loading space Code requirements and excess loading demand could be accommodated at the loading zone on California Street (where loading activities currently occur), project loading impacts would not be considered significant. Garbage and recycling containers for the proposed project would be stored within the building on LL1, and accessed through the loading dock on Presidio Avenue (using a service elevator).

4.6 Construction Impacts

The City and County of San Francisco has no adopted significance criteria for transportation impacts during construction-period activities. Generally, construction-related impacts would not be considered significant due to their temporary nature.

Construction of the Proposed Project is expected to take approximately 21 months. Construction activity would occur in five phases: Demolition (12/01 to 4/02), Excavation (3/02 to 7/02), Foundation (6/02 to 11/02), Building Shell and Core (9/02 to 5/03) and Interiors/Finishes (2/03 to 8/03). It is anticipated that construction activities would start in December 2001 and be completed by August 2003. Construction-related activities would typically occur Monday through Friday from 7:00 AM to 4:00 PM.

Due to the limited site staging area, longer-term storage would be off-site, with single-day staging only at the parking lane (see below). Smaller equipment and materials would be stored in below-grade parking levels following completion of those levels. Concrete mixer trucks would be staged along the north side of Euclid Avenue, adjacent to UCSF.

The parking lanes along California Street and Presidio Avenue (adjacent to the project site) would be closed for the duration of the project. Parking in this lane would be restricted to construction vehicles and same-day staging only. The sidewalks at California Street and Presidio Avenue would be closed for the duration of the first four phases of construction (through May 2003) and pedestrian traffic would need to be rerouted to the parking lane or across the street. It is not anticipated that any traffic lanes would need to be closed during the construction duration, aside from temporary closures for large/special material delivery (e.g. steel trusses). However, if it is determined that temporary traffic lane closures would be needed, the closures would be coordinated with the City in order to minimize the impacts on local traffic. In general, lane and sidewalk closures are subject to review and approval by the Department of Public Works (DPW) and the Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT).

Bus stops for the 1 / 1-BX / 4 lines on California, and the 3 / 43 lines on Presidio adjacent to the project site would need to be temporarily relocated. Relocation of the California Street stop could occur east of the intersection with Presidio Avenue. Relocation of the Presidio Avenue bus stop would need to accommodate the route terminus of the 3-Jackson line and bus layovers at that location, and could occur north or south of the current stop location. Temporary MUNI bus stop relocation would need to be coordinated with MUNI's Chief Inspector.[6] In addition, it should be noted that a dense network of overhead lines that provide power to MUNI's electric trolley buses exists at the corner of California Street and Presidio Avenue. It is the responsibility of the prime construction contractor to ensure that drivers are made aware of these lines and that they are not damaged through the movement of large construction vehicles and equipment.

During the construction period, there would be a flow of construction-related trucks into and out of the site. The impact of construction truck traffic would be a temporary lessening of the capacities of streets due to the slower movement and larger turning radii of trucks. This would affect both traffic and MUNI operations. A maximum of 9 trucks (2 average) would be at the site daily during the first phase of construction. A maximum of 45 trucks (39 average) would visit the site each day during the second construction phase, followed by a maximum of 26 trucks (1 average) during the third phase of construction. The fourth phase would have a maximum of 56 (9 average) construction-related trucks per day, and the fifth phase would have a maximum of 5 (5 average) trucks per day.

Construction-related deliveries from the North Bay would occur via the Golden Gate Bridge, and access the site using 19th Avenue and California Street. Deliveries from the South Bay would use I-280, also traveling on 19th Avenue and California Street. Construction-related deliveries from the East Bay would use I-80. For access to the site from I-80, trucks would be routed to the 5th Street or 9th Street off-ramps to Harrison Street, to 7th Street, to McAllister Street, to Franklin Street to California Street, and would return to I-80 via Gough Street (to 10th Street, to Bryant Street to the Sterling Street on-ramp) or Van Ness Avenue.

The peak construction period in terms of manpower required would occur during the fifth phase

[6] MUNI's Chief Inspector, Len Olsen, can be contacted at (415) 554-9286.

of construction, with a maximum of 60 workers (60 average) per day. A maximum of 15 workers (15 average) would visit the site during the first phase, a maximum of 12 workers (12 average) would visit the site during the second phase, 30 maximum (20 average) during the third phase and 41 maximum (34 average) during the fourth phase. Trip distribution and mode split data are not available for the construction workers. In terms of traffic conditions, the worst-case scenario would be if all workers drove to the project site. The addition of approximately 60 vehicles would somewhat affect the operating conditions at the nearby intersections; however, the impacts at the intersections would be less than those created by the Proposed Project.

These construction workers would cause a temporary parking demand. Since mode split information is not available for the construction workers, the worst-case scenario in terms of parking demand would be 60 vehicles. Due to limited parking in the area, most workers would be shuttled to the site by the General Contractor from remote parking. Use of the public parking at the UCSF Laurel Heights campus would be subject to restrictions at that lot. In addition, a portion of the construction workers may take transit to access the project site. These additional transit riders would increase the demand on the local and regional transit operators. However, since the transit operators currently operate with available capacity, there would not be a substantial impact due to the addition of construction workers. Furthermore, any transit impacts would be less than those created by the Proposed Project.

4.7 Cumulative (Year 2010) Traffic Impacts

Cumulative traffic growth would occur from other developments in the project area as well as the proposed project itself. The total cumulative growth was assumed to occur at a rate of one percent per year until the year 2010. The calculated cumulative traffic volumes were used to forecast the levels of service at the seven study intersections under 2010 cumulative conditions. The cumulative growth rate used for this study accounts for the level of traffic that would be associated with the other proposed projects in the vicinity of the proposed project as well as the project itself.

Table 4-3 summarizes the results of the intersection LOS analysis for the year 2010 cumulative weekday PM peak hour conditions (Existing and Existing Plus Project conditions have also been included for comparison purposes). The table indicates that six of the seven study intersections would operate at acceptable levels, (i.e., LOS D or better) and one intersection would operate at unacceptable levels (i.e., LOS E or F) for the year 2010 cumulative conditions. Under cumulative conditions, traffic at the intersection of Geary Boulevard and Masonic Avenue would incur significant delays.

TABLE 4-3
CUMULATIVE (YEAR 2010)
WEEKDAY PM PEAK HOUR LEVELS OF SERVICE

	Existing		Existing Plus Project		Cumulative (Year 2010)	
Intersection[1]	**LOS**	**Delay (sec/veh)**	**LOS**	**Delay (sec/veh)**	**LOS**	**Delay (sec/veh)**
Sacramento Street and Walnut Street	A	4.0	A	4.3	A	4.6
Sacramento Street and Presidio Avenue	B	9.0	B	9.1	B	9.9
California Street and Laurel Street	B	6.4	B	6.4	B	6.9
California Street and Walnut Street	B	6.5	B	6.7	B	7.0
California Street and Presidio Avenue	C	17.7	C	17.8	C	19.1
Pine Street and Presidio Avenue	B	8.6	B	8.7	B	9.0
Masonic Avenue and Geary Boulevard	E	42.5[2]	E	42.8[3]	F	65.5[4]

Source: Wilbur Smith Associates, March 2000

Notes:

1. The levels of service as defined for signalized intersections are different from those defined for unsignalized intersections, as shown in Appendix C.
2. A 1.01 volume-to-capacity (V/C) ratio.
3. A 1.01 volume-to-capacity (V/C) ratio.
4. A 1.12 volume-to-capacity (V/C) ratio.

The intersection of Geary Boulevard and Masonic Avenue is the only intersection that would operate at an unacceptable level of service during the PM peak hour under Existing-Plus-Project or Cumulative conditions. The proposed project contributes approximately five percent of the PM peak hour cumulative traffic growth this intersection, as shown in Table 4-4. The project's five percent contribution to this intersection is a de minimis contribution, and would not be a significant effect of the project. Under Cumulative conditions, this intersection would operate at LOS F without the traffic growth contributed by proposed project.

TABLE 4-4 PROJECT CONTRIBUTION TO CUMULATIVE (2010) PM PEAK HOUR INTERSECTION VOLUMES					
Study Intersection	**Existing**	**Cumulative (2010)**	**Cumulative minus Existing**	**Project**	**Percent Project Contribution**
Masonic Avenue and Geary Boulevard	3,805	4,203	398	18	4.5%

Source: Wilbur Smith Associates, March 2000

Chapter 5
TRANSPORTATION MITIGATION AND IMPROVEMENT MEASURES

5.1 Existing Plus Project Conditions

5.1.1 Traffic - Traffic generated by the proposed project during the PM peak hour would cause the average delay at the intersection of Masonic Avenue and Geary Bouevard to increase from 42.5 seconds per vehicle (LOS E) to 42.8 seconds per vehicle (LOS E). The effect of the proposed project at this intersection (additional 0.3 second delay) is not considered significant, and would not warrant mitigation. This intersection currently operates at an unacceptable level of service because the signal timing splits are not optimized for the traffic volumes. The time required for pedestrians to cross Masonic Avenue is greater than the time required for the through traffic volume on Geary Boulevard. Therefore, the pedestrian crossing time requirement determines the amount of green time allocated to the through movement on Geary Boulevard, increasing the length of the phase beyond optimal conditions. In turn, the time allocated to the traffic on Masonic Avenue is reduced from the optimal duration.

5.1.2 Transit - The project would generate an estimated 167 net new PM peak hour transit trips (82 inbound and 85 outbound). The project-generated net new PM peak hour transit trips would cause an increase in the existing transit ridership in the vicinity of the project during the PM peak hour. The MUNI line that operates with the greatest passenger load factor is the 2-Clement route. In the outbound direction, it currently operates at 101 percent of capacity at the maximum load point near the intersection of Sutter and Powell Streets. The proposed project would generate a small number of additional PM peak hour transit trips on this line. However, the 1-California and the 1BX-California Express buses serve a similar geographic area as the outbound 2-Clement route and stop nearer to the project site. Therefore, these lines would likely incur more patronage from the proposed project than the 2-Clement route. Furthermore, the maximum load point in the outbound direction occurs at the intersection of Sutter and Powell Streets, over twenty blocks from the 2-Clement bus stop nearest to the project site.

The 1-California route has a current PM peak hour load factor of 93% in the outbound direction, and can accommodate an additional 87 PM peak hour passengers before exceeding the capacity at the MLP. Because the proposed project would generate 167 net new PM peak hour transit trips, and the MLP for the outbound 1-California occurs at the intersection of Sacramento and Powell Street (23 blocks east of the project site), the proposed project would not cause ridership on the outbound direction of the 1-California route to exceed capacity. No transit-related impacts have been identified and no mitigation measures are required.

5.1.3 Pedestrians and Bicycles – The project would generate about 128 net new pedestrian trips and about eight trips made by bicycle or some other mode. The project would not cause any significant pedestrian-related impacts or significant bicycle-related impacts. Therefore, no pedestrian or bicycle mitigation measures are necessary.

5.1.4 Parking - The project calculated demand for a total of 293 parking spaces would not be met by the proposed supply of 166 on-site independently accessible parking spaces. A portion of the parking shortfall of 127 spaces could potentially be absorbed by the existing on-street parking that would be made available by the provision of parking on-site. However, because on-street parking in the area is currently 100% occupied, there may be latent parking demand from other uses in the area that would occupy any newly available on-street parking spaces. A limited amount of off-street parking would be available at the UCSF Laurel Heights campus (Lot 3). Although a shortfall of parking would present an inconvenience, the effect would not be a significant environmental impact. Therefore, no mitigation measures are required. It should also be noted that a 152-space parking demand currently exists at the JCC site. The 166 new spaces provided by the project would accommodate the project's net new demand of 141 spaces, and relieve a small portion of the parking demand currently generated by the existing site.[1]

The 166 independently accessible spaces that would be provided by the project do not meet the Code requirement for 236 spaces. The project sponsor would need to seek a variance to the parking requirement, or modify the parking requirement in the proposed Special Use District.

As an improvement measure, the project sponsor has proposed providing incentives to employees who carpool and use public transportation, to help reduce parking demand. In addition to other incentives, the use of the *Commuter Check* program is recommended. The JCC also plans to acquire one or more vans to be used to provide transportation for program participants. The extent of this van service has not been determined.

5.1.5 Loading - The proposed project would increase the amount of loading activity at the site. A large portion of the expected 32 daily project-generated truck trips would occur between 10:00 AM and 1:00 PM, and would not coincide with the PM peak commute hour chosen for traffic impact analysis. The proposed project would create a peak hour loading space demand of 1.8 spaces and an average hour loading space demand of 1.5 spaces. The proposed project would provide one off-street loading space, therefore the proposed loading space would generally be adequate to accommodate the expected demand, and would meet the Code requirement for one off-street loading space. In addition, the existing loading zone on California would be available to accommodate excess demand that may occur. No loading impacts have been identified, and therefore no loading mitigation measures are necessary.

5.1.6 Construction – Construction-related truck traffic should be restricted to off-peak hours (between 9:00 AM to 4:00 PM) to the extent possible. Limiting truck movements to these hours (or other times, if approved by DPT) would minimize disruption of the general traffic flow on adjacent streets during the AM and PM peak periods. The Project Sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Fire Department, MUNI, and the Planning Department to determine feasible

[1] Alternatively, with 141 parking spaces provided (equivalent to the net new demand), the existing parking scenario should remain constant (i.e. the project would not reduce existing unmet parking demand, but would not add new parking demand to the area).

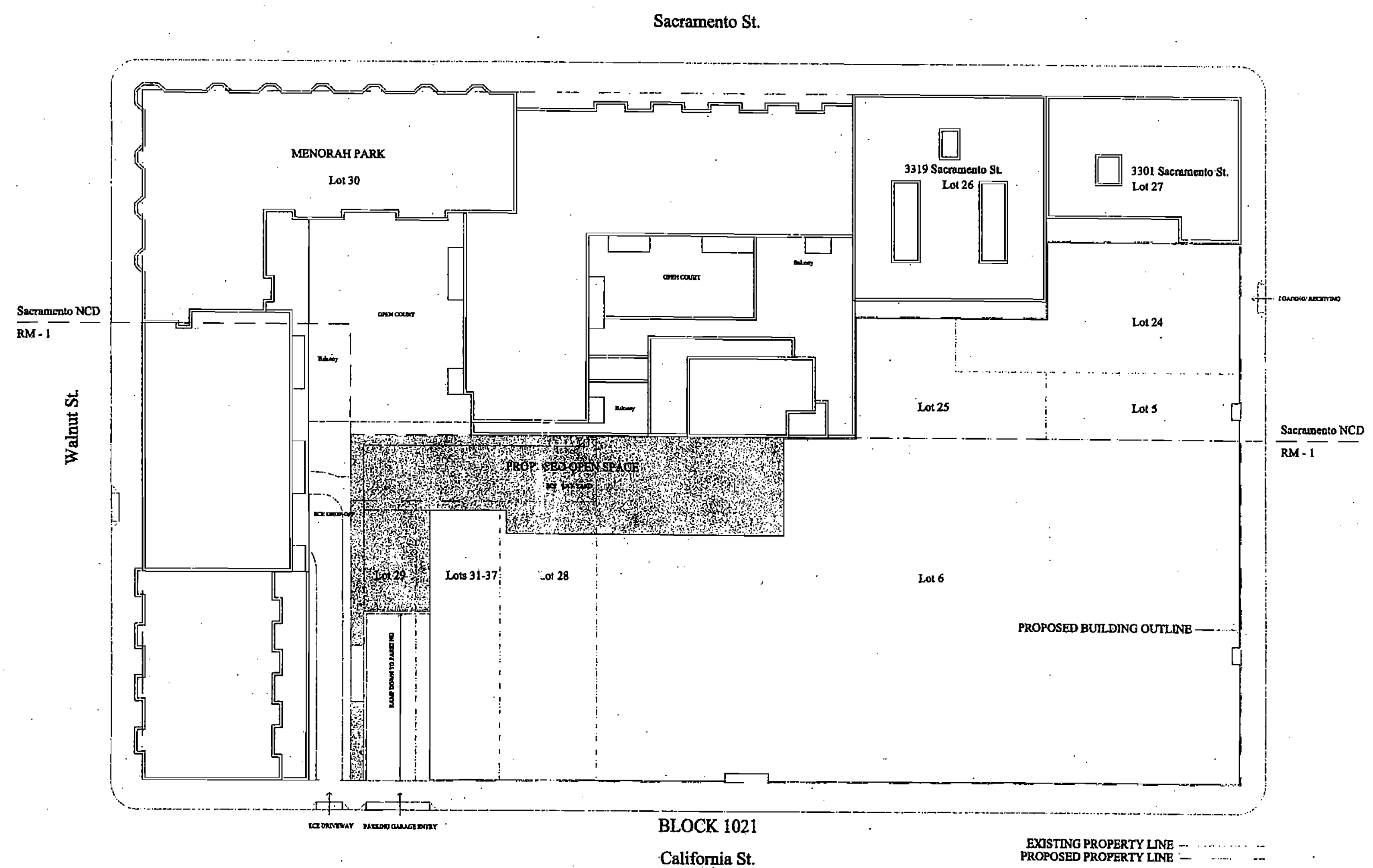
traffic mitigation measures to reduce traffic congestion, including transit disruption (bus stop relocation) and pedestrian circulation impacts during construction of the Proposed Project. The temporary parking demand by construction workers would need to be met on-site or through arrangements at other off-site parking facilities. The contractor would need to determine the location of an off-site parking facility for construction workers during the construction period. Because the impacts associated with project construction would be short-term and temporary, the impacts are not considered to be significant and no mitigation measures are required.

5.2 Cumulative (Year 2010) Conditions

The intersection of Masonic Avenue and Geary Boulevard would continue to operate at an unacceptable level of service under cumulative conditions. The project's five percent contribution to this intersection is a de minimis contribution, and would not be a significant impact.

APPENDICES

Appendix A
PROJECT PLANS



Jewish Community Center

JCC
3200 California Street
San Francisco, CA

Gensler

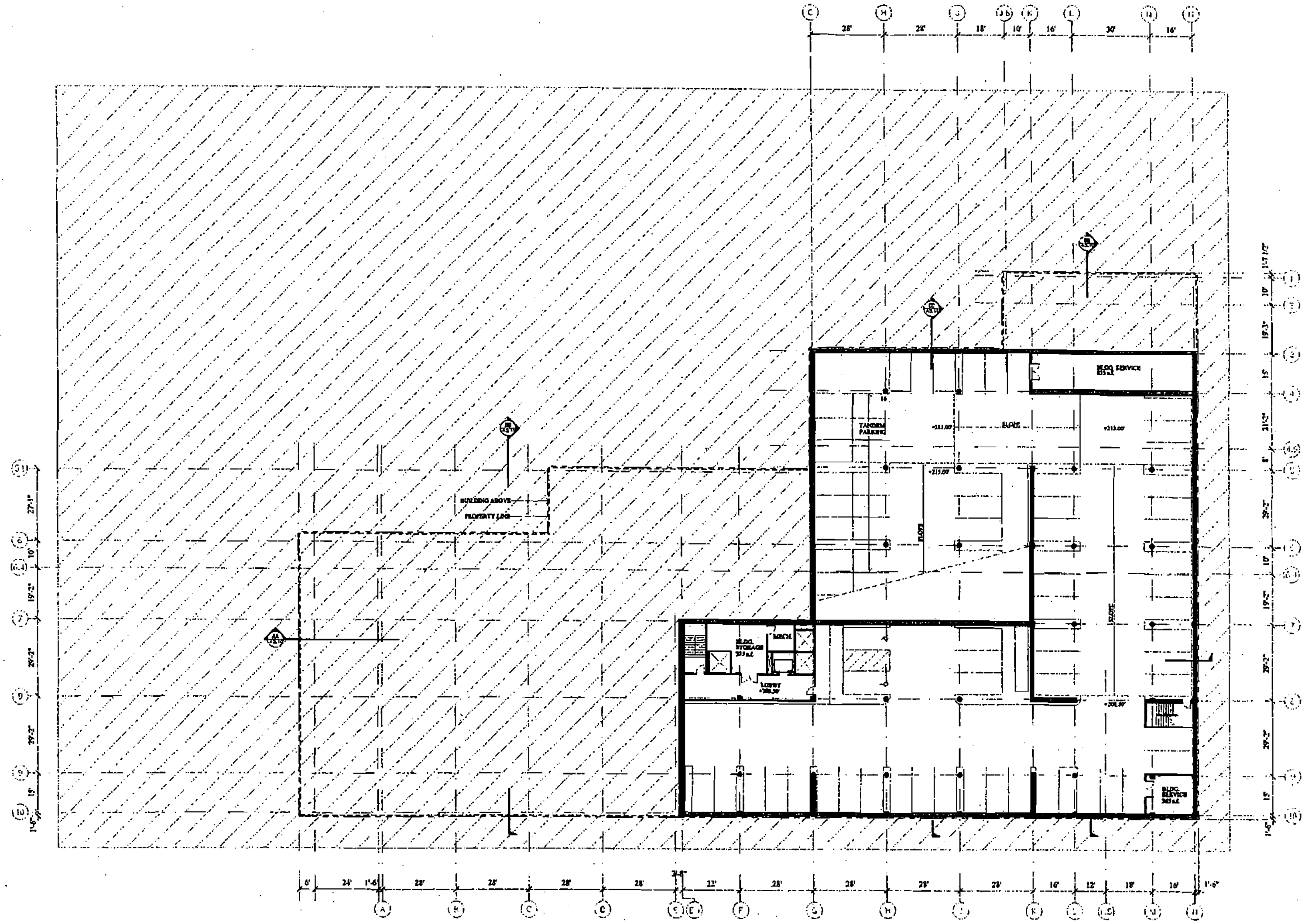
The Steinberg Group

Project Name: Jewish Community Center
Description: PARCEL PLAN

PARCEL PLAN

1

A0.02



PARKING 30,266 S.F.
66 CARS

Jewish
Community
Center

JCC
3200 California Street
San Francisco, CA

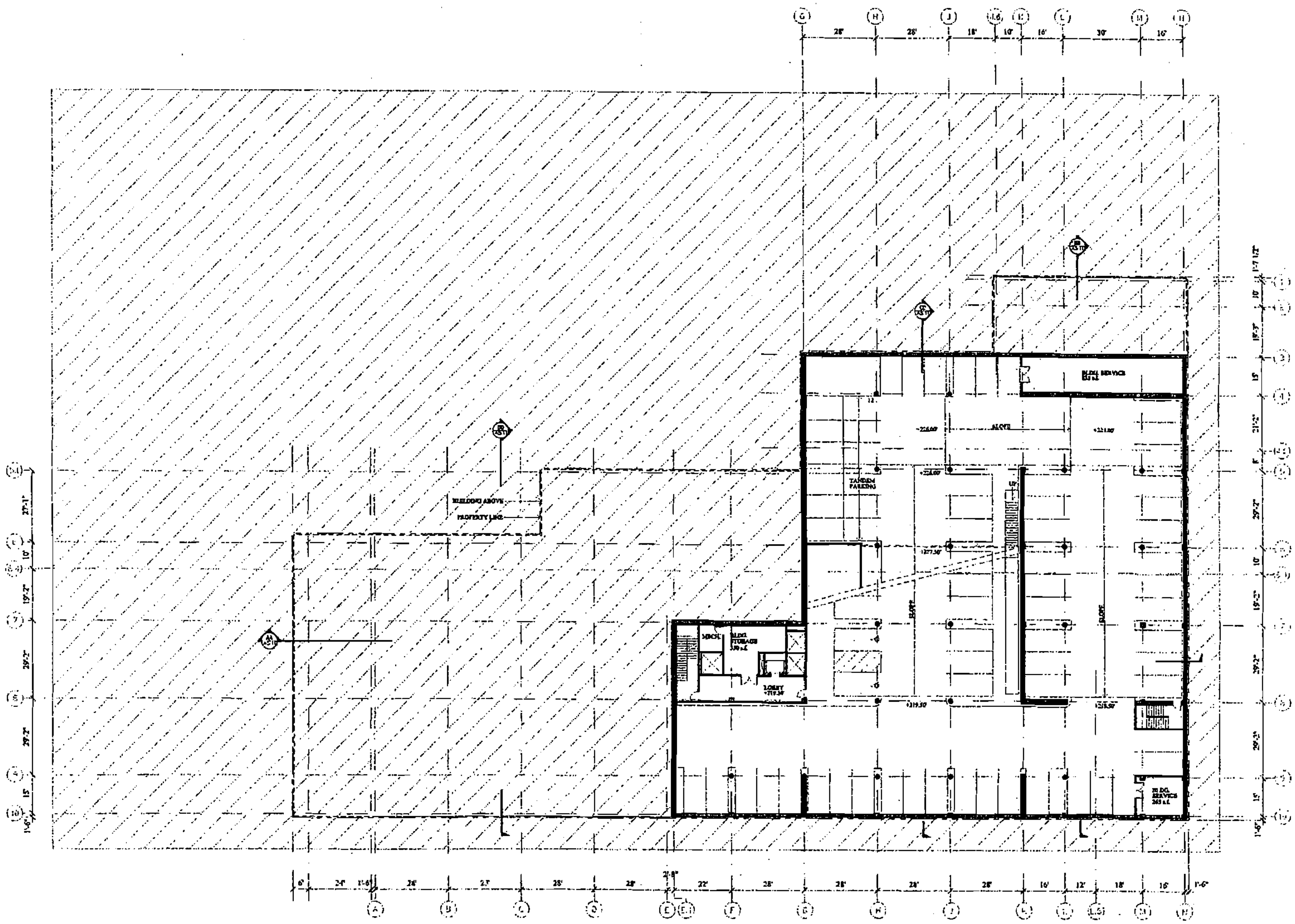
Gensler

The Steinberg Group

BASEMENT FLOOR PLAN-LOWER LEVEL 3

1

A2.01



PARKING 30,266 S.F.
76 CARS
[illegible] STANDARD STALLS
2 H.C STALLS
12 TANDEM STALLS

BASEMENT FLOOR PLAN-LOWER LEVEL 2
SCALE: 1/16" = 1'-0"

1

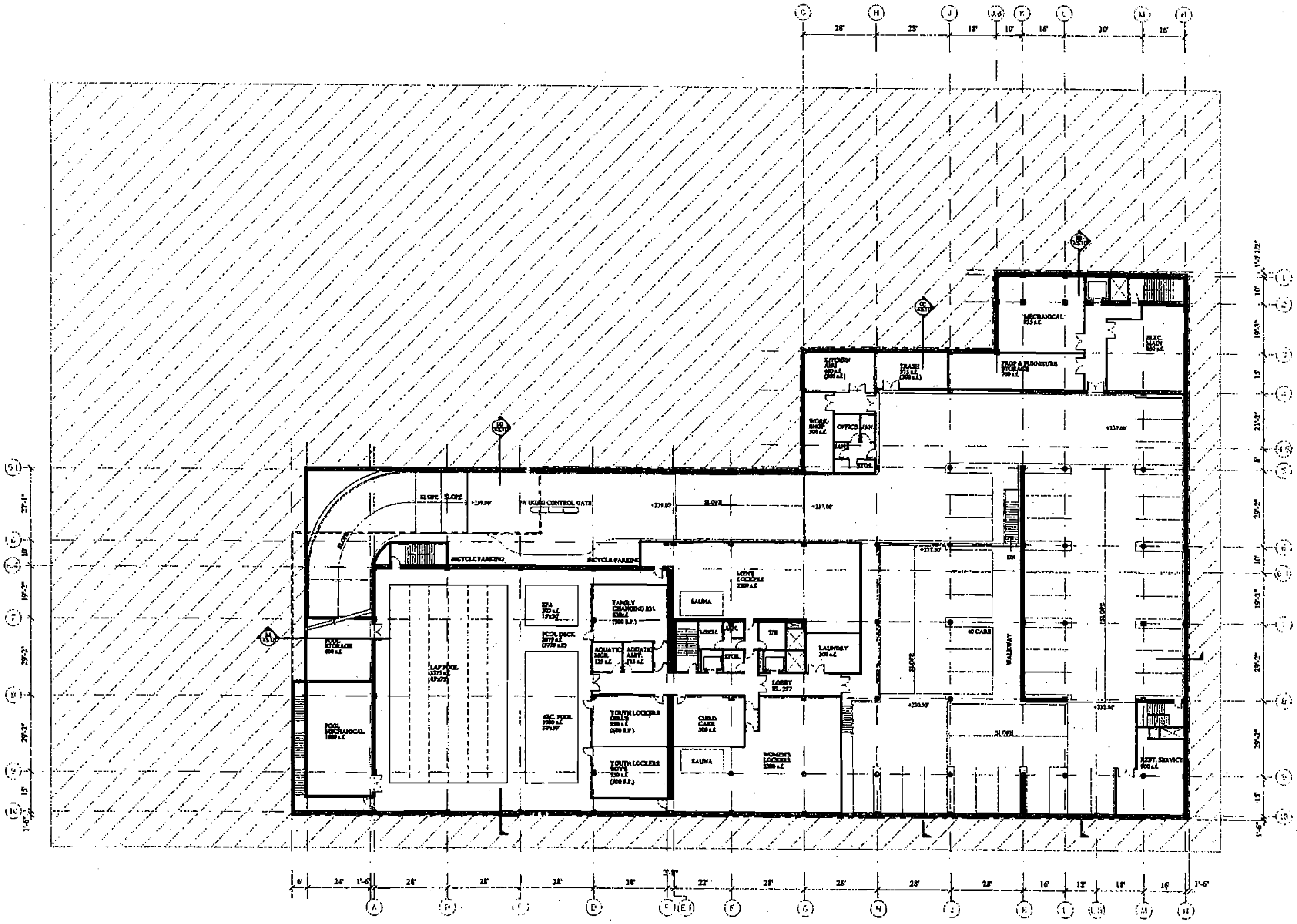
Jewish Community Center

JCC
3200 California Street
San Francisco, CA

Gensler

The Steinberg Group

A2.02



PARKING	32,747 S.F.
PROGRAM	20,678 S.F.
	53,425 S.F.

39 CARS
37 STANDARD STALLS
2 HC STALLS (1 VAN)

BASEMENT FLOOR PLAN-LOWER LEVEL 1
SCALE: 1/16" = 1'-0"

1

Jewish
Community
Center

JCC
3200 California Street
San Francisco, CA

Gensler

The
Steinberg
Group

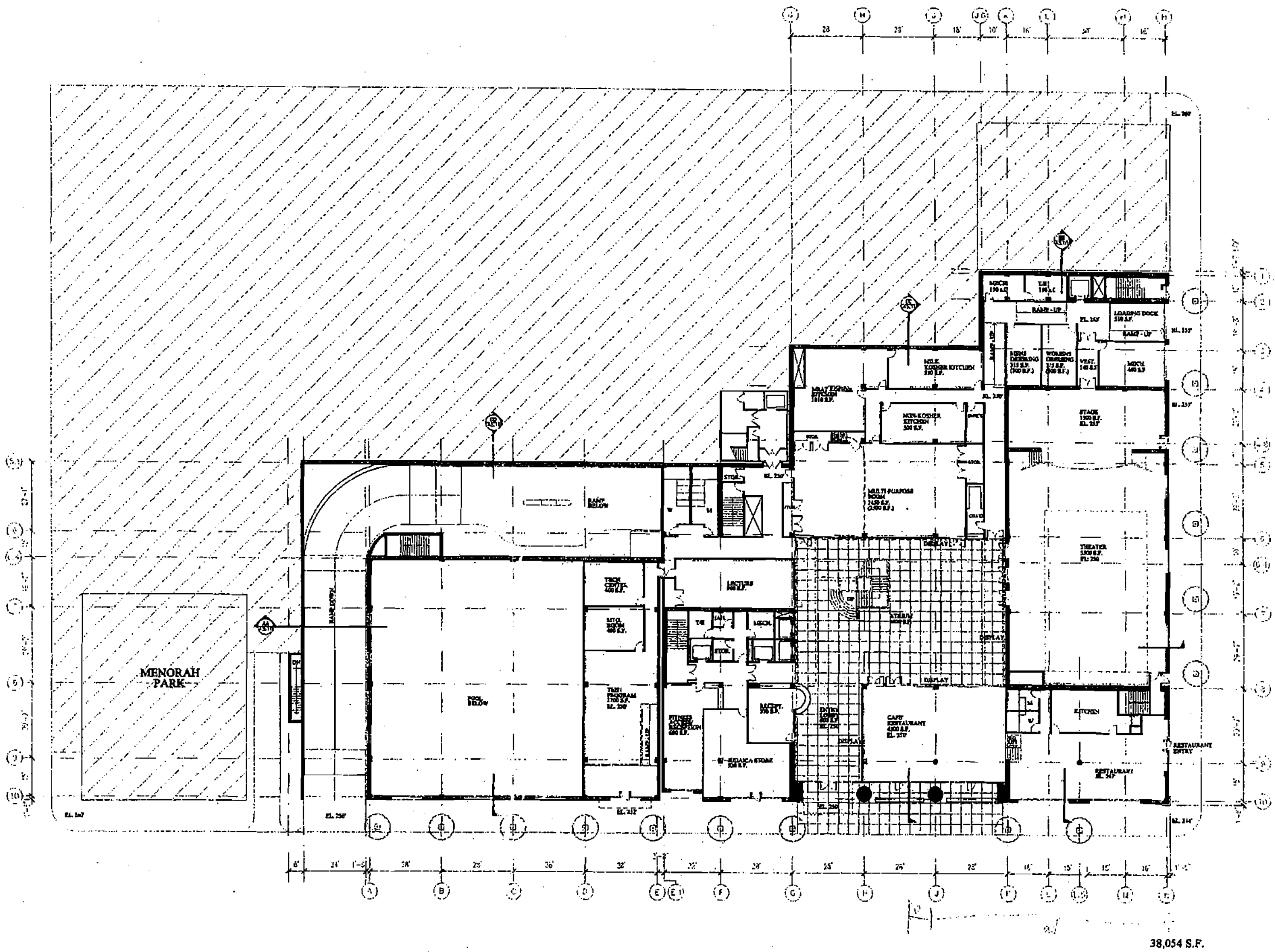
A2.03

Jewish Community Center

JCC
3200 California Street
San Francisco, CA

Gensler

The Steinberg Group
ARCHITECTURE
PLANNING
INTERIORS



GROUND FLOOR PLAN
SCALE: 1/16" = 1'-0"

1

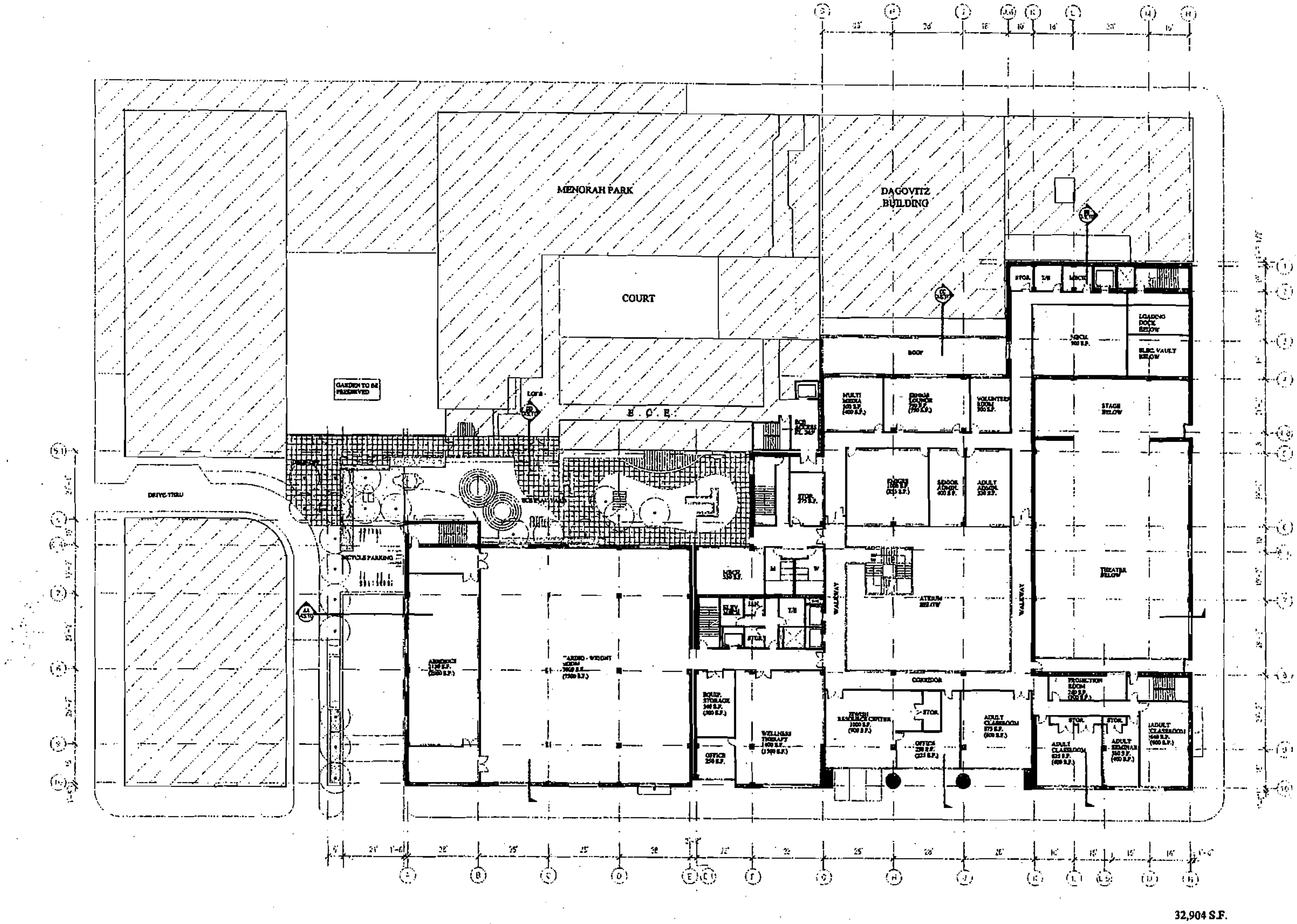
A2.04

Jewish Community Center

JCC
3200 California Street
San Francisco, CA

Gensler

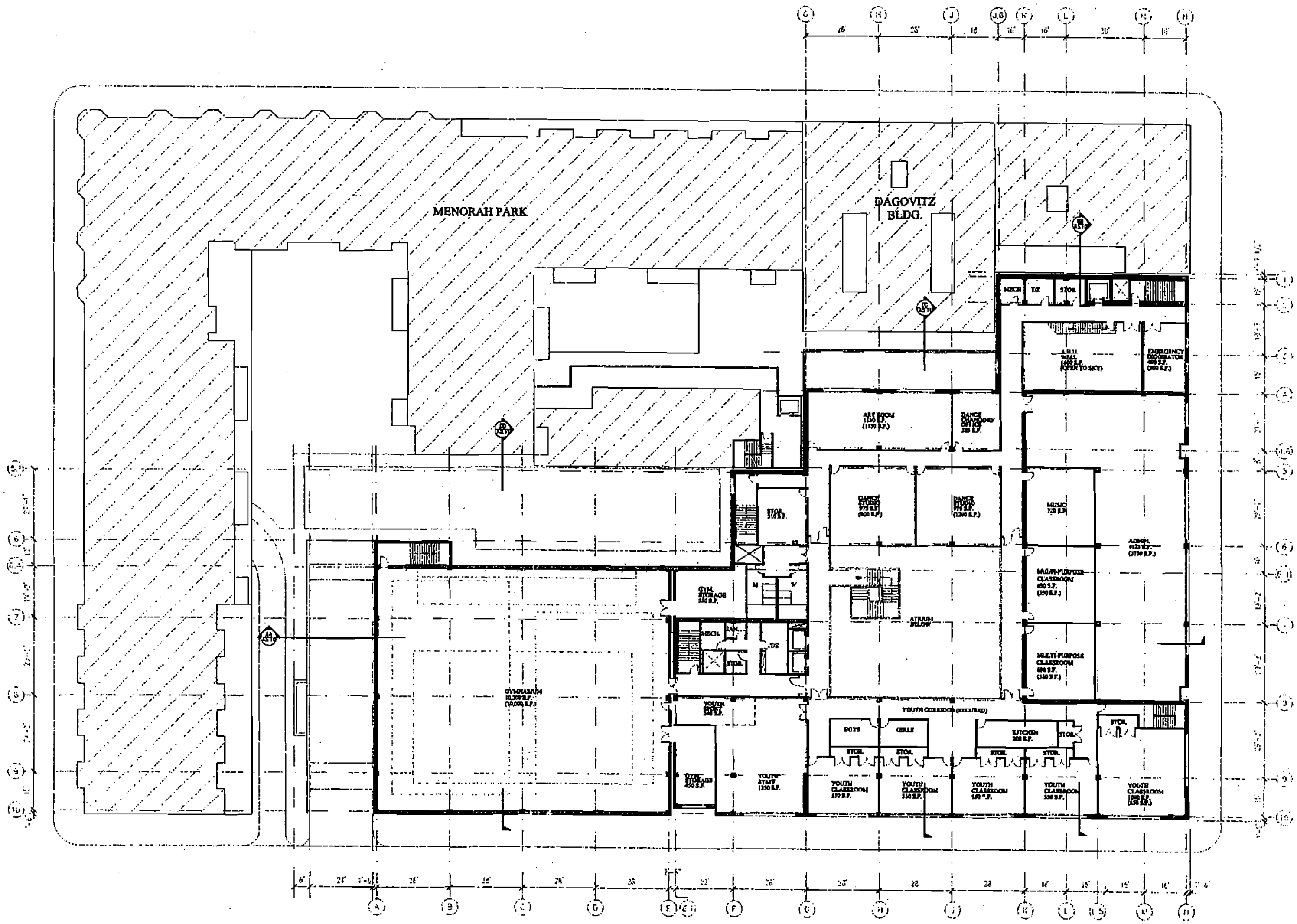
The Steinberg Group



SECOND FLOOR PLAN

1

A2.05



39,101 S.F.

THIRD FLOOR PLAN
SCALE: 1/16" = 1'-0"

1

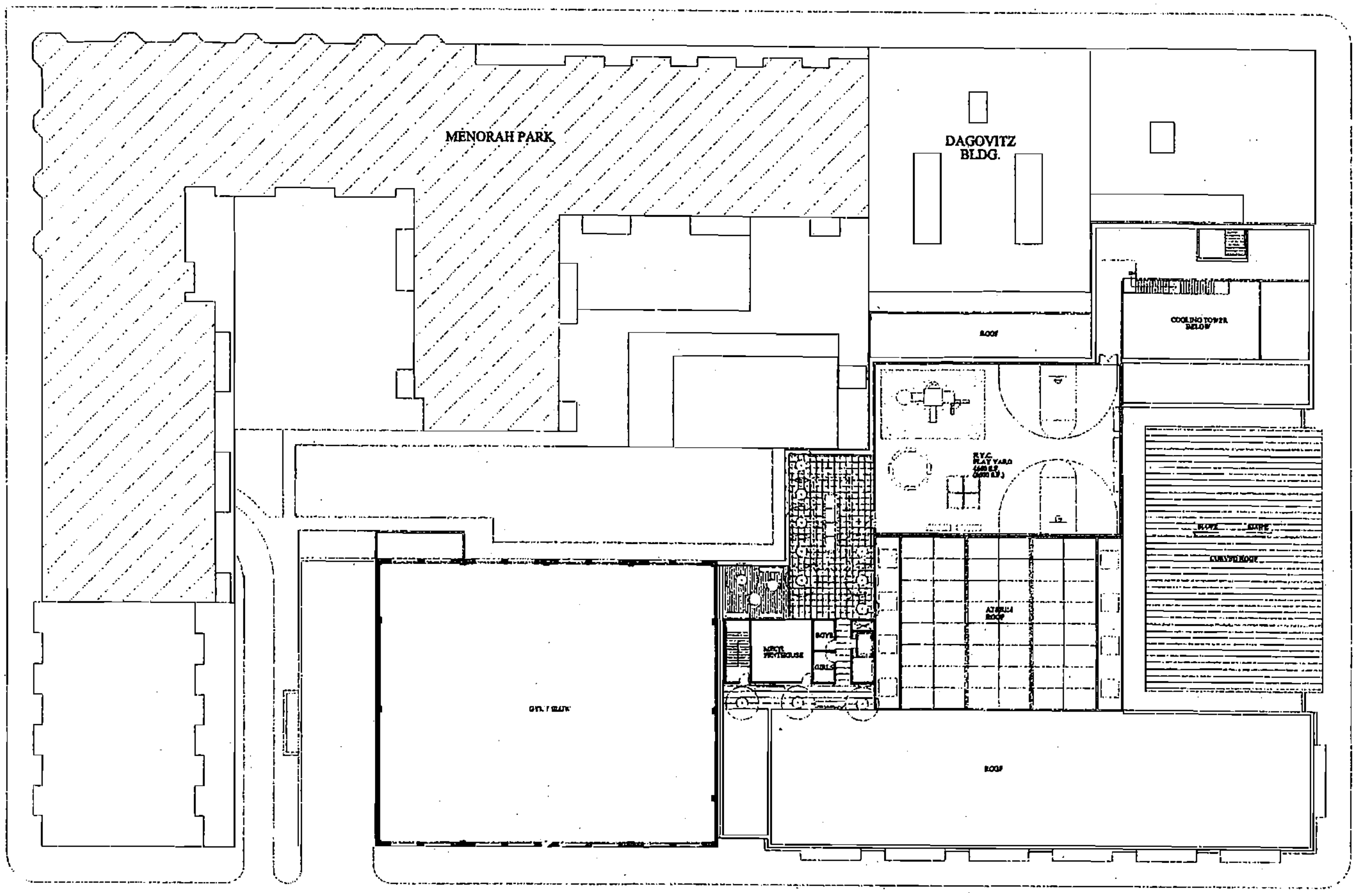
Jewish Community Center

JCC
3200 California Street
San Francisco, CA

Gensler

The Steinberg Group

A2.06



ROOF PLAN
SCALE: 1/16" = 1'-0"

1

Jewish Community Center

JCC
3200 California Street
San Francisco, CA

Gensler

The Steinberg Group

Scale: 0 4 8 16 32

A2.07

Appendix B
SCOPE OF WORK AND APPROVAL

TRANSPORTATION STUDY SCOPE OF *WORK ACKNOWLEDGMENT AND APPROVAL*

Transmittal To: Gretchen Heine
Wilbur Smith Associates
1145 Market Street, Tenth Floor
San Francisco, CA 94103

Date: March 29, 2000

The proposed scope of work for the 3200 California Street, Jewish Community Center Project, Case No. 99.812! , dated March 2, 2000 is hereby

X Approved as submitted

☐ Approved as revised and resubmitted

☐ Approved subject to comments below

☐ Not approved, pending modifications specified below and resubmitted

Signed: [signature] [signature]

Transportation *Environmental*

Comments:

Note: A copy of this approval and the final scope of work is to be appended to the transportation study. The Department advises consultants and project sponsors that review of the draft transportation report may identify issues or concerns of other City agencies not addressed in the scope of work hereby approved, and that the scope of work may need to be modified to accommodate such additional issues.

scopeapp.doc

SCOPE OF WORK

TRANSPORTATION STUDY FOR THE JEWISH COMMUNITY CENTER (JCC) PROJECT AT CALIFORNIA AND PRESIDIO STREETS

Wilbur Smith Associates (WSA) is pleased to submit this Scope of Work for the transportation study for the Proposed Jewish Community Center (JCC) Project. The JCC project site is located at 3200 California Street, between Presidio Avenue and Walnut Street. This work scope has been developed based on the San Francisco Planning Department's *Interim Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)*, January 2000, and on discussions held with City staff at the project scoping meeting (January 26, 2000). The proposed work program is summarized below:

Task 1. Project Description

WSA will describe the Proposed Project in a Project Description section. This section will include a brief description of the existing uses on the site (community, recreation and education services), and the Proposed Project, including the continuation, expansion of, or changes to, existing land uses. A site plan of the proposed building will also be provided. The description will include the number and type of parking spaces that will be provided and access to those spaces. Loading/unloading facilities and driveways, including dimensions, and the location of storage and pick-up for garbage will also be described.

Task 2. Data Collection

Traffic: WSA will collect traffic turning movement counts for the weekday P.M. peak period (4:00 P.M. to 6:00 P.M.) volumes for the following seven intersections.

- Presidio Avenue/Sacramento Street
- Walnut Street/ Sacramento Street
- California Street/Presidio Avenue
- California Street/Laurel Street
- California Street/Walnut Street
- Pine Street/Presidio Avenue
- Masonic Avenue/Geary Boulevard.

Parking: An off-street parking inventory and utilization survey will be compiled, for a weekday, during the Midday (1:00 to 3:00 PM) period. A qualitative description of on-street parking conditions will be provided based on field observations, assuming a 100% on-street parking occupancy (based on conditions similar to the downtown area). The parking study area is generally bounded to the north by Clay Street, to the east by Baker Street, to the south by Bush Street and to the west by Laurel Street.

Transit: WSA will compile data on MUNI transit route and bus stop data within a two-block radius of the Proposed Project site, and bus stop locations within a one-block radius. Peak period activities at the MUNI bus yard on Presidio Avenue will be described. Current conflicts between delivery vehicles and/or passenger vehicle pick-up/drop-off activities and MUNI bus operations on California Street will be described in detail.

Pedestrian: WSA will include a discussion of the pedestrian environment and a qualitative description of current pedestrian conditions in the area.

Bicycle: WSA will include a discussion of the bicycle environment and a qualitative description of current bicyclist conditions in the area.

Task 3. Document Existing Conditions

Using the data collected in Task 2, WSA will document existing street traffic, transit, parking, and pedestrian and bicycle conditions, including:

A base map and text for the study area, describing the street designations in General Plan, street names, number of lanes, bicycle lanes and routes and traffic flow directions;

A qualitative discussion of the peak activity of the existing JCC relative to the weekday PM peak period;

A map and discussion of transit services within the study area, including bus routes and bus stop locations;

On- and off-street parking supply and utilization within the study area;

A description of curbside regulation and use along the project site (including current regulation and use of curbside along California Street and Presidio Avenue);

A description of passenger (child) drop-off and pick-up activity on the site;

General pedestrian circulation conditions in the vicinity of the project site;

General bicycle circulation conditions in the vicinity of the project site; and,

Traffic LOS conditions for intersections during PM peak hour conditions at the study intersections.

Task 4. Determine Project Travel Demand

The JCC proposes to demolish the existing facility and construct a new facility for similar uses. The Transportation Study will analyze only the net new travel demand from the project.

Trip Generation: WSA will estimate the number of person trips that will be generated by the Proposed Project uses on a weekday basis and during the PM peak hour. To account for the broad range of existing and proposed uses, this information will be based on both the *SF Guidelines* and other sources where appropriate. The number of employees will be provided based on the actual number of JCC employees. This section will briefly describe why the weekday PM peak period (versus the project peak trip generation period) is used for the study analysis.

> ***New land uses (retail/restaurant):*** The trip generation rate for proposed *new* land uses (restaurant and retail) will be based on the *SF Guidelines*, including a 70 percent linked trip factor.
>
> ***Continuing land uses:*** The net number of new trips (both visitor and employee trips) for proposed JCC uses which would continue from existing JCC land uses will be developed by pro-rating the total number of existing trips (as provided in the *JCCSF Transportation Survey Report*), in accordance with the size (square foot) increase or decrease of comparable uses and/or facilities. The PM peak trip percentage will also be derived from information provided in the *JCCSF Transportation Survey Report*. All information used from the *Transportation Survey Report* will be reviewed and approved in advance by City staff.

Trip Distribution/Mode Split/Vehicle Occupancy: Trip distribution, mode split and vehicle occupancy rates for all land uses will be derived from information contained in the *JCCSF Transportation Survey Report* (prepared by WSA in June 1999). Corresponding rates will be used for both visitors and employees, as both were included in the *Transportation Survey Report* questionnaire. Use of travel demand data from the *Transportation Survey Report* will be reviewed and approved in advance by City staff.

Parking/Loading Demand: The parking demand for the existing <u>employees</u> will be based on the current number of employees, and be pro-rated per square footage of the new project. Parking demand for employees of new uses (retail and restaurant) will be based on methodology in the *SF Guidelines*. Mode split and vehicle occupancy information will be derived from information contained in the WSA *Transportation Survey Report*. The parking demand for <u>visitors</u> to the site will be based on information contained in the WSA *Transportation Survey Report* (the number of daily visitors pro-rated per square footage of the new project) as approved by City staff, and the *SF Guidelines*. The loading demand for the site will be based on the methodology in the *SF Guidelines*.

Task 5. Transportation Impact Analysis

WSA will identify transportation impacts associated with the Proposed Project. This will include impacts on the study intersections, impacts on transit, pedestrian circulation, bicycle circulation parking supply and demand, and passenger and freight loading supply and demand conditions. Mitigation measures will be proposed to improve operations where significant project-related impacts have been identified, and improvement measures will be proposed where non-significant impacts have been identified.

Task 5.1 Traffic
WSA will calculate intersection Level of Service (LOS) of both signalized and unsignalized study intersections using the *1985 Highway Capacity Manual Operations Methodology, 1994 Update*: *Chapters 9 and 10* (respectively). The intersection level of service analysis will be based on the net new vehicle trips that will be generated by the Proposed Project.

The LOS will be calculated for the following scenarios:

Existing,
Existing Plus Project scenario, and,
Future Year 2010 Cumulative.

The Year 2010 Cumulative traffic conditions will be based on an annual 1.0% growth rate.

Task 5.2 Parking
WSA will prepare a parking supply/demand analysis for the project. The proposed parking supply will be compared to the San Francisco *Planning Code* requirements and to the demand generated by the Proposed Project. The type of parking provided (valet or self-park) will be noted. Any deficit of parking spaces will be quantified, and discussed in relation to the effect on the parking supply in the area surrounding the project.

Task 5.3 Transit
WSA will discuss any potential project impacts to transit capacity and operations for nearby MUNI service. A quantitative Directional Link Analysis of the project-related impacts will be conducted for existing and future MUNI lines serving the project site, consistent with the *SF Guidelines*. This section will include a discussion of possible interference with MUNI operations.

Task 5.4 Pedestrians
WSA will conduct a qualitative evaluation of the impacts of the Proposed Project on pedestrian conditions in the study area for Existing Plus Project conditions.

Task 5.5 Bicyclists
WSA will conduct a qualitative evaluation of the impacts of the Proposed Project on bicycle conditions in the study area for Existing Plus Project conditions.

Task 5.6 Loading
WSA will estimate the demand for the project freight loading activities associated with the Proposed Project uses using the methodology presented in *SF Guidelines.* This demand will be compared to the proposed on-site loading supply, and the Code requirements.

Issues of safety, access and maneuverability will be focused on in this section. The proposed location, operation and possible conflicts related to the loading facilities will be discussed in detail, including conflicts that may occur between loading and garbage collection activities and the MUNI bus stop on Presidio Avenue. This section will also discuss the project's impact (if any) on the operation of the MUNI yard on Presidio Avenue, north of the project site.

In addition, this section will include a discussion of passenger loading demand and future usage of the curbside along California Street, including changes to the curb zone (if any). Passenger and school bus passenger loading activities will be described, and any potential conflicts with transit, traffic and other vehicles will be noted.

Task 5.7 Construction Impacts
WSA will evaluate potential short-term construction impacts that will be generated by the project. Construction impact evaluation will address the staging and duration of construction activity, truck routings, estimated daily truck volumes, street and/or sidewalk closures, impacts on MUNI operations, and construction worker parking.

Task 5.8 2010 Cumulative Analysis
This section of the transportation report will discuss future changes in transportation conditions in the vicinity of the Proposed Project. As noted in section 5.1, year 2010 Cumulative conditions will be presented for traffic conditions.

Task 6. Prepare a Draft Transportation Report
WSA will prepare a Draft Transportation Report, incorporating data, analysis, and conclusions from the above tasks. This draft report will be submitted to the Planning Department for review by the Planning Department, MUNI and the Department of Parking and Traffic.

Task 7. Prepare a Final Transportation Report
WSA will incorporate comments from the City agencies on the Draft Report, and then prepare a Final Report for the City's approval.

Task 8. Meetings/Coordination
In addition to the transportation scoping meeting with the Planning Department, WSA will attend up to two meetings with the project sponsor, EIP Associates, the project architect, or City agencies.

Appendix C
INTERSECTION LOS DEFINITIONS AND CALCULATION SHEETS

SIGNALIZED INTERSECTION LEVEL OF SERVICE DEFINITIONS

Level of Service	Stopped Delay (sec/veh)	Typical Traffic Condition
A	< 5.0	**Insignificant Delays:** Progression is extremely favorable, and most vehicles arrive during the green phase. Most vehicles do not stop at all.
B	5.1 - 15.0	**Minimal Delays:** Generally good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of average delay. Drivers begin to feel restricted.
C	15.1 - 25.0	**Acceptable Delays:** Fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear, though many still pass through the intersection without stopping. Most drivers feel somewhat restricted.
D	25.1 - 40.0	**Tolerable Delays:** The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable. Queues may develop but dissipate rapidly, without excessive delays.
E	40.1 - 60.0	**Significant Delays:** Considered by many agencies to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences. Vehicles may wait through several signal cycles and long queues of vehicles form upstream.
F	> 60.0	**Excessive Delays:** Considered to be unacceptable to most drivers. Often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay levels. Queues may block upstream intersections.

Source: *Highway Capacity Manual*, Special Report No. 209, Third Edition, Transportation Research Board, Washington, D.C. 1985 (Updated 1994).

ALL-WAY STOP CONTROLLED INTERSECTION LEVEL OF SERVICE DEFINITIONS

Level of Service	Average Total Delay (seconds/vehicle)
A	< 5.0
B	5.1 - 10.0
C	10.1 - 20.0
D	20.1 - 30.0
E	30.1 - 45.0
F	> 45.0

Sources: Highway Capacity Manual, Special Report No. 209, Third Edition, Transportation Research Board, Washington, D.C. 1985 (Updated 1994); Transportation Research Circular 373: Interim Research Board, Washington, D.C.

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Impact Analysis Report
Level Of Service

Intersection	Base LOS	Base Del/ Veh	Base V/ C	Future LOS	Future Del/ Veh	Future V/ C	Change in
# 1 Sacramento/Walnut	A	4.0	0.441	A	4.0	0.441	+ 0.000 V/C
# 2 Sacramento/Presidio	B	9.0	0.587	B	9.0	0.587	+ 0.000 D/V
# 3 California/Laurel	B	6.4	0.557	B	6.4	0.557	+ 0.000 D/V
# 4 California/Walnut	B	6.5	0.443	B	6.5	0.443	+ 0.000 D/V
# 5 California/Presidio	C	17.7	0.685	C	17.7	0.685	+ 0.000 D/V
# 6 Pine/Presidio	B	8.6	0.508	B	8.6	0.508	+ 0.000 D/V
# 7 Masonic/Geary	E	42.5	1.008	E	42.5	1.008	+ 0.000 D/V

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM 4-Way Stop Method (Base Volume Alternative)

Intersection #1 Sacramento/Walnut

Cycle (sec): 1 Critical Vol./Cap. (X): 0.441
Loss Time (sec): 0 (Y+R = 4 sec) Average Delay (sec/veh): 4.0
Optimal Cycle: 0 Level Of Service: A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Stop Sign			Stop Sign			Stop Sign			Stop Sign		
Rights:	Include			Include			Include			Include		
Lanes:	0 0	1!	0 0	0 0	1!	0 0	0 0	1!	0 0	0 0	1!	0 0
Volume Module:												
Base Vol:	36	54	114	18	44	38	29	168	28	32	161	44
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	36	54	114	18	44	38	29	168	28	32	161	44
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	38	57	120	19	46	40	31	177	29	34	169	46
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	38	57	120	19	46	40	31	177	29	34	169	46
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	38	57	120	19	46	40	31	177	29	34	169	46
Saturation Flow Module:												
Sat/Lane:	487	487	487	483	483	483	704	704	704	698	698	698
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	0.18	0.26	0.56	0.18	0.44	0.38	0.13	0.75	0.12	0.14	0.68	0.18
Final Sat.:	86	129	272	87	212	184	92	526	86	95	474	129
Capacity Analysis Module:												
Vol/Sat:	0.44	0.44	0.44	0.22	0.22	0.22	0.34	0.34	0.34	0.36	0.36	0.36
Crit Moves:			****	****					****			****
ApproachV/S:		0.44			0.22			0.34			0.36	
Level Of Service Module:												
Delay/Veh:	5.4	5.4	5.4	2.3	2.3	2.3	3.6	3.6	3.6	3.9	3.9	3.9
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	5.4	5.4	5.4	2.3	2.3	2.3	3.6	3.6	3.6	3.9	3.9	3.9
LOS by Move:	B	B	B	A	A	A	A	A	A	A	A	A
ApproachDel:		5.4			2.3			3.6			3.9	
LOS by Appr:		B			A			A			A	

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #2 Sacramento/Presidio

Cycle (sec): 60 Critical Vol./Cap. (X): 0.587
Loss Time (sec): 6 (Y+R = 3 sec) Average Delay (sec/veh): 9.0
Optimal Cycle: 60 Level Of Service: B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0	1!	0 0	0 0	1!	0 0	0 0	1!	0 0	0 0	1!	0 0
Volume Module:												
Base Vol:	29	264	41	19	405	53	35	145	65	20	126	38
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	29	264	41	19	405	53	35	145	65	20	126	38
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	31	278	43	20	426	56	37	153	68	21	133	40
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	31	278	43	20	426	56	37	153	68	21	133	40
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	31	278	43	20	426	56	37	153	68	21	133	40
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.68	0.68	0.68	0.78	0.78	0.78	0.72	0.72	0.72	0.73	0.73	0.73
Lanes:	0.09	0.79	0.12	0.04	0.85	0.11	0.14	0.60	0.26	0.11	0.68	0.21
Final Sat.:	114	1022	158	59	1253	165	196	811	360	150	949	285
Capacity Analysis Module:												
Vol/Sat:	0.27	0.27	0.27	0.34	0.34	0.34	0.19	0.19	0.19	0.14	0.14	0.14
Crit Moves:					****			****				
Green/Cycle:	0.58	0.58	0.58	0.58	0.58	0.58	0.32	0.32	0.32	0.32	0.32	0.32
Volume/Cap:	0.47	0.47	0.47	0.59	0.59	0.59	0.59	0.59	0.59	0.44	0.44	0.44
Level Of Service Module:												
Delay/Veh:	5.9	5.9	5.9	6.9	6.9	6.9	14.5	14.5	14.5	12.7	12.7	12.7
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	5.9	5.9	5.9	6.9	6.9	6.9	14.5	14.5	14.5	12.7	12.7	12.7
Queue:	0	3	1	0	5	1	1	2	1	0	2	1

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #3 California/Laurel

Cycle (sec): 60 Critical Vol./Cap. (X): 0.557
Loss Time (sec): 6 (Y+R = 3 sec) Average Delay (sec/veh): 6.4
Optimal Cycle: 60 Level Of Service: B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 1	0	1 0	0 0	1!	0 0	0 1	1!	1 0	0 1	0	1 0
Volume Module:												
Base Vol:	70	152	68	19	112	25	42	565	150	79	779	30
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	70	152	68	19	112	25	42	565	150	79	779	30
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	74	160	72	20	118	26	44	595	158	83	820	32
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	74	160	72	20	118	26	44	595	158	83	820	32
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.05	1.05	1.05	1.00	1.00	1.00	1.05	1.05	1.05	1.05	1.05	1.05
Final Vol.:	77	168	75	20	118	26	46	624	166	87	861	33
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.72	0.72	0.72	0.73	0.73	0.73	0.63	0.63	0.63	0.68	0.68	0.68
Lanes:	0.48	1.05	0.47	0.12	0.72	0.16	0.16	2.24	0.60	0.18	1.75	0.07
Final Sat.:	655	1428	638	169	996	219	197	2674	711	227	2251	86
Capacity Analysis Module:												
Vol/Sat:	0.12	0.12	0.12	0.12	0.12	0.12	0.23	0.23	0.23	0.38	0.38	0.38
Crit Moves:					****						****	
Green/Cycle:	0.21	0.21	0.21	0.21	0.21	0.21	0.69	0.69	0.69	0.69	0.69	0.69
Volume/Cap:	0.55	0.55	0.55	0.56	0.56	0.56	0.34	0.34	0.34	0.56	0.56	0.56
Level Of Service Module:												
Delay/Veh:	16.9	16.9	16.9	17.8	17.8	17.8	2.9	2.9	2.9	3.9	3.9	3.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	16.9	16.9	16.9	17.8	17.8	17.8	2.9	2.9	2.9	3.9	3.9	3.9
Queue:	1	3	1	0	2	1	0	4	1	1	7	0

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #4 California/Walnut

Cycle (sec):	60	Critical Vol./Cap. (X):	0.443
Loss Time (sec):	6 (Y+R = 3 sec)	Average Delay (sec/veh):	6.5
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	19	19	19	19	19	19	35	35	35	35	35	35
Lanes:	0 0 1! 0 0			0 0 1! 0 0			0 1 0 1 0			0 1 0 1 0		
Volume Module:												
Base Vol:	26	21	45	51	4	38	37	615	17	12	791	107
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	26	21	45	51	4	38	37	615	17	12	791	107
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
PHF Volume:	27	22	47	53	4	40	39	641	18	13	824	111
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	27	22	47	53	4	40	39	641	18	13	824	111
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.05	1.05	1.05	1.05	1.05	1.05
Final Vol.:	27	22	47	53	4	40	40	673	19	13	865	117
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.69	0.69	0.69	0.64	0.64	0.64	0.66	0.66	0.66	0.82	0.82	0.82
Lanes:	0.28	0.23	0.49	0.55	0.04	0.41	0.11	1.84	0.05	0.03	1.74	0.23
Final Sat.:	371	302	646	667	50	503	136	2295	65	41	2710	367
Capacity Analysis Module:												
Vol/Sat:	0.07	0.07	0.07	0.08	0.08	0.08	0.29	0.29	0.29	0.32	0.32	0.32
Crit Moves:					****						****	
Green/Cycle:	0.32	0.32	0.32	0.32	0.32	0.32	0.58	0.58	0.58	0.58	0.58	0.58
Volume/Cap:	0.23	0.23	0.23	0.25	0.25	0.25	0.50	0.50	0.50	0.55	0.55	0.55
Level Of Service Module:												
Delay/Veh:	11.5	11.5	11.5	11.6	11.6	11.6	5.8	5.8	5.8	6.1	6.1	6.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	11.5	11.5	11.5	11.6	11.6	11.6	5.8	5.8	5.8	6.1	6.1	6.1
Queue:	0	0	1	1	0	1	1	7	0	0	9	1

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #5 California/Presidio

Cycle (sec):	75	Critical Vol./Cap. (X):	0.685
Loss Time (sec):	9 (Y+R = 3 sec)	Average Delay (sec/veh):	17.7
Optimal Cycle:	75	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Permitted			Permitted		
Rights:	Include			Include			Ovl			Include		
Min. Green:	21	21	21	21	21	21	0	24	24	0	24	24
Lanes:	1 0 0 1 0			0 1 0 1 0			0 0 2 0 1			0 0 1 1 0		
Volume Module:												
Base Vol:	227	279	50	33	380	78	0	519	190	0	637	61
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	227	279	50	33	380	78	0	519	190	0	637	61
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
PHF Volume:	232	285	51	34	388	80	0	530	194	0	650	62
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	232	285	51	34	388	80	0	530	194	0	650	62
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.05	1.05	1.05	1.00	1.05	1.00	1.00	1.05	1.05
Final Vol.:	232	285	51	35	407	84	0	556	194	0	683	65
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.85	0.84	0.84	0.86	0.86	0.86	1.00	0.90	0.70	1.00	0.85	0.85
Lanes:	1.00	0.85	0.15	0.13	1.55	0.32	0.00	2.00	1.00	0.00	1.83	0.17
Final Sat.:	1625	1353	242	218	2531	522	0	3420	1326	0	2956	281
Capacity Analysis Module:												
Vol/Sat:	0.14	0.21	0.21	0.16	0.16	0.16	0.00	0.16	0.15	0.00	0.23	0.23
Crit Moves:		****			****						****	
Green/Cycle:	0.28	0.28	0.28	0.28	0.28	0.28	0.00	0.32	0.60	0.00	0.32	0.32
Volume/Cap:	0.51	0.75	0.75	0.57	0.57	0.57	0.00	0.51	0.24	0.00	0.72	0.72
Level Of Service Module:												
Delay/Veh:	18.0	23.6	23.6	18.3	18.3	18.3	0.0	16.1	5.4	0.0	18.9	18.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	18.0	23.6	23.6	18.3	18.3	18.3	0.0	16.1	5.4	0.0	18.9	18.9
Queue:	4	6	2	1	7	2	0	10	2	0	13	2

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #6 Pine/Presidio

Cycle (sec): 60 Critical Vol./Cap. (X): 0.508
Loss Time (sec): 10 (Y+R = 5 sec) Average Delay (sec/veh): 8.6
Optimal Cycle: 60 Level Of Service: B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Ignore			Include			Include		
Min. Green:	18	18	0	0	18	18	0	0	0	32	32	32
Lanes:	0 1 1 0 0			0 0 2 0 1			0 0 0 0 0			0 1 2! 1 0		
Volume Module:												
Base Vol:	12	340	0	0	250	366	0	0	0	48	1449	185
Growth Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	12	340	0	0	250	0	0	0	0	48	1449	185
User Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.94	0.94	0.94	0.94	0.94	0.00	0.94	0.94	0.94	0.94	0.94	0.94
PHF Volume:	13	362	0	0	266	0	0	0	0	51	1541	197
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	13	362	0	0	266	0	0	0	0	51	1541	197
PCE Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.05	1.05	1.00	1.00	1.05	0.00	1.00	1.00	1.00	1.10	1.10	1.10
Final Vol.:	13	380	0	0	279	0	0	0	0	56	1696	216
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.84	0.84	1.00	1.00	0.90	1.00	1.00	1.00	1.00	0.86	0.86	0.86
Lanes:	0.07	1.93	0.00	0.00	2.00	1.00	0.00	0.00	0.00	0.11	3.45	0.44
Final Sat.:	105	3075	0	0	3420	1900	0	0	0	187	5661	721
Capacity Analysis Module:												
Vol/Sat:	0.12	0.12	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.30	0.30	0.30
Crit Moves:		****									****	
Green/Cycle:	0.30	0.30	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.53	0.53	0.53
Volume/Cap:	0.41	0.41	0.00	0.00	0.27	0.00	0.00	0.00	0.00	0.56	0.56	0.56
Level Of Service Module:												
Delay/Veh:	12.9	12.9	0.0	0.0	12.2	0.0	0.0	0.0	0.0	7.2	7.2	7.2
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	12.9	12.9	0.0	0.0	12.2	0.0	0.0	0.0	0.0	7.2	7.2	7.2
Queue:	0	5	0	0	4	0	0	0	0	1	19	3

San Francisco Jewish Community Center EIR
Existing Conditions Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #7 Masonic/Geary

Cycle (sec): 85 Critical Vol./Cap. (X): 1.008
Loss Time (sec): 11 (Y+R = 4 sec) Average Delay (sec/veh): 42.5
Optimal Cycle: 85 Level Of Service: E

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Ovl			Ovl			Ignore			Include		
Min. Green:	38	38	38	0	38	38	11	25	25	11	25	25
Lanes:	1 0 2 0 1			0 0 2 0 1			1 0 1 0 1			2 0 1 1 0		
Volume Module:												
Base Vol:	112	917	251	0	1280	213	148	154	110	443	159	18
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
Initial Bse:	112	917	251	0	1280	213	148	154	0	443	159	18
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.00	0.94	0.94	0.94
PHF Volume:	119	976	267	0	1362	227	157	164	0	471	169	19
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	119	976	267	0	1362	227	157	164	0	471	169	19
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.05	1.00	1.00	1.05	1.00	1.00	1.00	0.00	1.03	1.05	1.05
Final Vol.:	119	1024	267	0	1430	227	157	164	0	485	178	20
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.10	0.90	0.77	1.00	0.90	0.77	0.85	0.90	1.00	0.85	0.89	0.89
Lanes:	1.00	2.00	1.00	0.00	2.00	1.00	1.00	1.00	1.00	2.00	1.80	0.20
Final Sat.:	188	3420	1454	0	3420	1454	1625	1710	1900	3249	3044	342
Capacity Analysis Module:												
Vol/Sat:	0.63	0.30	0.18	0.00	0.42	0.16	0.10	0.10	0.00	0.15	0.06	0.06
Crit Moves:	****							****		****		
Green/Cycle:	0.45	0.45	0.58	0.00	0.45	0.58	0.13	0.29	0.00	0.13	0.29	0.29
Volume/Cap:	1.42	0.67	0.32	0.00	0.94	0.27	0.75	0.33	0.00	1.15	0.20	0.20
Level Of Service Module:												
Delay/Veh:	391.9	14.9	7.2	0.0	25.1	6.9	36.2	17.9	0.0	123.2	17.1	17.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	391.9	14.9	7.2	0.0	25.1	6.9	36.2	17.9	0.0	123.2	17.1	17.1
Queue:	16	20	3	0	37	3	4	3	0	26	3	0

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Trip Generation Report

Forecast for

Zone #	Subzone	Amount	Units	Rate In	Rate Out	Trips In	Trips Out	Total Trips	% Of Total
1	JCC in	65.00	Inbound	1.00	0.00	65	0	65	49.2
	Zone 1 Subtotal		....			65	0	65	49.2
2	JCC out	67.00	Outbound	0.00	1.00	0	67	67	50.8
	Zone 2 Subtotal		....			0	67	67	50.8
TOTAL	....					65	67	132	100.0

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Trip Distribution Report

Percent Of Trips

Zone	To Gates 1	2	3	5	8	9
1	9.3	9.3	0.0	21.2	28.3	31.9
2	9.3	0.0	9.3	21.2	31.9	28.3

Traffix 7.0.1208 (c) 1997 Dowling Assoc. Licensed to Wilbur Smith Assoc., SF

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Turning Movement Report

Volume	Northbound			Southbound			Eastbound			Westbound			Total
Type	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Volume
#1 Sacramento/Walnut													
Base	36	54	114	18	44	38	29	168	28	32	161	44	766
Added	0	19	45	0	0	0	0	0	0	0	0	0	64
Total	36	73	159	18	44	38	29	168	28	32	161	44	830
#2 Sacramento/Presidio													
Base	29	264	41	19	405	53	35	145	65	20	126	38	1240
Added	0	0	0	0	21	0	0	0	45	0	0	0	66
Total	29	264	41	19	426	53	35	145	110	20	126	38	1306
#3 California/Laurel													
Base	70	152	68	19	112	25	42	565	150	79	779	30	2091
Added	0	0	0	0	0	0	0	18	0	0	21	0	39
Total	70	152	68	19	112	25	42	583	150	79	800	30	2130
#4 California/Walnut													
Base	26	21	45	51	4	38	37	615	17	12	791	107	1764
Added	0	0	0	0	0	0	18	0	0	0	21	46	85
Total	26	21	45	51	4	38	55	615	17	12	812	153	1849
#5 California/Presidio													
Base	227	279	50	33	380	78	0	519	190	0	637	61	2454
Added	20	0	0	6	20	39	0	0	0	0	6	0	91
Total	247	279	50	39	400	117	0	519	190	0	643	61	2545
#6 Pine/Presidio													
Base	12	340	0	0	250	366	0	0	0	48	1449	185	2650
Added	0	14	0	0	6	14	0	0	0	0	0	6	40
Total	12	354	0	0	256	380	0	0	0	48	1449	191	2690
#7 Masonic/Geary													
Base	112	917	251	0	1280	213	148	154	110	443	159	18	3805
Added	0	14	0	0	14	0	0	0	0	0	0	0	28
Total	112	931	251	0	1294	213	148	154	110	443	159	18	3833

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Impact Analysis Report
Level Of Service

Intersection	Base			Future			Change
	LOS	Del/ Veh	V/ C	LOS	Del/ Veh	V/ C	in
# 1 Sacramento/Walnut	A	4.0	0.441	A	4.8	0.526	+ 0.085 V/C
# 2 Sacramento/Presidio	B	9.0	0.587	B	9.8	0.643	+ 0.803 D/V
# 3 California/Laurel	B	6.4	0.557	B	6.4	0.572	-0.002 D/V
# 4 California/Walnut	B	6.5	0.443	B	6.9	0.469	+ 0.313 D/V
# 5 California/Presidio	C	17.7	0.685	C	18.0	0.713	+ 0.347 D/V
# 6 Pine/Presidio	B	8.6	0.508	B	8.7	0.515	+ 0.058 D/V
# 7 Masonic/Geary	E	42.5	1.008	E	42.8	1.008	+ 0.257 D/V

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM 4-Way Stop Method (Future Volume Alternative)

Intersection #1 Sacramento/Walnut

Cycle (sec): 1 Critical Vol./Cap. (X): 0.526
Loss Time (sec): 0 (Y+R = 4 sec) Average Delay (sec/veh): 4.8
Optimal Cycle: 0 Level Of Service: A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Stop Sign			Stop Sign			Stop Sign			Stop Sign		
Rights:	Include			Include			Include			Include		
Lanes:	0 0	1! 0	0	0 0	1! 0	0	0 0	1! 0	0	0 0	1! 0	0
Volume Module:												
Base Vol:	36	54	114	18	44	38	29	168	28	32	161	44
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	36	54	114	18	44	38	29	168	28	32	161	44
Added Vol:	0	19	45	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	36	73	159	18	44	38	29	168	28	32	161	44
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	38	77	167	19	46	40	31	177	29	34	169	46
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	38	77	167	19	46	40	31	177	29	34	169	46
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	38	77	167	19	46	40	31	177	29	34	169	46
Saturation Flow Module:												
Sat/Lane:	536	536	536	532	532	532	684	684	684	678	678	678
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	0.13	0.27	0.60	0.18	0.44	0.38	0.13	0.75	0.12	0.14	0.68	0.18
Final Sat.:	72	146	317	96	233	203	89	511	64	93	460	125
Capacity Analysis Module:												
Vol/Sat:	0.53	0.53	0.53	0.20	0.20	0.20	0.35	0.35	0.35	0.37	0.37	0.37
Crit Moves:		****				****	****			****		
ApproachV/S:		0.53			0.20			0.35			0.37	
Level Of Service Module:												
Delay/Veh:	7.4	7.4	7.4	2.1	2.1	2.1	3.7	3.7	3.7	4.0	4.0	4.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	7.4	7.4	7.4	2.1	2.1	2.1	3.7	3.7	3.7	4.0	4.0	4.0
LOS by Move:	B	B	B	A	A	A	A	A	A	A	A	A
ApproachDel:		7.4			2.1			3.7			4.0	
LOS by Appr:		B			A			A			A	

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Future Volume Alternative)

Intersection #2 Sacramento/Presidio

Cycle (sec): 60 Critical Vol./Cap. (X): 0.643
Loss Time (sec): 6 (Y+R = 3 sec) Average Delay (sec/veh): 9.8
Optimal Cycle: 60 Level Of Service: B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0	1! 0	0	0 0	1! 0	0	0 0	1! 0	0	0 0	1! 0	0
Volume Module:												
Base Vol:	29	264	41	19	405	53	35	145	65	20	126	38
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	29	264	41	19	405	53	35	145	65	20	126	38
Added Vol:	0	0	0	0	21	0	0	0	45	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	29	264	41	19	426	53	35	145	110	20	126	38
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	31	278	43	20	448	56	37	153	116	21	133	40
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	31	278	43	20	448	56	37	153	116	21	133	40
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	31	278	43	20	448	56	37	153	116	21	133	40
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.67	0.67	0.67	0.78	0.78	0.78	0.72	0.72	0.72	0.72	0.72	0.72
Lanes:	0.09	0.79	0.12	0.04	0.85	0.11	0.12	0.50	0.38	0.11	0.68	0.21
Final Sat.:	113	1010	156	56	1262	158	165	683	518	148	938	282
Capacity Analysis Module:												
Vol/Sat:	0.28	0.28	0.28	0.35	0.35	0.35	0.22	0.22	0.22	0.14	0.14	0.14
Crit Moves:					****			****				
Green/Cycle:	0.55	0.55	0.55	0.55	0.55	0.55	0.35	0.35	0.35	0.35	0.35	0.35
Volume/Cap:	0.50	0.50	0.50	0.64	0.64	0.64	0.64	0.64	0.64	0.41	0.41	0.41
Level Of Service Module:												
Delay/Veh:	6.8	6.8	6.8	8.3	8.3	8.3	14.6	14.6	14.6	11.6	11.6	11.6
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	6.8	6.8	6.8	8.3	8.3	8.3	14.6	14.6	14.6	11.6	11.6	11.6
Queue:	0	3	1	0	6	1	1	2	2	0	2	1

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Future Volume Alternative)

Intersection #3 California/Laurel

Cycle (sec):	60	Critical Vol./Cap. (X):	0.572
Loss Time (sec):	6 (Y+R = 3 sec)	Average Delay (sec/veh):	6.4
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:		Permitted			Permitted			Permitted			Permitted	
Rights:		Include			Include			Include			Include	
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:		0 1 0 1 0			0 0 1! 0 0			0 1 1! 1 0			0 1 0 1 0	

Volume Module:												
Base Vol:	70	152	68	19	112	25	42	565	150	79	779	30
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	70	152	68	19	112	25	42	565	150	79	779	30
Added Vol:	0	0	0	0	0	0	0	18	0	0	21	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	70	152	68	19	112	25	42	583	150	79	800	30
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	74	160	72	20	118	26	44	614	158	83	842	32
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	74	160	72	20	118	26	44	614	158	83	842	32
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.05	1.05	1.05	1.00	1.00	1.00	1.05	1.05	1.05	1.05	1.05	1.05
Final Vol.:	77	168	75	20	118	26	46	644	166	87	884	33

Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.72	0.72	0.72	0.73	0.73	0.73	0.63	0.63	0.63	0.67	0.67	0.67
Lanes:	0.48	1.05	0.47	0.12	0.72	0.16	0.16	2.26	0.58	0.17	1.76	0.07
Final Sat.:	655	1428	638	169	996	219	193	2695	695	219	2228	83

Capacity Analysis Module:												
Vol/Sat:	0.12	0.12	0.12	0.12	0.12	0.12	0.24	0.24	0.24	0.40	0.40	0.40
Crit Moves:					****						****	
Green/Cycle:	0.21	0.21	0.21	0.21	0.21	0.21	0.69	0.69	0.69	0.69	0.69	0.69
Volume/Cap:	0.57	0.57	0.57	0.57	0.57	0.57	0.34	0.34	0.34	0.57	0.57	0.57

Level Of Service Module:												
Delay/Veh:	17.3	17.3	17.3	18.3	18.3	18.3	2.9	2.9	2.9	3.9	3.9	3.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	17.3	17.3	17.3	18.3	18.3	18.3	2.9	2.9	2.9	3.9	3.9	3.9
Queue:	1	3	1	0	2	1	0	4	1	1	8	0

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Future Volume Alternative)

Intersection #4 California/Walnut

Cycle (sec):	60	Critical Vol./Cap. (X):	0.469
Loss Time (sec):	6 (Y+R = 3 sec)	Average Delay (sec/veh):	6.9
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:		Permitted			Permitted			Permitted			Permitted	
Rights:		Include			Include			Include			Include	
Min. Green:	19	19	19	19	19	19	35	35	35	35	35	35
Lanes:		0 0 1! 0 0			0 0 1! 0 0			0 1 0 1 0			0 1 0 1 0	

Volume Module:												
Base Vol:	26	21	45	51	4	38	37	615	17	12	791	107
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	26	21	45	51	4	38	37	615	17	12	791	107
Added Vol:	0	0	0	0	0	0	18	0	0	0	21	46
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	26	21	45	51	4	38	55	615	17	12	812	153
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
PHF Volume:	27	22	47	53	4	40	57	641	18	13	846	159
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	27	22	47	53	4	40	57	641	18	13	846	159
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.05	1.05	1.05	1.05	1.05	1.05
Final Vol.:	27	22	47	53	4	40	60	673	19	13	888	167

Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.69	0.69	0.69	0.64	0.64	0.64	0.60	0.60	0.60	0.82	0.82	0.82
Lanes:	0.28	0.23	0.49	0.55	0.04	0.41	0.16	1.79	0.05	0.02	1.67	0.31
Final Sat.:	371	302	646	667	50	503	183	2051	58	38	2592	487

Capacity Analysis Module:												
Vol/Sat:	0.07	0.07	0.07	0.08	0.08	0.08	0.33	0.33	0.33	0.34	0.34	0.34
Crit Moves:					****						****	
Green/Cycle:	0.32	0.32	0.32	0.32	0.32	0.32	0.58	0.58	0.58	0.58	0.58	0.58
Volume/Cap:	0.23	0.23	0.23	0.25	0.25	0.25	0.56	0.56	0.56	0.59	0.59	0.59

Level Of Service Module:												
Delay/Veh:	11.5	11.5	11.5	11.6	11.6	11.6	6.3	6.3	6.3	6.4	6.4	6.4
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	11.5	11.5	11.5	11.6	11.6	11.6	6.3	6.3	6.3	6.4	6.4	6.4
Queue:	0	0	1	1	0	1	1	7	0	0	10	2

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Future Volume Alternative)

Intersection #5 California/Presidio

Cycle (sec):	75	Critical Vol./Cap. (X):	0.713
Loss Time (sec):	9 (Y+R = 3 sec)	Average Delay (sec/veh):	18.0
Optimal Cycle:	75	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Permitted			Permitted		
Rights:	Include			Include			Ovl			Include		
Min. Green:	21	21	21	21	21	21	0	24	24	0	24	24
Lanes:	1 0 0 1 0			0 1 0 1 0			0 0 2 0 1			0 0 1 1 0		
Volume Module:												
Base Vol:	227	279	50	33	380	78	0	519	190	0	637	61
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	227	279	50	33	380	78	0	519	190	0	637	61
Added Vol:	20	0	0	6	20	39	0	0	0	0	6	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	247	279	50	39	400	117	0	519	190	0	643	61
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
PHF Volume:	252	285	51	40	408	119	0	530	194	0	656	62
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	252	285	51	40	408	119	0	530	194	0	656	62
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.05	1.05	1.05	1.00	1.05	1.00	1.00	1.05	1.05
Final Vol.:	252	285	51	42	429	125	0	556	194	0	689	65
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.85	0.84	0.84	0.85	0.85	0.85	1.00	0.90	0.70	1.00	0.85	0.85
Lanes:	1.00	0.85	0.15	0.14	1.44	0.42	0.00	2.00	1.00	0.00	1.83	0.17
Final Sat.:	1625	1353	242	228	2331	679	0	3420	1326	0	2958	279
Capacity Analysis Module:												
Vol/Sat:	0.16	0.21	0.21	0.18	0.18	0.18	0.00	0.16	0.15	0.00	0.23	0.23
Crit Moves:		****		****							****	
Green/Cycle:	0.28	0.28	0.28	0.28	0.28	0.28	0.00	0.32	0.60	0.00	0.32	0.32
Volume/Cap:	0.55	0.75	0.75	0.66	0.66	0.66	0.00	0.51	0.24	0.00	0.73	0.73
Level Of Service Module:												
Delay/Veh:	18.6	23.6	23.6	19.3	19.3	19.3	0.0	16.1	5.4	0.0	19.0	19.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	18.6	23.6	23.6	19.3	19.3	19.3	0.0	16.1	5.4	0.0	19.0	19.0
Queue:	5	6	2	1	8	3	0	10	2	0	13	2

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Future Volume Alternative)

Intersection #6 Pine/Presidio

Cycle (sec):	60	Critical Vol./Cap. (X):	0.515
Loss Time (sec):	10 (Y+R = 5 sec)	Average Delay (sec/veh):	8.7
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Ignore			Include			Include		
Min. Green:	18	18	0	0	18	18	0	0	0	32	32	32
Lanes:	0 1 1 0 0			0 0 2 0 1			0 0 0 0 0			0 1 2 1 0		
Volume Module:												
Base Vol:	12	340	0	0	250	366	0	0	0	48	1449	185
Growth Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	12	340	0	0	250	0	0	0	0	48	1449	185
Added Vol:	0	14	0	0	6	14	0	0	0	0	0	6
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	12	354	0	0	256	0	0	0	0	48	1449	191
User Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.94	0.94	0.94	0.94	0.94	0.00	0.94	0.94	0.94	0.94	0.94	0.94
PHF Volume:	13	377	0	0	272	0	0	0	0	51	1541	203
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	13	377	0	0	272	0	0	0	0	51	1541	203
PCE Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.05	1.05	1.00	1.00	1.05	0.00	1.00	1.00	1.00	1.10	1.10	1.10
Final Vol.:	13	395	0	0	286	0	0	0	0	56	1696	224
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.84	0.84	1.00	1.00	0.90	1.00	1.00	1.00	1.00	0.86	0.86	0.86
Lanes:	0.06	1.94	0.00	0.00	2.00	1.00	0.00	0.00	0.00	0.11	3.44	0.45
Final Sat.:	101	3079	0	0	3420	1900	0	0	0	186	5638	745
Capacity Analysis Module:												
Vol/Sat:	0.13	0.13	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.30	0.30	0.30
Crit Moves:		****									****	
Green/Cycle:	0.30	0.30	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.53	0.53	0.53
Volume/Cap:	0.43	0.43	0.00	0.00	0.28	0.00	0.00	0.00	0.00	0.56	0.56	0.56
Level Of Service Module:												
Delay/Veh:	13.0	13.0	0.0	0.0	12.2	0.0	0.0	0.0	0.0	7.3	7.3	7.3
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	13.0	13.0	0.0	0.0	12.2	0.0	0.0	0.0	0.0	7.3	7.3	7.3
Queue:	0	5	0	0	4	0	0	0	0	1	19	3

San Francisco Jewish Community Center EIR
Existing Plus Project Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Future Volume Alternative)

Intersection #7 Masonic/Geary

Cycle (sec):	85	Critical Vol./Cap. (X):	1.008
Loss Time (sec):	11 (Y+R = 4 sec)	Average Delay (sec/veh):	42.8
Optimal Cycle:	85	Level Of Service:	E

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:		Permitted			Permitted			Protected			Protected	
Rights:		Ovl			Ovl			Ignore			Include	
Min. Green:	38	38	38	0	38	38	11	25	25	11	25	25
Lanes:		1 0 2 0 1			0 0 2 0 1			1 0 1 0 1			2 0 1 1 0	
Volume Module:												
Base Vol:	112	917	251	0	1280	213	148	154	110	443	159	18
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
Initial Bse:	112	917	251	0	1280	213	148	154	0	443	159	18
Added Vol:	0	14	0	0	14	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	112	931	251	0	1294	213	148	154	0	443	159	18
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.00	0.94	0.94	0.94
PHF Volume:	119	990	267	0	1377	227	157	164	0	471	169	19
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	119	990	267	0	1377	227	157	164	0	471	169	19
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.05	1.00	1.00	1.05	1.00	1.00	1.00	0.00	1.03	1.05	1.05
Final Vol.:	119	1040	267	0	1445	227	157	164	0	485	178	20
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.10	0.90	0.77	1.00	0.90	0.77	0.85	0.90	1.00	0.85	0.89	0.89
Lanes:	1.00	2.00	1.00	0.00	2.00	1.00	1.00	1.00	1.00	2.00	1.80	0.20
Final Sat.:	188	3420	1454	0	3420	1454	1625	1710	1900	3249	3044	342
Capacity Analysis Module:												
Vol/Sat:	0.63	0.30	0.18	0.00	0.42	0.16	0.10	0.10	0.00	0.15	0.06	0.06
Crit Moves:	****							****		****		
Green/Cycle:	0.45	0.45	0.58	0.00	0.45	0.58	0.13	0.29	0.00	0.13	0.29	0.29
Volume/Cap:	1.42	0.68	0.32	0.00	0.95	0.27	0.75	0.33	0.00	1.15	0.20	0.20
Level Of Service Module:												
Delay/Veh:	391.9	15.1	7.2	0.0	26.2	6.9	36.2	17.9	0.0	123.2	17.1	17.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	391.9	15.1	7.2	0.0	26.2	6.9	36.2	17.9	0.0	123.2	17.1	17.1
Queue:	16	20	3	0	38	3	4	3	0	26	3	0

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Turning Movement Report

Volume	Northbound			Southbound			Eastbound			Westbound			Total
Type	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Volume
#1 Sacramento/Walnut													
Base	40	60	126	20	49	42	32	186	31	35	178	49	846
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	40	60	126	20	49	42	32	186	31	35	178	49	846
#2 Sacramento/Presidio													
Base	32	292	45	21	447	59	39	160	72	22	139	42	1370
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	32	292	45	21	447	59	39	160	72	22	139	42	1370
#3 California/Laurel													
Base	77	168	75	21	124	28	46	624	166	87	860	33	2310
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	77	168	75	21	124	28	46	624	166	87	860	33	2310
#4 California/Walnut													
Base	29	23	50	56	4	42	41	679	19	13	874	118	1949
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	29	23	50	56	4	42	41	679	19	13	874	118	1949
#5 California/Presidio													
Base	251	308	55	36	420	86	0	573	210	0	704	67	2711
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	251	308	55	36	420	86	0	573	210	0	704	67	2711
#6 Pine/Presidio													
Base	13	376	0	0	276	404	0	0	0	53	1601	204	2927
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	13	376	0	0	276	404	0	0	0	53	1601	204	2927
#7 Masonic/Geary													
Base	124	1013	277	0	1414	235	163	170	122	489	176	20	4203
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	124	1013	277	0	1414	235	163	170	122	489	176	20	4203
#73													
Base	0	0	0	0	0	0	0	0	0	0	0	0	0
Added	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Impact Analysis Report
Level Of Service

Intersection	Base			Future			Change
		Del/	V/		Del/	V/	in
	LOS	Veh	C	LOS	Veh	C	
# 1 Sacramento/Walnut	A	4.6	0.489	A	4.6	0.489	+ 0.000 V/C
# 2 Sacramento/Presidio	B	9.9	0.660	B	9.9	0.660	+ 0.000 D/V
# 3 California/Laurel	B	6.9	0.639	B	6.9	0.639	+ 0.000 D/V
# 4 California/Walnut	B	7.0	0.497	B	7.0	0.497	+ 0.000 D/V
# 5 California/Presidio	C	19.1	0.755	C	19.1	0.755	+ 0.000 D/V
# 6 Pine/Presidio	B	9.0	0.561	B	9.0	0.561	+ 0.000 D/V
# 7 Masonic/Geary	F	65.5	1.117	F	65.5	1.117	+ 0.000 D/V

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM 4-Way Stop Method (Base Volume Alternative)

Intersection #1 Sacramento/Walnut

Cycle (sec): 1 Critical Vol./Cap. (X): 0.489
Loss Time (sec): 0 (Y+R = 4 sec) Average Delay (sec/veh): 4.6
Optimal Cycle: 0 Level Of Service: A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Stop Sign			Stop Sign			Stop Sign			Stop Sign		
Rights:	Include			Include			Include			Include		
Lanes:	0 0 1! 0 0			0 0 1! 0 0			0 0 1! 0 0			0 0 1! 0 0		
Volume Module:												
Base Vol:	36	54	114	18	44	38	29	168	28	32	161	44
Growth Adj:	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10
Initial Bse:	40	60	126	20	49	42	32	186	31	35	178	49
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	42	63	133	21	51	44	34	195	33	37	187	51
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	42	63	133	21	51	44	34	195	33	37	187	51
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	42	63	133	21	51	44	34	195	33	37	187	51
Saturation Flow Module:												
Sat/Lane:	487	487	487	483	483	483	704	704	704	698	698	698
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	0.18	0.26	0.56	0.18	0.44	0.38	0.13	0.74	0.13	0.13	0.68	0.19
Final Sat.:	86	129	272	87	212	183	91	524	89	94	475	129
Capacity Analysis Module:												
Vol/Sat:	0.49	0.49	0.49	0.24	0.24	0.24	0.37	0.37	0.37	0.39	0.39	0.39
Crit Moves:			****			****		****				****
ApproachV/S:		0.49			0.24			0.37			0.39	
Level Of Service Module:												
Delay/Veh:	6.4	6.4	6.4	2.5	2.5	2.5	4.1	4.1	4.1	4.5	4.5	4.5
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	6.4	6.4	6.4	2.5	2.5	2.5	4.1	4.1	4.1	4.5	4.5	4.5
LOS by Move:	B	B	B	A	A	A	A	A	A	A	A	A
ApproachDel:		6.4			2.5			4.1			4.5	
LOS by Appr:		B			A			A			A	

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #2 Sacramento/Presidio

Cycle (sec): 60 Critical Vol./Cap. (X): 0.660
Loss Time (sec): 6 (Y+R = 3 sec) Average Delay (sec/veh): 9.9
Optimal Cycle: 60 Level Of Service: B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0 1! 0 0			0 0 1! 0 0			0 0 1! 0 0			0 0 1! 0 0		
Volume Module:												
Base Vol:	29	264	41	19	405	53	35	145	65	20	126	38
Growth Adj:	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10
Initial Bse:	32	292	45	21	447	59	39	160	72	22	139	42
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	34	307	48	22	471	62	41	169	76	23	147	44
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	34	307	48	22	471	62	41	169	76	23	147	44
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	34	307	48	22	471	62	41	169	76	23	147	44
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.67	0.67	0.67	0.77	0.77	0.77	0.70	0.70	0.70	0.72	0.72	0.72
Lanes:	0.09	0.79	0.12	0.04	0.85	0.11	0.14	0.59	0.27	0.11	0.69	0.20
Final Sat.:	110	998	156	58	1240	163	192	791	356	147	940	281
Capacity Analysis Module:												
Vol/Sat:	0.31	0.31	0.31	0.38	0.38	0.38	0.21	0.21	0.21	0.16	0.16	0.16
Crit Moves:					****			****				
Green/Cycle:	0.58	0.58	0.58	0.58	0.58	0.58	0.32	0.32	0.32	0.32	0.32	0.32
Volume/Cap:	0.53	0.53	0.53	0.66	0.66	0.66	0.66	0.66	0.66	0.48	0.48	0.48
Level Of Service Module:												
Delay/Veh:	6.5	6.5	6.5	8.0	8.0	8.0	15.8	15.8	15.8	13.0	13.0	13.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	6.5	6.5	6.5	8.0	8.0	8.0	15.8	15.8	15.8	13.0	13.0	13.0
Queue:	0	3	1	1	6	1	1	3	1	0	2	1

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #3 California/Laurel

Cycle (sec):	60	Critical Vol./Cap. (X):	0.639
Loss Time (sec):	6 (Y+R = 3 sec)	Average Delay (sec/veh):	6.9
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 1	0 1	0	0 0	1!	0 0	0 1	1!	1 0	0 1	0 1	0
Volume Module:												
Base Vol:	70	152	68	19	112	25	42	565	150	79	779	30
Growth Adj:	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10
Initial Bse:	77	168	75	21	124	28	46	624	166	87	860	33
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	81	177	79	22	130	29	49	657	174	92	906	35
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	81	177	79	22	130	29	49	657	174	92	906	35
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.05	1.05	1.05	1.00	1.00	1.00	1.05	1.05	1.05	1.05	1.05	1.05
Final Vol.:	85	186	83	22	130	29	51	690	183	96	951	37
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.69	0.69	0.69	0.72	0.72	0.72	0.61	0.61	0.61	0.65	0.65	0.65
Lanes:	0.48	1.05	0.47	0.12	0.72	0.16	0.17	2.24	0.59	0.18	1.75	0.07
Final Sat.:	629	1377	614	166	984	219	192	2601	690	218	2160	84
Capacity Analysis Module:												
Vol/Sat:	0.14	0.14	0.14	0.13	0.13	0.13	0.27	0.27	0.27	0.44	0.44	0.44
Crit Moves:		****									****	
Green/Cycle:	0.21	0.21	0.21	0.21	0.21	0.21	0.69	0.69	0.69	0.69	0.69	0.69
Volume/Cap:	0.64	0.64	0.64	0.63	0.63	0.63	0.39	0.39	0.39	0.64	0.64	0.64
Level Of Service Module:												
Delay/Veh:	18.1	18.1	18.1	19.3	19.3	19.3	3.1	3.1	3.1	4.5	4.5	4.5
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	18.1	18.1	18.1	19.3	19.3	19.3	3.1	3.1	3.1	4.5	4.5	4.5
Queue:	2	3	2	1	2	1	0	5	1	1	9	1

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #4 California/Walnut

Cycle (sec):	60	Critical Vol./Cap. (X):	0.497
Loss Time (sec):	6 (Y+R = 3 sec)	Average Delay (sec/veh):	7.0
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Include			Include			Include		
Min. Green:	19	19	19	19	19	19	35	35	35	35	35	35
Lanes:	0 0	1!	0 0	0 0	1!	0 0	0 1	0 1	0	0 1	0 1	0
Volume Module:												
Base Vol:	26	21	45	51	4	38	37	615	17	12	791	107
Growth Adj:	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10
Initial Bse:	29	23	50	56	4	42	41	679	19	13	874	118
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
PHF Volume:	30	24	52	59	5	44	43	708	20	14	910	123
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	30	24	52	59	5	44	43	708	20	14	910	123
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.05	1.05	1.05	1.05	1.05	1.05
Final Vol.:	30	24	52	59	5	44	45	743	21	14	956	129
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.69	0.69	0.69	0.63	0.63	0.63	0.64	0.64	0.64	0.81	0.81	0.81
Lanes:	0.28	0.23	0.49	0.54	0.05	0.41	0.11	1.84	0.05	0.03	1.74	0.23
Final Sat.:	370	296	641	651	55	486	135	2230	63	39	2682	362
Capacity Analysis Module:												
Vol/Sat:	0.08	0.08	0.08	0.09	0.09	0.09	0.33	0.33	0.33	0.36	0.36	0.36
Crit Moves:					****						****	
Green/Cycle:	0.32	0.32	0.32	0.32	0.32	0.32	0.58	0.58	0.58	0.58	0.58	0.58
Volume/Cap:	0.26	0.26	0.26	0.29	0.29	0.29	0.57	0.57	0.57	0.61	0.61	0.61
Level Of Service Module:												
Delay/Veh:	11.7	11.7	11.7	11.8	11.8	11.8	6.4	6.4	6.4	6.6	6.6	6.6
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	11.7	11.7	11.7	11.8	11.8	11.8	6.4	6.4	6.4	6.6	6.6	6.6
Queue:	0	0	1	1	0	1	1	8	0	0	11	2

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #5 California/Presidio

Cycle (sec):	75	Critical Vol./Cap. (X):	0.755
Loss Time (sec):	9 (Y+R = 3 sec)	Average Delay (sec/veh):	19.1
Optimal Cycle:	75	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Permitted			Permitted		
Rights:	Include			Include			Ovl			Include		
Min. Green:	21	21	21	21	21	21	0	24	24	0	24	24
Lanes:	1 0 0 1 0			0 1 0 1 0			0 0 2 0 1			0 0 1 1 0		
Volume Module:												
Base Vol:	227	279	50	33	380	78	0	519	190	0	637	61
Growth Adj:	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10
Initial Bse:	251	308	55	36	420	86	0	573	210	0	704	67
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
PHF Volume:	256	314	56	37	428	88	0	585	214	0	718	69
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	256	314	56	37	428	88	0	585	214	0	718	69
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.05	1.05	1.05	1.00	1.05	1.00	1.00	1.05	1.05
Final Vol.:	256	314	56	39	450	92	0	614	214	0	754	72
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.85	0.84	0.84	0.86	0.86	0.86	1.00	0.90	0.70	1.00	0.85	0.85
Lanes:	1.00	0.85	0.15	0.13	1.55	0.32	0.00	2.00	1.00	0.00	1.83	0.17
Final Sat.:	1625	1354	241	220	2534	518	0	3420	1326	0	2955	282
Capacity Analysis Module:												
Vol/Sat:	0.16	0.23	0.23	0.18	0.18	0.18	0.00	0.18	0.16	0.00	0.26	0.26
Crit Moves:		****			****						****	
Green/Cycle:	0.28	0.28	0.28	0.28	0.28	0.28	0.00	0.32	0.60	0.00	0.32	0.32
Volume/Cap:	0.56	0.83	0.83	0.63	0.63	0.63	0.00	0.56	0.27	0.00	0.80	0.80
Level Of Service Module:												
Delay/Veh:	18.7	27.7	27.7	19.0	19.0	19.0	0.0	16.6	5.5	0.0	20.8	20.8
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	18.7	27.7	27.7	19.0	19.0	19.0	0.0	16.6	5.5	0.0	20.8	20.8
Queue:	5	7	2	1	9	2	0	11	2	0	16	2

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

Intersection #6 Pine/Presidio

Cycle (sec):	60	Critical Vol./Cap. (X):	0.561
Loss Time (sec):	10 (Y+R = 5 sec)	Average Delay (sec/veh):	9.0
Optimal Cycle:	60	Level Of Service:	B

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Permitted			Permitted			Permitted			Permitted		
Rights:	Include			Ignore			Include			Include		
Min. Green:	18	18	0	0	18	18	0	0	0	32	32	32
Lanes:	0 1 1 0 0			0 0 2 0 1			0 0 0 0 0			0 1 2 1 0		
Volume Module:												
Base Vol:	12	340	0	0	250	366	0	0	0	48	1449	185
Growth Adj:	1.10	1.10	1.10	1.10	1.10	0.00	1.10	1.10	1.10	1.10	1.10	1.10
Initial Bse:	13	376	0	0	276	0	0	0	0	53	1601	204
User Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.94	0.94	0.94	0.94	0.94	0.00	0.94	0.94	0.94	0.94	0.94	0.94
PHF Volume:	14	400	0	0	294	0	0	0	0	56	1703	217
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	14	400	0	0	294	0	0	0	0	56	1703	217
PCE Adj:	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.05	1.05	1.00	1.00	1.05	0.00	1.00	1.00	1.00	1.10	1.10	1.10
Final Vol.:	15	420	0	0	308	0	0	0	0	62	1873	239
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.84	0.84	1.00	1.00	0.90	1.00	1.00	1.00	1.00	0.86	0.86	0.86
Lanes:	0.07	1.93	0.00	0.00	2.00	1.00	0.00	0.00	0.00	0.11	3.45	0.44
Final Sat.:	110	3071	0	0	3420	1900	0	0	0	187	5660	722
Capacity Analysis Module:												
Vol/Sat:	0.14	0.14	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.33	0.33	0.33
Crit Moves:		****									****	
Green/Cycle:	0.30	0.30	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.53	0.53	0.53
Volume/Cap:	0.46	0.46	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.62	0.62	0.62
Level Of Service Module:												
Delay/Veh:	13.2	13.2	0.0	0.0	12.3	0.0	0.0	0.0	0.0	7.7	7.7	7.7
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	13.2	13.2	0.0	0.0	12.3	0.0	0.0	0.0	0.0	7.7	7.7	7.7
Queue:	0	6	0	0	4	0	0	0	0	1	22	3

San Francisco Jewish Community Center EIR
Year 2010 Cumulative Scenario - PM Peak Hour

Level Of Service Computation Report
1994 HCM Operations Method (Base Volume Alternative)

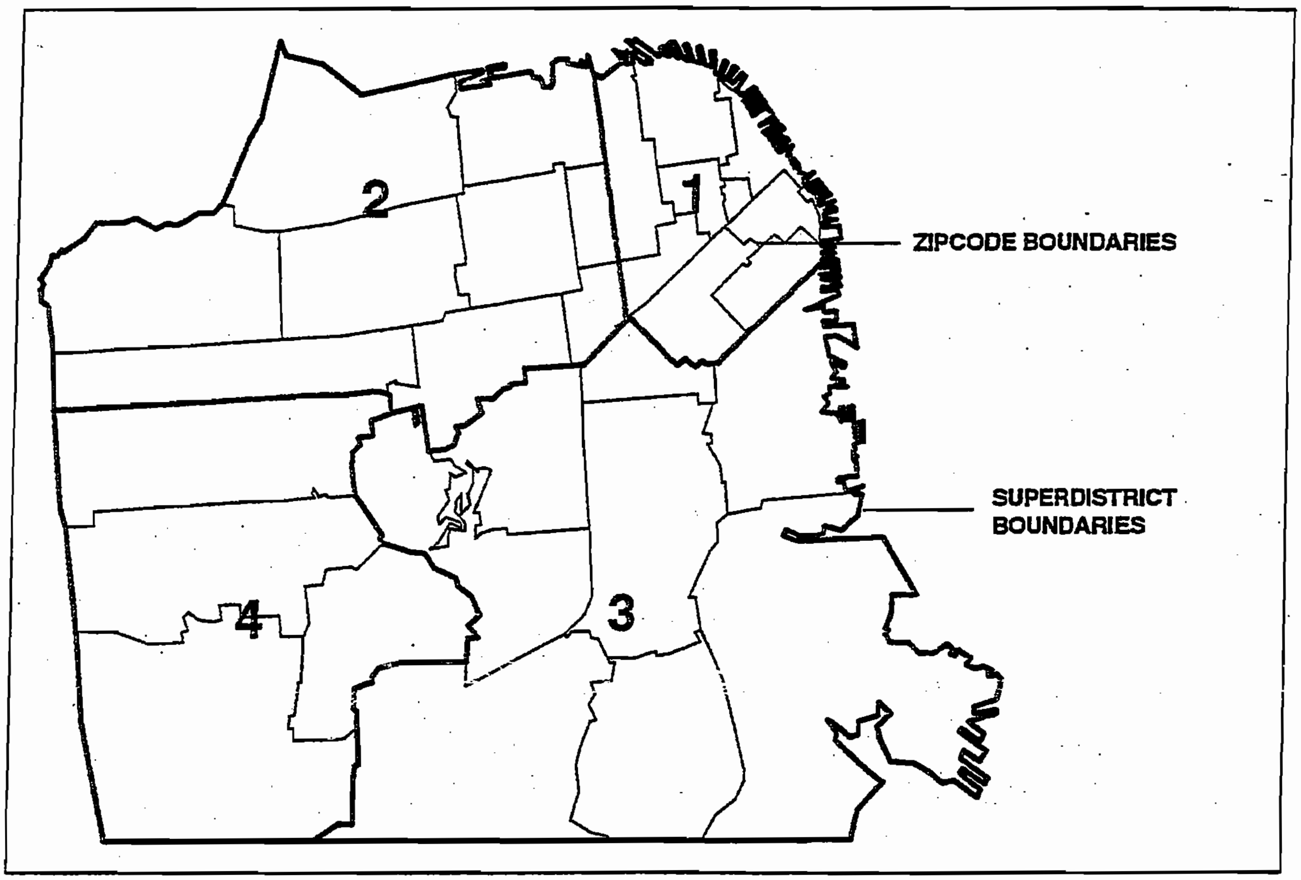
Intersection #7 Masonic/Geary

Cycle (sec):	85	Critical Vol./Cap. (X):	1.117
Loss Time (sec):	11 (Y+R = 4 sec)	Average Delay (sec/veh):	65.5
Optimal Cycle:	85	Level Of Service:	F

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:		Permitted			Permitted			Protected			Protected	
Rights:		Ovl			Ovl			Ignore			Include	
Min. Green:	38	38	38	0	38	38	11	25	25	11	25	25
Lanes:	1 0	2 0	1	0 0	2 0	1	1 0	1 0	1	2 0	1 1	0
Volume Module:												
Base Vol:	112	917	251	0	1280	213	148	154	110	443	159	18
Growth Adj:	1.10	1.10	1.10	1.10	1.10	1.10	1.10	1.10	0.00	1.10	1.10	1.10
Initial Bse:	124	1013	277	0	1414	235	163	170	0	489	176	20
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.00	0.94	0.94	0.94
PHF Volume:	132	1078	295	0	1504	250	174	181	0	521	187	21
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	132	1078	295	0	1504	250	174	181	0	521	187	21
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.05	1.00	1.00	1.05	1.00	1.00	1.00	0.00	1.03	1.05	1.05
Final Vol.:	132	1131	295	0	1579	250	174	181	0	536	196	22
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.10	0.90	0.77	1.00	0.90	0.77	0.85	0.90	1.00	0.85	0.89	0.89
Lanes:	1.00	2.00	1.00	0.00	2.00	1.00	1.00	1.00	1.00	2.00	1.80	0.20
Final Sat.:	188	3420	1454	0	3420	1454	1625	1710	1900	3249	3044	342
Capacity Analysis Module:												
Vol/Sat:	0.70	0.33	0.20	0.00	0.46	0.17	0.11	0.11	0.00	0.16	0.06	0.06
Crit Moves:	****							****		****		
Green/Cycle:	0.45	0.45	0.58	0.00	0.45	0.58	0.13	0.29	0.00	0.13	0.29	0.29
Volume/Cap:	1.57	0.74	0.35	0.00	1.03	0.30	0.83	0.36	0.00	1.27	0.22	0.22
Level Of Service Module:												
Delay/Veh:	597.2	16.1	7.4	0.0	44.0	7.1	43.1	18.2	0.0	204.4	17.2	17.2
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	597.2	16.1	7.4	0.0	44.0	7.1	43.1	18.2	0.0	204.4	17.2	17.2
Queue:	23	23	4	0	53	3	5	3	0	40	3	0

Appendix D
TRIP GENERATION CALCULATIONS

FIGURE 1 - MAP OF SAN FRANCISCO SHOWING SUPERDISTRICT BOUNDARIES



JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
LAND USE: RESTAURANT (ALL TRIPS)

? % work
? % non-work

Proposed Size:	5,400 sq.ft.		
DAILY		**PM PEAK HOUR**	
Person-trip Generation Rate [1]:	600.00 trips/1000 gsf	Person-trip Generation Rate [1]:	81.00 trips/1000 gsf
Linked Trip Factor:	0.70	Linked Trip Factor:	0.70
Total Person-trips:	2,268 person-trips	Total Person-trips:	306 person-trips

Origins	Distribution [2]	Mode	Percent [2]	V.O.R. [3]	Daily Person Trips	Daily Auto Trips	PM Peak Hour Person Trips	PM Peak Hour Auto Trips
Superdistrict 1	7.0%	Auto	42.0%	1.93	67	35	9	5
		Transit	52.0%		83		11	
		Walk	3.0%		5		1	
		Other	3.0%		5		1	
		TOTAL	***100.0%***		***159***	***35***	***21***	***5***
Superdistrict 2	64.0%	Auto	40.0%	1.96	581	296	78	40
		Transit	24.0%		348		47	
		Walk	35.0%		508		69	
		Other	1.0%		15		2	
		TOTAL	***100.0%***		***1,452***	***296***	***196***	***40***
Superdistrict 3	11.0%	Auto	56.0%	2.05	140	68	19	9
		Transit	38.0%		95		13	
		Walk	0.0%		0		0	
		Other	6.0%		15		2	
		TOTAL	***100.0%***		***249***	***68***	***34***	***9***
Superdistrict 4	8.0%	Auto	51.0%	2.16	93	43	12	6
		Transit	49.0%		89		12	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***181***	***43***	***24***	***6***
East Bay	4.0%	Auto	78.0%	2.20	71	32	10	4
		Transit	22.0%		20		3	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***91***	***32***	***12***	***4***
North Bay	2.0%	Auto	80.0%	1.89	36	19	5	3
		Transit	20.0%		9		1	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***45***	***19***	***6***	***3***
South Bay	4.0%	Auto	78.0%	2.30	71	31	10	4
		Transit	22.0%		20		3	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***91***	***31***	***12***	***4***
Out of Region	0.0%	Auto	0.0%	2.07	0	0	0	0
		Transit	0.0%		0		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***0.0%***		***0***	***0***	***0***	***0***
TOTAL	100.0%	Auto	46.6%	2.02	1,057	524	143	71
		Transit	29.3%		664		90	
		Walk	22.6%		513		69	
		Other	1.5%		34		5	
		TOTAL	***100.0%***		***2,268***	***524***	***306***	***71***

Notes:
[1] SF Guidelines for Environmental Review, Appendix C - Eating/Drinking: Composite Rate
[2] JCCSF Transportation Survey Report
[3] SF Guidelines for Environmental Review, Appendix E - Visitor Trips to SD-2 (All Other)

JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
LAND USE: RETAIL (ALL TRIPS)

Proposed Size:	970 sq.ft.		
DAILY		**PM PEAK HOUR**	
Person-trip Generation Rate [1]:	150.00 trips/1000 gsf	Person-trip Generation Rate [1]:	6.00 trips/1000 gsf
Linked Trip Factor:	0.70	Linked Trip Factor:	0.70
Total Person-trips:	102 person-trips	Total Person-trips:	4 person-trips

Origins	Distribution [2]	Mode	Percent [2]	V.O.R. [3]	Daily Person Trips	Daily Auto Trips	PM Peak Hour Person Trips	PM Peak Hour Auto Trips
Superdistrict 1	7.0%	Auto	42.0%	1.93	3	2	0	0
		Transit	52.0%		4		0	
		Walk	3.0%		0		0	
		Other	3.0%		0		0	
		TOTAL	***100.0%***		***7***	***2***	***0***	***0***
Superdistrict 2	64.0%	Auto	40.0%	1.96	26	13	1	1
		Transit	24.0%		16		1	
		Walk	35.0%		23		1	
		Other	1.0%		1		0	
		TOTAL	***100.0%***		***65***	***13***	***3***	***1***
Superdistrict 3	11.0%	Auto	56.0%	2.05	6	3	0	0
		Transit	38.0%		4		0	
		Walk	0.0%		0		0	
		Other	6.0%		1		0	
		TOTAL	***100.0%***		***11***	***3***	***0***	***0***
Superdistrict 4	8.0%	Auto	51.0%	2.16	4	2	0	0
		Transit	49.0%		4		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***8***	***2***	***0***	***0***
East Bay	4.0%	Auto	78.0%	2.20	3	1	0	0
		Transit	22.0%		1		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***4***	***1***	***0***	***0***
North Bay	2.0%	Auto	80.0%	1.89	2	1	0	0
		Transit	20.0%		0		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***2***	***1***	***0***	***0***
South Bay	4.0%	Auto	78.0%	2.30	3	1	0	0
		Transit	22.0%		1		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***4***	***1***	***0***	***0***
Out of Region	0.0%	Auto	0.0%	2.07	0	0	0	0
		Transit	0.0%		0		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***0.0%***		***0***	***0***	***0***	***0***
TOTAL	100.0%	Auto	46.6%	2.02	47	24	2	1
		Transit	29.3%		30		1	
		Walk	22.6%		23		1	
		Other	1.5%		2		0	
		TOTAL	***100.0%***		***102***	***24***	***4***	***1***

Notes:
[1] SF Guidelines for Environmental Review, Appendix C - General Convenience Retail
[2] JCCSF Transportation Survey Report
[3] SF Guidelines for Environmental Review, Appendix E - Visitor Trips to SD-2 (All Other)

JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
LAND USE: CONTINUING USES / COMMUNITY CENTER (ALL TRIPS)

Proposed Size:	44,028 sq.ft.		
DAILY		**PM PEAK HOUR**	
Person-trip Generation Rate [1]:	0.06818 N/A	Person-trip Generation Rate [1]:	N/A 8.6%
Linked Trip Factor:	N/A	Linked Trip Factor:	N/A
Total Person-trips:	3,002 person-trips	Total Person-trips:	258 person-trips

Origins	Distribution [2]	Mode	Percent [2]	V.O.R. [3]	Daily Person Trips	Daily Auto Trips	PM Peak Hour Person Trips	PM Peak Hour Auto Trips
Superdistrict 1	7.0%	Auto	42.0%	1.93	88	46	8	4
		Transit	52.0%		109		9	
		Walk	3.0%		6		1	
		Other	3.0%		6		1	
		TOTAL	***100.0%***		***210***	***46***	***18***	***4***
Superdistrict 2	64.0%	Auto	40.0%	1.96	769	392	66	34
		Transit	24.0%		461		40	
		Walk	35.0%		672		58	
		Other	1.0%		19		2	
		TOTAL	***100.0%***		***1,921***	***392***	***165***	***34***
Superdistrict 3	11.0%	Auto	56.0%	2.05	185	90	16	8
		Transit	38.0%		125		11	
		Walk	0.0%		0		0	
		Other	6.0%		20		2	
		TOTAL	***100.0%***		***330***	***90***	***28***	***8***
Superdistrict 4	8.0%	Auto	51.0%	2.16	122	57	11	5
		Transit	49.0%		118		10	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***240***	***57***	***21***	***5***
East Bay	4.0%	Auto	78.0%	2.20	94	43	8	4
		Transit	22.0%		26		2	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***120***	***43***	***10***	***4***
North Bay	2.0%	Auto	80.0%	1.89	48	25	4	2
		Transit	20.0%		12		1	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***60***	***25***	***5***	***2***
South Bay	4.0%	Auto	78.0%	2.30	94	41	8	3
		Transit	22.0%		26		2	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***100.0%***		***120***	***41***	***10***	***3***
Out of Region	0.0%	Auto	0.0%	2.07	0	0	0	0
		Transit	0.0%		0		0	
		Walk	0.0%		0		0	
		Other	0.0%		0		0	
		TOTAL	***0.0%***		***0***	***0***	***0***	***0***
TOTAL	100.0%	Auto	46.6%	2.02	1,400	693	120	60
		Transit	29.3%		878		75	
		Walk	22.6%		679		58	
		Other	1.5%		45		4	
		TOTAL	***100.0%***		***3,002***	***693***	***258***	***60***

Notes:
[1] Existing trips pro-rated in accordance with the sq.ft. increase of the Proposed Project.
[2] JCCSF Transportation Survey Report
[3] SF Guidelines for Environmental Review, Appendix E - Visitor Trips to SD-2 (All Other)

JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
ALL LAND USES (ALL TRIPS)

Origins	Mode	Daily		PM Peak Hour		PM Peak Hour			
		Person Trips	Auto Trips	Person Trips	Auto Trips	Person Trips		Auto Trips	
						IB	OB	IB	OB
Superdistrict 1	Auto	158	82	17	9	8	8	4	4
	Transit	196		21		10	11		
	Walk	11		1		1	1		
	Other	11		1		1	1		
	TOTAL	***376***	***82***	***40***	***9***	***20***	***20***		
Superdistrict 2	Auto	1,375	702	145	74	72	74	36	38
	Transit	825		87		43	44		
	Walk	1,203		127		63	65		
	Other	34		4		2	2		
	TOTAL	***3,438***	***702***	***364***	***74***	***179***	***185***		
Superdistrict 3	Auto	331	161	35	17	17	18	8	9
	Transit	225		24		12	12		
	Walk	0		0		0	0		
	Other	35		4		2	2		
	TOTAL	***591***	***161***	***63***	***17***	***31***	***32***		
Superdistrict 4	Auto	219	101	23	11	11	12	5	5
	Transit	211		22		11	11		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***430***	***101***	***45***	***11***	***22***	***23***		
East Bay	Auto	168	76	18	8	9	9	4	4
	Transit	47		5		2	3		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***215***	***76***	***23***	***8***	***11***	***12***		
North Bay	Auto	86	45	9	5	4	5	2	2
	Transit	21		2		1	1		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***107***	***45***	***11***	***5***	***6***	***6***		
South Bay	Auto	168	73	18	8	9	9	4	4
	Transit	47		5		2	3		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***215***	***73***	***23***	***8***	***11***	***12***		
Out of Region	Auto	0	0	0	0	0	0	0	0
	Transit	0		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***0***	***0***	***0***	***0***	***0***	***0***		
TOTAL	Auto	2,504	1,241	265	131	130	135	65	67
	Transit	1,572		166		82	85		
	Walk	1,215		128		63	65		
	Other	81		9		4	4		
	TOTAL	***5,372***	***1,241***	***568***	***131***	***279***	***289***		

JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
LAND USE: CONTINUING USES / COMMUNITY CENTER (ALL TRIPS)

Origins	Mode	Daily		PM Peak Hour		PM Peak Hour			
		Person Trips	Auto Trips	Person Trips	Auto Trips	Person Trips		Auto Trips	
						IB	OB	IB	OB
Superdistrict 1	Auto	88	46	8	4	4	4	2	2
	Transit	109		9		5	4		
	Walk	6		1		0	0		
	Other	6		1		0	0		
	TOTAL	***210***	***46***	***18***	***4***	***10***	***8***		
Superdistrict 2	Auto	769	392	66	34	35	31	18	16
	Transit	461		40		21	19		
	Walk	672		58		31	27		
	Other	19		2		1	1		
	TOTAL	***1,921***	***392***	***165***	***34***	***87***	***78***		
Superdistrict 3	Auto	185	90	16	8	8	7	4	4
	Transit	125		11		6	5		
	Walk	0		0		0	0		
	Other	20		2		1	1		
	TOTAL	***330***	***90***	***28***	***8***	***15***	***13***		
Superdistrict 4	Auto	122	57	11	5	6	5	3	2
	Transit	118		10		5	5		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***240***	***57***	***21***	***5***	***11***	***10***		
East Bay	Auto	94	43	8	4	4	4	2	2
	Transit	26		2		1	1		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***120***	***43***	***10***	***4***	***5***	***5***		
North Bay	Auto	48	25	4	2	2	2	1	1
	Transit	12		1		1	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***60***	***25***	***5***	***2***	***3***	***2***		
South Bay	Auto	94	41	8	3	4	4	2	2
	Transit	26		2		1	1		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***120***	***41***	***10***	***3***	***5***	***5***		
Out of Region	Auto	0	0	0	0	0	0	0	0
	Transit	0		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***0***	***0***	***0***	***0***	***0***	***0***		
TOTAL	Auto	1,400	693	120	60	64	57	32	28
	Transit	878		75		40	36		
	Walk	679		58		31	27		
	Other	45		4		2	2		
	TOTAL	***3,002***	***693***	***258***	***60***	***137***	***121***		

JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
LAND USE: RESTAURANT (ALL TRIPS)

Origins	Mode	Daily		PM Peak Hour		PM Peak Hour			
		Person Trips	Auto Trips	Person Trips	Auto Trips	Person Trips		Auto Trips	
						IB	OB	IB	OB
Superdistrict 1	Auto	67	35	9	5	4	5	2	3
	Transit	83		11		5	6		
	Walk	5		1		0	0		
	Other	5		1		0	0		
	TOTAL	***159***	***35***	***21***	***5***	***10***	***12***		
Superdistrict 2	Auto	581	296	78	40	36	42	18	22
	Transit	348		47		22	25		
	Walk	508		69		32	37		
	Other	15		2		1	1		
	TOTAL	***1,452***	***296***	***196***	***40***	***90***	***106***		
Superdistrict 3	Auto	140	68	19	9	9	10	4	5
	Transit	95		13		6	7		
	Walk	0		0		0	0		
	Other	15		2		1	1		
	TOTAL	***249***	***68***	***34***	***9***	***15***	***18***		
Superdistrict 4	Auto	93	43	12	6	6	7	3	3
	Transit	89		12		6	6		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***181***	***43***	***24***	***6***	***11***	***13***		
East Bay	Auto	71	32	10	4	4	5	2	2
	Transit	20		3		1	1		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***91***	***32***	***12***	***4***	***6***	***7***		
North Bay	Auto	36	19	5	3	2	3	1	1
	Transit	9		1		1	1		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***45***	***19***	***6***	***3***	***3***	***3***		
South Bay	Auto	71	31	10	4	4	5	2	2
	Transit	20		3		1	1		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***91***	***31***	***12***	***4***	***6***	***7***		
Out of Region	Auto	0	0	0	0	0	0	0	0
	Transit	0		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***0***	***0***	***0***	***0***	***0***	***0***		
TOTAL	Auto	1,057	524	143	71	66	77	33	38
	Transit	664		90		41	48		
	Walk	513		69		32	37		
	Other	34		5		2	2		
	TOTAL	***2,268***	***524***	***306***	***71***	***141***	***165***		

JCC TRANSPORTATION STUDY
PROJECT TRIP GENERATION - WEEKDAY
LAND USE: RETAIL (ALL TRIPS)

Origins	Mode	Daily Person Trips	Daily Auto Trips	PM Peak Hour Person Trips	PM Peak Hour Auto Trips	PM Peak Hour Person Trips IB	PM Peak Hour Person Trips OB	PM Peak Hour Auto Trips IB	PM Peak Hour Auto Trips OB
Superdistrict 1	Auto	3	2	0	0	0	0	0	0
	Transit	4		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***7***	***2***	***0***	***0***	***0***	***0***		
Superdistrict 2	Auto	26	13	1	1	0	1	0	0
	Transit	16		1		0	0		
	Walk	23		1		0	0		
	Other	1		0		0	0		
	TOTAL	***65***	***13***	***3***	***1***	***1***	***1***		
Superdistrict 3	Auto	6	3	0	0	0	0	0	0
	Transit	4		0		0	0		
	Walk	0		0		0	0		
	Other	1		0		0	0		
	TOTAL	***11***	***3***	***0***	***0***	***0***	***0***		
Superdistrict 4	Auto	4	2	0	0	0	0	0	0
	Transit	4		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***8***	***2***	***0***	***0***	***0***	***0***		
East Bay	Auto	3	1	0	0	0	0	0	0
	Transit	1		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***4***	***1***	***0***	***0***	***0***	***0***		
North Bay	Auto	2	1	0	0	0	0	0	0
	Transit	0		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***2***	***1***	***0***	***0***	***0***	***0***		
South Bay	Auto	3	1	0	0	0	0	0	0
	Transit	1		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***4***	***1***	***0***	***0***	***0***	***0***		
Out of Region	Auto	0	0	0	0	0	0	0	0
	Transit	0		0		0	0		
	Walk	0		0		0	0		
	Other	0		0		0	0		
	TOTAL	***0***	***0***	***0***	***0***	***0***	***0***		
TOTAL	Auto	47	24	2	1	1	1	0	1
	Transit	30		1		1	1		
	Walk	23		1		0	0		
	Other	2		0		0	0		
	TOTAL	***102***	***24***	***4***	***1***	***2***	***2***		

Appendix E
PARKING AND LOADING CALCULATIONS

PARKING DEMAND CALCULATION - PM PEAK HOUR
JEWISH COMMUNITY CENTER, SAN FRANCISCO

COMMUNITY CENTER

Employee Parking Demand

Current Peak Number of Employees [1] =	65	employees on-site simultaneously
Existing Square Footage =	80,339	SF
Existing Employee Density =	1,235.98	SF/employee
Existing Parking Demand [2] =	28	spaces
Proposed Square Footage =	124,367	SF
X Existing Employee Density		
Projected Number of Employees =	101	employees on-site simultaneously
Current Community Center Auto Mode Share [3] =	46.6%	
V.O.R. [4] =	1.10	persons/vehicle
Community Center Employee Parking Demand =	**43**	**spaces**

Visitor Parking Demand

Peak Current Number of Visitors On-site [5] =	293	visitors on-site simultaneously
Existing Square Footage =	80,339	SF
Existing Visitor Density =	274.19	SF/visitor
Existing Parking Demand [2] =	124	spaces
Proposed Square Footage =	124,367	SF
X Existing Visitor Density		
Projected Number of Visitors =	454	visitors on-site simultaneously
Current Community Center Auto Mode Share [3] =	46.6%	
V.O.R. [4] =	1.10	persons/vehicle
Community Center Visitor Parking Demand =	**192**	**spaces**

RETAIL/RESTAURANT

Employee Parking Demand

Proposed Square Footage =	6,370	SF
Employee Density =	350	SF/employee
Number of Employees =	18.2	employees
Current Community Center Auto Mode Share [3] =	46.6%	
V.O.R. [4] =	1.10	persons/vehicle
Retail/Restaurant Employee Parking Demand =	**8**	**spaces**

Visitor Parking Demand

Daily Vehicle Trips =	547	daily vehicle trips
X 92% non-work =	504	daily non-work vehicle trips
Divided by 2 trip ends =	252	daily non-work vehicles on-site
Turnover Rate =	5	vehicles/space/day
Retail/Restaurant Visitor Parking Demand =	**50**	**spaces**

TOTAL PROJECT PARKING DEMAND	**293**	**spaces**

[1] Current JCC Employee Work Schedule, Memorandum from Nate Levine, JCC to Ron Foster, Wilbur Smith Associates, February 11, 2000.
[2] Based on Current Community Center Auto Mode Share and V.O.R. provided below.
[3] JCCSF Transportation Survey Report.
[4] JCCSF Transportation Survey Report.
[5] Comprehensive person entrance and exit counts at JCC, March 3, 1999.

TABLE 1: Land Use Definitions		**Revised 07/14/00**
JCCSF Program	**Occupied Floor Area** (note - Boldface type indicates revised OFA calculation)	**Land Use/Activity**
Administration	3,558 Sq.Ft.	Office
Adult Education	*5 classrooms=* 3,250 Sq.Ft. 2,695 office Sq.Ft.	Secondary/Post-Secondary School Office
Art/Rec./Music/Dance Classes	4,380 activity Sq.Ft. 475 office Sq.Ft.	Art Activities Office
Building Services	100 Sq.Ft.	Office
Émigré Services	755 Sq.Ft.	Office
Fitness/Gym	Gym – 10,200 Sq.Ft. Workout - 11,350 Sq.Ft. Pool-7,544 Admin -1,985 Sq.Ft.	Recreation Building (Institutional Other - NCD) Personal Service Personal Service Office
Program Spaces	*3 classrooms=* 3,350 Sq.Ft.	Secondary/Post-Secondary School
Restaurant	4,500 x .7 = 3,150 Sq.Ft.	Restaurant
Retail Store	900 x .7 = 670 Sq.Ft.	Retail (includes 40 sf for ATM)
Teen Program	*2 classrooms=* 1,386 Sq.Ft. Admin – 744 Sq.Ft.	Secondary/Post-Secondary School Office
Theater/Auditorium	*500 seats=* 5,500 Sq.Ft.	Theater/Auditorium
Youth and Day Camp (after school care)	Admin - 695 Sq.Ft. *8 classrooms=* 5,220 Sq.Ft.	Office Elementary School
Corridor Space	**18,824**	Added per Zoning Administrator Interpretation
TOTAL	67,007 **(85,831) Sq.Ft.**	

Notes:
(1) Table does not include ECE programming space as it is not a component of the main community center building, and remodeling will not include any addition to or expansion of existing facilities.
(2) For kitchen, retail and restaurant uses, multiplier of .7 is used to determine occupied floor area to account for stock/storage.
(3) Theatre/auditorium occupancy established by Fire Marshal posting.
(4) Corridor space adjacent to classrooms excluded per direction by SF City Planning Department (Adam Light).

TABLE 2: Off-Street Parking Code Requirement Calculations **Revised 07/14/00**

Use or Activity	Occupied Floor Area (note - boldface indicates revised calculations)	Required Spaces	Off-Street ParkingCode
Office (Administration)	**14,099** Sq.Ft.	**28.2**	1 car per 500 Sq.Ft. of OFA
Art Activities	**5,610** Sq.Ft.	**2.8**	1 car per 2,000 Sq.Ft. of OFA
Elementary School	8 classrooms	1.3	1 car per every 6 classrooms
Secondary/Post-Secondary School	12 classrooms	6.0	1 car per every 2 classrooms
Recreation Building (Gym)	**13,065** Sq.Ft.	**65.3**	1 car per 200 Sq.Ft. of OFA
Other Retail - Workout	**14,539** Sq.Ft.	**29.1**	1 car per 500 Sq.Ft. of OFA
Pool	**9,663** Sq. Ft.	**19.3**	1 car per 500 Sq. Ft. of OFA
Restaurant	**4,035** Sq.Ft.	**20.2**	1 car per 200 Sq.Ft. of OFA
Retail	**807** Sq.Ft.	**1.6**	1 car per 500 Sq.Ft. of OFA
Theatre/Auditorium	500 seats	62.5	1 car per 8 seats
TOTAL		**236.4**	

Note:
OFA = Occupied Floor Area and includes corridor area proportionally distributed where parking requirement is based on spaces per occupied floor area.

Jewish Community Center
Table 3

06/14/00

PROGRAM SUMMARY

Program Description	Total Net Usable SF - Revised	Load Factor	Total Bldg.Gross SF(construction)	Total Bldg.Gross SF(San Francisco Planning)	Occupiable Floor Area (see note 1)	Delta
Admin	4125	33%	5502	5060	3558	-567
Adult	6545	33%	8731	8029	5945	-600
Art/Rec/Music/Dance	3865	33%	5156	4741	2905	-960
Building Services	6215	33%	8290	7624	100	-6115
Commercial	5900	33%	7870	7237	3820	-2080
Émigré	755	33%	1007	926	755	0
Fitness	41419	33%	55250	50807	33029	-8390
Kitchen	2470	33%	3295	3030	0	-2470
Program Spaces (Non-Dedicated)	7770	33%	10365	9531	3350	-4420
Teen	2500	33%	3335	3067	2130	-370
Theater	9730	33%	12979	11935	5500	-4230
Youth	6715	33%	8957	8237	5915	-800
Total	**98,009**	33%	**130,737**	**120,224**	**67,007**	**-31,002**

Note 1 - Occupied Floor Area is as defined by Planning Code Section 102.10 for the purpose of calculating parking requirements.

ADMIN. PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Usable Sq. Footage	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Registration/Reception	3	64	192	128	128	
Executive Director	1	188	188	188	188	
Asst.. Exec. Dir./COO	1	150	150	150	150	
Executive Assistant	1	60	60	60	60	
Executive Storage	1	50	50	50	0	(102.10(d))
Dir. Marketing	1	155	155	155	155	
Member Services	1	80	80	52	52	
Memberships, Sales Assistants (includes fitness sales)	3	60	180	120	120	
Publications Manager	1	80	80	80	80	
Publications Assistant	1	60	60	60	60	
Graphic Designer	1	60	60	60	60	
PR/Communications Director	1	80	80	80	80	
Admin. Assistant	1	60	60	60	60	
Marketing Storage	1	50	50	50	0	(102.10(d))
Director of Development	1	125	125	125	125	
Development Assistant	1	60	60	60	60	
Grants Manager	1	60	60	60	60	
Events/Rentals Coordinator	1	80	80	80	80	
Additional Development	1	60	60	60	60	
Development Storage	1	50	50	50	0	(102.10(d))
Director of Finance	1	125	125	125	125	
Accounting Manager	1	60	60	60	60	
Accounting Assistants	3	60	180	180	180	
Budget Analyst	1	80	80	80	80	
Human Resources	1	80	80	80	80	
Human Resources Asst.	1	60	60	60	60	
Computer Systems Manager	1	80	80	80	80	
Computer Systems Asst.	1	60	60	60	60	
Admin. Services Manager	1	100	100	100	100	
Admin. Services Asst.	1	60	60	60	60	
Room Scheduling	1	60	60	60	60	
Mail Clerk(Mail room)	1	200	200	200	200	
Large Conference Room	1	240	240	240	240	
Small Conference/workroom	1	120	120	120	120	
Admin. Support	1	200	200	200	200	
Staff Lounge	1	275	275	275	275	
Central Supply Room	1	260	260	260	0	(102.10(d))
Unassigned Area				305	0	(102.10(d))
Sub-total			**4120**	4125	3558	5
Load Factor			**30%**			
Total Gross Dedicated Space			**5356**			

7/31/00

ADULT/SENIOR PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Usable Sq. Footage	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Director of Adult Programs	1	155	155	*155*	*155*	
Creative Arts Manager	1	100	100	*100*	*100*	
Jewish Education Manager	1	100	100	*100*	*100*	
Interfaith Manager	1	100	100	*100*	*100*	
Singles Manager	1	100	100	*100*	*100*	
Senior Programs Manager	1	100	100	*100*	*100*	
Program Assistants	5	60	300	*300*	*300*	
Small Conference Room	1	120	120	*120*	*120*	
Support Space	1	175	175	*175*	*175*	
Adult Classroom #1	1	750	750	*875*	*875*	
Adult Classroom #2	1	400	400	*380*	*380*	
Adult Seminar Rooms	2	600	1200	*1265*	*1265*	
Jewish Resource Center	1	900	900	*1000*	*1000*	
Jewish Educator	1	125	125	*125*	*125*	
Storage	1	400	400	*325*	*0*	*(102.10(d))*
Senior Lounge	1	750	750	*750*	*750*	
Volunteer Space	1	300	300	*300*	*300*	
Unassigned				*275*	*0*	*(102.10(d))*
Sub-total			**6075**	*6545*	*5945*	*470*
Load Factor			**30%**			
Total Gross Dedicated Space			**7898**			

ART/REC./MUSIC/DANCE PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Usable Square Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Art Studio	1	800	800	*1030*	*1030*	
Storage	1	200	200	*200*	*0*	*(102.10(d))*
Kiln	1	100	100	*100*	*0*	*In art studio*
Multi-Media Lab	1	400	400	*500*	*500*	
Art Staff	0	0	0		*0*	*In HYC/Adult*
Dance	0	0	0		*0*	*See Fitness*
Dance Storage	0	0	0		*0*	*See Fitness*
Dance Changing Room	1	150	150	*150*	*150*	
Dance Staff	0	0	0		*0*	*See Fitness*
Music Studio	1	750	750	*750*	*750*	
Music Storage	1	150	150	*150*	*0*	*(102.10(d))*
Rec	0	0	0	*0*	*0*	*See Fitness*
Rec Storage	0	0	0	*0*	*0*	*See Fitness*
Rec Staff						
Director of Fitness & Recreation	0	0	0	*0*	*0*	*See Fitness*
Adult Programs Dir./Asst. Mgr,	0	0	0	*0*	*0*	*See Fitness*
Adm. Asst.	0	0	0	*0*	*0*	*See Fitness*
Youth Sports Director	1	125	125	*125*	*125*	
Youth Program Asst./Head Coach	1	100	100	*100*	*100*	
Youth Sports Prg. Asst.	2	60	120	*170*	*170*	
Youth Sports Adm. Asst.	1	60	60	*80*	*80*	
Unassigned				*510*		
Sub-total			**2955**	*3865*	*2905*	*910*
Load Factor			**30%**			
Total Gross Dedicated Space			**3842**			

BUILDING SERVICES PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Usable Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Main Mech. Room	1	1500	1500	*1600*	0	*(102.10(c))*
Main Elec. Room	1	400	400	*550*	0	*(102.10(c))*
Main Telecom Room	1	300	300	*300*	0	*(102.10(c))*
Building Manager's Office	1	125	125	*100*	*100*	
Asst.Building Mngr.	1	60	60	*0*	0	*office not included*
Engineering Workshop	1	400	400	*300*	0	*(102.10(c))*
Large Maintenance Supply	1	650	650	*650*	0	*(102.10(d))*
Janitorial Supply Storage	1	300	300	*300*	0	*(102.10(d))*
Janitorial Closets	6	30	180	*200*	0	*(102.10(d))*
Staff Locker Room	1	200	200	*200*	0	*(102.10(d))*
Disaster Supply Storage	1	50	50	*50*	0	*(102.10(d))*
Archive Storage	1	300	300	*300*	0	*(102.10(d))*
Trash/Recycling			300	*375*	0	*(102.10(d))*
Loading Dock/Receiving			535	*535*	0	*(102.10(d))*
Transformer Vault			355	*355*	0	*(102.10(c))*
Emergency Generator			400	*400*	0	*(102.10(c))*
Sub-total			**6055**	*6215*	*100*	*160*
Load Factor			**30%**			
Total Gross Dedicated Space			**7872**			

COMMERCIAL PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Arae	Comments (indicates excepted area)
Dedicated Space						
Restaurant	1	4500	4500	4500	3150	.7 X 4,500 for kitchen stor. (102.10(d))
Judaica Store	1	1250	1250	900	630	.7 X 4,500 for kitchen stor. (102.10(d))
ATM	1	40	40	40	40	
Restaurant Service	1	460	460	460	0	(102 "Floor Area Occupied" - 5/93)
Sub-total			**6250**	5900	3820	-350
Load Factor			**0%**			
Total Gross Dedicated Space			**6250**			

ÉMIGRÉ PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Émigré Program Manager	1	125	125	*125*	*125*	
Admin. Assistant	1	60	60	*60*	*60*	
Program Assistant	1	60	60	*60*	*60*	
ESL Coordinator	1	100	100	*100*	*100*	
Reception	1	60	60	*60*	*60*	
Russian newspaper	1	350	350	*350*	*350*	
ESL Teachers			100	*0*	*0*	*office not included*
Small Conference Room			0	*0*	*0*	*Shared w/ Adult Admin*
Sub-total			**855**	*755*	*755*	*-100*
Load Factor			**30%**			
Total Gross Dedicated Space			**1112**			

FITNESS PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Gymnasium	1	10000	10000	10200	10200	
Gym Storage	1	1000	1000	1200	0	Sec 102.10(d)
Gym Subtotal	2		11000	11400	10200	
Lap Pool	1	3375	3375	3375	3375	
Rec. Pool	1	1225	1225	1000	1000	
Jacuzzi	1	300	300	300	300	
Deck	1	3750	3750	2869	2869	
Pool Storage	1	600	600	600	0	Sec 102.10(d)
Pool Subtotal	5		9250	8144	7544	
Weight Training	1	4000	4000	4000	4000	
Cardiovascular	1	3500	3500	3800	3800	
Cardio/Wt. Train. Subtotal	2		7500	7800	7800	
Aerobics Studio	1	2000	2000	2150	2150	
Large Dance Studio	1	1200	1200	975	975	
Small Dance Studio	1	800	800	975	975	
Aerobics/Dance Subtotal	3		4000	4100	4100	
Adult Lockers	2	2000	4000	4000	0	Sec 102.10(d)
Youth Lockers	2	600	1200	1100	0	Sec 102.10(d)
Family Changing Room	1	500	500	650	0	Sec 102.10(d)
Sauna/Steam Rooms	2	200	400	400	400	
Lockers Subtotal	7		6100	6150	400	
Other Fitness/Staff						
Massage/Wellness/Physical Therapy	1	1500	1500	1400	1400	
Childcare	1	500	500	500	500	
Access/Reception	1	300	300	525	525	
Equipment Storage	1	500	500	540	0	Sec 102.10(d)
Towel Laundry	1	300	300	300	0	Sec 102.10(d)
Director of Fitness/Recreation	1	155	155	100	100	
Adult Programs Director/Asst. Mgnr.	1	125	125	100	100	
Admin Asst.	1	60	60	50	50	
Aquatics Director's Office	1	125	125	125	125	
Aquatics Assistants	2	60	120	125	125	
Group Exercise Manager	1	60	60	0	0	office not included
Fitness Manager	1	60	60	0	0	office not included
Dance and Movement Mgr.	1	60	60	60	60	office not included
Program Admin. Asst.	1	60	60	0	0	office not included
Coaches/Teachers	1	200	200	0	0	office not included
Other Fitness/Staff Subtotal	16		4125	3825	2985	
Sub-total			**41975**	41419	33029	-556
Load Factor			**25%**			
Total Gross Dedicated Space			**52469**			

KITCHEN PROGRAM

Space Description	Qty	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Kosher Serving Milk Kitchen	1	550	550	*550*	*0*	*(102 "Floor Area Occupied" -5/93)*
Kosher Serving Meat Kitchen	1	1100	1100	*1010*	*0*	*(102 "Floor Area Occupied" -5/93)*
Kosher Service Hall	1	400	400	*310*	*0*	*(102 "Floor Area Occupied" -5/93)*
Non- Kosher Serving Kitchen	1	500	500	*500*	*0*	*(102 "Floor Area Occupied" -5/93)*
Kitchen/Food Coordinator	1	100	100	*100*	*0*	*(102 "Floor Area Occupied" -5/93)*
Sub-total			**2650**	*2470*	*0*	*-180*
Load Factor			**30%**			
Total Gross Dedicated Space			**3445**			

PROGRAM SPACES - (non dedicated)

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Lobby	1	2000	2000	*4220*	*0*	*(102 "Floor Area Occupied" - 10/89 lobby cannot be assigned to specific use or occupied for exclusive use.)*
Multi-purpose/Dining	1	2500	2500	*2450*	*2450*	
Multi-purpose Storage	1	300	300	*200*	*0*	*(102.10(d))*
Lecture/Reception Hall	1	900	900	*900*	*900*	
Sub-total			**5700**	*7770*	*3350*	*2070*
Load Factor			**30%**			
Total Gross Dedicated			**7410**			

TEEN PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Teen Director's Office	1	125	125	144	144	
Teen Assistant Office	2	60	120	139	139	
Teen Lounge	1	800	800	924	924	
Teen Tech Center	1	400	400	462	462	
Teen Meeting Room	1	400	400	462	462	
Teen Kitchenette	1	100	100	115	0	(Sec 102.10(d))
Teen Storage	1	100	100	115	0	(Sec 102.10(d))
Toilet rooms	2	60	120	139	0	(Sec 102.10(d))
Sub-total			**2165**	2500	2130	335
Load Factor			**30%**			
Total Gross Dedicated Space			**2815**			

THEATER PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Theater	1	5500	5500	5500	5500	
Stage	1	1500	1500	1500	0	(Table 151 Parking reqd for theater based on seating count.)
Pre-Function Lobby	1	1000	1000	1000	0	(102 "Floor Area Occupied" - 10/89 lobby cannot be assigned to specific use or occupied for exclusive use.)
Box Office	1	50	50	40	0	(102 "Floor Area Occupied" - 5/93)
Coat Room	1	100	100	80	0	(102 "Floor Area Occupied" - 5/93)
Dressing Rooms	2	300	600	630	0	(Sec 102.10(d))
Projection Room	1	300	300	280	0	(Sec 102.10(d))
Prop Storage	1	400	400	400	0	(102 "Floor Area Occupied" - 5/93)
Furniture Storage	1	300	300	300	0	(102 "Floor Area Occupied" - 5/93)
Sub-total			**9750**	9730	5500	-20
Load Factor			**35%**			
Total Gross Dedicated Space			**13163**			

YOUTH PROGRAM

Space Description	Quantity	Net Usable Sq. Footage	Total Net Usable Sq. Footage	Actual Net Sq. Feet	Occupiable Floor Area	Comments (indicates excepted area)
Dedicated Space						
Director of Youth Programs	1	155	155	155	155	
HYC Director	1	100	100	100	100	
Camp Director	1	100	100	100	100	
Creative Arts Manager	1	100	100	100	100	
Program Assistant	2	60	120	120	120	
Administrative Assistant	2	60	120	120	120	
Staff Work Room	1	200	200	200	0	(Sec 102.10(d))
Storage	1	300	300	300	0	(Sec 102.10(f))
Classrooms, K-1	3	550	1650	1650	1650	
Classrooms, 2-3	2	550	1100	1100	1100	
Classrooms, 4-5	1	550	550	1090	1090	
Multi-purpose Classrooms	2	550	1100	1380	1380	
Program Kitchen	1	300	300	300	0	(Sec 102.10(d))
Sub-total			**5895**	6715	5915	820
Load Factor			**30%**			
Total Gross Dedicated Space			**7664**			

LOADING DEMAND CALCULATION - JEWISH COMMUNITY CENTER, SAN FRANCISCO

DEMAND

Community Center (Institution):	R = 0.10
Retail :	R = 0.18
Restaurant:	R = 3.60

Daily Truck Trips

Institution	= GSF / 1,000 x R
	= 124,367 / 1,000 x 0.10
	= 12.4 trips
Retail	= GSF / 1,000 x R
	= 970 / 1,000 x 0.18
	= 0.2 trips
Restaurant	= GSF/1,000 x R
	= 5,400 / 1,000 x 3.60
	= 19.4 trips
Total	**=32 trips**

Average Hour Demand for Loading Spaces

Institution	= GSF / 1,000 x R / 9 / 2.4
	= 124,367 / 1,000 x 0.10 / 9 / 2.4
	= 0.6 spaces
Retail	= GSF / 1,000 x R / 9 / 2.4
	= 970 / 1,000 x 0.18 / 9 / 2.4
	= 0 spaces
Restaurant	= GSF / 1,000 x R / 9 / 2.4
	= 5,400 / 1,000 x 3.60 / 9 / 2.4
	= 0.9 spaces
Total	**=1.5 spaces**

Peak Hour Demand for Spaces

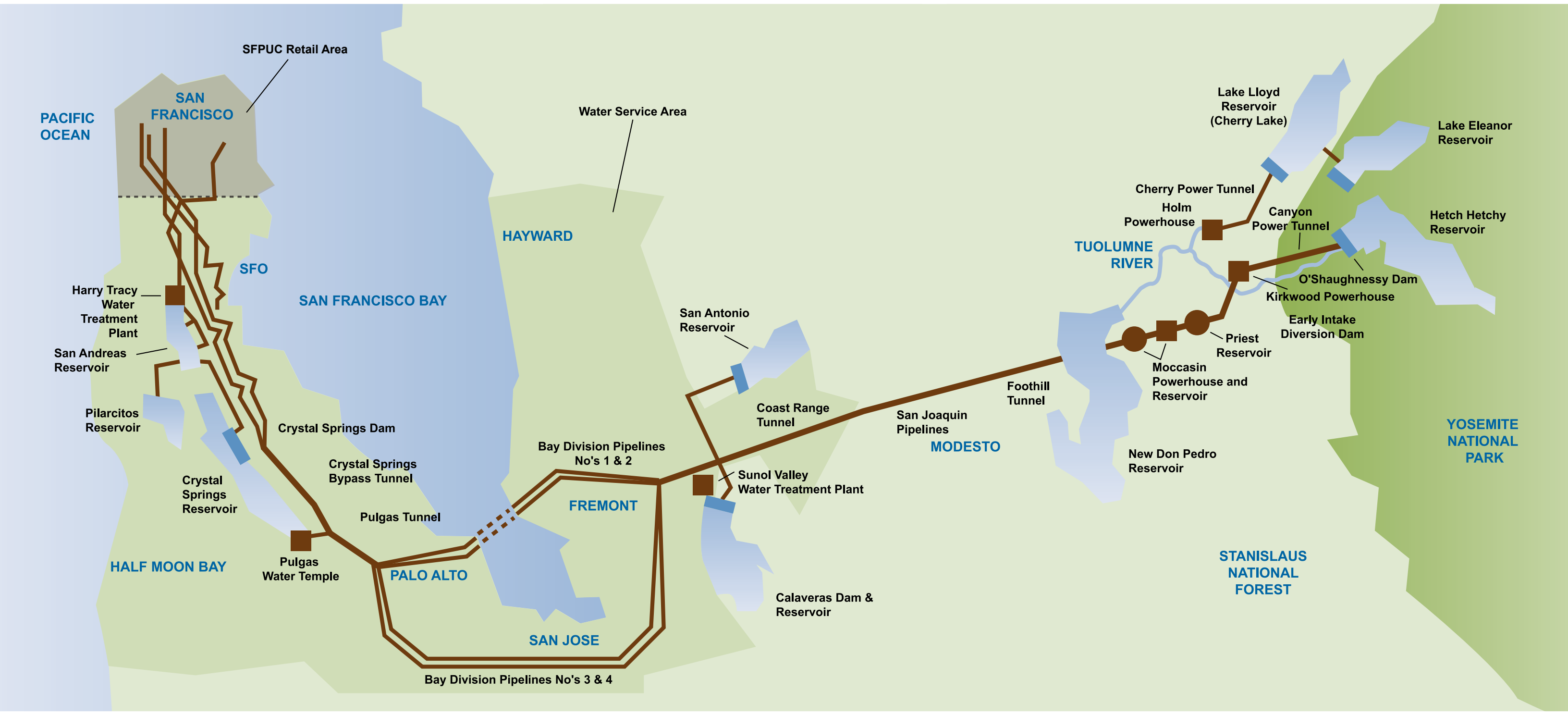
Institution	= GSF / 1,000 x R x 1.25 / 9 / 2.4
	= 124,367 / 1,000 x 0.10 x 1.25 / 9 / 2.4
	= 0.7 spaces
Retail	= GSF / 1,000 x R x 1.25 / 9 / 2.4
	= 970 / 1,000 x 0.18 x 1.25 / 9 / 2.4
	= 0 spaces
Restaurant	= GSF / 1,000 x R x 1.25 / 9 / 2.4
	= 5,400 / 1,000 x 3.60 x 1.25 / 9 / 2.4
	= 1.1 spaces
Total	**=1.8 spaces**

2010 Urban Water Management Plan
for the City and County of San Francisco

Prepared by: The San Francisco Public Utilities Commission

June 2011





San Francisco Water Power Sewer

Services of the San Francisco Public Utilities Commission

As described in the SFPUC Retail Demand Model Update and Calibration Technical Memorandum (**Appendix D**), the average persons per household in single-family and multi-family households are estimated to be approximately 3.1 and 2.0, respectively, by 2015. Because the distribution of single-family versus multi-family planned housing units is currently unknown, it is assumed that the planned units will house approximately 2.55 persons per household, the average of the projected values for single- and multi-family households. As a result, it is estimated that approximately 18,546 residents will occupy planned lower income housing units by June of 2014.

As described in Section 4.2, per capita water use in the SFPUC's retail water service area is currently approximately 85.6 gpcd. Water use in planned lower income housing units is therefore estimated to be approximately 1.6 mgd (18,546 people x 85.6 gpcd) by June of 2014.

This estimated future lower income water demand is included in the retail water demand projections presented in **Table 12**, which include all demands of existing and planned lower-income housing. The SFPUC has always included lower income households as part of the overall city demand in its planning efforts, and all demands presented in Section 4 include lower income demands. Updates to the Urban Water Management Planning Act require that entities separately calculate the water demands for lower income households in this UWMP, and this estimate reflects the SFPUC's best effort to do so. Please note that the SFPUC does not use this number for any planning purposes.

4.1.5 Methodology Used to Project Retail Water Demands

The SFPUC uses disaggregated end-use models to project its retail water demands. San Francisco's water demand is segregated into three distinct categories of water use: non-residential (industrial, commercial and municipal uses); multi-family residential (e.g. townhouses and apartments); and single-family residential. The remainder of San Francisco's water demands such as unaccounted for water and minor uses such as docks and shipping are forecast through trend analysis.

Future non-residential water use is projected using relationships between employment within San Francisco and employee use of water. These coefficients are segregated by type of business or service enterprise, which is based on SIC codes. Appropriate employee-use rates within San Francisco's model were determined by extensive review of industry literature.

Two separate end-use models estimate multi-family and single family residential water use. These models rely on a disaggregation of household end-use of water, such as the number and volume of toilet flushes, duration of showering, and the size and frequency of use of washing machines and dishwashers. These data were derived from available residential end-use monitoring studies.[12]

The models have been verified with water delivery records for historical periods, including periods of time when water demands were affected by drought-induced rationing programs. Water use projections through the year 2035 were developed using these models. The water use projections incorporate the effects of water-saving plumbing code requirements, among other factors. **Appendix D** contains a detailed discussion of the methodology.

12 End-use studies include the Residential End Uses of Water Study (American Water Works Association Research Foundation, 1999) and the California Single-Family Water Use Efficiency Study (Prepared by Aquacraft, Inc. with Stratus Consulting & the Pacific Institute. Sponsored by the California Department of Water Resources, Draft Final April 2011).

4.1.6 Differences between 2005 and 2010 Water Demand Projections

Although the SFPUC used the same methodology to project retail water demands in the 2005 UWMP, a few key assumptions were updated in the models used for the 2010 UWMP, resulting in lower projected water demands. The SFPUC Retail Demand Model Update and Calibration Technical Memorandum in **Appendix D** contains a detailed description of these changes. **Table 14** contains a summary of these key changes.

Table 14: Updated Demand Model Assumptions

UPDATED ASSUMPTIONS	CHANGES FROM 2005
Population, housing, and employment projections	Since the 2005 UWMP, new population, employment and housing projections were released. Updates were primarily based on data obtained from Association of Bay Area Governments (ABAG), California Department of Finance, and the City's Planning Department. The updated projections resulted in increased water demands in the multi family sector in 2030 due to a projected increase of 37,081 households. However, the revised projections decreased the employment projections in 2030 by 130,370 jobs, which resulted in decreased water demands in the non-residential sector.
Water Loss	The model was updated to more accurately account for water loss due to meter under-registration. The original model specification included water losses due to customer meter under-registration, both within each billing sector's projected water demand and as a component of the Unaccounted-for-Water causing the model to overestimate in-City retail demands.
Conservation Savings	The original model projected 4.5 mgd of active water conservation savings by 2030. The suite of conservation measures included in the 2004 model was updated to better reflect the mix of conservation measures and technologies that the SFPUC expects to implement in the near future. Additionally savings from new regulations were added into the model, including the City's 2009 Retrofit on Resale (ROR) ordinance, the phase-in of high-efficiency toilet standards under AB 715, California Energy Commission's (CEC) proposed efficiency standards for residential clothes washers, and California's and the City's green building standards. These changes resulted in 2.0 mgd of additional conservation savings.
Other Retail Customer Demands	The demands associated with "other Retail Customers" were updated to reflect a decrease in water use over the past 10 years by these customers. Additionally the groundwater demands of Castlewood and Sunol were removed from this category as these demands are already captured under the groundwater demands.
City Irrigation Demands	City Irrigation demands were updated based on new data. In 2005, City irrigation demands were projected to be 2.5 mgd. Based on the latest metered data, city irrigation demands have been decreased to 1.5 mgd.

The changes summarized above result in decrease in demand of nearly 9.0 mgd in 2030 between the 2005 UWMP and the 2010 UWMP. The 2005 UWMP did not project 2035 demands.

TIMEFRAME	ASSIGNMENT METHOD	LEGAL CONTEXT
1983 through 2000-01 School Year (17 years)	**Optional Enrollment Process** – All students new to SFUSD had to submit an application and could list three to five choices. Assignments were made using the Optional Enrollment Process (OER) described below. – All 5th and 8th grade SFUSD students were accommodated by their attendance area school. o Students automatically assigned to their attendance area school, regardless of capacity and racial/ethnic composition, unless they requested other schools through an Optional Enrollment Form (OER). o Non-SFUSD students exiting 5^{th} and 8^{th} grade were processed through the OER procedure and there was no guarantee that they could get assigned to their attendance area school. – OER assignments were made using a "Computer Random Selection Process" -- a method of reviewing and evaluating applications randomly by computer. o School assignments were determined by space availability in the requested grade level, and the racial/ethnic balance of the requested school. o The computer determined which race/ethnicity was appropriate to fill any openings. o The computer evaluated each request randomly looking to fill the openings with students who would not adversely impact the racial/ethnic percentages at the school. – The maximum percentage of students for any racial/ethnic group was 45% for non-alternative schools and 40% for alternative schools. o These caps were based on the entire student population, not the grade level. o The same caps (45% and 40%) were applied to all schools. o In cases where the automatic assignment of attendance area students through promoting current 5th and 8th grade students exceeded the racial/ethnic caps, the school would become balanced through the OER process i.e., through requests to attend non-attendance area schools and through students new to SFUSD. – Attempts for placements were made in the following order: • Siblings • Designated students (students who were not assigned to their attendance area school received a priority the following year) • Bayview/Hunter's Point students (Zip Code 94124) • Hispanic and African American students • All other requests Note: The priority groups were not static during the 17 year period. For example, at one point 94110 was a priority zip code. There was also a priority for students attending SFSUD children centers.	**SFNAACP v. SFUSD** – Filed against SFUSD and State of CA in 1978. – The class was all children of school age who were or may in the future attend public schools. – Plaintiffs alleged that the District and State engaged in discriminatory practices and maintained a segregated school system. – Consent Decree approved by US District Court in 1983. o Paragraph 39 "The overall goal of this Consent Decree will require continued and accelerated efforts to achieve academic excellence throughout the SFUSD." o Paragraph 13 set forth racial and ethnic guidelines for student assignment. • No school could have fewer than 4 racial/ethnic groups. • No racial/ethnic group could constitute more than 45% of the student enrollment.

TIMEFRAME	ASSIGNMENT METHOD	LEGAL CONTEXT
2001-02 School Year (1 year)	**Random Computerized Process** – 5th and 8th grade SFUSD students who were currently attending an SFUSD school were no longer automatically assigned to their attendance area school. o It was the first time that 5th and 8th grade SFUSD students were required to complete an enrollment application form. – The 40%/45% caps were abolished. – Assignments were made through a random computerized process that did not use race as a factor. – All first choice requests were reviewed and processed. o If students were not assigned to their first choice, the lottery attempted to assign students to their second choice. o The lottery then moved to the third choice, and so forth until it had reviewed all choices and assigned as many students as possible to one of their choices. – Siblings and attendance area students received a priority in the lottery. – Students who did not get one of their choices were designated to the school that was closest to them that still had space.	**Ho v. SFUSD** – Filed against SFUSD and State of CA in 1994. – Brought on behalf of all children of Chinese descent of school age who were current residents of San Francisco and who were eligible to attend public school. – Plaintiffs alleged that Paragraph 13's student assignment plan violated the U.S. Equal Protection Clause because it discriminated based on race. – 1999 Settlement Agreement.

<table>
<tr><th>TIMEFRAME</th><th>ASSIGNMENT METHOD</th><th>LEGAL CONTEXT</th></tr>
<tr>
<td>2002-03 School Year through Present (8 years)</td>
<td>
Diversity Index Lottery
– Designed to attempt to give parents choice, ensure equal access, and promote diversity without using race/ethnicity.
– The most significant determinants of a student’s school assignment are parental choice and school capacity.
– Any child can apply to attend any school in the District; parents/guardians are strongly encouraged to list 7 schools on the application form.
– Younger siblings and students with program need (inclusion students, students exiting newcomer programs and requesting language programs) get pre-assigned.
– The diversity index lottery is used when there are more applicants than seats.
– The diversity index is a formula, made up of six race neutral, but educationally significant, diversity factors that calculates the probability that in a given grade, randomly chosen students will be different from each other based on the race neutral factors.
o Extreme poverty; socioeconomic status; student’s home language; quality of student’s prior school; student’s prior academic achievement.
– Attendance area students receive a preference, not a priority.
– Students who do not get assigned to one of their choices get designated to the school closest to them that still has space.
– There are waiting pools, medical appeals, and family hardship appeals.
Summary of modifications to the diversity index lottery
<table>
<tr><td>2003-04 SY</td><td>Allow any student that could be assigned to more than one choice to be assigned to their highest choice</td></tr>
<tr><td>2004-05 SY</td><td>Expand the number of schools a family can request on the enrollment application form from five to seven</td></tr>
<tr><td>2006-07 SY</td><td>Eliminate the language proficiency factor from the Diversity Index Lottery</td></tr>
<tr><td>2007-08 SY</td><td>Eliminate mother’s educational background as a factor from the Diversity Index Lottery
Add a factor for extreme poverty</td></tr>
</table>
</td>
<td>
2001 Settlement Agreement
– In 2001 the District Court approved a settlement agreement for both cases.
– Called for the District to implement “Excellence for All”.
– The District agreed to take all practicable actions to eliminate any vestiges of past de jure racial and ethnic discrimination.
– The agreement modified the student assignment process.
– Since then, SFUSD has operated a race-neutral, choice-based student assignment system that includes three parts:
1. Outreach and Recruitment
2. Program Placement
3. Diversity Index Lottery
– On December 31, 2005 the Consent Decree expired.
o Judge William Alsup denied the Consent Decree parties’ request for an 18 month extension to the Consent Decree.
– For the first time in twenty-two years the SFUSD student assignment process is not regulated by a federal judge.
</td>
</tr>
</table>

SAVE THE LAGUNA STREET CAMPUS, Plaintiff and Appellant, v. CITY AND COUNTY OF SAN FRANCISCO et al., Defendants and Respondents; A. F. EVANS DEVELOPMENT, INC., et al., Real Parties in Interest and Respondents.

A124531

COURT OF APPEAL OF CALIFORNIA, FIRST APPELLATE DISTRICT, DIVISION FIVE

2010 Cal. App. Unpub. LEXIS 3886

May 25, 2010, Filed

NOTICE: NOT TO BE PUBLISHED IN OFFICIAL REPORTS. *CALIFORNIA RULES OF COURT, RULE 8.1115(a)*, PROHIBITS COURTS AND PARTIES FROM CITING OR RELYING ON OPINIONS NOT CERTIFIED FOR PUBLICATION OR ORDERED PUBLISHED, EXCEPT AS SPECIFIED BY *RULE 8.1115(b)*. THIS OPINION HAS NOT BEEN CERTIFIED FOR PUBLICATION OR ORDERED PUBLISHED FOR THE PURPOSES OF *RULE 8.1115*.

PRIOR HISTORY: [*1]

San Francisco City and County Super. Ct. No. CPF-08-508277.

JUDGES: SIMONS, J. We concur: JONES, P. J., NEEDHAM, J.

OPINION BY: SIMONS

OPINION

This case arises under the California Environmental Quality Act (CEQA), *Public Resources Code section 21000 et seq.* [1] A. F. Evans has proposed to construct a development, known as the 55 Laguna Mixed Use Project (the Project), on the site of the former University of California, Berkeley Extension campus. The Project would include approximately 440 residential units in new buildings and rehabilitated historic buildings, as well as retail, community, and open space. It would also result in the demolition of an historic building, a portion of a second historic building, and a retaining wall along Laguna Street. Acting through the Board, City approved certification of an environmental impact report (EIR), which concluded that the Project would have significant unmitigated impacts on historic resources at the site. Nevertheless, City found that alternatives to the Project were infeasible and that overriding considerations warranted approval of the Project. Appellant petitioned the superior court for a writ of mandate, alleging violations of CEQA. The court denied the petition. **[*2]** On appeal, appellant contends City violated CEQA by finding infeasible an alternative to the Project that would have avoided demolition of historic structures on the site. We conclude City's finding is supported by substantial evidence, reject appellant's other contentions, and affirm the judgment denying appellant's petition. [2]

1 All further undesignated section references are to the Public Resources Code.

The parties are plaintiff and appellant Save the Laguna Street Campus (appellant); defendants and respondents City and County of San Francisco (City) and the Board of Supervisors of the City and County of San Francisco (the Board);

and real parties in interest and respondents A. F. Evans Development, Inc. (A. F. Evans), a nonprofit organization called "openhouse" (openhouse), and The Regents of the University of California (Regents).

2 This court gave permission to The San Francisco Preservation Consortium (amicus) to file an amicus curiae brief in support of appellant.

FACTUAL AND PROCEDURAL BACKGROUND

The Project is proposed to be located on 5.8 acres north of Market Street in the Hayes Valley neighborhood, on two city blocks bounded by Haight Street to the north, Laguna Street to the **[*3]** east, Hermann Street to the south, and Buchanan Street to the west. Regents own the land and propose to lease the site to the Project developers.

The Project site contains four historic structures built in the 1920's and 1930's in the "Spanish Colonial Revival style of architecture" (Woods Hall, Woods Hall Annex, Richardson Hall, and Middle Hall) during the site's use by the San Francisco State Teacher's College. The site also contains substantial surface parking lot space, and a newer building occupied by the University of California, San Francisco Dental School (which is not part of the Project). The EIR prepared by City for the Project explains that the site "has been in some form of public use for over 150 years, for such uses as a Protestant Orphan Asylum (1854-1867); the State Normal School (1867-1899); San Francisco State Normal School (1899-1921); San Francisco State Teacher's College (1921-1935); San Francisco State College (1935-1957); the University of California, Berkeley Extension, San Francisco (1957-2002); and [the French-American International School] (1973-2003)."

As of January 7, 2008, the Project site is a designated historic district in the National Register of Historic **[*4]** Places. The four historic buildings qualify as historical resources, and Woods Hall, Woods Hall Annex, and Richardson Hall (with the exception of its administration wing) are designated as City landmarks.

The Project would consist of a mixed-use development including approximately 430,800 square feet of residential space in approximately 440 units, up to 5,000 square feet of retail space, approximately 10,000 square feet of community facility space, and approximately 127,360 square feet of mostly underground parking. A. F. Evans would develop approximately 330 of the units as rental housing and approximately 110 of the units would be developed by openhouse as senior housing, "welcoming" to the lesbian, gay, bisexual, and transgender (LGBT) senior community. [3] Between 15 percent and 20 percent of the A. F. Evans units would be affordable housing under City's inclusionary housing ordinance, the final percentage depending on the availability of tax-exempt bond financing. The 440 residential units would occupy seven new buildings as well as rehabilitated Woods Hall, Woods Hall Annex, and Richardson Hall. [4] The retail and community space would occupy portions of Richardson Hall. Most of **[*5]** the new buildings would replace the current surface parking lots. But the Project would require the demolition of the administration wing of Richardson Hall (one-fourth of the building) to accommodate the openhouse development. The Project would also involve demolition of Middle Hall to, according to the EIR, "accommodate a proposed residential building fronting Buchanan Street[, Building 2], and stepping down the interior slope of the site." [5] Finally, the Project would result in the demolition of the retaining wall along Laguna Street between Waller and Haight Streets to accommodate a new building facing Laguna Street. [6]

3 The Board's April 2008 findings under CEQA refer to 330 A. F. Evans units and 110 openhouse units. The EIR refers to 365 A. F. Evans units and 88 openhouse units.

4 At a March 2008 hearing before the Board, counsel for A. F. Evans and openhouse asserted that the Project preserves 83 percent of the existing historic square footage.

5 In its opening brief, appellant states that the demolition of Middle Hall is to accommodate a new residential building, but in its reply brief, appellant asserts that the demolition of Middle Hall is solely for the purpose of creating open **[*6]** space, an assertion also made by amicus. However, neither appellant nor amicus argue that the EIR's description of the reasons for demolition of Middle Hall is in error.

6 The Board's April 2008 findings under CEQA refer to the destruction of "the retaining walls along Laguna and Haight Streets," without further explanation. Appellant does not contend the EIR is in error on this issue.

On January 27, 2007, City's Planning Commission (the Commission) published the draft EIR (DEIR) for the Project. The public comment period ran from January 27 through May 2; on April 19, the Commission held a public hearing on the DEIR; and on November 29, City published a document entitled "'55 Laguna Street Mixed Use Project [DEIR] Comments and Responses." The Planning Department prepared the EIR, consisting of the DEIR, comments received during the review process, additional information that became available, and the DEIR comments and responses.

The EIR acknowledges the Project would have significant adverse impacts to historical resources. The EIR describes three alternatives to the Project: a "no project" alternative, a "preservation" alternative, and a "New College of California/Global Citizen Center **[*7]** Concept Plan" (New College Plan). The preservation alternative would renovate and reuse all four historic buildings and add six new buildings, for a total of up to 332 residential units. The New College Plan envisions reuse of the four historic buildings and use of newly constructed buildings by "a private, non-profit educational institution in partnership with a non-profit green business organization," such as New College of California in partnership with the Global Citizen Center.

On December 13, 2007, seven months after the May 2 close of the public comment period and two weeks after the November 29 release of the comments and responses regarding the DEIR, appellant submitted to the Commission two axonometric [7] drawings of another preservation alternative prepared by architect Alan Martinez. Appellant referred to the design as the "Modified Preservation Alternative" (MPA). Although the drawings lacked floor plans, building dimensions, and other relevant details, appellant asserted that the MPA contemplated the construction of 450 residential units, the retention of Middle Hall for community use, and the retention of the Richardson Hall Annex for use by the seniors in the openhouse **[*8]** building.

7 An axonometric drawing is one "prepared by the projection of objects on the drawing surface so that they appear inclined with three sides showing and with horizontal and vertical distances drawn to scale but diagonal and curved lines distorted." (Merriam-Webster's Collegiate Dict., 11th ed., 2003, p. 87.)

On January 17, 2008, the Commission certified the EIR and found that the Project will result in impacts to historical resources that cannot be reduced to a level of insignificance with mitigation measures: the demolition of Middle Hall, the administration wing of Richardson Hall, and the Laguna Street retaining wall; the potential ineligibility of the site to continue as a listed historic district; and similar negative impacts to historical resources from rezoning of the site. On February 6, 2008, appellant appealed the Commission's certification to the Board. Appellant also requested that "the pro forma for the entire Project be re-evaluated by an independent economic consultant."

An independent real estate economic consulting firm, Seifel Consulting, Inc. (Seifel), reviewed A. F. Evans's pro forma, including an estimate of the costs of constructing the MPA and the revenues **[*9]** and returns that could be realized were the MPA implemented. On February 25, 2008, Seifel issued a report (Seifel Report) stating its conclusions. Seifel concluded that A. F. Evans's cost and revenue estimates were reasonable and that the MPA was financially infeasible because it would not provide enough returns to support financing, primarily due to the higher cost of the "mid-rise" construction required by the MPA.

In a letter to City dated February 26, 2008, Martinez disputed the A. F. Evans cost estimates, but he did not dispute that the MPA would require construction of taller buildings. On March 4, the Board held a public hearing on appellant's appeal of the January 17 certification of the EIR. Martinez spoke and criticized the preservation alternative in the EIR. He stated, "The opportunity of this site was really that the State could have asked for a rezoning of whatever height limits they wanted and that gave them a great opportunity to shape the buildable area on this site. I think [if] a serious preservation alternative had been done they would have asked for increased height limits in certain areas that didn't impact the surrounding area and that could have given them enough **[*10]** bulk to do what they wanted to do." At the end of the hearing, the Board affirmed certification of the EIR.

In a letter dated April 8, 2008, the date of the Board's hearing on adoption of its CEQA findings, architect Arnie Lerner purported to provide a "peer review" of the MPA "cost estimate." However, the letter and an attachment provided only estimates for a few items, such as the cost of retaining Middle Hall, rather than an estimate of total costs.

On April 8, 2008, the Board adopted its CEQA findings (CEQA Findings). The Board found that "the Project provides the best balance between satisfaction of the project objectives and mitigation of environmental impacts to the extent feasible, as described and analyzed in the EIR." The CEQA Findings addressed the three alternatives discussed in the EIR, as well as the MPA. With regard to the MPA, the Board relied on the Seifel Report to find the MPA economically infeasible because it "requires equity investments that are unsupportable given private equity underwriting requirements." The Board found that if the mitigation measures proposed in the EIR were adopted, all environmental impacts of the Project, except impacts to historic resources, **[*11]** would be avoided or reduced to an insignificant level. The Board concurred in the Commission's finding that the Project will result in specified impacts to historical resources that cannot be reduced to a level of insignificance with mitigation measures. Nevertheless, the Board found that the Project has substantial benefits to City, including the provision of rental housing (some of which would be affordable), senior housing and services welcoming to the LGBT community, a community center, publicly accessible open space, reintegration of the site into the surrounding neighborhood, retail space, adaptive reuse of three City landmarks, and fiscal benefits to City. The Project is also consistent with City policy in favor of public transit and the Project is "a nationally recognized LEED ND (leadership in energy and environmental design for neighborhood developments) pilot project." The Board found these benefits "outweigh the unavoidable adverse environmental effects to historic resources." On April 15, the Board approved various other actions in furtherance of the Project including, for example, general plan and zoning amendments and the approval of a special use district.

In April 2008, **[*12]** appellant filed a petition for writ of mandate requesting, among other things, that City be directed to set aside and void all Project approvals and to comply with CEQA and other legal requirements. In May 2008, appellant filed an amended petition seeking the same relief. The trial court denied the petition and entered judgment against appellant.

DISCUSSION

I. *Summary of Relevant CEQA Requirements*

"CEQA is a comprehensive [statutory] scheme designed to provide long-term protection to the environment." (*Mountain Lion Foundation v. Fish & Game Com. (1997) 16 Cal.4th 105, 112* (*Mountain Lion*).) Its purpose is to ensure that public agencies regulating activities that may affect the environment give primary consideration to preventing environmental damage. (*Architectural Heritage Assn. v. County of Monterey (2004) 122 Cal.App.4th 1095, 1100* (*Architectural Heritage*).) Pursuant to section 21083, regulatory guidelines regarding the application of CEQA have been promulgated in *California Code of Regulations, title 14, section 15000 et seq.* (hereafter Guidelines). [8] (*Architectural Heritage, at p. 1100* & fn. 2.)

> 8 Courts should give great weight to the Guidelines except when a provision is clearly **[*13]** unauthorized or erroneous under CEQA. (*Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 391, fn. 2* (*Laurel Heights*).)

The "heart of CEQA" is the EIR. (*Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564* (*Goleta Valley*); *California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 978* (*California Native Plant*).) "The EIR, with all its specificity and complexity, is the mechanism prescribed by CEQA to force informed decision making and to expose the decision making process to public scrutiny. [Citations.]" (*Planning & Conservation League v. Department of Water Resources (2000) 83 Cal.App.4th 892, 910.*) "A **[*14]** public agency must prepare an EIR or cause an EIR to be prepared for any project that it proposes to carry out or approve that may have a significant effect on the environment. [Citations.] The EIR must describe the proposed project and its environmental setting, state the objectives sought to be achieved, identify and analyze the significant effects on the environment, state how those impacts can be mitigated or avoided, and identify alternatives to the project, among other requirements. [Citations.]" (*Federation of Hillside and Canyon Associations v. City of Los Angeles (2004) 126 Cal.App.4th 1180, 1197.*) A significant impact is a substantial, or potentially substantial, adverse physical change in the environment, including adverse changes to objects of historic significance. (*County of Amador v. El Dorado County Water Agency (1999) 76 Cal.App.4th 931, 945*; see also § 21084.1 ["A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."].) 9

9 Section 21068 defines a "'[s]ignificant effect on the environment'" as "a substantial, or potentially substantial, adverse change in **[*15]** the environment." Guidelines section 15382 further defines a "'[s]ignificant effect on the environment'" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance." (See also *Citizens for Responsible & Open Government v. City of Grand Terrace (2008) 160 Cal.App.4th 1323, 1333.*)

"CEQA requires that an EIR, in addition to analyzing the environmental effects of a proposed project, also consider and analyze project alternatives that would reduce adverse environmental impacts. [Citations.]" (*In re Bay-Delta etc. (2008) 43 Cal.4th 1143, 1163.*) According to the Guidelines: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range **[*16]** of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible." (Guidelines, § 15126.6, subd. (a); see also *In re Bay-Delta etc., at p. 1163.*) As defined by statute, "'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (§ 21061.1; see also Guidelines, § 15364.)

Feasibility is also important at the project approval stage. (*California Native Plant, supra, 177 Cal.App.4th at p. 981.*) "CEQA contains a 'substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are *feasible* alternatives or *mitigation measures*' that can substantially lessen or avoid those effects. [Citations.]" (*County of San Diego v. Grossmont-Cuyamaca Community College Dist. (2006) 141 Cal.App.4th 86, 98*, quoting *Mountain Lion, supra, 16 Cal.4th at p. 134*; see also § 21002; *California Native Plant, at p. 978.*) While "*potentially* feasible" alternatives should be included in the EIR, at the project approval stage **[*17]** the issue is whether the alternatives are "*actually* feasible." (*California Native Plant, at p. 981*; see also *City of Marina v. Board of Trustees of California State University (2006) 39 Cal.4th 341, 368-369.*) Any finding of infeasibility must be supported by substantial evidence. (§ 21081.5; Guidelines, § 15091, subd. (b).)

"As relevant here, a project with significant environmental impacts may be approved only if the decisionmaking body finds (1) that identified mitigation measures and alternatives are infeasible and (2) that unavoidable impacts are acceptable because of overriding considerations. [Citations.]" (*California Native Plant, supra, 177 Cal.App.4th at p. 982.*) A public agency's statement of overriding considerations is "an express written determination that the project's benefits outweigh any potential environmental harm. [Citations.]" (*Id. at p. 983.*) Under section 21081, subdivision (b), the agency must find "that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment." "While the mitigation and feasibility findings typically focus on the feasibility of specific proposed alternatives **[*18]** and mitigation measures, the statement of overriding considerations focuses on the larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes, and the like. [Citation.]" (*Concerned Citizens of South Central L.A. v. Los Angeles Unified School Dist. (1994) 24 Cal.App.4th 826, 847.*) The public entity's statement of overriding considerations must be supported by substantial evidence. (*California Native Plant, at p. 983.*)

On appeal from denial of appellant's petition for writ of mandate, this court reviews City's actions, not the trial court's decision. (*California Farm Bureau Federation v. California Wildlife Conservation Bd. (2006) 143 Cal.App.4th 173, 185.*) We independently review the administrative record to determine whether City prejudicially abused its discretion by failing to proceed in a manner required by law, or by rendering a decision unsupported by substantial evidence. (§ 21168.5; *California Native Plant, supra, 177 Cal.App.4th at p. 984.*) This court determines de novo whether City employed the correct procedures under CEQA. (

California Native Plant, at p. 984.) On the other hand, we apply the "highly deferential" **[*19]** substantial evidence standard of review to City's factual determinations. (*Western States Petroleum Assn. v. Superior Court (1995) 9 Cal.4th 559, 572.*) Guidelines section 15384, subdivision (a), defines "'substantial evidence'" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." To support a fair argument, "substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact," but not "argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment." (§ 21080, subd. (e)(1) & (2); see also Guidelines, § 15384.) "'The agency is the finder of fact and we must indulge all reasonable inferences from the evidence that would support the agency's determinations and resolve all conflicts in the evidence in favor of the agency's decision.' [Citation.] That deferential review standard flows from the fact that 'the agency has the discretion **[*20]** to resolve factual issues and to make policy decisions.' [Citation.]" (*California Native Plant, at p. 985.*) The decision of the lead agency is "presumed correct," and the party seeking a writ of mandamus "bear[s] the burden of proving otherwise." (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656, 674* (*San Franciscans*).)

II. *Substantial Evidence Supports City's Finding That the MPA Is Infeasible*

In this case, City found that the preservation alternative discussed in the EIR and the MPA are infeasible on economic grounds. In particular, City accepted the conclusion of an independent economic consulting firm, Seifel, that the preservation alternative and the MPA did not have high enough profit potential to attract the type of equity investment necessary to fund the development. Appellant contends the Seifel Report does not constitute substantial evidence to support the finding that the MPA is infeasible. [10] We disagree.

10 Appellant fails to present any reasoned argument that City erred in finding that the preservation alternative is infeasible. Appellant merely asserts that the reasoning applicable to the MPA also applies to the preservation **[*21]** alternative, and that the California Department of Parks and Recreation Office of Historic Preservation sent a letter to City in support of the preservation alternative. However, the Seifel Report indicates that the problem with the preservation alternative is lack of enough units to produce sufficient revenue, not higher construction costs, which is the problem with the MPA.

A. *The Seifel Report*

A. F. Evans retained Seifel "to provide an independent financial evaluation of the proposed residential development and three project alternatives for 55 Laguna Street in San Francisco." Appellant does not dispute Seifel's qualifications to advise City on the issue of economic feasibility. According to the firm's statement of qualifications, Seifel is "an economic consulting firm providing strategic real estate and urban economic advisory services to public agencies, institutional investors and developers . . . . Seifel has specialized expertise in the areas of public-private development transactions, redevelopment and other public financing techniques, affordable housing feasibility and funding, and fiscal and economic impact analysis." Seifel has experience working with numerous San Francisco **[*22]** agencies and other public entities statewide, and on projects in numerous San Francisco neighborhoods. The firm identifies "real estate economics" as the "foundation" for its work and explains: "It is a technical discipline that provides insight into the real estate market through tools such as site analysis, market research, financial feasibility, and highest and best use studies. [Seifel] combine[s] insight into the real estate market with a well-honed foundation in cash flow modeling, asset valuation, and other analytical methods."

The Seifel Report, dated February 25, 2008, scrutinized the cost estimates in A. F. Evans's pro forma for the Project (referred to in the report as the "preferred project") and the alternatives. The Seifel Report summarized the cost estimates as follows: "A. F. Evans['s] construction costs for the preferred and preservation alternatives are based on estimates from Cahill Contractors[, Inc.,] completed in Fall 2007. The cost estimates for the [MPA] are based on an extrapolation from these estimates based on differences in anticipated construction costs due to changes in construction type and complexity associated with historic rehabilitation." A. F. Evans **[*23]** estimated that the "hard" construction costs for the MPA would be $ 401 per square foot, as compared to $ 330 per square foot for the preferred project. A. F. Evans's estimates were for its construction costs, excluding the separately financed units to be built by openhouse.

The Seifel Report concluded that A. F. Evans's costs estimates were reasonable: "These hard costs are within the range of other projects that we have reviewed and the construction costs reported in the 2006 San Francisco Inclusionary Housing Study. This Study surveyed a variety of development projects citywide in 2006 and found that average construction costs" were "about [20] percent higher, for midrise construction." [11] Mid-rise construction contemplates buildings made out of concrete rather than wood frame structures. This largely accounted for the higher cost of the MPA: "The 21 percent increase in hard costs/sf between the [MPA] and the preferred project is reasonable given the greater amount of historic rehabilitation that would be accomplished and the higher cost of midrise construction, which is . . . substantially more expensive than wood frame construction." The report also concluded it was reasonable **[*24]** that the construction costs of Cahill Contractors, Inc. (Cahill), were about 10 percent higher than those in the study, given the "complex site grading work and historic rehabilitation of existing structures."

> 11 Appellant asserts that the conclusion that mid-rise construction is more expensive is unsupported, but appellant fails to acknowledge the Seifel Report's reliance on the 2006 San Francisco Inclusionary Housing Study.

The Seifel Report then proceeded to explain the difficulties A. F. Evans faced in obtaining financing for the Project. As explained in the report, the amount of a traditional commercial loan is based on the revenue the project "could currently be expected to generate, as if it were already constructed and operating at stabilized occupancy." However, all three of the relevant development proposals--A. F. Evans's preferred project, the preservation alternative, and the MPA--lack a sufficient potential revenue stream to support total development costs. For example, A. F. Evans's preferred project "has a total development cost of $ 171.0 million, and after taking into account contributions from openhouse and tax credits, it would require a construction loan of $ 157.8 **[*25]** million, which is substantially more than the capitalized value of $ 118 million." A. F. Evans plans to overcome this obstacle by finding an equity investor "able to guarantee the difference between the construction [loan] and the potential value of the project." The Seifel Report explains the investor's motivation: "The equity investor receives a fee and a share of project profits in exchange for its guarantee. When the project converts from a construction loan to a permanent loan (projected to occur in 2015), the equity investor must also contribute the difference between the outstanding construction loan and the maximum supportable permanent loan. This difference is estimated to be $ 30.2 million for the preferred project, $ 37.4 million for the preservation alternative and $ 63.2 million for the [MPA]. The investor would look to recover this investment when the project is sold. The scale of the guarantee and the subsequent cash investment in the project limits the potential pool of investors to large, established equity investors." (Fn. omitted.)

The Seifel Report also explains the difficulty in financing either of the preservation alternatives: "We spoke to several institutional **[*26]** equity investors in order to confirm the terms of this type of financing structure, their underwriting considerations and the returns required for them to pursue the investment. The investors would typically look for this type of project to require equity of no more than 15 to 20 percent of the value of the construction loan. . . . [T]he preferred project is within this range, but the alternatives require equity of 30 to 33 percent of the construction loan, making it unlikely that investors would underwrite these investments." The report further explains: "Given the size and [the] risk of this project, investors stated that they would require an internal rate of return in the high teens to low twenties on their equity investment in exchange for their involvement in the project. . . . [P] [T]he preferred project is the only project alternative with sufficient proceeds from the sale of the development to produce the required returns. While the financial performance of the preservation [alternative and the MPA] could improve if operating expenses were lower, our analysis indicates that net operating income would not likely change enough to result in a project that institutional investors **[*27]** and/or lenders would consider funding given stated underwriting standards." The Seifel Report concludes: "In summary, Seifel . . . concurs with the developer that the preferred project is the only financially viable development program. Our analysis demonstrates that even the preferred project is challenged to meet investor hurdle rates given the risks associated with a project of this complexity. The three alternatives require equity investments that are unsupportable given private underwriting requirements."

The Board's CEQA Findings describe the Seifel Report and explain the reasoning underlying the conclusion that the MPA is infeasible. The findings rely on the Seifel Report to find the MPA economically infeasible because the MPA "requires equity investments that are unsupportable given private equity underwriting requirements." The findings conclude: "Because the [MPA] is financially infeasible and is unlikely to be implemented, it would not provide to . . . City the significant benefits of the proposed project . . . , but may result in the property remaining vacant for an indefinite period of time, resulting in continuing deterioration of the three City landmarks on the site and **[*28]** continuing safety and security problems for neighbors."

B. *Appellant's Contentions*

Appellant bears the burden of demonstrating that the Seifel Report, on which the finding of infeasibility is based, is "clearly inadequate or unsupported." (*Laurel Heights, supra, 47 Cal.3d at p. 409, fn. 12*; *Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437, 1467-1468* (*Save Round Valley); State Water Resources Control Bd. Cases (2006) 136 Cal.App.4th 674, 795.*) [12] As noted previously, appellant does not contend Seifel was unqualified to perform the economic analysis reflected in the report. Neither does appellant dispute Seifel's analysis of the difficulty of securing financing for the Project or Seifel's statements regarding the equity percentage and returns required by the type of equity investor needed to finance the Project. Instead, appellant questions the A. F. Evans cost estimates for the MPA, which estimates were accepted as reasonable in the Seifel Report. As support, appellant points to a February 26, 2008 letter submitted by Martinez, reporting on an informal survey he conducted regarding construction costs. Martinez wrote: "I have recently questioned several architects **[*29]** and developers for the hard construction costs for multiunit residential projects and have come up with a range of answers from a low of $ 180 per square foot to a high of about $ 270 per square foot." Regarding the cost estimate for the MPA in the Seifel Report, the Martinez letter states: "The statement that the [MPA] would have a higher per square foot construction cost is unsubstantiated in [the Seifel Report], and is only supported by A. F. Evans['s] claim that it is true. Recent experience shown by the projects [in Martinez's informal survey] has been that all-concrete construction (even type 1) now can be cheaper than wood or steel frame construction so an appeal to higher expense due to a difference in type of construction is simply not true anymore." The Martinez letter concludes, "The type of construction shown in the [MPA] is not so remarkably different from the construction shown in [A. F. Evans's] preferred [project] to justify a claim of a higher per square foot construction cost, and even if it was a different type of construction that in itself would not now justify a claim of higher construction costs."

12 These cases are in the context of review of findings in an EIR, **[*30]** which are also reviewed for substantial evidence.

The Martinez letter fails to undermine the Seifel Report. The letter fails to acknowledge the Seifel Report's reliance on construction costs reported in the 2006 San Francisco Inclusionary Housing Study, which appears to be more reliable than Martinez's informal survey of "several" architects and developers. The Martinez letter does not state that any of the projects he surveyed involved historical preservation and rehabilitation, which the Seifel Report explains accounts in part for Cahill's higher cost estimates. Finally, the Martinez letter does not indicate he has any expertise in estimating construction costs or provide a reasoned explanation for his assertion that the MPA, which requires buildings of greater height, would not be more expensive. [13] (See *San Franciscans, supra, 102 Cal.App.4th at p. 695, fn. 23* [witness testimony that expert underestimated value of commercial rental space and that alternate tenants were available did not undermine expert opinion regarding economic infeasibility of preservation alternatives].) In any event, this court is obligated to resolve conflicts in the evidence in favor of City, including conflicting **[*31]** expert opinions. (*Sierra Club v. County of Sonoma (1992) 6 Cal.App.4th 1307, 1317*; see also *Association of Irritated Residents v. County of Madera (2003) 107 Cal.App.4th 1383, 1397* (*Irritated Residents*) ["When the evidence on an issue conflicts, the decisionmaker is 'permitted to give more weight to some of the evidence and to favor the opinions and estimates of some of the experts over the others.' [Citation.]"]; *Laurel Heights, supra, 47 Cal.3d at p. 409* ["It is also well established that '[d]isagreement among experts does not make an EIR inadequate.' [Citation.]"].) [14]

13 Elsewhere in its briefs, appellant disputes that the MPA would include taller buildings, but appellant cites to nothing in the record supporting its position and fails to explain how the MPA could preserve all of the historic structures and include as many units as A. F. Evans's proposal without taller buildings. In fact, Martinez, who conceived of the MPA, told the Board that a "serious preservation alternative" would involve "increased height limits."

14 Appellant also quotes a letter submitted to City from Lerner + Associates asserting that historic preservation tax credits would provide a "net gain of about $ 450,000 **[*32]** to the project [developer] per" the Seifel Report. However, that does not undermine the Seifel Report or its conclusions; the Seifel Report states those credits are factored into the A. F. Evans cost estimates. Appellant also cites to testimony from Cynthia Servetnick, who holds a degree in architecture, that it is "common sense" that the A. F. Evans cost estimates for the MPA are wrong. That assertion obviously does little to undermine the Seifel Report.

Appellant cites language from *Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal.App.3d 1167, 1181*, that "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." That quotation supports the Board's finding of infeasibility; the Seifel Report concluded not just that the MPA is more expensive, but also that financing for the MPA would be unattainable. (See also *Save Round Valley, supra, 157 Cal.App.4th at p. 1461*.) This case bears some similarity to *San Franciscans,* which involved **[*33]** a redevelopment project planned for the site of the former Emporium store in downtown San Francisco. (*San Franciscans, supra, 102 Cal.App.4th at p. 666*.) An independent expert considered various alternatives to the proposed project, which alternatives included more preservation and rehabilitation of the former store. (*Id. at pp. 693-694*.) The expert's analysis showed that the preservation alternatives were more costly and provided lower projected income streams and profitability, which decreased the availability of private investment sources and required more financing with public resources. (*Id. at p. 694*.) The expert concluded the developer's preferred project was the only economically feasible option because it was the only option in which the increased tax revenues generated by the project would be sufficient to cover the entire public investment. (*Ibid.*) In concluding that the infeasibility findings were supported by substantial evidence, the *San Franciscans* decision stated: "The [c]ity and its agencies made every effort to mitigate the environmental impacts of the [p]roject as much as possible, requiring numerous changes and amendments that ultimately resulted in a proposal that **[*34]** preserves the most significant architectural and historic elements of the Emporium Building while revitalizing a major downtown area at a cost the [c]ity could afford." (*Id. at p. 695*.)

City found that redevelopment of the 55 Laguna Street campus requires a similar balancing of preservation and profitability, and substantial evidence supports City's finding that the MPA is infeasible on economic grounds. [15]

15 Because we conclude City's finding on feasibility is supported by substantial evidence, we reject appellant's challenge to the Board's statement of overriding considerations. Appellant's only argument on the issue is that it was improper for the Board to adopt a statement of overriding considerations where there were feasible alternatives to the Project.

C. *Additional Arguments Regarding Feasibility Made by Amicus*

Amicus presents a string of additional arguments regarding City's finding that the MPA is infeasible, none of which are raised by appellant on appeal and none of which appear to have been presented to City below. [16] Amicus's arguments are calculated to raise doubts about the conclusion in the Seifel Report that the MPA would be more expensive because of the greater amount **[*35]** of rehabilitation and because the taller buildings would be more expensive to construct. [17]

16 This court normally does not address arguments presented only in an amicus curiae brief. (See, e.g., *Neilson v. City of California City (2005) 133 Cal.App.4th 1296, 1310-1311, fn. 5*.)

Moreover, this court normally does not address grounds that were not presented to the lead agency during the administrative CEQA compliance process. (*State Water Resources Control Bd. Cases, supra, 136 Cal.App.4th at pp. 794-795.*) Because amicus's contentions plainly fail to show the infeasibility finding is unsupported by substantial evidence, we need not determine whether we should decline to consider amicus's arguments on either of those grounds.

17 Amicus also asserts that an additional alternative was presented to City in an April 8, 2008, letter from architect Arnie Lerner. Amicus characterizes this alternative as a "'low tech' proposal simply to retain Middle Hall, instead of tearing it down for open space." In fact, the Lerner letter only purports to be a cost estimate for the MPA, not yet another alternative. Amicus cites to no other portion of the record supporting its assertion that Lerner presented a **[*36]** separate alternative to City.

Amicus also contends that the Seifel Report fails to include tax-exempt bonds, associated with the affordable housing component of the A. F. Evans development, as a source of funds for the MPA. In fact, the Seifel Report describes tax-exempt bonds as a funding source for the preferred project, the preservation alternative, and the MPA. Amicus has not shown that the feasibility calculations in the Seifel Report fail to account for tax-exempt bond financing, or that any omissions could have affected the report's conclusions.

On the rehabilitation issue, amicus points out that Cahill's estimates show that rehabilitation is actually less expensive than new construction. However, amicus cites to nothing in the record showing that each square foot of additional rehabilitation under the MPA would translate into one fewer square foot of necessary new construction. Thus, amicus has not shown that the MPA would not result in some overall additional rehabilitation work without a corresponding decrease in new construction. In any event, according to the Seifel Report, the higher cost of the MPA is primarily due to the higher cost of mid-rise construction.

On the mid-rise **[*37]** construction issue, amicus asserts that Cahill indicated that construction of a taller building would cost only $ 1 million more because, in estimating the cost of the preservation alternative, Cahill included a notation "Note--[openhouse] building not included[.] Add $ 1,000,000 premium for high[-]rise." [18] However, that notation is too lacking in context or explanation to undermine the Seifel Report's analysis, particularly where that analysis is supported by a study of San Francisco construction costs. [19] Moreover, the Cahill notation is, at most, conflicting evidence that cannot justify overturning City's finding of infeasibility. (*California Native Plant, supra, 177 Cal.App.4th at p. 985.*)

18 At oral argument, appellant argued that, in estimating the cost of the MPA, the Seifel Report should have used a Cahill estimate of the cost of mid-rise construction for the preservation alternative. We understand this to be a reference to the $ 1 million "premium for high[-]rise" notation discussed herein. Appellant has provided no record citation for a Cahill estimate of the cost of mid-rise construction for the preservation alternative, which (aside from the openhouse building) includes **[*38]** only buildings three to four stories tall.

19 Like appellant, amicus ignores that the Seifel Report cites to the 2006 San Francisco Inclusionary Housing Study as support for its conclusion that the A. F. Evans cost estimates are reasonable.

Finally, amicus argues it was improper for A. F. Evans to estimate for the MPA across the board construction cost increases of over 20 percent, where not all of the new buildings in the MPA are significantly higher than those in the Project. Amicus asserts that only one of the buildings in the MPA "is significantly taller than the four-story buildings that [A. F. Evans] plans for the campus." Our analysis of this argument is impeded by the lack of detail in the MPA, submitted by appellant in an untimely fashion, seven months after the May 2007 close of the public comment period. [20] The axonometric sketch that constitutes the MPA lacks any building heights or other details, and A. F. Evans necessarily was required to assign building dimensions and allocate the residential units in order to come up with a cost estimate. Subsequently, Martinez, who conceived of the MPA, accepted the assumption that the MPA would require concrete construction, and he did **[*39]** not argue that such construction would be limited to one building or provide details regarding building heights in order to undermine the A. F. Evans cost estimate.

20 The Board's CEQA Findings assert that City was not required to address the MPA. The findings cite to section 15207 of the Guidelines, which provides that a "lead agency need not respond to late comments" to an EIR. Because we conclude substantial evidence supports City's finding of infeasibility, we need not consider whether City could have declined to address the MPA.

Moreover, the one building (building B-4) in the MPA that amicus admits is significantly taller than any of the buildings in the Project as proposed by A. F. Evans would contain nearly 40 percent of the units to be constructed by A. F. Evans under the MPA. Accordingly, a substantial increase in the cost of constructing that building alone would have a significant impact on the overall construction cost. This is important because the Seifel Report concludes that the Project as proposed is already "challenged to meet investor hurdle rates given the risks associated with a project of this complexity." The report explains that investors would typically look for **[*40]** a project of this type to require equity of "no more than 15 to 20 percent of the value of the construction loan." The Project as proposed will require equity of 19 percent of the value of the loan, so any significant increase to the construction cost is likely to render the Project financially infeasible under the Seifel Report's analysis. The Seifel Report projects the MPA will require equity of 33 percent of the value of the construction loan. Accordingly, even if its analysis is imperfect, amicus has not shown that any flaws affect the fundamental conclusion that the MPA is financially infeasible.

The Seifel Report is the type of expert opinion that can provide substantial evidence for City's infeasibility finding. (See *San Franciscans, supra, 102 Cal.App.4th at pp. 694-695* [relying on opinion of independent real estate valuation expert to support the city's finding of economic infeasibility of alternatives].) As explained by the California Supreme Court, "the issue is not whether the studies are irrefutable or whether they could have been better." (*Laurel Heights, supra, 47 Cal.3d at p. 409.*) Amicus has not shown that the Seifel Report is so "clearly inadequate or unsupported" **[*41]** that it cannot constitute substantial evidence in support of City's finding of infeasibility. (*Id. at p. 409, fn. 12.*) [21]

21 Respondents fail to address any of the specific contentions made by Amicus regarding the Seifel Report, asserting that this court is not required to "inquire into the purely factual basis of the infeasibility findings at issue here in order to determine the validity of those findings." Respondents are mistaken. If the conclusions in the Seifel Report lack factual support, the report would not constitute substantial evidence. (§ 21080, subd. (e)(1) & (2); see also *Laurel Heights, supra, 47 Cal.3d at p. 409, fn. 12* ["A clearly inadequate or unsupported study is entitled to no judicial deference."].)

III. *Appellant's Contention That the EIR Must Be Recirculated*

Appellant contends the EIR must be recirculated with evaluation of the MPA. However, appellant fails to provide any authority that City is obligated to recirculate the EIR to include discussion of a late-presented alternative that the lead agency has found to be infeasible.

Guidelines section 15088.5, subdivision (a), provides in part that "A lead agency is required to recirculate an EIR when significant new information **[*42]** is added to the EIR after public notice is given of the availability of the draft EIR for public review . . . but before certification." (See also § 21092.1.) The Guidelines specify that "[s]ignificant new information" (Guidelines, § 15088.5, subd. (a)) includes a disclosure that "[a] *feasible* project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it" (Guidelines, § 15088.5, subd. (a)(3), italics added). The Guidelines also state that new information is *not* significant unless failure to recirculate would deprive the public of an opportunity to comment "upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a *feasible* project alternative) that the project's proponents have declined to implement." (Guidelines § 15088.5, subd. (a), italics added.) Because we have upheld City's determination that the MPA was not a feasible alternative, City was not required to recirculate the EIR under section 15088.5, subdivision (a) of the Guidelines. [22] (See *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*

(2007) 40 Cal.4th 412, 447.) **[*43]** Appellant has identified no other authority supporting the proposition that City was required to recirculate the EIR with discussion of the MPA. 23

22 We need not consider whether City actually "added" new information about the MPA to the EIR before certification. (Guidelines, § 15088.5, subd. (a).)

23 "CEQA requires that governmental agencies consider reasonable alternatives. It is not limited to alternatives proposed and justified by objectors [to an EIR]." *(Citizens of Goleta Valley v. Board of Supervisors, supra, 197 Cal.App.3d at p. 1178.)* The discussion of alternatives in the EIR must be sufficient "to allow informed decision making." *(Laurel Heights, supra, 47 Cal.3d at p. 404.)* In this case, the EIR discussed a "no project" alternative, a housing development alternative that preserved all historic buildings, and an educational development alternative that preserved all historic buildings. (Cf. *Laurel Heights, at p. 404* ["The EIR prepared by [the University of California, San Francisco,] contains no analysis of any alternative locations."].) Appellant does not argue that the EIR is flawed because the MPA (or its equivalent) should have been included in the original EIR; that is, **[*44]** appellant does not contend that the EIR does not discuss an adequate range of alternatives.

Also on point is the California Supreme Court's decision in *Goleta Valley, supra, 52 Cal.3d 553*. There, the court concluded that the decision of a county board of supervisors to reject as infeasible certain alternatives to a resort hotel project was supported by substantial evidence. *(Id. at p. 559.)* In addition to concluding that the findings were supported by the evidence in the record, the court concluded that, because the objector to the project suggested the additional alternatives after expiration of the comment period, the lead agency did not err in making administrative findings that the additional alternatives were infeasible, rather than analyzing the late-presented alternatives in a supplemental EIR. *(Id. at pp. 569-570.)* The same reasoning is applicable in this case, where the MPA was not presented to City until seven months after close of the comment period.

III. *The EIR's Cumulative Impact Analysis*

"'[A] cumulative impact of a project is an impact to which that project contributes and to which other projects contribute as well. . . .'" *(Sierra Club v. West Side Irrigation Dist. (2005) 128 Cal.App.4th 690, 700.)* **[*45]** The Guidelines define "'[c]umulative impacts'" as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (Guidelines, § 15355.) "Proper cumulative impact analysis is vital 'because the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.' [Citations.] '[C]onsideration of the effects of a project or projects as if no others existed would encourage the piecemeal approval of several projects that, taken together, could overwhelm the natural environment and disastrously overburden the man-made infrastructure and vital community services. This would effectively defeat CEQA's mandate to review the actual effect of the projects upon the environment.' [Citation.]" *(Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184, 1214-1215.)*

Section **[*46]** 15130, subdivision (b)(1)(B) of the Guidelines provides that, in describing cumulative impacts, an agency may rely on and incorporate into an EIR a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. The DEIR and EIR state that they "analyze[] the cumulative impacts of the proposed project in light of the policies and principles established in the Market and Octavia . . . Neighborhood Plan, which is the current tool for guiding development within this area, as well as the Plan's potential impacts to historic resources as identified in the Neighborhood Plan Draft EIR." Appellant contends the EIR's cumulative impact analysis is flawed because the Market and Octavia Neighborhood Plan (Neighborhood Plan) and the Neighborhood Plan EIR had not been adopted or certified when the DEIR was published on January 27, 2007. Instead, the Neighborhood Plan EIR was certified by the Planning Commission on April 5, 2007, prior to certification of the EIR on January 17, 2008. 24

24 It is unclear [*47] when the Neighborhood Plan was adopted, but the Neighborhood Plan EIR is the document with the information relevant to the cumulative impacts analysis.

The draft Neighborhood Plan EIR stated that "no significant impacts to historical resources from the proposed plan have been identified that could combine with past, present or future impacts" and, thus, "the cumulative impacts resulting from the [Neighborhood] Plan would be less than significant." The final Neighborhood Plan EIR was certified in April 2007 with "no significant revisions" to the draft. Relying on the Neighborhood Plan EIR, the DEIR and EIR conclude there are no significant cumulative impacts to historic resources. The DEIR and EIR reason: "The Draft EIR for the [Market and Octavia] Area Plan did not identify any significant impacts to historic resources resulting from implementation of the Plan. Since no significant impacts to historic resources were identified as part of implementation of the Area Plan, the significant impacts to historic resources associated with the proposed project would not combine with other potential impacts to historic resources in the Market and Octavia neighborhood to form a significant adverse [*48] cumulative impact. In other words, the loss of the existing historic buildings and structures on the project site, as well as the site itself as a potential campus historic district, would not be cumulatively considerable in light of the absence of potential impacts to other historic resources in the larger Market and Octavia neighborhood. . . ."

Even if the DEIR violated section 15130, subdivision (b)(1)(B) of the Guidelines by relying on an uncertified Neighborhood Plan EIR, the document had been certified, without any significant changes, by the time the EIR was certified. Appellant has not shown that the DEIR's reliance on the draft Neighborhood Plan EIR provides a basis to invalidate the cumulative impact analysis in the EIR. This is particularly true where appellant has not identified any prejudice resulting from the DEIR's citation to the uncertified Neighborhood Plan EIR. (See *Irritated Residents, supra, 107 Cal.App.4th at p. 1391* ["'[A] prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.' [Citation.]"].) City's finding [*49] of no significant cumulative impacts is supported by substantial evidence. (See *Gray v. County of Madera (2008) 167 Cal.App.4th 1099, 1128.*)

DISPOSITION

The trial court's judgment is affirmed. Costs to respondents.

SIMONS, J.

We concur.

JONES, P.J.

NEEDHAM, J.

Jonathan Carey

From: Eugene.Flannery@SFGOV.ORG
Sent: Wednesday, July 25, 2012 9:39 AM
To: Ramie Dare; Jonathan Carey
Subject: Fw: Matrix for housing

Follow Up Flag: Follow up
Flag Status: Completed

Servetnick has no information for us.

Eugene T. Flannery
Environmental Compliance Manager
Mayor's Office of Housing
1 South Van Ness Avenue
Fifth Floor
San Francisco, CA 94103
415-701-5598
h
----- Forwarded by Eugene Flannery/OCDHH/MAYOR/SFGOV on 07/25/2012 09:36 AM -----

From: Cynthia Servetnick <cynthia.servetnick@gmail.com>
To: Eugene.Flannery@sfgov.org
Date: 07/25/2012 09:33 AM
Subject: Re: Matrix for housing

Mr. Flannery:

I have not been able to fill out the below matrix with the information for the modified preservation alternative shown in the axonometric drawing prepared by Alan Martinez, AIA in the Final EIR for the 55 Laguna Mixed Use Project.

However, in addition to the no project alternative, we suggest the NEPA environmental document analyze the exact project A.F. Evans submitted for analysis under CEQA with the sole exception of retaining the original gymnasium portion of Middle Hall for community use rather than tearing it down for community gardens.

Again, thank you for inviting our input.

Sincerely,

Cynthia Servetnick, Director
Save the Laguna Street Campus

On Mon, Jul 16, 2012 at 9:22 AM, <Eugene.Flannery@sfgov.org> wrote:
per your request
please include narrative description in your response

Building	New or Renovation	Studio	1 BR	2 BR	Total D.U.	Square Feet
5 (Residential)	New	1	68	1	70	54,983

5 (Senior Center)	New	Senior Activity Center				8,615
6 (Residential)	Renovation	10	27	3	40	41,961
6 (Offices)	Renovation	Openhouse Offices				2,717
6 (Retail)	Renovation	Ground-Floor Retail Space				2,410
Total	**--**	**7**	**97**	**6**	**110**	**110,686**
Source: Building 5: BAR Architects, January 2012 CUP Submittal; Building 6: Van Meter Williams Pollack, February 29, 2012						

Eugene T. Flannery
Environmental Compliance Manager
Mayor's Office of Housing
1 South Van Ness Avenue
Fifth Floor
San Francisco, CA 94103
415-701-5598
h

=

4) Seifel Consulting, Inc. R... .ew of 55 Laguna Mixed Use Project ... Project Alternatives, February 25, 2008

Seifel
CONSULTING INC.

221 Main Street
Suite 420
San Francisco CA
94105

415.618.0700
fax 415.618.0707
www.seifel.com

Memorandum

VIA (EMAIL)

February 25, 2008

To: San Francisco Planning Department

Cc: Ruthy T. Bennett, AF Evans; Steven L. Vettel, Farella Braun & Martel

From: Libby Seifel, Jessica Zenk, and Evan Sarna, Seifel Consulting Inc.

Subject: Review of 55 Laguna Street Project and Project Alternatives

Seifel Consulting Inc. (Seifel) was retained by AF Evans Development (AF Evans) to provide an independent financial evaluation of the proposed residential development and three project alternatives for 55 Laguna Street in San Francisco. This memorandum summarizes the findings of our evaluation, and is organized as follows:

A. Description of Preferred Project and Project Alternatives

B. Summary of AF Evans Pro Forma Analysis

C. Review of AF Evans Pro Forma Assumptions and Methodology

   1. Residential Project Alternatives

      i. Land, Construction and Soft Costs

      ii. Revenue, Expense and Sale Assumptions

      iii. Financing

   2. New College/Global Citizens Center Alternative

D. Conclusion

A. Description of Preferred Project and Project Alternatives

The 55 Laguna property is currently owned by the University of California and contains five buildings totaling 119,910 square feet on the 5.4 acre site. The University of California selected AF Evans Development (AF Evans) to lead development activities at the site. The preferred project proposal calls for rehabilitation of three buildings (Woods Hall, Woods Hall Annex, and most of Richardson Hall) and demolition of a fourth building, Middle Hall, and a portion of Richardson Hall. The preferred project also provides for the construction of seven new buildings on the site.

The preferred project development program would contain approximately 438 units, including 110 units of affordable senior housing, a mixed-income apartment development consisting of 262 market-rate and 66 below market-rate units (20 percent of these units). All of the senior units will be affordable to households earning 50 percent or less of the Area Median Income (AMI). The program also includes 310 parking spaces, approximately 12,000 square feet of community space, 5,000 square feet of retail space and 41,000 square feet of public and open space. The lead developer of the project, AF Evans, proposes to partner with openhouse, a non-profit organization based in San Francisco, to develop the 110 units of affordable housing welcoming to LGBT seniors.

Two alternatives have been evaluated for the Environmental Impact Report (EIR). The first alternative, referred to as the Preservation Alternative, assumes that all existing buildings and a retaining wall along Laguna Street would be preserved. Infill residential development would proceed in a manner similar to the preferred proposal with a reduced size and density. A total of 332 housing units, including 79 affordable senior units and 51 below market rent units, would be built on the site.

The second alternative evaluated in the EIR, or the New College of California / Global Citizen Center Concept Plan (NC/GCC), would retain and reuse all existing buildings on the site. The NC/GCC alternative includes the development of educational facilities, 90 infill residential units for students, non-profit commercial uses, parking, and open space.

A third alternative, as proposed by the Save the Laguna Street Campus organization, has also been evaluated for the site. The Modified Preservation Alternative would retain all existing buildings at the site and increase the total number of residential units to 450 by constructing additional infill units, assumed to be in midrise buildings, including 110 affordable senior units and 69 below market rent units.

Table 1 summarizes the development program, including unit counts and square footages, for the preferred and alternative proposals.

Table 1
Summary of Proposed Development Programs
Preferred and Alternative Proposals
55 Laguna Pro Forma Review

	Preferred Project	Preservation Alternative	NC/GCC Alternative	Modified Preservation Alternative
Buildings (Rehab)	3	4	4	4
Buildings (New Construction)	7	6	3	6
Total Residential Units	438	332	90	450
openhouse Senior Units	110	79		110
Market Rate Units	262	202	90	272
Inclusionary Affordable Units	66	51		68
Parking Units	321	335	178	321
Retail Space (SF)	5,000	5,000	17,000	5,000
Community Space (SF)	12,000	10,000		10,000
Public/Open Space (SF)	41,000	41,000		41,000
Institutional Space (SF)			111,000	

Source: San Francisco Planning Department, January 2008; 55 Laguna Mixed Use Development, Draft Environmental Impact Report, Chapter IV, January 2007; AF Evans, February 2008.

B. Review of Proposed Sources and Uses

We evaluated the financial pro forma analysis that AF Evans performed on each of the four alternatives. We first reviewed the projected sources and uses for each alternative, and then performed more detailed analysis on the supporting documentation and methodology that AF Evans used to project development costs, revenues, operating expenses, and financing/equity terms.

The development costs (or uses) for each program include land, construction costs and soft costs that include architectural/engineering fees, contractor fees, developer fee and financing costs. The proposed funding sources for the project consist of tax-exempt bonds, low-income housing tax credits, and a $6.6 million contribution from openhouse. Table 2 summarizes the sources and uses for the preferred and alternative proposals.

59

Table 2
Proposed Sources and Uses
Preferred and Alternative Proposals
55 Laguna Pro Forma Review

	Preferred Project	Preservation Alternative	NC/GCC Alternative	Modified Preservation Alternative
Uses				
Land	$ 18,025,000	$ 18,025,000	$ -	$ 18,025,000
Hard Costs	$ 124,367,781	$ 99,120,957	$ 82,000,000	$ 155,701,269
Financing Costs	$ 11,027,056	$ 8,850,000	$ -	$ 14,809,435
Developer Fee	$ 5,500,000	$ 3,361,217	$ -	$ 5,500,000
Other Soft Costs	$ 12,036,556	$ 9,820,519	$ 16,400,000	$ 12,932,061
Total Uses	**$ 170,956,393**	**$ 139,177,693**	**$ 98,400,000**	**$ 206,967,765**
Sources				
openhouse Contribution	$ 6,640,000	$ 6,640,000	$ -	$ 6,640,000
Low Income Housing Tax Credits	$ 5,588,319	$ 4,548,557	$ -	$ 5,794,192
Historic Preservation Tax Credits	$ -	$ 1,231,108	$ 1,231,108	$ 1,980,000
Permanent Loan	$ 121,283,133	$ 84,265,032	$ 37,786,457	$ 118,332,232
Equity Contribution/Financing Gap	$ 37,444,941	$ 42,492,996	$ 59,382,435	$ 74,221,341
Total Sources	**$ 170,956,393**	**$ 139,177,693**	**$ 98,400,000**	**$ 206,967,765**

Source: AF Evans, February 2008.

C. Review of Pro Forma Assumptions and Methodology

We reviewed the underlying assumptions and methodology that AF Evans used to evaluate for the preferred and alternative projects. As the preferred and two of the alternatives primarily contain residential uses, we evaluated the residential proposals first, and then focused on the NC/GCC alternative, which primarily consists of non-residential, educational uses.

1. Residential Project Alternatives

Land, Construction and Soft Costs

Land, construction and soft costs appear reasonable given our knowledge from working on other projects in the San Francisco and Bay Area. Within all three residential project alternatives (preferred, preservation and modified preservation), AF Evans would pay the University of California $18 million for the right to the land, or $40,000 to $54,000 per unit overall (including both openhouse and the mixed-income apartment units). This cost per unit is less than what we have seen reported for recent condominium projects in San Francisco. However, given that the residential alternatives would include apartment units with a relatively large proportion of affordable units (about 40% overall), significant amounts of non-revenue producing community space, and the complexities of developing the project, this appears to be a reasonable price.

AF Evans construction costs for the preferred and preservation alternatives are based on estimates from Cahill Contractors completed in Fall 2007. The cost estimates for the modified preservation alternative are based on an extrapolation from these estimates based on differences in anticipated construction costs due to changes in construction type and complexity associated with historic rehabilitation. The estimates for the modified preservation alternative were completed to the best of AF Evans' abilities based on axiometric drawings, without program or design details. Hard construction costs equal $262,000 per unit ($330/building square feet) for the preferred project, $275,000 per unit ($335/building square feet) for the preservation alternative and $324,000 per unit ($401/building square feet) for the modified preservation alternative. These hard costs include parking construction costs, which are estimated at about $30,000 per structured space.

AF Evans escalates these hard costs by 7 percent to account for inflation, and includes a 5 percent construction contingency and a 3 percent contractor fee, as well as relatively small amounts for tenant improvements, hazardous materials testing and remediation, utility connections and other incidental items.

These hard costs are within the range of other projects that we have reviewed and the construction costs reported in the 2006 San Francisco Inclusionary Housing Study. This Study surveyed a variety of development projects citywide in 2006 and found that average construction costs for podium or low-rise, wood frame construction (including parking) averaged $275/building square feet (sf) and $330/building sf, or about twenty percent higher, for midrise construction. Based on an average annual increase in construction costs of five percent per year for 2006 to 2008, these would be equivalent to $305/building sf for low rise and $365/building sf for midrise construction in 2008 dollars.[1]

Cahill's construction costs are about ten percent higher per building sf than those reported in the Inclusionary Housing Study but considered reasonable given the complex site grading work and historic rehabilitation of existing structures which complicates how one approaches the construction work. The 2 percent increase in hard cost/sf between the preservation alternative and preferred project appears reasonable given the potential increased rehabilitation costs associated with historic rehabilitation and lost economies of scale due to fewer units. The 21 percent increase in hard cost/sf between the modified preservation alternative and the preferred project is reasonable given the greater amount of historic rehabilitation that would be accomplished and the higher cost of midrise construction, which is more substantially more expensive than wood frame construction.

[1] According to Engineering News-Record, a construction industry publication, San Francisco's building construction cost index (CCI) increased at about 5 percent per year from 2006 to 2008.

61

The 7 percent inflation adjustment, 3 percent contractor fee and 5 percent contingency levels are within the range of project assumptions for developments of this size, although potentially on the low side. The preservation and modified preservation alternatives likely warrant higher construction contingencies, given the requirements associated with completing historic rehabilitation to standards necessary for 20% historic tax credits. For example, in other development pro formas involving historic rehabilitation that we have reviewed, a more typical construction contingency allowance would range from 5% to 15%.

Other soft costs amount to 8% to 10% of hard construction costs, which in our experience is on the low side for projects of this complexity, particularly given the potential use of low income housing and historic tax credits. However, the project may be able to achieve a low percentage for other soft costs due to its relatively large scale.

Revenue, Expense and Sale Assumptions

Table 3 summarizes the income and expense assumptions for the preferred and alternative proposals in 2015.

Table 3
Income and Expenses, Yr. 2015
Preferred and Alternative Proposals
55 Laguna Pro Forma Review

Revenue	Preferred Project	Preservation Alternative	NC/GCC Alternative	Modified Preservation Alternative
Total Residential Rents	$ 12,536,775	$ 9,563,394	$ 810,000	$ 13,446,771
Other Income/Vacancy/Loss to Lease[a]	$ 338,797	$ 377,686	$ 7,584,990	$ 394,488
Total Operating Expenses (Incl. Reserves)	$ (3,611,590)	$ (3,504,655)	$ (8,090,000)	$ (4,423,133)
Net Operating Income (NOI)	**$ 9,263,982**	**$ 6,436,425**	**$ 304,990**	**$ 9,418,126**
Operating Expenses as a Percent of Rents	29%	37%	N/A	33%

a. Includes commerical rents for all proposals and projected tuition income for the NC/GCC Alternative.

Source: AF Evans, February 2008.

AF Evans assumes that the average rent in 2015 for a market rate unit will be $3,778 per month, while the average below market rent for an affordable unit will be $905 per month.[2] These assumptions are based on estimated market rent increases higher than 3.5 percent. The developer assumes market rents will increase 9.5 percent between 2007 and 2008, and 4.5 percent annually between 2008 and 2010. Thereafter, market rents are assumed to increase at 3.5 percent per year. The total amount of rental income generated by each proposal depends upon the number of residential units included in the development. Table 4 presents our analysis of income and expenses for the preferred project in 2008 and projected to 2015 based on assumptions provided by AF Evans.

[2] Rents and expenses are assessed for 2015 as this is the year in which AF Evans believes the project will support a traditional permanent loan. In the January 3, 2008 pro formas submitted by AF Evans, this was mislabeled 2017.

Table 4
Average Monthly Rents and Expenses, 2008 & 2015
55 Laguna Pro Forma Review

	Preferred Project		Average Annual Percent Change
	2008	2015	
Monthly Rent	$ 2,486	$ 3,200	3.7%
Market Rent	$ 2,913	$ 3,778	3.8%
BMR Rent	$ 788	$ 905	2.0%
Other Income/Vacancy/Loss to Lease	$ 111	$ 109	-0.2%
Other Income (Parking, Storage, Laundry, etc.)	$ 262	$ 304	2.1%
Vacancy (2.87% of Rents)	$ (71)	$ (92)	3.7%
Loss to Lease (3.19% of Rents)	$ (80)	$ (103)	3.7%
Total Operating Expenses	$ (797)	$ (953)	2.6%
Reserves	$ (21)	$ (21)	0.0%
Property Taxes	$ (347)	$ (398)	2.0%
Other Operating Expenses	$ (430)	$ (533)	3.1%
Monthly Net Operating Income (NOI)	**$ 1,799**	**$ 2,357**	3.9%

Source: AF Evans, February 2008.

Other income generated by each development proposal includes rents from commercial spaces, parking and storage fees, based on $250 per month for parking and $126 per month for storage, laundry and other tenant income in current dollars. Included in this line item are vacancy and loss to lease rates, which are assumed to be 2.87 and 3.19 percent respectively. Income generated from parking and storage fees offsets potential losses from vacancies and cancelled leases.

AF Evans estimates operating expenses and reserves per unit in 2015 to be 29 percent of annual rental income for the preferred project, 37 percent for the preservation alternative and 33 percent for the modified preservation alternative. These include reserves, property taxes and standard operating and maintenance costs. AF Evans explained that operating expenses for the preferred project maximize economies of scale and therefore achieve the most efficient operating expense levels. Operating expenses are typically 25 to 30 percent of rental income, and the preferred project falls in this range.

The preservation alternative is anticipated to operate less efficiently due to its lower overall unit count and higher proportion of common areas to rentable square feet, requiring greater maintenance and leasing staff on a per unit basis. The modified preservation alternative is anticipated to operate less efficiently than the preferred project but more efficiently than the preservation alternative. Midrise buildings would typically have higher operating expenses per unit, as they demand different levels of staffing and higher maintenance costs due to the greater number of floors.

The premiums for the preservation and modified preservation alternative are plausible, although AF Evans may be able to reduce operating expenses for the modified preservation alternative given the scale of the project. With operating expenses set at 30 percent of rents for the modified preservation alternative, operating expenses would be about ten percent less, or $4.0 million in 2015. While AF Evans may be able to reduce projected operating expenses with property tax abatements for the historic buildings available through the Mills Act Property Tax Abatement Program, AF Evans has agreed with the City that potential tax abatements would be provided as income to the community center to help defray its operating expenses.

Given estimated income and expenses, in 2015 the project is expected to have between $6.4 and $9.4 million remaining for debt service and cash flow. AF Evans anticipates the project will carry annual debt service on its permanent loan ranging from $4.8 to $7.0 million, leaving net operating income of $1.6 to $2.6 million.

The developer proposes to put the completed development up for sale in the year 2020. Sales assumptions include a 6 percent capitalization rate and 1.25 percent sale cost. Based on 2020 net operating income and sales assumptions, the development's value would be $183.9 million, $128.4 million, and $180.2 million under the preferred, preservation and modified preservation alternatives respectively. Seifel confirmed these values given AF Evans income and expense information.

Financing

The developer proposes to fund the residential project alternatives using a combination of tax-exempt bonds, low-income housing and/or historic tax credits, and equity from openhouse, the non-profit developer of the 110 unit building for low-income seniors. The construction loan will be converted to a permanent loan as soon as the development generates sufficient revenues to support permanent financing.

Tax Credits

All three residential projects assume the use of 4 percent low income housing tax credits and tax-exempt bonds. The preservation and modified preservation alternatives also propose to use 20 percent historic tax credits. AF Evans assumes the tax credit syndication rate will be $0.75 per tax credit dollar for low income housing tax credits and $0.90 per tax credit dollar for historic tax credits.

The California Tax Credit Allocation Committee (CTCAC) recently revised their threshold bases for affordable housing developments to adjust for increasing construction costs throughout the state. Revised calculations from AF Evans indicate that the preferred and alternative residential proposals will generate more low income housing tax credit equity than initially estimated. According to the revised calculations from AF Evans, the preferred project can expect to receive approximately $1 million more in tax credit equity. The preservation and modified preservation alternatives may receive approximately $340,000 and $1.5 million more

64

in tax credit equity, respectively. This increase may reduce the size of the construction loan required to complete the project.

According to our tax credit analysis, AF Evans can reasonably expect to receive more low income housing tax credit equity for the preferred and alternative residential proposals than initially projected. Furthermore, we agree that with increased tax credit equity to the project, AF Evans may be able to reduce the size of the construction loan required to complete the project.

Within the preservation and modified preservation alternatives, 20% percent historic tax credits are assumed.[3] AF Evans calculated the amount of these credits based on the hard construction costs of rehabilitating the historic structures. They may be able to slightly increase the amount of historic tax credits by also including the soft costs (primarily architectural and engineering) associated with the historic rehabilitation. However, as discussed in the section above, the project may be understating the costs associated with seeking the certified historic rehabilitation project necessary to achieve the 20 percent credits.

Loan and Equity

In a traditional commercial loan, the permanent loan amount is sized based on the revenue it could currently be expected to generate, as if it were already constructed and operating at stabilized occupancy. For example, we estimate that if the preferred project were completed in 2008, its expected net operating income (NOI) would equal roughly $7.1 million. With a 5.75% interest rate, 35 year term, and a debt service coverage ratio of 1.15, this scenario would yield a supportable permanent loan amount of $97.4 million.

In addition, a typical lender or investor would be looking for the 2008 capitalized value to equal or exceed development costs. The preferred project, however, has a total development cost of $171.0 million, and after taking into account contributions from openhouse and tax credits, it would require a construction loan of $157.8 million, which is substantially more than the capitalized value of $118 million. In other words, the project's current potential revenue stream does not support total development costs, as shown in Table 5a. This situation holds true for all residential project alternatives. Table 5b estimates supportable debt and capitalized value for the preferred project and preservation alternatives in 2015.

[3] Based on existing knowledge of historic tax credits and conversations with Elisa Skaggs and Jay Turnbell at Page & Turnbell, historic preservation specialists and architects.

65

Table 5a
Supportable Debt and Capitalized Value, Preferred Project, 2008, 2015 & 2020
55 Laguna Pro Forma Review

	Preferred Project		
	2008	**2015**	**2020**
Total Development Costs	**$ 170,956,393**		
Net Operating Income (Annual)	**$ 7,092,340**	**$ 9,291,531**	**$ 11,138,492**
Debt Coverage Ratio	1.15	1.15	1.15
Interest Rate	5.75%	5.75%	5.75%
Loan Term	35	35	35
Supportable Debt[a]	**$97,395,375**	**$127,595,715**	**$152,959,055**
Capitalization Rate	6.00%	6.00%	6.00%
Capitalized Value/Anticipated Sales Price	$ 118,205,663	$ 154,858,852	$ 185,641,530
Sales Expense	1.25%	1.25%	1.25%
Net Sales Price	**$ 116,728,092**	**$ 152,923,117**	**$ 183,321,011**

a. As calculated by Seifel based on NOI.

Source: AF Evans, February 2008.

Table 5b
Supportable Debt and Capitalized Value, 2015
55 Laguna Pro Forma Review

	Preferred Project	Preservation Alternative	Modified Preservation Alternative
Total Development Costs (2008)	**$ 170,956,393**	**$ 139,177,693**	**$ 206,967,765**
Net Operating Income (Annual)	**$ 9,291,531**	**$ 6,436,425**	**$ 9,418,125**
Debt Coverage Ratio	1.15	1.15	1.15
Interest Rate	5.75%	5.75%	5.75%
Loan Term	35	35	35
Supportable Debt[a]	**$127,595,715**	**$88,388,042**	**$129,334,164**
Capitalization Rate	6.00%	6.00%	6.00%
Capitalized Value/Anticipated Sales Price	$ 154,858,852	$ 107,273,750	$ 156,968,753
Sales Expense	1.25%	1.25%	1.25%
Net Sales Price	**$ 152,923,117**	**$ 105,932,828**	**$ 155,006,643**

a. As calculated by Seifel based on 2015 NOI. AF Evans permanent loan estimates are $121,283,133, $84,265,032 and $118,332,232 for the preferred project, preservation alternative and modified preservation alternative respectively.

Source: AF Evans, February 2008.

66

In order to raise the capital needed for development, AF Evans plans to turn to an equity investor able to guarantee the difference between the construction loan and the potential value of the project. The equity investor receives a fee and a share of project profits in exchange for its guarantee. When the project converts from a construction to a permanent loan (projected to occur in 2015), the equity investor must also contribute the difference between the outstanding construction loan and the maximum supportable permanent loan. This difference is estimated to be $30.2 million for the preferred project, $37.4 million for the preservation alternative and $63.2 million for the modified preservation alternative.[4] The investor would look to recover this investment when the project is sold. The scale of the guarantee and the subsequent cash investment in the project limits the potential pool of investors to large, established equity investors. Estimated sales prices in 2020 for all three residential project alternatives and the gap between sales prices and the permanent loan are shown in Table 6.

Table 6
Debt, Equity and Sales Value
55 Laguna Pro Forma Review

	Preferred Project	Preservation Alternative	Modified Preservation Alternative
Total Project Cost	$ 170,956,393	$ 139,177,693	$ 206,967,765
Contributions from openhouse, LIHTC & HTC	$ (12,228,319)	$ (12,419,665)	$ (14,414,192)
Construction Loan	$ 157,755,868	$ 125,757,587	$ 192,553,573
Maximum Permanent Debt (2015)	$ 127,595,715	$ 88,388,042	$ 129,334,164
Investor Equity Required	$ 30,160,153	$ 37,369,545	$ 63,219,409
Equity as Percent of Construction Loan	19%	30%	33%
Net Sales Value (2020)[a]	$ 183,321,011	$ 128,448,779	$ 180,205,413
Proceeds from Sale Remaining after Perm. Debt	$ 55,725,296	$ 40,060,737	$ 50,871,249
Remaining Proceeds after Investor Equity Returned	$ 25,565,143	$ 2,691,192	$ (12,348,160)

a. Preferred project value calculated by Seifel (see Table 5a), and preservation and modified preservation alternatives sale prices AF Evans estimates based on 2020 NOI.

Source: AF Evans, February 2008.

[4] Holding operating cost constant at 30 percent between the preferred and modified preservation alternatives, Seifel estimates that the modified preservation alternative could qualify for a permanent loan of roughly $132.6 million.

67

We spoke to several institutional equity investors in order to confirm the terms of this type of financing structure, their underwriting considerations and the returns required for them to pursue the investment. The investors would typically look for this type of project to require equity of no more than 15 to 20 percent of the value of the construction loan. As shown in Table 6, the preferred project is within this range, but the alternatives require equity of 30 to 33 percent of the construction loan, making it unlikely that investors would underwrite these investments. For all project alternatives, the major risks are as follows:

- Market or Rent Risk. The equity investment and expected returns for this project are predicated upon the assumption that rents will rise to a point where the project supports the permanent loan and then the sale of the project. If rents do not rise as expected, the investor may lose some or all of its investment or not achieve projected returns. Higher than expected vacancies and/or loss to lease pose a similar risk.

- Construction Risk. Given the size and complexity of the development and rehabilitation project, construction costs could rise above anticipated levels and exceed construction contingency. In such an event, the investor's equity guarantee could be called to cover the needed funding gap.

Given the size and risk of this project, investors stated that they would require an internal rate of return in the high teens to low twenties on their equity investment in exchange for their involvement in the project. Moreover, the investment horizon for these investors is relatively short, 5 to 7 years, meaning that any investment made by these equity investors would need to be repaid within that timeframe. This fact is driving the near-term sale of the project, proposed by AF Evans to occur in 2020 as discussed in the previous section. At that time, the project must be valued and sold at a price that yields required internal rates of return.

As shown in Table 6, the preferred project is the only project alternative with sufficient proceeds from the sale of the development to produce the required returns. While the financial performance of the preservation and modified preservation alternatives could improve if operating expenses were lower, our analysis indicates that net operating income would not likely change enough to result in a project that institutional investors and/or lenders would consider funding given stated underwriting standards.

2. New College/Global Citizens Center Concept Plan

Development cost estimates for the NC/GCC alternative are based on an extrapolation of Cahill Construction estimates, given the proposed concept plan. Rehabilitation and new construction costs for the site under the NC/GCC alternative are estimated at $82 million, and soft costs at $16.4 million. The bulk of construction costs are due to new construction of a dorm building, with the remaining costs going to rehabilitation. AF Evans assumes that historic rehabilitation costs would be eligible for 20 percent historic tax credits, providing the project with roughly $1.2 million in equity. The NC/GCC alternative may be able to qualify for slightly more from the historic tax credits based on soft costs related to historic rehabilitation, although, as discussed above, the project may be understating the costs associated with seeking the certified historic rehabilitation project necessary to achieve the 20 percent credits.

AF Evans assessed the NC/GCC alternative based on revenues from tuition and rental income from the 90 beds proposed for the campus. Average tuition is $6,700, and AF Evans assumed that roughly 1,140 students would attend the campus, in line with EIR estimates. These revenue sources result in approximately $8.4 million in annual income. Expenses for New College were estimated based on faculty salaries, administration and housing operation costs, for a total of $8.1 million in expenses. This leaves net operating income of roughly $300,000.

While NC/GCC estimates are basic, we believe they are reasonable and illustrate the difficulties in pursuing an institutional project, as net operating income is insufficient to support the kind of debt necessary to pay for the rehabilitation and development of the campus.

D. Conclusion

In summary, Seifel Consulting concurs with the developer that the preferred project is the only financially viable development program. Our analysis demonstrates that even the preferred project is challenged to meet investor hurdle rates given the risks associated with a project of this complexity. The three alternatives require equity investments that are unsupportable given private equity underwriting requirements.

AF Evans estimates are reasonable on balance. The preferred project and alternative proposals could achieve slightly higher equity amounts from tax credits and could have lower operating expenses, which would increase cash flow. However, construction and soft costs could be higher than anticipated given what we have seen with other projects in the local marketplace.

Appendix A: Firm Qualifications & Expertise

I. Firm Qualifications & Expertise

A. Firm Qualifications

Name:	Seifel Consulting Inc. (Seifel)
Founded:	1990, Incorporated 1995
Form:	California S Corporation
Federal ID:	94-322-5313
Principal:	Elizabeth (Libby) Seifel, President
Address:	221 Main Street, Suite 420, San Francisco, CA 94105-1906
Phone:	415-618-0700
Fax:	415-618-0707
Web site:	www.seifel.com

Seifel Consulting Inc. (Seifel) is an economic consulting firm providing strategic real estate and urban economic advisory services to public agencies, institutional investors and developers. Seifel helps our clients resolve complex urban growth issues, maximize the value of real estate assets, and achieve fiscal goals. Seifel advises on developments involving a variety of land uses, including mixed-use, residential, retail, office, industrial, former military bases, waterfronts and recreation areas. Seifel provides research, analysis, financial projections, written documentation, project management and consultation to our clients. Seifel has specialized expertise in the areas of public-private development transactions, redevelopment and other public financing techniques, affordable housing feasibility and funding, and fiscal and economic impact analysis.

Seifel provides services in four interdependent practice areas—redevelopment, real estate, economics and housing. We typically tap into more than one practice area during the course of a project. Our ability to provide relevant expertise at progressive phases of each engagement enables our clients to sustain consistency and momentum—crucial to meeting a project's time and budget objectives.

- Real Estate—Lead clients through the planning, funding and development of high-quality real estate.
- Redevelopment—Guide the creation and implementation of successful redevelopment projects.
- Economics—Evaluate local economies and recommend strategies to enhance economic growth and fiscal health.
- Housing—Facilitate residential development and design programs that expand and diversify a community's housing supply.

Seifel's practice areas are described in further detail in Section B.

Seifel has extensive experience working in San Francisco, providing us with a strong understanding of the market conditions and community needs currently present in the area. Seifel has worked with various San Francisco agencies, including the Redevelopment Agency, Planning Department, Mayor's Office of Economic and Workforce Development (MOEWD) and Mayor's Office of Housing (MOH), Housing Authority, Department of Building Inspection, Treasure Island Development Authority, and Transbay Joint Powers Authority. We have direct experience with a number of the Agency's active redevelopment plan and/or survey areas, including

Bayview Hunters Point, Hunters Point Shipyard, Federal Office Building, Transbay, Mission Bay, India Basin, Mid Market, and Visitation Valley. Within San Francisco, our real estate economics experience includes:

- Performing market analysis and developing growth forecasts for the Transit Center District Plan,
- Surveying and analyzing small business needs for the San Francisco Economic Strategy,
- Conducting a community needs assessment, recommending funding strategies and developing financial models for the Eastern Neighborhoods Community Planning process,
- Analyzing the fiscal and economic impact of development and performing developer due diligence for Hunters Point Shipyard, and
- Evaluating potential land uses and development concepts for the Upper Market Community Workshop series.

Seifel is a California Corporation owned and operated by Elizabeth (Libby) Seifel. The firm is a certified Women Owned Business and Small Business Enterprise with the State of California and a certified Local Business Enterprise with the City of San Francisco. The firm is also an approved vendor with the City of San Francisco (Vendor # 32122). Additional information on Seifel is available on the web at http://www.seifel.com.

B. Areas of Expertise

Real Estate Economics

Real estate economics is the foundation for Seifel's work. It is a technical discipline that provides insight into the real estate market through tools such as site analysis, market research, financial feasibility, and highest and best use studies. We combine insight into the real estate market with a well-honed foundation in cash flow modeling, asset valuation, and other analytical methods.

Seifel determines the market potential for commercial, industrial and residential development as both stand-alone and complementary land uses. We perform market analyses for raw land, improved sites, and buildings proposed for reuse. Our analyses have included evaluations of the reuse potential of publicly owned redevelopment properties, surplus military facilities, air rights developments, waterfronts, schools, government buildings, and post offices.

Seifel uses the analytical tools of real estate economics and urban planning to determine the best development strategies for properties owned, leased, or governed by our clients. We help clients prepare development strategies for raw land, improved sites, or property reuse. The firm has advised private and public sector clients on development properties and portfolios ranging in value from $5 million to $4 billion.

Redevelopment Advisory

Seifel assists clients at every stage of the redevelopment process, from project area designation through plan formulation, adoption and implementation. Our services range from document preparation to plan amendment management and coordination of the community participation processes. The following are Seifel's redevelopment services:

- Plan adoption, amendment and merger services

- Implementation Plans
- Tax increment projections
- Fiscal consultant reports for bond financing
- Financing strategies
- Physical and economic blight analysis
- Property reuse and revitalization strategies
- Developer solicitation and negotiation

Seifel is up to date with the latest changes in the California Community Redevelopment Law (CRL), ensuring that the redevelopment plans and reports we prepare are in compliance with the CRL and the most recent amendments to it.

Economic Development Planning

Seifel helps communities understand the economic implications of various land use and development decisions, fostering successful places that satisfy community needs and are financially viable. Seifel conducts fiscal and economic impact analysis, employment and industry trends, and assessments of business and employee needs to derive recommendations for strengthening the local economy and revitalizing areas suffering from disinvestment. We also assess the economic, fiscal and financial ramifications of existing and proposed land use policies, development proposals, and public programs, and work to create or strengthen partnerships between local governments, special districts, and business leaders. We effectively communicate our findings and recommendations to community leaders and staff, thereby enabling communities to realize their economic development, land use planning, and fiscal goals.

Recent and ongoing economic development planning and advisory services include projects like the San Francisco Economic Strategy, North Watt Avenue Plan (Sacramento County), Western Nevada County Economic Development Strategy, and the North Hemet Revitalization Plan.

Affordable Housing

Seifel advises public agencies, institutions, and private for-profit and nonprofit developers on all aspects of housing development and policy analysis. We analyze housing markets for opportunities, recommend strategies for products that meet a community's housing needs at all income levels, and consult on financing and construction. Our firm prepares market analyses and housing needs assessments, develops effective funding/financing strategies, prepares funding applications, and structures development agreements. We consult on the development, rehabilitation, financing and preservation of affordable housing, as well as mixed income and market rate developments. We also work with teams of professionals experienced in site analysis, civil engineering, real estate economics, architecture, urban design and planning, and environmental compliance. Seifel have prepared successful funding applications yielding more than $75 million for affordable housing. Seifel also advises on housing policy issues—helping jurisdictions evaluate and implement inclusionary housing policies and other programs to increase the supply of affordable housing.

Seifel Representative Clients

Private Sector

American Hotels Inc.
Asian Inc.
Bay Area Council
Best, Best & Krieger
BRIDGE Housing
Catellus Development Corporation
CCH of Northern California
Children's Hospital Oakland
Centex Homes
Chinatown Community Development Center
Civic Center Associates
De Silva Group
Ford Foundation
Forest City Development Company
Goldfarb & Lipman
Hanson, Bridgett, Marcus, Vlahos & Rudy
HDNPC
Heritage Partners
Huntington Partners, Inc.
Kenwood Investment
Kronick Moskovitz Tiedemann & Girard
Legacy Partners
Lennar Communities
LINC Housing
Lozano Smith Smith Woliver & Behrens
Mason McDuffie Real Estate
McCuen Properties
McDonough Holland & Allen
Meyers, Nave, Riback, Silver & Wilson
Mid-Peninsula Housing Coalition
NS Development
Nehemiah Corporation
Pacific Stock Exchange
Providence International Foundation
Rod Read & Son
Solano Affordable Housing Foundation
Sobrato Development Company
Swerdlow Real Estate Group
Telesis West
The Real Estate and Land Use Institute
The RREEF Funds
Volunteers of America

California Cities, Towns and Redevelopment Agencies

Alameda	Folsom	Orinda	San Ramon
Arvin	Fremont	Palo Alto	Santa Cruz
Berkeley	Hayward	Petaluma	Santa Monica
Brentwood	Hesperia	Portola	Santa Rosa
Brisbane	Livermore	Rancho Cordova	Santee
Capitola	Lodi	Richmond	Soledad
Chico	Long Beach	Ripon	South San Francisco
Concord	Los Angeles	Roseville	Stockton
Coachella	Los Gatos	Sacramento	Sunnyvale
Daly City	Martinez	San Bruno	Union City
Dublin	Milpitas	San Diego	Truckee
East Palo Alto	Modesto	San Francisco	Watsonville
El Cerrito	Mountain View	San Jose	West Sacramento
El Sobrante	Novato	San Leandro	Willows
Fairfield	National City	San Mateo	

California Counties

Alameda	Marin	Nevada	San Joaquin
Butte	Mendocino	Placer	Santa Cruz
Contra Costa	Monterey	Plumas	Sonoma
Kern	Napa	San Diego	Stanislaus
Los Angeles		San Francisco	Yolo

Other Public Sector

Alameda Reuse and Redevelopment Authority
Berkeley Rent Stabilization Board
California Department of Real Estate
California Department of Justice
California Housing Finance Agency
City and County of Fresno Housing Authorities
Clovis Unified School District
Contra Costa Water District
City of Henderson, Nevada
Hastings College of Law
Housing & Community Development Corp. of Hawaii
San Diego Association of Governments
San Francisco Housing Authority
Santa Monica Rent Control Board
The Presidio Trust
Transbay Joint Powers Authority
Treasure Island Development Authority
Tri County Economic Development Corporation
U.S. General Services Administration
University of California Berkeley Extension

CYNTHIA SERVETNICK, AICP

845 Sutter Street, Apt. 512, San Francisco, CA 94109 • 415.563.7336 • cynthia.servetnick@gmail.com

SUMMARY OF QUALIFICATIONS

- Extensive planning and project management experience in community, university and corporate settings including: San Francisco Public Utilities Commission, Port of San Francisco, City of Berkeley, State of Massachusetts, University of California, Berkeley, San Francisco State University, City University of New York, and Genentech, Inc.

- Strong environmental and regulatory compliance skills.

- American Institute of Certified Planners membership.

- Professional degree in architecture from Cornell University.

PROFESSIONAL EXPERIENCE

Cynthia is currently employed as an environmental project manager for the San Francisco Public Utilities Commission where she provides planning, environmental and regulatory compliance services for water supply, wastewater and stormwater projects.

As a senior campus planner for the University of California, Berkeley, Cynthia evaluated privately-owned properties in conjunction with studies to relocate university facilities and assisted with the preparation of pro formas for campus housing projects. As a senior campus planner for the City University of New York, she supervised staff in preparing the annual system-wide capital budget and 5-Year Capital Improvement Program. As a campus planner for San Francisco State University, she facilitated the development of significant public-private real estate partnerships.

As an associate planner for the City of Berkeley, Cynthia implemented an acquisition program for affordable rental housing. As a planner for the State of Massachusetts, she coordinated real property acquisition and administered surplus property disposition. As a facilities planning consultant for Genentech, Inc., she managed property acquisition and coordinated preparation of the Corporate Facilities Master Plan.

6) Statement of Qualifications: Ja ıeline Bernier

JACQUELINE BERNIER

1709 Delaware Street
Berkeley, CA 94703

510-843-3166
jackibernier@comcast.net

PROFESSIONAL HIGHLIGHTS

Planning

- Managed long- and short-range planning for UC Berkeley's Auxiliary Programs (Housing, Dining and Childcare; Real Estate: Parking and Transportation; Intercollegiate Athletics and Recreation Sports; UC Extension).
- Initiated and coordinated planning studies, including master plans, space programs, design guidelines, financial feasibility analyses, site selection and massing studies.
- Managed planning for redevelopment of 920-unit affordable student family project; supervised planning for public/private mixed-use development; managed planning for over 2,000 beds of undergraduate housing; childcare, parking, and recreation facilities.
- Developed commercial, industrial and public access waterfront projects, including analyzing financial feasibility and preparing projects for financing, assisting local communities and developers, and identifying needs and program to assist commercial fishing industry.
- Supported preparation of Environmental Impact Reports for several highly controversial projects, including drafting significant portions of texts.
- Worked with environmental safety and other units to resolve soil contamination, water quality, and other environmental issues.

Presentations

- Presented controversial projects to communities, including Berkeley City Council, Planning, Transportation and Design Review Commissions, and neighborhood groups.
- Prepared and presented recommendations for review and approval to oversight committees.

Management and Supervision

- Supervised planning staff and mentored new planners and project managers.
- Managed consultant studies, including preparing Requests for Proposals, work scope, schedules, budgets, etc., and supervising consultants.

EDUCATION

MBA, Real Estate and Urban Economics, University of California, Berkeley
BA, Architecture, University of California, Berkeley
Bachelor of Architecture program, Pennsylvania State University

Seifel
CONSULTING INC.

Memorandum

221 Main Street
Suite 420
San Francisco CA
94105

415.618.0700
fax 415.618.0707
www.seifel.com

VIA (EMAIL)

August 15, 2012

To: San Francisco Planning Commission

cc: Brian Pianca, Wood Partners Inc.; Ramie Dare, Mercy Housing; Seth Kilbourn, Openhouse; Steven L. Vettel, Farella Braun & Martel

From: Seifel Consulting Inc.

Subject: Review of 55 Laguna Street Project and Project Alternatives

Seifel Consulting Inc. (Seifel) was retained by Wood Partners Inc., Mercy Housing California and Openhouse to provide an updated independent financial evaluation of the modified residential development programs and three project alternatives for 55 Laguna Street in San Francisco. Wood Partners Inc. and Mercy Housing/Openhouse assumed the responsibility for the development of 55 Laguna Street from A.F. Evans. In 2008, Seifel performed a review of this development and the project alternatives as proposed by A.F. Evans. The findings in this memorandum build upon the analysis performed in 2008. This memorandum summarizes the findings of our evaluation and is organized as follows:

A. Description of 2012 Preferred Project

B. Summary of Changes from the 2008 to 2012 Development Proposal and Alternatives

C. Review of Pro Forma Assumptions and Methodology

D. Conclusion

A. Description of 2012 Preferred Project

The 55 Laguna property is currently owned by the University of California and contains five buildings totaling 119,910 square feet on the 5.4-acre site. The preferred project proposal called for the rehabilitation of three buildings (Woods Hall, Woods Hall Annex, and most of Richardson Hall) and demolition of the fourth building, Middle Hall, and a portion of Richardson Hall. The University of California selected AF Evans Development to lead development activities at the site.

In 2008, the proposed project evaluated in the FEIR for 55 Laguna included approximately 430,800 square feet of residential space, up to 5,000 square feet of retail space, approximately 10,000 square feet of community facility space, and approximately 127,360 square feet of parking (310 off-street parking spaces) in seven new buildings and two underground garages on the project site.

Wood Partners purchased the previous project sponsor's (AF Evans Inc.) interest in the project. Wood Partners and Mercy Housing/Openhouse, which will be developing the senior housing component, have proposed project modifications and prepared a revised site plan and building lay-out for the two-block site. The modified "preferred project" includes 330 mixed income rental units (including 15% or 50 affordable units rented to households at 55% of areawide median income), 110 senior affordable dwelling units, 12,000 square feet community facility space and up to 5,000 square feet of retail space and office space for Openhouse in the ground floor of Richardson Hall. A total of seven new buildings, including an amenities building, are proposed. As in 2008, 310 off-street spaces are proposed, only 249 of which would be available for rent to residents. 51 are reserved for use by the UC Dental Clinic that will remain adjacent to the site and 10 are for car-share parking rent-free.

The construction timeline for the modified project is estimated to last approximately 48 months. The market rate residential portion of the proposed project is estimated to start with the demolition in the Fall of 2012 and to continue for 30 months to open in 2015, consistent with the original timeline proposed by AF Evans.

The senior affordable residential portion of the project would lag behind construction of the market rate units because of financing requirements. The work on Richardson Hall is estimated to start in Spring 2014 and last until Spring 2015. The new senior building is estimated to begin in Fall 2015, with completion in Spring 2017.

Table 1 compares the preferred project and alternatives from 2008 with the updated 2012 development program.

Table 1
Summary of Preferred Project

	2008 Analysis	Current Analysis
Buildings (Rehab)	3	3
Buildings (New Construction)	7	7
Total Residential Units	438	440
openhouse Senior Units	110	110
Market Rate Units	262	280
Inclusionary Affordable Units	66	50
Parking Units	321	310
Retail Space (SF)	5,000	5,000
Community Space (SF)	12,000	12,000
Public/Open Space (SF)	41,000	41,000
Institutional Space (SF)		

Source: San Francisco Planning Department, January 2008; San Francisco Planning Department, January 2012; 55 Laguna Mixed Use Development, Draft Environmental Impact Report, Chapter IV, January 2007; AF Evans, February 2008; Wood Partners Inc.; Seifel Consulting Inc.

B. Summary of Changes from the 2008 to 2012 Development Proposal and Alternatives

This financial analysis is based on the 2012 proposed modified project as described in Section A. In addition, it includes analysis of the three alternatives included in the environmental review process in 2008.

With the exception of the Modified Preservation Alternative, the development programs for the alternatives are the same as they were in 2008. The Modified Preservation Alternative has been adjusted to reflect the 15 percent inclusionary housing requirement for the market rate component (affordable to households at 55% of areawide median income). Previously, this alternative was structured as an “80/20” deal, with 20 percent of the units affordable to households at 50% of areawide median income, which meant that 20% of the project would be eligible to utilize low income housing tax credits. Table 2 summarizes the projects evaluated in the 2008 DEIR process and the projects included in this financial feasibility analysis.

Table 2
Summary of Proposed Development Programs

2008 Analysis	Preferred Project	Preservation Alternative	NC/GCC Alternative	Modified Preservation Alternative
Buildings (Rehab)	3	4	4	4
Buildings (New Construction)	7	6	3	6
Total Residential Units	438	332	90	450
openhouse Senior Units	110	79		110
Market Rate Units	262	202	90	272
Inclusionary Affordable Units	66	51		68
Parking Units	321	335	178	321
Retail Space (SF)	5,000	5,000	17,000	5,000
Community Space (SF)	12,000	10,000		10,000
Public/Open Space (SF)	41,000	41,000		41,000
Institutional Space (SF)			111,000	
2012 Updated Analysis	**Preferred Project**	**Preservation Alternative**	**NC/GCC Alternative**	**Modified Preservation Alternative**
Buildings (Rehab)	3	4	4	4
Buildings (New Construction)	7	6	3	6
Total Residential Units	440	332	90	450
openhouse Senior Units	110	79		110
Market Rate Units	280	202	90	289
Inclusionary Affordable Units	50	51		51
Parking Units	310	335	178	321
Retail Space (SF)	5,000	5,000	17,000	5,000
Community Space (SF)	12,000	10,000		10,000
Public/Open Space (SF)	41,000	41,000		41,000
Institutional Space (SF)			111,000	

Source: San Francisco Planning Department, January 2008; San Francisco Planning Department, January 2012; 55 Laguna Mixed Use Development, Draft Environmental Impact Report, Chapter IV, January 2007; AF Evans, February 2008; Wood Partners Inc.; Seifel Consulting Inc.

C. Review of Pro Forma Assumptions and Methodology

We reviewed the financial pro forma analysis that AF Evans performed on each of the four alternatives in 2008, our analysis from 2008, our current work with the San Francisco Mayor's Office of Housing[1], Mercy Housing/Openhouse's pro formas for its senior affordable development, and documents from the San Francisco Planning Department. Based upon these

[1] Seifel is currently working on a study regarding the financial feasibility of the inclusionary housing program, and as part of this work we have been gathering data from local developers and contractors active in residential development in San Francisco.

resources, we updated the underlying assumptions for the four development scenarios to reflect today's market conditions.

1. Residential Project Alternatives

Land, Construction and Soft Costs

Land, construction and soft costs appear reasonable given our knowledge from working on the San Francisco Mayor's Office of Housing Inclusionary Housing Financial Feasibility Analysis and other projects in San Francisco and the Bay Area.

Land costs are assumed to remain the same as 2008. Within all three residential project alternatives (preferred, preservation and modified preservation), the developer is assumed to pay the University of California $18 million for the right to the land, or $40,000 to $54,000 per unit overall (including both the affordable senior housing and the mixed-income apartment units). This cost per unit is significantly less than what we have seen reported for recent condominium and apartment projects in San Francisco. However, given that the residential alternatives would include apartment units with a relatively large proportion of affordable units (about 40% overall), significant amounts of non-revenue producing community space, and the complexities of developing the project, this appears to be a reasonable price, although potentially on the high side given the large amount of non-revenue producing or below market rate rental income.

AF Evans construction costs for the preferred and preservation alternatives were based on estimates from Cahill Contractors completed in Fall 2007. The cost estimates for the modified preservation alternative were based on an extrapolation from these estimates and account for project differences and changes in construction type. Hard construction costs equaled $262,000 per unit ($330/building sf) for the preferred project and $275,000 per unit ($335/building sf) for the preservation alternatives. These included parking construction costs at slightly more than $30,000 per structured space.

These construction costs are within the range of other projects that we have reviewed as part of the 2012 Inclusionary Housing Financial Feasibility Update and our conversations with contractors active in San Francisco. Based on Wood Partners' proposed average unit size and unit mix for the project, average construction costs in today's real estate market for podium or low-rise development (including parking) average $273,000 ($300/building sf) and $301,000 ($320/building sf) for mid-rise. These costs increase to $323,000 ($354/building sf) to $353,000 ($389/building sf) under the Modified Preservation Alternative, assuming that construction costs are about 18 to 20 percent higher as found previously by A.F. Evans.

In comparison, Cahill's construction costs from 2007 are slightly higher than today's market but considered reasonable given the complex site grading work and rehabilitation of existing structures, which complicate how one approaches the construction work. The 5 percent variation between the preferred and preservation alternative appears reasonable given increased rehabilitation costs and lost economies of scale due to fewer units in the preservation alternative. The 18 to 20 percent difference between the modified and original preservation alternative is reasonable given the cost of developing units within a mid-rise building.

The 7 percent inflation adjustment used in 2008 to escalate costs to 2015 is reasonable, given that the ENR's Building Cost Index indicates costs have increased 4 percent from 2008 to 2012, and contractors indicate that costs are continuing to increase. The 3 percent contractor fee and 5 percent contingency levels are within the range of project assumptions for developments of this size. The preservation and modified preservation alternatives likely warrant higher construction contingencies, given the requirements associated with completing historic rehabilitation to standards necessary for 20% percent historic tax credits.

Other soft costs amount to 8 to 10 percent of hard construction costs, which in our experience is on the low side for projects of this complexity. However, the project may be able to achieve a low percentage for other soft costs due to its relatively large scale.

Revenue and Expense Assumptions

Table 3 summarizes and compares the average monthly rents and expenses for the 2008 analysis and the updated analysis.

Table 3
Average Monthly Rents and Expenses, 2015

	Preferred Project - 2015	
	2008 Analysis	Current Analysis
Monthly Rent	\$3,200	\$3,405
Market Rent	\$3,778	\$3,800
BMR Rent	\$905	\$1,167
Other Income/Vacancy/Loss to Lease	\$109	\$108
Other Income (Parking, Storage, Laundry, etc.)	\$304	\$315
Vacancy/Loss to Lease	(\$194)	(\$206)
Total Operating Expenses	(\$953)	(\$1,012)
Reserves	(\$21)	(\$21)
Property Taxes	(\$398)	(\$424)
Other Operating Expenses	(\$533)	(\$567)
Monthly Net Operating Income	**\$2,356**	**\$2,502**

Source: San Francisco Planning Department, January 2008; San Francisco Planning Department, January 2012; 55 Laguna Mixed Use Development, Draft Environmental Impact Report, Chapter IV, January 2007; AF Evans, February 2008; Wood Partners Inc.; Seifel Consulting Inc.

The underlying revenue and expense assumptions from the 2008 Analysis and the Current Analysis are similar. The main difference is the shift from an 80/20 project to 15 percent inclusionary housing. This has increased the average monthly market rent from \$3,200 to approximately \$3,400. The market rent has also been slightly increased. Today's market rent is \$4.00/sf, which has been escalated 4 percent to \$4.16/sf for the 2015 market rent.

The BMR rent is based on the proposed unit mix for the project and the San Francisco Mayor's Office of Housing's 2012 rent limits for households earning 55 percent of areawide median income. It has been escalated at 2 percent to 2015.

Other income generated by each development proposal includes parking, storage, laundry and other tenant income. Parking is assumed at $250 per month for 249 parking spaces available to residents of the development, and storage, laundry and other tenant income is based on $126 per month, and these assumptions are reasonable for 2012. An allowance for vacancy and loss to lease are conservatively assumed to be 2.87 and 3.19 percent respectively. Income generated from parking and storage fees offsets potential losses from vacancies and cancelled leases.

Operating expenses, which include reserves, property taxes and standard operating and maintenance costs are typically within 25 to 35 percent of rental income depending on project size, complexity and level of amenities that require maintenance. They are assumed at 30 percent of annual rental income and other income for the preferred project.

Table 4 summarizes the income and expense assumptions for the preferred and alternative proposals in 2015. With the exception of the NC/GCC Alternative, the NOI have increased since 2008 due to an increase in rents and a decrease in the number of BMR units. The Preferred Project's NOI increased 5 percent from 2008 to today.

Table 4
Income and Expenses, Year 2015

Mixed Income Apartments	Preferred Project	Preservation Alternative	NC/GCC Alternative	Modified Preservation Alternative
Total Residential Rents	$ 13,484,239	$ 10,337,917	$ 810,000	$ 13,892,853
Market Rent	$ 3,800	$ 3,800	$ 750	$ 3,800
BMR Rent	$ 1,167	$ 1,167		$ 1,167
Other Income	$ 1,245,960	$ 1,129,536	$ 7,584,990	$ 1,261,080
Vacancy/Loss to Lease[a]	$ (817,145)	$ (626,478)		$ (841,907)
Total Operating Expenses (Incl. Reserves)	$ (4,173,916)	$ (4,011,161)	$ (8,090,000)	$ (4,722,969)
Operating Expenses per Unit	$ (12,648)	$ (15,854)	N/A	$ (13,891)
Net Operating Income (NOI)	**$ 9,739,138**	**$ 6,829,814**	**$ 304,990**	**$ 9,589,057**
Operating Expenses as a Percent of Rents	30%	37%	N/A	33%

a. Includes commerical rents for all proposals and projected tuition income for the NC/GCC Alternative.

Source: AF Evans, February 2008; Seifel Consulting Inc.

Financing

As described above, the proposed project has changed from an 80/20 deal to 15 percent inclusionary housing. With this change, Wood Partners cannot use tax credit equity or tax-exempt bonds as part of its funding sources; however the reduction in affordable units increases the average rents and gross potential income for the project.

Sources and Uses

Seifel has reviewed the pro formas provided by Mercy Housing/Openhouse for its 110 unit senior development in Building 5 and Building 6. Mercy Housing/Openhouse is relying on significant commitments of public funds (about $15 million) and investment of low income housing tax credits of (about $37 million) to make the project feasible. The pro formas demonstrate project feasibility with the sources and uses being equal.

Loan and Equity

As described above, the costs and revenues associated with the preferred project and the project alternatives have not changed substantially from 2008 to today (within 5 percent difference). Without significant changes in either the costs or revenues, the overall financial feasibility analysis for the development scenarios remains similar to 2008, except that both equity and lending underwriting requirements have strengthened as a result of the recent economic downturn (Table 5). This means that the amount of equity that would be needed has increased, and lenders will want greater assurance that the project is financially viable before providing construction and permanent financing.

Table 5
Construction Costs, Debt and Equity, Year 2015

	Preferred	Preservation Alternative	Modified Preservation Alternative
Total Project Cost[a]	$177,794,649	$144,744,801	$215,246,476
Maximum Permanent Debt (2015)	$133,742,467	$93,790,251	$131,681,486
Investor Equity Required	$44,052,182	$50,954,549	$83,564,990
Net Sales Value (2020)[b]	$185,554,616	$130,124,818	$182,695,206
Proceeds from Sale Remaining after Perm. Debt	$51,812,150	$36,334,566	$51,013,721
Remaining Proceeds after Investor Equity Returned	$7,759,968	($14,619,983)	($32,551,269)

a. Total Project Cost based on AF Evans estimates from 2008 escalated 4%.

b. Net Sales Value based on 2015 NOI escalated 3.5% to 2020 with a capitalization rate of 6%, sales expense of 1.25% and transfer tax rate of 2.5%. The transfer tax is higher than what was assumed in 2008 due to legislation.

Source: AF Evans,February 2008; ENR; Seifel Consulting Inc.

2. New College/Global Citizens Center Concept Plan

Development cost estimates for the NC/GCC project were based on an extrapolation of Cahill Construction estimates from 2007, given the concept plan available. Rehabilitation and new construction costs for the site under the NC/GCC were estimated at $82 million, and soft costs at $16.4 million. The bulk of construction costs were due to new construction of a dorm building, with the remaining costs going to rehabilitation. AF Evans assumed that historic rehabilitation costs would be eligible for 20 percent historic tax credits, providing the project with roughly $1.2 million in equity. Wood Partners may be able to qualify for slightly more from the historic tax credits based on soft costs related to historic rehabilitation, although, as discussed above, the project may be understating the costs associated with seeking the certified historic rehabilitation project necessary to achieve the 20 percent credits.

In 2008, AF Evans assessed the NC/GCC project based on revenues from tuition and rental income from the 90 beds proposed for the campus. Average tuition was $6,700, and AF Evans assumed that roughly 1,140 students would attend the campus, in line with EIR estimates. These revenue sources result in approximately $8.4 million in annual income. Expenses for New

College were estimated based on faculty salaries, administration and housing operation costs, for a total of $8.1 million in expenses. This leaves net operating income of roughly $300,000.

In the intervening years, New College has closed down, but this analysis could be applied to a similar private school. We believe that the 2008 estimates continue to be reasonable and illustrate the difficulties in pursuing an institutional project, as net operating income is insufficient to support the kind of debt necessary to pay for the rehabilitation and development of the campus.

D. Conclusion

In summary, our update to the 2008 analysis indicates that the preferred project continues to be the only financially viable development program. Based on our previous analysis in 2008 and current development trends, the preferred project is the most financially viable to meet investor requirements given the risks associated with a project of this complexity. The three alternatives require equity investments that are unsupportable given private equity underwriting requirements or would require significant additional public subsidy because the alternatives do not provide sufficient returns on equity.