

INDIA BASIN NEIGHBORHOOD ASSOCIATION

October 29, 2017

SENT VIA EMAIL

Michael J. Li
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1650 Mission Street, Suite 400
San Francisco, CA 94103
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Re: India Basin Mixed-Use Project / Case No. 2014-002541ENV



*Advocating for our
community since 1994*

Dear Mr. Li,

BOARD OF DIRECTORS

Sue Ellen Smith
Chair

Anietie Ekanem

Jill Fox

Alan Frazier

Tori Freeman

Sean Karlin

Steve LaPlante

Richard Laufman

Monica Padilla-

Stemmelen

India Basin Neighborhood Association (IBNA) is an all-volunteer group of neighbors who live in India Basin, the subject area of the above-referenced Draft Environmental Impact Report. Established in 1994, IBNA's mission is to preserve the maritime history, natural beauty, diverse character, and unique ambiance of our vibrant, mixed-use neighborhood through active community organizing. IBNA has long advocated for responsible development in our community. It took a lead advocacy role for developing the original India Basin Shoreline Park, successfully obtaining landmark status for the Shipwright's Cottage, and acquiring the 900 Innes Avenue property for a public park.

As those most directly affected by the proposed development, we have taken an active interest in this project, and have spent considerable hours over the past four years meeting with BUILD, Inc. and SF Rec & Park as these plans have been developed.

IBNA Board of Directors have read and reviewed the Draft EIR for the India Basin Mixed-Use Project. We attended the hearing on this matter on October 19, 2017. Our greatest concerns are: 1) the two proposed 14 story towers, which will dwarf existing buildings and create aesthetic, wind, shadow, and other impacts; 2) the lack of a plan to underground the aging power lines along Innes Avenue feeding the proposed development, and 3) the impact of proposed transportation changes on existing homes and businesses along Innes Avenue and the rest of India Basin. Attached to this letter we describe more fully our concerns about some elements of the EIR and the likely impacts of this project on our community.

Sincerely,

Sue Ellen Smith, Chair
SueEllen@indiabasin.org

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IBNA's RESPONSE TO DEIR 2014-002541ENV
INDIA BASIN MIXED-USE PROJECT

3.1 Land Use and Land Use Planning

Impact LU-2: The proposed project or variant would not result in conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact LU-2 would have a less than significant CEQA impact.

Table 2-3 & 2-3: There is no variant for 14-story buildings; that is, nothing else is proposed but the 14 stories. Current zoning allows for 4 stories at this site, and although this projects seeks to change that, what is proposed for this project does not offer a variant of anything less than 14 stories. Yet, there is an inconsistency in the DEIR, as Table 3 – Proposed Build Inc. Development lists “Height: up to 120' (not 160”) = 11 stories.

Impact C-LU-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not result in significant cumulative impacts related to land use and land use planning. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact C-LU-1 would have a less than significant CEQA impact.

The DEIR does not address the impending PG&E development on their former Hunter's Point power plant location. While no plans are yet available, it is well known that PG&E is actively developing plans for this site, and this DEIR should address the likely increase in population, traffic, noise, etc.

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3.3 Population and Housing

Impact PH-1: *The proposed project or variant would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure). CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact PH-1 would have a less than significant CEQA impact.

IBNA believes that the approach for addressing the Impact of PH-1 is faulty and needs further examination. The DEIR properly addresses the impact of population and housing in terms of “planned” housing (such as is proposed under this project plan). The DEIR addresses the project plans for adding 929 employees to the site and notes that the proposed on-site housing could accommodate all 929 individuals. Likewise, the variant proposes adding 3,535 employees to the site and specifically states that this number could not be accommodated in housing planned for the site, but states that those employees could easily find housing elsewhere in the region. However, all of this presupposes that these additional individuals to the area could afford *any* of the available housing, either on site or in the region. The Bay Area is experiencing an extreme housing shortage, most critically for individuals who earn a middle-class income. Nothing in this plan links up income levels of the new population with housing costs on-site.

Impact CPH-1: *The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not substantially contribute to cumulative impacts related to population and housing. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact CPH-1 would have a less than significant CEQA impact.

The DEIR states that the additional supply of housing under the cumulative projects scenario would be between 54-57% of the Regional Housing Needs Assessment target for the City by 2022, and that the population growth under the cumulative projects would represent 12% of the City's anticipated population growth by 2030. Yet these population estimates do not take into consideration the rising costs of housing in the region, and the corresponding increase in per-unit number of residents (rather than the 2.1 number-per-unit used in the DEIR) necessary to afford the costs of housing. We believe a deeper examination of this should be addressed.

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3.5 Transportation and Circulation

Impact TR-1: The proposed project or variant would not cause substantial additional VMT or substantially induce automobile travel. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact TR-1 would have a less than significant CEQA impact.

The proposed 55 bus line is inadequate, only getting residents as far as 3rd Street. With such a poor bus line, it may be safely assumed that residents will find that frustrating and would simply resort to using their personal cars for transportation. This plan does not address what has happened as a result of the new Shipyard development: a dramatic increase in VMT as new residents use their own cars as primary transportation. We suggest a traffic measuring test to determine the true number of cars traveling along Innes Avenue through the project area. A better mitigation would be to leave the 19 bus line as it is, and add a 19 Express bus that does not go up to Hunter's View or Potrero Hill, and travels on the 101 Freeway to the 9th Street exit and from there continue the regular route to Larkin Street and beyond.

Impact TR-3: The proposed project or variant would cause a substantial increase in transit demand that would not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service. CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.

IBNA disputes that Impact TR-3 would have a less than significant CEQA impact after Mitigation Measures.

Re:Transportation and Circulation Table 3.5-26: There has not been adequate explanation or suggested mitigation to property owners, residents, and businesses in the area of impact about the cumulative street network changes of the proposed project as described in Table 3.5-26. IBNA requests specific community outreach and input concerning changes to transportation, transit, and circulation.

Impact TR8: Under either the proposed project or variant, passenger loading demand associated with the school during the peak hour of loading activities would not be accommodated within proposed on-site passenger loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit. CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.

IBNA disputes that Impact TR-8 would have a less than significant CEQA impact after Mitigation Measures.

A school, once reaching 22 students will create a hazard, but housing with potentially thousands of residents will not? We find this absurd and needing further examination.

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3.6 Noise

Impact NO-2: Construction of the proposed project or variant would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. **CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.**

Impact NO-3: Noise from stationary sources associated with operation of the proposed project or variant would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. **CEQA Impacts both before and after Mitigation Measures: Significant / Significant and Unavoidable with Mitigation.**

IBNA disputes that Impact NO-2 would have a less than significant CEQA impact after Mitigation Measures, and agrees that Impact NO-3 would result in Significant and Unavoidable Impacts even with Mitigation.

After review, we request additional evaluation concerning noise because (1) the Existing Noise-Sensitive Land Uses are not properly described, (2) the Ambient Noise Level locations need to expand, (3) operational impacts are not adequately described, and (4) other mitigation measures should be considered.

The Existing Noise-Sensitive Land Uses (DEIR, pages 3.6-5 - 6) described in the first bullet point as “the cluster of residential uses on the north and south sides of Innes Avenue between Griffith and Earl” is inadequate. As mentioned multiple times in prior public comment, sound travels farther than that. The water of India Basin conducts sounds throughout the natural amphitheater formed by the topography of India Basin. We suggest a more accurate description of land uses impacted by this project (first bullet point) is: All residential and business properties on both sides of Innes Avenue from Middle Point Road to Donahue and on both sides of Hudson from Hunters Point Boulevard to Arelious Walker. Add an additional bullet point to include all property to the top of the ridge, which would include the Northridge Cooperative Homes (above Innes Avenue) and the Morgan Heights townhome development (on Cleo Rand and on Jerrold). On page 3.6-6, add to the list of buildings on the project site eligible for the California Register of Historic Places 911 Innes Avenue and the Albion Castle at 880 Innes Avenue, which is already listed on the National Register of Historic Places.

To properly reflect the requested expanded Existing Noise-Sensitive Land Uses, the Ambient Noise Level locations shown in Table 3.6-4 need to include sites at the top of the ridge, in addition to those at street level. As mentioned multiple times in prior public comment, it is our experience that sound is

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louder as it travels up.

The Operational Noise (page 3.6-42 and Table 3.6-17) does not include noise impacts on the requested expanded Existing Noise-Sensitive Land Uses that will be generated by the large, active-use public spaces in the newly designed India Basin Shoreline Park, 900 Innes, and public spaces within the 700 Innes property.

Impact CNO-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would substantially contribute to cumulative impacts related to noise. CEQA Impacts both before and after Mitigation Measures: Significant / Significant and Unavoidable.

IBNA agrees that Impact CNO-1 would result in Significant and Unavoidable Impacts even with Mitigation.

We respectfully request additional noise mitigation suggestions for the homes and businesses within the requested expanded Existing Noise-Sensitive Land Uses zones. Multiple items shown in Table S-2 3.6 Noise Impact (No 3, No 4, and Impact C-No-1), are listed as having CEQA Impacts “Significant” and have “no feasible mitigation measures” indicated.

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3.12 Utilities and Service Systems

Note: Section 3.12 only discusses water, both potable and recycled, and wastewater, both sewage and stormwater. It does not discuss electricity or gas supply which is a glaring omission, which must be addressed. No information is provided on the impact to existing electrical, internet, and cable infrastructure when access to these utilities are provided to the 700 Innes project. How will those utilities get to the project except to use the existing lines and poles. India Basin has some of the oldest power lines along Innes Avenue (dating back to 1941), which feed electricity to both this proposed development as well as the new Shipyard development, at which point all utilities are underground. These aging power lines have failed multiple times in recent years, resulting in at least three blown transformers causing fires that threatened existing homes. IBNA believes that the only safe mitigation measure would be to underground all utilities running along Innes Avenue from Middlepoint/Jennings at Evans to Innes Avenue at Donahue. This DEIR does not address this issue, but plans to underground utilities must be included before finalizing. This is a health and safety issue of utmost importance.

Impact UT-1: The proposed project or variant would not exceed wastewater treatment requirements of the applicable RWQCB or result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the projected demand in addition to the provider's existing commitments. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact UT-1 would have a less than significant CEQA impact.

This plan is a little light on the storm water plan. It remains pretty vague and needs more detail. There is a plan to set up a first phase sewage treatment plant on-site that would create a gray water reservoir to keep the common areas watered all year and send the sludge waste on to the main sewage treatment plant at 3rd & Evans.

Impact UT3: The proposed project or variant would not require new or expanded water supply resources or entitlements. CEQA Impacts both before and after Mitigation Measures: None / Less Than Significant.

IBNA disputes that Impact UT-3 would have none or a less than significant CEQA impact.

Section 3.12-28 finds the supply of water to adequate for the project, but does not evaluate water pressure. The supply may be adequate (this is not clear from the DEIR) but is the distribution system capable of delivering this increased flow without a significant reduction in our already very low water pressure? It seems that the developer recognizes that the water utilities will not be enough to accommodate the increased population both in the Shipyard and in the 700 Innes project. Water pressure must be examined to see if residents' needs can be met.

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