

San Francisco Redevelopment Agency

72 Townsend Street Residential Project

COMMENTS AND RESPONSES

ER 12.15.05

State Clearinghouse No. 2006012057

June 21, 2006

Draft EIR Publication Date: April 19, 2006

Draft EIR Public Hearing Date: May 16, 2006

Draft EIR Public Comment Period: April 19, 2006 – June 5, 2006

**72 Townsend Street
Environmental Impact Report
COMMENTS AND RESPONSES**

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EXHIBIT

1. Comment Letter
2. Transcript of Public Hearing

A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed 72 Townsend Street residential project, and responses to those comments.

All substantive comments received during the Draft EIR public review period from April 19, 2006 to June 5, 2006 are presented herein by direct quotation. Because only one comment letter was received, comments in that letter are presented sequentially, with each comment followed by a response. This comment letter on the 72 Townsend Street Residential Project Draft EIR is included as Exhibit 1.

No comments were made at the Draft EIR public hearing before the Agency Commission on May 16, 2006; therefore, none are included in this Comments and Responses document. The transcript of the public hearing is included as Exhibit 2.

The Comments and Responses component of the EIR is intended to respond to comments received during the Draft EIR public review period on the adequacy of the approach and analysis in the Draft EIR. Comments regarding the merits of and concerns about the project itself should be directed to the Agency Commission to assist with its consideration of the proposed project at a public meeting after the certification (determination of completeness) of the EIR. In order to approve the project, the Agency Commission will be required to adopt a Statement of Overriding Considerations, pursuant to the California Environmental Quality Act (CEQA), to explain the greater public good that would be achieved despite the significant unavoidable impacts that would occur as identified in the EIR. Some comments do not pertain to physical environmental issues, but, in some instances, responses are included to provide additional information related to the proposed project.

Following certification, these comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the Final EIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

The following individual submitted written comments during the April 19, 2006 to June 5, 2006 public review period for the 72 Townsend Street Residential Project Draft EIR. No oral testimony was provided at the public hearing on May 16, 2006.

Adrienne Alcantara (written comments, May 26, 2006)

C. COMMENTS AND RESPONSES

WRITTEN COMMENTS OF ADRIENNE ALCANTARA

Comment #1

"The developers are commended for the sensitive respect for the Hooper's Warehouse historic structure by stepping the new addition tower a full structural bay back from the Townsend Street facade. I recommend to further maintain the effect of the structure that the developers retain the existing wood post and beam structure within that first bay of the building as it represents a rare view of the kind of structure that existed within the South End Historic District prior to the 1906 earthquake. In addition, the structure is quite attractive which may help to attract a viable business into the retail space."

Response # 1

The DEIR analyzed the impacts of the proposed project on the historical resources, and, as discussed on page 49, concluded that the proposed project would have a significant, unavoidable adverse impact on historic architectural resources. Possible retention of the existing wood post and beam structure within the first bay will be considered by Agency staff in its review of the schematic design of the proposed project.

Comment # 2

"Mitigation of the unfortunate façade changes made in the 1999 renovation to Hooper's Warehouse will improve the historic character of the neighborhood as well as attract a viable business into the retail space."

Response #2

Mitigation Measure CR-2, page 84 of the DEIR, calls for decreasing the level of fenestration on the Townsend Street façade, which would partially restore the sense of enclosure that is characteristic of the original warehouse design of the building. As noted on page 49, this mitigation measure would reduce the impact of the proposed project on historic resources, but the impact of the project could not be reduced to a less than significant level.

Comment #3

"Page 1 (and again frequently throughout the document)- the height of the proposed structure is described as 99-foot-high, per other documents released by the developer, the proposed structure is in fact 114-foot-high including the proposed penthouses and mechanical screens. See also Figure 5."

Response #3

As noted on page 55 of the Initial Study (Appendix A of the DEIR), the project site is in the 40-105 foot height district in the Design for Development and in the 105-F Bulk District pursuant to Article 2.5 of the San Francisco Planning Code. For purposes of compliance with height restrictions, building heights are measured to the top of the building roof, which, as stated in the DEIR, is 99 feet for the proposed project. For buildings exceeding 65 feet, this measurement excludes up to 16 feet of mechanical equipment and appurtenances, together with visual screening for these features (Planning Code Section 260(b)(1)(A)). Thus, while the highest point of the proposed rooftop mechanical penthouses would be higher than 99 feet, the DEIR's description of the building as 99 feet in height is consistent with the applicable definition of building height.

Comment #4

"Page 4- While there is high-rise development in the vicinity of the proposed project, not one of the structures falls within the boundaries of the South End Historic district and not one of the named properties had a contributing structure to the historic district on the property prior to the proposed construction. While 72 Townsend may aspire to the heights of these adjacent structures, any building that exceeds the height of the buildings within the block is a significant negative distracter to the historic designation of the neighborhood. The block that Hooper's Warehouse occupies is defined as bordered by Townsend, Collin P. Kelly Jr., Brannon, and Second Streets."

Response #4

As noted in the DEIR, page 49, the Hooper's Warehouse building is located within, and along the boundary of, the City-designated South End Historic District. That District retains its integrity, and the DEIR concluded that the proposed construction of seven stories above the existing historic one-story warehouse would result in a considerable contribution to a significant adverse cumulative impact on historic architectural resources in the project vicinity.

Comment #5

"Page 17- The project negatively effects views for surrounding residential properties including 88 Townsend and 650 Second Street. Alternatives require additional consideration in that the alternatives included do minimize the effect on adjacent properties."

Response #5

As discussed on page 14 of the Initial Study (Appendix A of the DEIR), the upper stories of mid-rise and high-rise buildings in the project vicinity may, depending on location, afford more expansive views of the city that many people would consider scenic, and/or views of San Francisco Bay, Treasure Island, and the East Bay hills to the east that would certainly be considered scenic; however, these views are private. Under the Guidelines of the California Environmental Quality Act ("CEQA"), changes to private views are generally not considered significant unless they affect a large number of people or constitute a dramatic degradation of views. Because of the project's modest height relative to many taller residential buildings in the vicinity, expansive views from many locations would not be blocked by the proposed building. Views from lower floors of neighboring buildings would be interrupted in a number of cases, but due to their lower vantage point, such views would not be expansive. For these reasons, the proposed project's impacts on private scenic views would be very limited, and would be considered less than significant.

The DEIR evaluated three alternatives to the project: a No-Project Alternative, a Preservation Alternative in which the existing historic building on the project site would be preserved, and a Reduced Alternative that would be approximately half the size and height of the proposed project. As discussed on pages 93, 94, and 95 of the DEIR, respectively, these three alternatives would eliminate or reduce the proposed project's effects on views from surrounding residential properties. As discussed above, and on pages 93, 94, and 95 of the DEIR, the effect of the proposed project and the three alternatives on private views would be less than significant.

Comment #6

"Page 51- 650 Second Street, is a six-story cement block residential building and not an office building."

Response #6

The commenter is correct. The following revisions are made to the DEIR:

Pages 51-52

Northward to Brannan Street, the remainder of the west side of this block of Second Street is occupied, respectively, by an apparently vacant three-story brick office building (680 Second Street), a six-story cement block ~~residential~~ office building (650 Second Street), a three-story cement block office building (640 Second Street), and a three-story brick office building (634 Second Street) housing Advent Software, Inc.

Comment #7

"Page 55- Application of the Northeastern Waterfront Plan to this project requires clarification as it specifically references the warehouse buildings to the west. These buildings are defined as contributing structures to the South End Historic District, which 72 Townsend or Hooper's Warehouse is part of. If application of this policy is applicable for this project, there are numerous issues with the proposed project against this policy including blocking of views, material scale, and massing."

Response #7

Relevant objectives and policies from the Northeastern Waterfront Plan are listed on pages 55 through 57 of the DEIR. One of these objectives and policies, South Beach Subarea Policy 30.18, on page 56 of the DEIR, refers to "warehouse buildings to the west". This policy is reproduced below (emphasis added):

Develop housing in small clusters of 100 to 200 units. Provide a range of building heights with no more than 40 feet in height along the Embarcadero and stepping up in height on the more inland portions to the maximum of 160 feet. In buildings fronting on Brannan Street in the 160-foot height area, create a strong base which maintains the street wall created by the residential complex to the east and *the warehouse buildings to the west*. Orient the mix of unit types to one and two bedrooms and include some three and four bedroom units. Pursue as the income and tenure goals, a mix of 20 percent low, 30 percent moderate and 50 percent middle and upper income, and a mix of rental, cooperative, and condominium units.

Policy 30.18 refers to the street wall on Brannan Street, and does not apply to the proposed project, which fronts on Townsend and Colin P. Kelly Jr. Streets, but does not front on Brannan Street.

The South End Historic District and the warehouse buildings it contains are discussed on pages 32 through 34 of the DEIR. As noted on page 49 of the DEIR, the proposed project is located within the South End Historic District, and would result in a considerable

contribution to a significant adverse cumulative impact on historic architectural resources in the project vicinity.

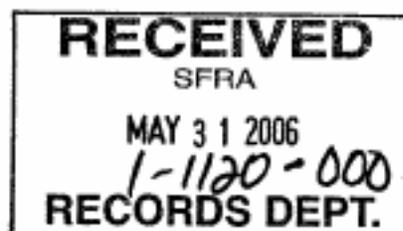
The effects of the proposed project on views, scale, and massing are discussed on pages 13 through 17 of the Initial Study (Appendix A of the DEIR), which concluded that these effects would be less than significant.

Exhibit 1:
COMMENT LETTER

Adrienne Alcantara
650 Second Street #305
San Francisco, CA 94107

May 26, 2006

Stanley Muraoka
Project Manager
San Francisco Redevelopment Agency
One South Van Ness Avenue, 5th Floor
San Francisco, CA 94103



Re: ER12.15.05
State Clearinghouse No. 2006012057

Please accept the following comments regarding the draft Environmental Impact Report for the project, 72 Townsend Street Residential Project-

1. The developers are commended for the sensitive respect for the Hooper's Warehouse historic structure by stepping the new addition tower a full structural bay back from the Townsend Street façade. I recommend to further maintain the effect of the structure that the developers retain the existing wood post and beam structure within that first bay of the building as it represents a rare view of the kind of structure that existed within the South End Historic District prior to the 1906 earthquake. In addition, the structure is quite attractive which may help to attract a viable business into the retail space.
2. Mitigation of the unfortunate façade changes made in the 1999 renovation to Hooper's Warehouse will improve the historic character of the neighborhood as well as attract a viable business into the retail space.
3. Page 1 (and again frequently throughout the document)- the height of the proposed structure is described as 99-foot-high, per other documents released by the developer, the proposed structure is in fact 114-foot-high including the proposed penthouses and mechanical screens. See also Figure 5.
4. Page 4- While there is high-rise development in the vicinity of the proposed project, not one of the structures falls within the boundaries of the South End Historic district and not one of the named properties had a contributing structure to the historic district on the property prior to the proposed construction. While 72 Townsend may aspire to the heights of these adjacent structures, any building that exceeds the height of the buildings within the block is a significant negative distracter to the historic designation of the neighborhood. The block that Hooper's Warehouse occupies is defined as bordered by Townsend, Collin P. Kelly Jr., Brannon, and Second Streets.
5. Page 17- The project negatively effects views for surrounding residential properties including 88 Townsend and 650 Second Street. Alternatives

require additional consideration in that the alternatives included do minimize the effect on adjacent properties.

6. Page 51- 650 Second Street, is a six-story cement block residential building and not an office building.
7. Page 55- Application of the Northeastern Waterfront Plan to this project requires clarification as it specifically references the warehouse buildings to the west. These buildings are defined as contributing structures to the South End Historic District, which 72 Townsend or Hooper's Warehouse is part of. If application of this policy is applicable for this project, there are numerous issues with the proposed project against this policy including blocking of views, material scale, and massing.

Please do not hesitate to contact me if you have any questions.

A handwritten signature in black ink, appearing to read 'Adrienne Alcantara', written in a cursive style.

Adrienne Alcantara

Exhibit 2:
TRANSCRIPT OF PUBLIC HEARING

REDEVELOPMENT AGENCY
OF THE
CITY AND COUNTY OF SAN FRANCISCO

CITY HALL, ROOM 416
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CALIFORNIA 94102

Transcript of Proceedings

re: Agenda Item H

Tuesday, May 16, 2006

ORIGINAL

Reported by:

RITA R. LERNER, CSR 3179

(2001-381565)



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1 REDEVELOPMENT AGENCY COMMISSION PANEL:

2

3 Richard H. Peterson, Jr., President.

4 London Breed, Vice President

5 Francee Covington

6 Ramon E. Romero

7 Darshan Singh

8 Benny Y. Yee

9

10 Marcia Rosen, Executive Director

11 Erwin R. Tanjuaquio, Commission Secretary

12 Penny Nakatsu, Counsel

13

14 REDEVELOPMENT AGENCY STAFF presenting re: Item H.

15 Tiffany Bohee - Development Specialist, Real Estate

16 Development Services

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1 (4:12 p.m.)

2 COMMISSION SECRETARY TANJUAQUIO:

3 Commissioners, we'll go on to Item H: Public hearing on
4 the Draft Environmental Impact Report for the 74-unit
5 residential project located at 64-72 Townsend Street,
6 Assessor's Block 3789, Lot 3, located at the northwest
7 corner of Townsend and Colin P. Kelly, Jr. Streets;
8 within the Rincon Point-South Beach Redevelopment
9 Project Area.

10 Madam Director.

11 COMMISSION DIRECTOR ROSEN: Thank you,
12 Mr. Secretary.

13 Commissioners, Tiffany Bohee, from our Real
14 Estate Services Division, will present this item.

15 This is a public hearing only; is that correct?

16 MS. BOHEE: Yes, that's correct.

17 Thank you, Director Rosen.

18 Good afternoon, President Peterson, Vice
19 President Breed, Agency Commissioners. I'm Tiffany
20 Bohee from the Real Estate Division.

21 The 64 and 72 Townsend project is currently
22 improved with a single-story reinforced masonry building
23 known as the Hooper South End Grain Warehouse.

24 Lambert Development, the project's sponsor, is
25 proposing a residential adapted reuse of this privately

1 owned warehouse building. The proposed development will
2 include 74 for-sale residential units, including seven
3 affordable units, 5,000 square feet of ground floor
4 commercial, and parking for each of the residential
5 units.

6 The Hooper South End Grain Warehouse is
7 considered a contributory building to the City's south
8 end historic warehouse district, and is considered a
9 historic resource under the California Environmental
10 Quality Act, or CEQA.

11 In compliance with CEQA, an initial study of
12 the proposed project was completed, and it was
13 determined that the project would have probable
14 environmental effects in the areas of historic
15 resources, traffic, and cumulative transportation
16 effects. As a result, further environmental analysis
17 was required in these particular areas and a Draft EIR
18 was prepared.

19 In accordance with CEQA, a public hearing in
20 the matter before you must be held to hear public
21 comments on the adequacy of the Draft EIR, which is
22 transmitted to the Commission in your packets.

23 The EIR public comment period began on June
24 19th -- I'm sorry; excuse me -- on April 19th, and
25 closes on June 5th. The notice of this public hearing

1 today on the Draft EIR was published in the
2 San Francisco Examiner, was mailed to over 250 persons
3 on the Rincon Point-South Beach Areawide Interested
4 Parties list, and was posted in several locations in the
5 project area. Copies of this Draft EIR were distributed
6 to over 90 people, including the Rincon Point-South
7 Beach CAC, neighboring property owners, and other
8 interested parties, in addition to local and state
9 agencies.

10 In addition, this Draft EIR is posted on the
11 Agency's website, and electronic copies were transmitted
12 to over 25 people.

13 In terms of the next steps after this public
14 hearing today, Agency staff will prepare a comments and
15 responses document that will contain a summary of all
16 public comments on the Draft EIR, and will welcome
17 responses to those comments.

18 Within the next few months, the Commission will
19 be asked to consider this Draft EIR and the comments and
20 responses document at a public meeting, and if adequate,
21 will be asked to certify them as the final EIR.

22 The Commission will also be requested to
23 consider other related actions on the project, including
24 entering into an OPA with Lambert Development and
25 approval of the schematic design. However, again, the

1 purpose of today's hearing is solely to hear public
2 testimony on the Draft EIR.

3 The project sponsor, Lambert Development, along
4 with its EIR consultants, the project architect, as well
5 as other consultants, are here today.

6 That concludes the staff presentation.

7 COMMISSION PRESIDENT PETERSON: Any questions
8 or public comment?

9 COMMISSION SECRETARY TANJUAQUIO: I have no
10 speaker cards for this item.

11 COMMISSION PRESIDENT PETERSON: Very well.
12 Does anyone wish to make comments?

13 (No response)

14 COMMISSION PRESIDENT PETERSON: Okay. We'll
15 close public comment. It's not something we're voting
16 on, so it's a workshop for the commissioners if they
17 have questions to ask. If not, we can move forward to
18 the next item.

19 COMMISSION SECRETARY TANJUAQUIO: Should I call
20 the next item?

21 COMMISSION PRESIDENT PETERSON: Yes.

22 (Proceedings adjourned re: Item H at 6:16 p.m.)
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CERTIFICATE OF REPORTER

I, RITA R. LERNER, duly authorized
shorthand reporter, do hereby certify:

That the foregoing transcript constitutes a
true, full and correct transcript of my shorthand notes
taken as such reporter of the proceedings herein and
reduced to typewriting under my supervision and control
to the best of my ability.

MAY 19, 2006

Rita R. Lerner

RITA R. LERNER, CSR No. 3179

