2.3 LAND USE

2.3.1 UNITED STATES COAST GUARD FACILITY

Comments

Thank you for inviting the U. S. Coast Guard (USCG) to review the Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island (YBI) Redevelopment Project. The USCG presence on YBI dates to 1872, when the Lighthouse Board constructed the first lighthouse on the Island. Over time the USCG has constructed many facilities of various types on 47.9 acres of USCG-controlled YBI land, immediately adjacent to the proposed development. These USCG facilities are essential to supporting the Maritime Homeland Security (MHLS) mission of the United States, and will be negatively impacted by the Redevelopment Project.

In particular the Vessel Traffic Service (VTS) maintains facilities on YBI that provide direct radar, radio, and visual contact with all vessels in the major shipping channels to the Ports of Oakland and Richmond. These facilities may be negatively impacted by the proposed project. Buildings over 300 feet in height on Treasure Island may eliminate the direct contact currently provided by the existing VTS facilities, creating an unacceptable maritime risk to both the vessels and the public without mitigation. The operation of the VTS equipment may also create electronic and radio interference, which may negatively impact Treasure Island residents on higher floors of the proposed buildings. To resolve these issues, the USCG is prepared to work with the developers to identify appropriate locations on Treasure Island for additional USCG facilities to maintain direct radio and radar contact with vessels in the navigable waters of the Bay. Any new facilities required by the USCG would be owned by the USCG, though their construction costs should be paid for by the developer. (P. M. McMillin, Captain, U. S. Coast Guard) [10.1]

Summary, p. S.7 – Need to list “Impact to CG operations on YBI” as a stand-alone summary in this table. (P. M. McMillin, Captain, U. S. Coast Guard) [10.6]

Response

The comment states that proposed buildings on Treasure Island that would exceed heights of 300 feet could interfere with direct radar, radio, and visual contact between the U.S. Coast Guard’s Vessel Traffic Service and vessels in the navigable waters of San Francisco Bay, which would create an unacceptable maritime risk to both the vessels and the public.

The U.S. Coast Guard Station and Sector Facility, through its Vessel Traffic Service (“VTS”) unit, maintains direct radar, radio, and visual contact with vessels in San Francisco Bay. As stated in the comment, construction of some of the new buildings on Treasure Island could eliminate direct contact provided by existing VTS facilities and create potential risks to maritime vessels and the public. Implementation of the Proposed Project could potentially interfere with the ability of the U.S. Coast Guard to carry out its mission to coordinate the safe passage of vessels in San Francisco Bay if appropriate design measures are not taken into account.
To avoid potential visibility conflicts with the U.S. Coast Guard, the proposed updated Design for Development would include a formal consultation process between the Treasure Island Development Authority (“TIDA”) and the U.S. Coast Guard to determine whether interference would occur; identify appropriate modifications to any proposed buildings that could cause interference; and require the building developer to make space available and provide access to the Coast Guard to place equipment on the roof of the building, identify alternate locations on Treasure Island for additional facilities, or establish some other similar solution, as necessary, for the purpose of maintaining direct radar and radio contact between the VTS and vessels in the navigable waters of San Francisco Bay. The footprint of such additional facilities, if needed, would be small in size, and land is available to site such facilities on the island so that they do not disturb sensitive habitat; accordingly, even if additional facilities are required, constructing those facilities would not result in significant environmental impacts. The project sponsors have met with the U.S. Coast Guard to develop the requirements for the consultation process that will be included in the proposed updated Design for Development.

**Comment**

Section II, p. II.17 – The land use map shows that no high intensity development will occur on the project’s boundary with USCG property. This is desirable to ensure residential and mixed use redevelopment of the historic USN Officers Quarters is buffered from USCG operations. (P. M. McMillin, Captain, U. S. Coast Guard) [10.8]

**Response**

The comment does not address the adequacy or accuracy of the EIR; it expresses support for the low-intensity land uses being proposed on Yerba Buena Island that are adjacent to the boundary of the U.S. Coast Guard property. The comment is acknowledged and may be considered by the decision-makers during their review of the project’s entitlements.

**Comments**

Appendix C, p. 2 – The text refers to the size of USCG facilities as 47 acres. The main DEIR text often says the USCG owns 39 acres. The Appendix is correct. The USCG owns 47.9 acres of land on YBI – please correct the acreage number throughout the document and in all appendices. Please see comment 36 for further detail... (P. M. McMillin, Captain, U. S. Coast Guard) [10.28]

General – Please note that it is not just a USCG Station located on the Island. It is a combined Station and Sector Facility. The Station is under the direction of the Sector Command indicating that the Sector is at a higher level in the USCG hierarchy. The Sector’s Area of Responsibility (AoR) includes most of Northern California from the Oregon border to just south of Monterey Bay. Therefore the facility near the water’s edge in total MUST be referred to Sector San Francisco (although the Station is collocated with the Sector).
The exact history of the USCG’s real property interests is included on record of survey #20101960234 filed 04/28/2010 with the San Francisco Assessor Recorder’s office. You may obtain this from the Assessor’s office or we may provide you a copy. A brief history is provided below:

The USCG’s presence on YBI predated the establishment of Naval Station Treasure Island (NSTI). Initially the lighthouse built by the Lighthouse Board in 1872 was located on land leased from the War Department. However, the USCG obtained full real property interests on these 26.51 acres of YBI on July 27, 1939 via an Act of Congress. This area included the lighthouse and portions north of it up to Hillcrest/Treasure Island Road including the oldest buildings of Sector San Francisco.

The next major expansion of the USCG’s property occurred on 6/14/1967 via the acquisition of 8.207 acres from the USN, via a form 1354 transfer, just north of the property acquired in 1939. The new buildings of the Sector Command were built in this area. An adjoining 2.71 acres were acquired through a direct transfer of land from the USN dated 8/20/1974.

On 4/17/1998, the USCG acquired 5 additional parcels of land, totaling 10.4831 acres from the USN through the transfer process. The parcels included Quarters 8 & 9, and the uphill site currently occupied by the Vessel Traffic Service (VTS).

Finally on 11/26/2002 the USN transferred ownership of 11.8 acres of submerged lands to the USCG.

Thus, in total, the USCG owns 47.9101 acres of land on YBI and another 11.8 acres of submerged lands. (P. M. McMillin, Captain, U. S. Coast Guard) [10.29]

Response

The comments state that the U.S. Coast Guard owns 47.9 acres of land on Yerba Buena Island, not 39 acres, and request that this information be corrected throughout the EIR. The first comment also refers to EIR Appendix C, Transportation Impact Study, which states that the Coast Guard occupies approximately 47 acres of land on Yerba Buena Island. The correction to the Coast Guard acreage requires the total acreage of Yerba Buena Island to be corrected as well.

The second comment clarifies the organizational hierarchy of the Coast Guard.

In order to address these comments, the following changes are made to the text of EIR Section IV.A, Land Use and Land Use Planning (deletions are shown in strikethrough and new text is underlined).

The third full paragraph on EIR p. IV.A.6 is revised as follows:

The U.S. Coast Guard maintains an active Station and Sector Facility that covers approximately 47.9 acres on the southeast side of Yerba Buena Island. This Station and Sector Facility includes housing, administrative facilities, buoy maintenance facilities, docks, storage, and a lighthouse that was built by the U.S. Army. The Station and Sector Facility is not part of the Project Area or the Development Plan Area and would not undergo any changes as part of the Proposed Project.
Table IV.A.1: Existing Land Uses on Treasure Island and Yerba Buena Island, on EIR p. IV.A.8, is revised as follows:

(Revised) Table IV.A.1: Existing Land Uses on Treasure Island and Yerba Buena Island

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Treasure Island</th>
<th>Yerba Buena Island</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Units or Acres)</td>
<td>(Units or Acres)</td>
<td>(Units or Acres)</td>
</tr>
<tr>
<td>Residential</td>
<td>908 / 110 acres</td>
<td>97 / 19 acres</td>
<td>1,005</td>
</tr>
<tr>
<td>Community and Institutional</td>
<td>30</td>
<td>—</td>
<td>30</td>
</tr>
<tr>
<td>Office and Retail</td>
<td>20</td>
<td>—</td>
<td>20</td>
</tr>
<tr>
<td>Industrial</td>
<td>20</td>
<td>—</td>
<td>20</td>
</tr>
<tr>
<td>Open Space and Recreation Facilities</td>
<td>90</td>
<td>80</td>
<td>170</td>
</tr>
<tr>
<td>Other</td>
<td>37</td>
<td>$266</td>
<td>94103</td>
</tr>
</tbody>
</table>

Notes:
1 Total acreage on Treasure Island equals approximately 404 acres; totals shown above are rounded.
2 Does not include approximately 95 acres dedicated to parking and roads.
3 Approximately 725 units are available for occupancy.
4 Approximately 80 units are available for occupancy.
5 Approximately 805 total units are available for occupancy.
6 Includes the 37-acre Job Corps campus on Treasure Island, approximately 18 acres occupied by the California Department of Transportation, and approximately 48 acres occupied by the U.S. Coast Guard Station and Sector Facility on Yerba Buena Island.

Source: San Francisco Planning Department, 2005; Treasure Island Development Authority, 2010; and the U.S. Coast Guard, 2010.

The third full paragraph on EIR p. IV.A.21 is revised as follows:

The U.S. Coast Guard Station and Sector Facility on the southern portion of Yerba Buena Island is an adjacent land use that is outside of the Project Area. The physical topography and separation of the U.S. Coast Guard Station and Sector Facility would limit potential construction impacts on this facility. Construction activities would not result in the physical disruption or division of the U.S. Coast Guard Station and Sector Facility.

The first sentence of the third full paragraph on EIR p. IV.A.25 is revised as follows:

The only uses near the proposed Development Plan Area on Yerba Buena Island are the existing U.S. Coast Guard Station and Sector Facility and the Bay Bridge span and structure on the southern portion of Yerba Buena Island.

The first paragraph under the subheading “Yerba Buena Island” on EIR p. IV.A.26 is revised as follows:

Currently, only approximately 2 acres of the 150 acres on Yerba Buena Island would be subject to the Tidelands Trust upon transfer.
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2. Comments and Responses

3. Land Use

The first full sentence at the top of EIR p. IV.A.28 is revised as follows:

The U.S. Coast Guard station and Sector Facility, which is outside of the Project Area, is expected to remain and continue to operate at its existing site on Yerba Buena Island.

Additional text changes regarding the name of the U.S. Coast Guard facility and its acreage are made in other EIR chapters and sections, as shown below (deletions are shown in strikethrough and new text is underlined).

In EIR Chapter I, Introduction, the first sentence of the second paragraph on p. I.3 is revised as follows:

The U.S. Coast Guard also requested approximately 39-48 acres plus water area for facilities on Yerba Buena Island, and received authorization from the Navy for property transfer effective March 3, 1998, and November 27, 2002.

In EIR Chapter II, Project Description, the last sentence of the first paragraph on p. II.1 is revised as follows:

The Islands also include a U.S. Coast Guard Station and Sector Facility, a U.S. Department of Labor Job Corps campus, and Federal Highway Administration ("FHWA") land occupied by the San Francisco-Oakland Bay Bridge ("Bay Bridge") and tunnel structures.

The second sentence of the first paragraph on EIR p. II.6 is revised as follows:

Treasure Island contains approximately 404 acres of land, and Yerba Buena Island, approximately 150-160 acres.

The third sentence of the last paragraph on EIR p. II.6 is revised as follows:

The Navy has transferred approximately 37 acres in the center of Treasure Island to the U.S. Department of Labor for the Job Corps facility, approximately 39-48 acres of land on Yerba Buena Island to the U.S. Coast Guard, and approximately 18 acres of land on Yerba Buena Island to the Federal Highway Administration.

The third full paragraph on EIR p. II.11 is revised as follows:

U.S. Coast Guard facilities occupy approximately 39-48 acres of land on Yerba Buena Island adjacent to the Project Area. The U.S. Coast Guard Station and Sector Facility, on the southeast side of Yerba Buena Island, includes housing, administrative facilities, open storage and docks, buoy maintenance facilities, and a lighthouse built in 1872. Coast Guard facilities also include a vehicle tracking system facility on the northwestern part of Yerba Buena Island and Navigation Light No. 6 on the northern end of Treasure Island. The Coast Guard facilities are expected to remain in use in their present location for the foreseeable future.
In EIR Chapter III, Plans and Policies, the last sentence of the first paragraph on p. III.13 is revised as follows:

Except for the approximately 2 acres of existing tidelands on Yerba Buena Island, currently, none of the 150 acres of land on Yerba Buena Island is subject to the Tidelands Trust.

The last sentence of the second full paragraph on EIR p. III.14 is revised as follows:

The Tidelands Trust lands subject to the Exchange Agreement affect about 367 acres on Treasure Island and about 94 acres on Yerba Buena Island within the Development Plan Area and excludes the Jobs Corps campus on Treasure Island and the Coast Guard Station and Sector Facility and Caltrans properties on Yerba Buena Island.

In EIR Section IV.D, Cultural and Paleontological Resources, the second sentence of the first paragraph on p. IV.D.28 is revised as follows:

Troops were stationed on the southeastern part of the island, above a cove near the modern Coast Guard Station and Sector Facility.

Table IV.D.1: NRHP Listed Properties in the Development Plan Area, on EIR p. IV.D.31, is revised as follows:

(Revised) Table IV.D.1: NRHP Listed Properties in the Development Plan Area

<table>
<thead>
<tr>
<th>Resource Number</th>
<th>Resource Name</th>
<th>Year Constructed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yerba Buena Island</td>
<td>Senior Officers’ Quarters Historic District: The Nimitz House (Quarters 1); six other senior officers’ quarters (Quarters 2-7), associated garages (Building 205, Building 230), family quarters (Building 83), and formal landscaping elements of the area.</td>
<td>1900 - 1905</td>
</tr>
<tr>
<td>1, 2-7, 83, 205, 230</td>
<td>Nimitz House (individually listed and a contributor to district)</td>
<td>1900</td>
</tr>
<tr>
<td>10/267</td>
<td>Quarters 10 and its contributing garage (individually listed)</td>
<td>1948</td>
</tr>
<tr>
<td>262</td>
<td>Torpedo Assembly Building (individually listed)</td>
<td>1891</td>
</tr>
<tr>
<td>Treasure Island</td>
<td>Administration Building, Building 1 (individually listed)</td>
<td>1939</td>
</tr>
<tr>
<td>1</td>
<td>Hall of Transportation, Building 2 (individually listed)</td>
<td>1939</td>
</tr>
<tr>
<td>3</td>
<td>Palace of Fine and Decorative Arts, Building 3 (individually listed, Building 111 is identified as a component of Building 3)</td>
<td>1939</td>
</tr>
</tbody>
</table>

Note: This table excludes Yerba Buena Island buildings that are south of the Bay Bridge. They are currently located on the U.S. Coast Guard Station and Sector Facility. They are not within the Development Plan Area and are not subject to study in this EIR Section.

Source: San Francisco Planning Department, 2005 EIR.
In EIR Section IV.E, Transportation, the second sentence of the first full paragraph on p. IV.E.81 is revised as follows:

Primary access between the Coast Guard Station and Sector Facility and the eastbound on-ramp is via South Gate Road (which connects with North Gate Road).

The last sentence of the last paragraph on EIR p. IV.E.81 is revised as follows:

In addition, the longest potential queue the Coast Guard vehicles would have to wait in would be about one-tenth of a mile, based on the distance between the places such vehicles access the main YBI circulation route and the Bay Bridge. Accordingly, the Proposed Project would not be expected to substantially affect access to the Coast Guard Station and Sector Facility.

In EIR Section IV.J, Recreation, the first sentence of the first full paragraph on p. IV.J.5 is revised as follows:

Yerba Buena Island is an approximately 450-acre island in the middle of San Francisco Bay.\(^{16}\)

Footnote 16 on EIR p. IV.J.5 is revised as follows:

\(^{16}\) The Caltrans right-of-way for the Bay Bridge takes up about 18 acres of land area. The U.S. Coast Guard owns and operates a 39-acre facility south of the Bay Bridge. The Coast Guard Property is not included in the Project Area.

In EIR Section IV.K, Utilities and Service Systems, the second sentence of the last paragraph on p. IV.K.1 is revised as follows:

The eastern side of the island, including the Coast Guard Station and Sector Facility, has a gravity sewer system that drains to a pump station under the Bay Bridge at the eastern tip of Yerba Buena Island.

In EIR Section IV.O, Hydrology and Water Quality, the second sentence of the first full paragraph on p. IV.O.4 is revised as follows:

One small area of Yerba Buena Island near the Coast Guard Station and Sector Facility, on the eastern side of the island, contains sediments that hold groundwater.

The first sentence of the first paragraph on EIR p. IV.O.38 is revised as follows:

Near-surface groundwater is located in many portions of the Development Plan Area, including all of Treasure Island and low-lying portions of Yerba Buena Island (e.g., near the Coast Guard Station and Sector Facility).

The last sentence of the last paragraph on EIR p. IV.O.48 is revised as follows:

Because the Proposed Project encompasses many low-lying areas, in particular all of Treasure Island and some low-lying areas along the western flank of Yerba Buena Island near the existing U.S. Coast Guard Station and Sector Facility, a substantial portion of the
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Project Area, at current elevations and without future improvements, could potentially be at risk of inundation due to future potential sea level rise.

The second sentence of the first paragraph on EIR p. IV.O.49 is revised as follows:

For instance, if no action were taken, under a 55-inch sea level rise scenario, shorefront areas along the existing Treasure Island perimeter would be inundated during a mean higher high water (“MHHW”) tidal event, and areas surrounding the U.S. Coast Guard Station and Sector Facility on Yerba Buena Island could also become inundated.

In EIR Section IV.R, Agricultural Resources and Forest Land, the sixth sentence of the first paragraph on p. IV.R.1 is revised as follows:

Yerba Buena Island has a U.S. Coast Guard facility Station and Sector Facility (about 3948 acres) and a portion of the San Francisco-Oakland Bay Bridge (about 18 acres).

In EIR Chapter VII, Alternatives to the Proposed Project, the third sentence of the first paragraph on p. VII.5 is revised as follows:

The U.S. Coast Guard also requested approximately 3948 acres plus water area and the Federal Highway Administration (“FHWA”) requested approximately 18 acres for facilities on Yerba Buena Island.

The last sentence of the second full paragraph on EIR p. VII.6 is revised as follows:

The U.S. Coast Guard would continue to occupy 3948 acres on the south and east sides of Yerba Buena Island.

2.3.2 LOCATIONS OF RESIDENTIAL USES

Comment

North and East perimeters of T.I.: This side of the Island provides some excellent views of the Bay towards San Pablo Strait and the beautiful Berkeley Hills. At some future time it might be worth considering building some homes, only along the Perimeter Road, Such homes might also defray future increased expenses of the Project. (Neil Malloch) [44.3]

Response

The comment does not address the adequacy or accuracy of the EIR; it suggests that, in the future, the project sponsors should consider building residential uses along the perimeter road on Treasure Island. As discussed in EIR Chapter III, Plans and Policies, pp. III.12-III.15, approximately 217 acres on Treasure Island would be subject to the California Tidelands Trust Doctrine (“Tidelands Trust”). The Tidelands Trust is a legal doctrine that governs the use of tidal and submerged lands. Under this doctrine, residential uses are rarely allowed on land that is subject to the Tidelands Trust. The area along the northern and eastern perimeters of Treasure Island would be subject to the Tidelands Trust (see Figure II.3: Tidelands Trust Land Exchange,
in EIR Chapter II, Project Description, p. II.15). Therefore, residential uses would not be allowed in the area suggested in the comment.

2.3.3 ON-ISLAND SERVICES

Comment

In the land-use section of the EIR, it states that TIDI occupies the fitness center and gymnasium. For the record, we no longer operate the gym. It’s operated by the YMCA. However, we do use the former fitness center as a community center, and this is a critical resource for existing residents. It is a site of numerous community meetings and events, a weekly food pantry program, a computer lab and workshops. It provides a venue for residents to come together as a community. (Sherry Williams, Treasure Island Homeless Development Initiative) [TR.4.3]

Response

The comment clarifies that the existing gymnasium on Treasure Island is operated by the YMCA, not the Treasure Island Homeless Development Initiative. In EIR Section IV.A, Land Use and Land Use Planning, the second sentence in the last paragraph on p. IV.A.9 is revised as follows (new text is underlined):

TIHDI occupies the fitness center, and the YMCA operates the gymnasium.

Comment

We’re assuming at this point that the 48,500 square feet allocated to the community center and the 30,000 square feet for community services will be used to support everything from youth programming to a wellness center to a general purpose community center, like we have currently. It will be important to keep these basic services in place to support existing residents, as construction occurs, and until their replacements are developed. (Sherry Williams, Treasure Island Homeless Development Initiative) [TR.4.4]

Response

The comment asks for confirmation that the proposed community center and community services would be used to support a wide range of activities similar to those currently in place. The proposed community center and community services would be able to accommodate a variety of activities, including, but not limited to, a childcare facility, a general-purpose assembly space, a library, a senior center, a wellness center, or youth programs.

The comment states that it will be important to keep basic community services in place to support existing residents during construction until the new facilities have been completed. Basic community services will be maintained during construction until their replacements are developed.
Comment

1. To mitigate the significant transportation impacts of the project, an overall program level mitigation/principle measure is necessary: “As much as feasible, minimize the practical necessity for residents of the Project to leave the Island for routine (non-work) activities and purposes.” This will include not just essential services such as childcare, but also at build out occasional services such as dental care and popular activities like a neighborhood bar with entertainment. Price levels must be taken into account too, given that 30% of the population will be households eligible for affordable housing. Of course the larger population of 20,000+ at build-out will support a wider variety of uses than earlier phases can. But as a guiding principle this will be very important throughout the life of the Project. (John Elberling, TIDA Board Member) [22.1]

Response

The comment proposes a program-level objective designed to encourage a variety of affordable neighborhood-serving uses in order to minimize the number of off-island trips that would be made by the future residents. The Proposed Project would provide a variety of neighborhood-serving uses intended to minimize the number of off-island trips that residents would need to make. Please see the response to Comment TR.26.1, above, and also the responses in Subsection 2.7.3.12, Trip Distribution, and Subsection 2.7.3.13, Trip Generation, in Section 2.7, Transportation, of this Comments and Responses document.

As stated in EIR Chapter II, Project Description, p. II.79, the proposed Development Program is expected to involve four major phases that are anticipated to occur over a 15- to 20-year period. Phase 1 would include the installation of the infrastructure backbone and portions of the geotechnical stabilization; the subsequent phases would include the extension of infrastructure and ground improvements and development of the residential, commercial, open space/recreational, cultural, and institutional and public uses. Phase 2 is expected to overlap with Phase 1; Phases 3 and 4 may also overlap with other phases. As described in the response in Subsection 2.1.8, Phasing, in Section 2.1, Project Description, of this Comments and Responses document, the EIR is a project-level EIR and analyzes the Proposed Project at full buildout, providing an analysis that includes all phases of the Proposed Project. It does not analyze all impacts of interim phases in detail, because such an approach would result in a much longer and redundant document without aiding in the understanding of the Proposed Project’s impacts. Pursuant to Section 15378 of the CEQA Guidelines, a “project” is defined as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment …” Under this definition, the environmental analysis of a project should not split a project into two or more segments. In addition, impacts of individual phases may be less than those of the Proposed Project at buildout. For example, transportation impacts and traffic-generated noise impacts would be greatest when the largest number of residents, employees, and visitors were on the Islands, which would occur at full buildout. Although at early periods of the development, residents are likely to need to
travel off the Islands for purchases and services that would be available on the Islands during later phases of development, the amount of travel that would occur in these early periods would be less than that generated at full buildout.

Pursuant to Section 15131 of the CEQA Guidelines, the economic or social effects of a project shall not be treated as significant effects on the environment. However, the economic or social effects of a project may be used to determine the significance of physical changes caused by the project. The construction of the proposed neighborhood-serving uses would represent a physical change to Treasure Island and Yerba Buena Island. If those neighborhood-serving uses are not affordable, some of the residents would have to make off-island trips for basic products and services. These trips could be made by automobile or by transit. The environmental impacts of off-island trips are discussed in EIR Section IV.E, Transportation, pp. IV.E.74-IV.E.108.

**Comment**

And I want to thank Mr. Elberling for bringing up the concerns about jobs on the island, particularly, those that deal with neighborhood serving, and I think it is well analyzed in the EIR that there are, I believe, a total of around 451,000 square feet, between the commercial, retail, square footage on there, and maybe a little bit more, when we consider the hotels and perhaps even some of the recreational uses. But I think it is important that the residents, as it is analyzed, be able to find those uses that they use on a daily basis to be present on the island. And I think that’s good. *(Michael Antonini, Planning Commission)* [TR.26.1]

**Response**

The comment states that while the EIR adequately analyzes the jobs that would be provided by the proposed neighborhood-serving uses, it is important that the neighborhood-serving uses are actually developed. As discussed in EIR Section IV.A, Land Use and Land Use Planning, on p. IV.A.16, the Proposed Project would include a total of 207,000 square feet (“sq. ft.”) of retail space, 150,000 sq. ft. of entertainment space, and 100,000 sq. ft. of office space.

The proposed Treasure Island and Yerba Buena Island Design for Development document *(Design for Development)* contains the standards and guidelines that apply to all future development within the Project Area. As shown in Table T3.c: Treasure Island Land Use Standards, on pp. 151-154 of the proposed Design for Development, examples of neighborhood-serving uses that would be allowed on the Islands include automobile service stations; bars, cafes, and restaurants; business, medical, and professional offices; childcare facilities; dry cleaners and laundromats; financial services; grocery stores; outpatient medical clinics; recreation uses; religious institutions; retail establishments; and theaters.

The Proposed Project provides for many of the neighborhood-serving uses listed above, which would provide residents with many of the essential day-to-day products and services that they would need. These neighborhood-serving uses would be within biking/walking distance of the
residential uses, thus minimizing the number of off-island trips that residents would need to make. The Disposition and Development Agreement between Treasure Island Community Development, LLC (“TICD”) and TIDA would include obligations that require TICD to provide a minimum of 60,000 sq. ft. of retail space, including the grocery store. The timing of such required improvements would be proportionate to the number of residential units constructed so that essential day-to-day products and services would be available to residents starting in the early phases of the Project.

In addition, as discussed in EIR Section IV.C, Population and Housing, on p. IV.C.17, proposed new uses under the Proposed Project include about 140,000 sq. ft. of new commercial and retail space; approximately 100,000 sq. ft. of new office space; adaptive reuse of historic Buildings 1, 2, and 3 with up to approximately 311,000 sq. ft. of commercial space, which includes about 67,000 sq. ft. of adaptively reused retail space; approximately 500 hotel rooms; 300 acres of parks and open space; bicycle, transit, and pedestrian facilities; a Ferry Terminal and intermodal Transit Hub; and new and/or upgraded public services and utilities, including a new or upgraded wastewater treatment plant, public school, and combined police and fire station. The operational employment anticipated from the Proposed Project is expected to total about 2,920 employees, with net new employment totaling about 2,600 jobs in the Development Plan Area. Much of the proposed commercial and retail space would serve residents of the Islands.

Comment

As we discussed today, the traffic analysis mitigation focuses on transit options, not providing the services on Treasure Island that would reduce transportation. Since public transportation is voluntary, it is difficult to determine the amount of traffic that would be reduced, but the majority of impacts are deemed significant and unavoidable. (Rosie Masters) [TR.17.2]

Response

The comment states that the traffic mitigation measures focus on providing public transit as a way of discouraging automobile use instead of providing a variety of neighborhood-serving uses within biking/walking distance of the future residential uses. The Proposed Project is designed to accommodate neighborhood-serving retail services to meet the day-to-day needs of residents. Please see the response to Comment TR.26.1, above, and also the responses in Subsection 2.7.3.12, Trip Distribution, and Subsection 2.7.4.5, Travel Mode, in Section 2.7, Transportation, of this Comments and Responses document.

Comment

The Mews: This, or some nearby street in the SW sector should be brightly lit at least in the early hours of the night, for the restaurants, hotels, stores, cinemas, etc. that had better be there or else everyone on T.I will head to the city on most nights. (Neil Malloch) [44.2]
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Response

The comment states that the Mews and other streets leading to the restaurants, hotels, stores, cinemas, etc., located in the Island Center should be adequately illuminated at night. As discussed in EIR Section IV.B, Aesthetics, pp. IV.B.27-IV.B.29, implementation of the Proposed Project would increase the nighttime lighting requirements within the Development Plan Area. Lighting for the Proposed Project would include exterior lighting of streets, sidewalks, parking areas, public spaces, and building entrances.

The comment stresses the importance of developing entertainment uses such as restaurants, hotels, stores, and cinemas in order to minimize the number of off-island trips that residents would need to make. Please see the response to Comment TR.26.1 under Section 2.3.3, On-Island Services, above.

Comments

2. As I understand it, no public assembly facility, which might include a church at any location, is included in the development program that the EIR is evaluating, and so if some property owner proposed such a use in the future, it could not be allowed. This is a serious oversight. Per 1. above, such flexible multiuse facilities are potentially important to mitigate transportation impacts. Also, “zoning out” any kind of future religious facility for residents of faith would be ethically reprehensible. A cumulative total of 25,000 sq ft should be included in the Program for such non-commercial potential public assembly facilities, whoever may build them (not necessarily the Developer). Also, I see no potential location provided in the Plan and the DEIR for such a free standing building. An appropriate general area should at least be designated. (John Elberling, TIDA Board Member) [22.2]

The EIR cites that there is space allocated for community center and redevelopment, and we’re very pleased to see this. While we’re in an interim phase on the island now, over the past 13 or so years, we have tried to create and support community by providing, at least, basic services, such as childcare, youth programming, recreational programming, and so on. It’s very important to us and we believe the future of the new Treasure Island community to have such services in place and to plan for them.

The one particular detail that I couldn’t find in a document at all and I can’t find in a program is public assembly. There are all kinds of reasons that residents need to assemble in groups in order to do things. There is nothing in our program, and I asked, we don’t have any such facilities, specifically, in our development program today. I think that’s a glaring omission. It’s needed. (John Elberling, TIDA) [TR.23.6]

I wanted, though, to focus on one everyday thing that particularly stands out in my mind, which is communities of faith need places to gather on Fridays, Saturdays, or Sundays, and various holy days, respectively, throughout the year, to share their faith. And when I asked, where can there be -- could there be a church on Treasure Island? Where would congregations of any description gather, there is no provision for this. It just hasn’t been included. I asked if some organization could buy a piece of land and build a church, and, basically, the answer was no. And I really -- and I’m a secular person, but I understand clearly that communities of faith are really vital parts
of building real cities and real neighborhoods. And to exclude that almost -- well, I’m not saying it’s conscious, but to exclude it de facto, it’s something I really think is very inappropriate.

In an environmental sense, of course, if we do not accommodate them on the island, they will be driving on Fridays, Saturdays, and Sundays to various places elsewhere. And -- but even beyond that, we will lose the resource of their good energies to building our neighborhood, and I don’t think it’s right. There is, of course, a church on the island now. It’s a Christian church, but it’s a church. *(John Elberling, TIDA)* [TR.23.7]

**Response**

The comments address the lack of public assembly uses in the proposed development program. As discussed in the response in Subsection 2.6.2, Navy Chapel, in Section 2.6, Historic Resources, of this Comments and Responses document, the project sponsors have decided to retain the existing chapel on Treasure Island. Although the development program evaluated in the EIR does not identify specific locations for other public assembly uses or religious institutions, these land uses are among the types of land uses that could be developed under the Proposed Project. As shown in Table T3.c: Treasure Island Land Use Standards, on pp. 151-154 of the proposed *Design for Development*, religious institutions would be allowed. Such uses would require a conditional use permit from either TIDA or the Planning Commission, depending on the location of the proposed use.

One of the comments states that the presence of religious institutions on the Islands would reduce the need for the future residents to make off-island trips on weekends and on holy days. Please see the response to Comment TR.26.1 under Section 2.3.3, On-Island Services, above, and also the responses in Subsection 2.7.3.12, Trip Distribution, and Subsection 2.7.3.13, Trip Generation, in Section 2.7, Transportation, in this Comments and Responses document.

**Comments**

But out of that, I think there is a crucial missing overarching mitigation for the whole project that really needs to be stated as a mitigation, and it’s an important one to guide its long-term development over the next 20 to 30 years. Which is that, the project should minimize the necessity for residents to travel off island for their everyday needs and lives. We have to, in other words, include on the island, as much of the facilities and services as feasible that residents routinely need. Because otherwise, they will have to go to -- onto the bridge or onto the ferry or onto something to come to the mainland. *(John Elberling, TIDA)* [TR.23.4]

I am using an example, which is noted in a document but not quantified, is childcare. All working parents are going to have arrangements for childcare. If it’s not on the island, they are going to have to go off the island to do that, and they will almost certainly drive a car to do that. That’s an obvious example of something that we have to be sure that there is the most adequate childcare we’ve ever seen in a Master Plan San Francisco neighborhood. And that concept is not in this document, although clearly it has an environmental impact. *(John Elberling, TIDA)* [TR.23.5]
Response

The comments address the need to provide a variety of neighborhood-serving uses on the Islands in order to minimize the number of off-island trips that residents would need to make. Childcare is mentioned as a specific example of a neighborhood-serving use that should be provided. A childcare center currently operates on Treasure Island. Childcare would be a permitted use in the proposed Design for Development, and, as noted in Table II.1: Proposed Development Plan, in EIR Chapter II, Project Description, p. II.18, childcare is included among the basic community services that would be built on Treasure Island. Please see the response to Comment TR.26.1 under Section 2.3.3, On-Island Services, above.

Comment

Whether or not Board Member Elberling is right or not about the 47 -- 1947 with the church issue there, I think this is an environmental document. Assembly could be one issue, but I don’t remember any time that we have to address assembly issues in any other EIRs. (William Lee, Planning Commission) [TR.24.5]

Response

The comment states that the purpose of the EIR is to analyze the environmental impacts of the Proposed Project, not to address the appropriateness of including or excluding certain types of land uses. Those decisions are described in Table T3.c: Treasure Island Land Use Standards, on pp.151-154 of the proposed Design for Development. The comment is acknowledged.

2.3.4 HEIGHT LIMITS

Comment

Significant Change in Height Limits: Although the DEIR admits that increasing the height limit on TI/YBI from the existing 40X feet to heights up to 650 feet would conflict with existing zoning controls applicable to TI/YBI, and would require amendments to the General Plan and Planning Code, the DEIR concludes (Impact LY-3) that impacts on existing land use and land use planning would be less than significant. This is simply not an objective conclusion.

Please respond to each the following requests/questions/comments:

As to the DEIR’s conclusion that the Redevelopment Project would not have a substantial impact upon the existing character of the vicinity:

- Please explain objectively how the proposed height increase from 40 feet to up to 650 feet would not have a substantial impact upon the existing character of Treasure Island and the entire San Francisco Bay in terms aesthetics.
- Please explain how the proposed height increase from 40 feet to up to 650 feet would not have a substantial impact upon the existing character of Treasure Island and the entire San Francisco Bay in impacts upon cultural resources and their setting.
• Please explain how the Project’s conflicts with the existing 40 ft height limits (and associated population increases – residents and visitors) would not impact traffic, air quality and greenhouse gas emissions.  (Vedica Puri, President, Telegraph Hill Dwellers) [39.13]

Response

The comment states that the EIR is not objective in its conclusion that the increased height limits would have less-than-significant land use impacts and requests an explanation of how the increased height limits would not have significant impacts on aesthetics and cultural resources. The comment also requests an explanation of how the Proposed Project’s conflicts with the existing height limit would not impact traffic, air quality, and greenhouse gases. Although the increased height limits being proposed by the project sponsors conflict with the existing height limit, the conflict itself is not a physical environmental effect. (See Lighthouse Field Beach Rescue v, City of Santa Cruz (2005) 131 Cal.App.4th 1170, 1207.) However, the buildings that could be constructed as a result of the increased height limits, in combination with the increased resident population that would result from this construction, would have physical environmental effects. Land use impacts are discussed in EIR Section IV.A, Land Use and Land Use Planning, pp. IV.A.23-IV.A.28. Impacts on aesthetics are discussed in EIR Section IV.B, Aesthetics, pp. IV.B.21-IV.B.27. For a discussion of impacts on cultural resources, see EIR Section IV.D, Cultural and Paleontological Resources, pp. IV.D.58-IV.D.61. Traffic impacts are discussed in EIR Section IV.E, Transportation, pp. IV.E.67-IV.E.141. Impacts on air quality are discussed in EIR Section IV.G, Air Quality, pp. IV.G.38-IV.G.58. For a discussion of impacts related to greenhouse gas emissions, see EIR Section IV.H, Greenhouse Gas Emissions, pp. IV.H.44-IV.H.46.

The EIR analyzes the environmental impacts of the Proposed Project based on maximum proposed building heights shown in Figure II.6a: Treasure Island Maximum Height Limit Plan, on EIR p. II.25, and on Figure T4.p: Maximum Height Limit Plan, on p. 157 of the draft Design for Development. The project sponsors have lowered some of the proposed maximum building heights (among other changes, the tallest tower would be reduced from 650 feet to 450 feet) in the final update to the proposed Design for Development that will be considered by the decision-makers. Therefore, the EIR provides a conservative analysis of the environmental impacts of the Proposed Project.

2.3.5 DENSITY

Comment

Significant Change in Density: The DEIR discloses that the Planning Code’s density would also have to be amended and would no longer apply to the Redevelopment Plan area. Instead, TI and YBI would be subject to a maximum number of residential units. According to the DEIR, this would increase the total number of dwelling units from the current 805 dwelling units to the
8,000 dwelling units – increasing the population from 1,820 persons to 18,640 persons, representing an increase of 16,820 net new persons on TI/[Y]BI.

**Please respond to the following requests/comments:**

- Please explain objectively how this increase in density limits, with the accompanying increase in resident population *from 1,820 persons to 18,640 persons* would *not* have a substantial impact upon the existing character of Treasure Island and Yerba Buena Island, and the entire region, in terms of traffic and air quality. *(Vedica Puri, President, Telegraph Hill Dwellers)*

**Response**

The comment appears to state that the EIR erroneously concludes that the increased density limits, which would result in a population increase of approximately 16,280 residents, would not have a substantial impact on traffic and air quality. Some of the Proposed Project’s impacts on traffic and air quality were determined to be Significant and Unavoidable with Mitigation or Significant and Unavoidable. For a discussion of traffic impacts, see EIR Section IV.E, Transportation, pp. IV.E.67-IV.E.141. Air quality impacts are discussed in EIR Section IV.G, Air Quality, pp. IV.G.38-IV.G.58. Land use impacts are discussed in EIR Section IV.A, Land Use and Land Use Planning, pp.IV.A.23-IV.A.28; the analysis concludes that the Proposed Project’s impact on the character of the Islands would not be significant. The commentor’s disagreement with this conclusion may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.