2.21 ALTERNATIVES

2.21.1 PURPOSE OF ALTERNATIVES IN EIRs

Comments

So regarding the EIR with the transportation and the environment and some of the alternatives, again, I am going back to the role of the EIR, how we look at the alternatives, how we look at -- and I think we have adequately looked at the alternatives. We know we have -- there is mitigation issues, but going back again, the public should understand, this is a document to look -- how we look at all the alternatives. (William Lee, San Francisco Planning Commission) [TR.24.6]

As stated on page VII.1:

The analysis of alternatives is of benefit to decision-makers because it provides more complete information about the potential impacts of land use decisions, and consequently a better understanding of the inter-relationships among all of the environmental topics under evaluation.

The importance of having a basis of comparison to truly understand the Proposed Project’s enormous auto-related impacts and the effectiveness of various possible mitigation measures outweighs the unproven possibility that reducing driving might make the project less profitable. (Ruth Gravanis) [31.9]

Need for Alternatives  Because this range of options cited above (“flex” and “variants”) is a moving target that cannot be nailed down for study, it would be more appropriate to set out several Alternatives that would contain this range of options and tag them Small, Medium and Large. In any case, CEQA requires that the alternative with the highest numbers, greatest size, most dense, etc. is the subject to be studied in the EIR. It is self-evident that options with lower numbers would have less environmental impact. (Jennifer Clary, President, San Francisco Tomorrow) [38.7]

- Provide a comparative analysis of all alternatives, including the “Minimum-Impact Alternative.” For each alternative and variant, please assess, presented in a manner that facilitates comparisons between and among the alternatives, the following:
  - The total quantity of greenhouse gases and other criteria pollutants generated per year;
  - Vehicle miles traveled;
  - Impacts on the Tuolumne Watershed;
  - Walking time radii to transit stops for YBI as well as TI;
  - Impacts on YBI’s biodiversity for various levels of management of harmful species;
  - Transportation impacts on the entire region, including Bridge-related backups on I-80 in the East Bay and on San Francisco streets and freeways;
  - Off-peak analysis of transportation impacts; and
  - Respective carbon footprints, including impacts associated with demolition/deconstruction, disposal and re-building. (Vedica Puri, President, Telegraph Hill Dwellers) [39.86]
For each alternative and variant, the EIR should assess, presented in a manner that facilitates comparisons between and among the alternatives, the following:

- The total quantity of greenhouse gases and other criteria pollutants generated per year;
- Vehicle miles traveled;
- Impacts on the Tuolumne Watershed;
- Walking time radii to transit stops for YBI as well as TI;
- Building durability: the EIR should undertake a comparative analysis of durable and non-durable high-rise buildings, assessing all environmental impacts, including the respective carbon footprints. The analysis should include all impacts related to seismic activity and any associated demolition/deconstruction, disposal and re-building. The EIR should also describe the performance standards that will apply to the proposed buildings in the various alternatives;
- Impacts on YBI’s biodiversity for various levels of management of harmful species;
- Transportation impacts on the entire region, including bridge-related backups on I-80 in the East Bay and on San Francisco streets and freeways; and
- Off-peak analysis of transportation impacts. (Jared Blumenthal, Department of the Environment, letter of February 25, 2008, submitted as an attachment to comment letter from Vedica Puri, President, Telegraph Hill Dwellers) [39.91]

Response

CEQA Guidelines Section 15126.6 addresses the purpose and required content of the consideration and discussion of Alternatives. Section 15126.6(c) of the CEQA Guidelines (a) states that 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 merit of the alternatives.” Refer to Response 2.21.2 below for a discussion of a Reduced Parking Alternative.

The range of options referred to as “flex” zones and “variants” are not project alternatives. As discussed in Chapter II, Project Description (Vol. 1) on EIR page II.24 - 26, flex zones refer to specific areas within the Project Area in which the height limits of buildings would be taller than what would be allowed under base height limits. Project variants describe variations on infrastructure features of the Proposed Project. Unlike the alternatives to the Proposed Project, each variant modifies limited features or aspects of the Proposed Project, and do not alter the land use components or overall Development Program.

Section 15126.6(c) of the CEQA Guidelines state that the range of potential alternatives “shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA does not require that the alternative with the highest number, greatest size, or most dense development be studied in the EIR. Because of the different mix of uses and transportation options of the two build alternatives, Alternative B, Reduced Development Alternative, and Alternative C, No Ferry
Service Alternative, lower density development would not necessarily have the least significant environmental impacts. This point was noted by several commenters during the public scoping process for this EIR in 2008.

Chapter VII. Alternatives of the EIR provides an analysis and comparison of a range of alternatives which comply with Section 15126.6 of the CEQA Guidelines. As stated on EIR p. VII.1, an EIR need not consider every conceivable alternative to a proposed project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. A comparative analysis of the specific issues listed in the comments above is not required by CEQA, and would be relevant only to the extent that the issues relate to potential significant environmental impacts as compared to the Proposed Project. See also the responses in Subsection 2.21.9, Environmentally Superior Alternative, and Subsection 2.22.4, Public Scoping.

The Alternatives discussed on EIR pp. VII.1 - VII.72, include the No Project Alternative, which would entail minimum environmental impacts. Other elements listed in the comment that could result in significant environmental effects as defined by CEQA, such as greenhouse gas emissions, vehicle miles traveled, impacts on biodiversity on Yerba Buena Island, and Bay Bridge and regional transportation impacts, are discussed and compared in the discussion of alternatives.

The comment identified as from the San Francisco Department of the Environment dated February 25, 2008, and attached to the comment letter from Telegraph Hill Dwellers appears to be a formal response to the Notice of Preparation and public scoping process for this EIR. A letter dated February 25, 2008, was received by the Planning Department from the San Francisco Department of the Environment during public scoping. A copy of this letter is included in Appendix B, Public Scoping Report, in the EIR (Vol. 3). However, the letter attached to the Telegraph Hill Dwellers includes different text than the official letter received by the Planning Department. The comment included above was not in the formal scoping letter.

2.21.2 REDUCED PARKING ALTERNATIVE

Comments

The only thing that sort of struck me would be an alternative, I feel should be provided. And kind of along the lines of what Commissioner Moore said. But I’m focused on the parking piece that would look at an alternative to what we have here, which would see a reduction in parking, a project alternative with a reduction in parking. So I would like to see something like that provided in the future.

There is some much rhetoric around sustainability. We have AB32 and SB375. Mandates that are coming from the federal government, as well as state government, that is directing, I think, local planning efforts to consider reduction in carbon emissions. And it seems to me that, given
that focus or that -- we should be looking at an alternative that would provide at least a .5 or something, some reduction in parking. (Christina Ologue, Planning Commission) [TR.21.1]

…indicates that the EIR should include a minimum impact alternative instead of a less intensive development alternative. What really the challenges are here is, to balance high density with a decrease in cars, and not use parking as an argument for economic feasibility. I regret that, and I strongly urge that the EIR indeed, looks at, with the challenges it poses.

I think if we want to be truly a green neighborhood, we need to be able to at least go through the motions and examine how we can do that with an emphasis on a robust transportation network. (Kathrin Moore, San Francisco Planning Commission) [TR.20.3]

Third, page IV.E.139 relies on a strawman argument when it states that with “no” offstreet parking, there would be insufficient funding for transit service and the TDM Plan. If page VII.75 is accurate, proponents of a reduced-parking alternative were not asking for a prohibition on all offstreet parking. They instead requested consideration of parking maximums similar to maximums that the City has established in other neighborhoods where the City has adopted a strategy of minimizing automobile use. The EIR should evaluate how various reduced-parking scenarios would affect the TDM program. As pointed out previously in this letter, reduced residential parking would apparently not have any direct effect on revenues. Reduced supply of commercial parking conceivably might reduce revenue, or it might increase revenue by increasing the prices that could be charged for parking, or it might be a wash. It’s impossible to tell given the lack of analysis in the DEIR. (Christopher Pederson) [5.5]

The DEIR fails to adequately explain its refusal to evaluate a reduced-parking alternative. There appear to be ways to reduce parking supply (e.g., for affordable units) that would be both environmentally beneficial and do no harm to the financial viability of the project. The final EIR should therefore include analysis of a reduced-parking alternative or provide a reasonable, accurate, and internally consistent explanation for its refusal to do so. (Christopher Pederson) [5.7b]

The DEIR for the TI/YBI Redevelopment Project is legally and practically insufficient because it does not include study of a true environmentally superior alternative. Such an alternative would include enough density to support realistically cost-effective public transit and neighborhood-serving retail businesses. It would also minimize parking.

I urge the Department to include a full and impartial analysis of such an alternative in the FEIR. (Donald Forman) [11.1]

It makes sense, therefore, to analyze a “truly environmentally superior alternative” whose major difference from the Proposed Project is its decreased reliance on the private auto and its significantly less impact on traffic and transit currently assessed as “Significant and Unavoidable with Mitigation” in numerous locations. For the sake of convenience, this comment letter will use the term “Reduced Driving Alternative,” though other labels would work as well. It is similar to, but not the same as, the “Reduced Parking Alternative” that is described and rejected in the DEIR. (Ruth Gravanis) [31.3]

The Proposed Project is to be commended for specifying that parking spaces will be unbundled from residential units. In the Reduced Driving Alternative, a dedicated parking space could only be rented and not purchased, even if the dwelling unit is purchased. (Ruth Gravanis) [31.5]

Whether or not deemed economically infeasible by the Project Sponsor, the DEIR should include an analysis of a Reduced Driving Alternative in which the provision of adequate transit service is not dependent on car-generated revenues. The analysis should take into account that the more
people taking transit, the cheaper per passenger mile to provide that transit. And the fewer cars on the road, the more reliable and efficient the bus transit will be. (Ruth Gravanis) [31.8]

The analysis should also include the increased desirability of living on and visiting the islands due to greater safety, especially for families, and reduced noise and pollution. Also include the increase in bicycle use that is likely to result from having fewer cars on the roads, especially on Macalla and Treasure Island Roads. (Ruth Gravanis) [31.10]

Please also note the following, from AB 981 (Leno), Treasure Island Transportation Management Act:

CHAPTER 9. TREASURE ISLAND TRANSPORTATION MANAGEMENT

1967. This act shall be known and may be cited as the Treasure Island Transportation Management Act.
1967.1. The Legislature finds and declares all of the following:
(a) It is essential for the economic well-being of the state and the maintenance of a high quality of life that the people of California have efficient transportation systems that will reduce traffic congestion, vehicle miles traveled, and greenhouse gas emissions, and improve travel times and air quality.
(b) In 2006, the Legislature passed Assembly Bill 32 (Ch. 488, Stats. 2006), which enacted the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), a landmark act that establishes a first-in-the-world comprehensive program of regulatory and market mechanisms to achieve real, quantifiable, cost-effective reductions of greenhouse gases.
(c) Implementation of the California Global Warming Solutions Act of 2006 will require creative and innovative solutions, including strategies designed to integrate land use and transportation measures to reduce vehicle miles traveled and traffic congestion, improve travel times, and encourage transit use.
(d) The proposed development of Treasure Island includes an innovative and comprehensive land use and transportation program designed to discourage motor vehicle usage, reduce vehicle miles traveled, encourage public transit, and serve as a model of sustainable neighborhood development. An element of the transportation program is the use of congestion pricing.
(h) The purpose of the Treasure Island transportation program is to accomplish all of the following:
(1) To facilitate the implementation of an innovative, sustainable transportation program for Treasure Island that will encourage public transit, bicycle, pedestrian, and waterborne modes of transportation, reduce vehicle miles traveled, and minimize the impact of Treasure Island development on the system of state and local roadways affected by the San Francisco-Oakland Bay Bridge, as well as on the bridge itself, in furtherance of the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code).

How can we say that the development will reduce vehicle miles traveled and minimize the impact on the bridge when the DEIR states that the Proposed Project will have significant and unavoidable impacts on the bridge?

It is essential to identify and fully analyze an alternative that complies with AB 32, AB 981, and the Proposed Project’s own objectives. That has not been done. (Ruth Gravanis) [31.11]
We agree with Ruth Gravanis and disagree with MEA’s rejection of the low-parking alternatives. The DEIR does not adequately support the contention that providing fewer parking spaces will make the project economically infeasible. Given that the project’s purpose is to create a world-class model of sustainable, carbon-neutral development the sponsors should not create an economic pro forma that depends on parking revenues, thereby creating an incentive for them to encourage driving. (Arc Ecology) [28.12]

Based on the above, the Sierra Club requests that the EIR analyze an alternative project with minimum transportation impacts to include:

1) At least 8,000 units because this residential density seems to provide an adequate market size for most necessary continuous retail so that residents will not have to regularly drive off the island;
2) Fewer than 4,000 unbundled residential off street parking spaces, including car share because: a) The Planning Department produced a paper showing that 1:2 parking was adequate for SOMA, a short bus ride away; b) This project will have good transit like SOMA; c) This project will have a higher percentage of affordable units than SOMA and lower income people will own fewer cars; d) While fewer people will walk to work than in SOMA the necessity of less driving is even more clear today. e) Expanding on the analysis included in the Appendix, of the impacts of delay and cost on drivers, other reasons for less parking, on the island, include: probable congestion pricing fees to enter or leave San Francisco’s downtown on top of the proposed TI/YB congestion pricing exit fees; no expectation that sufficient additional parking will be provided in the downtown for all of the additional drivers; improved transit to other San Francisco areas to meet the transit needs induced by congestion pricing; and reduced construction costs, on TI, for less parking, with less of the parking below sea level.
3) An expanded “prepaid transit voucher” requirement including all adults and reduced fare passes for all senior and high school age residents because a majority of trips are not to work sites.
4) Limiting the total area of commercial services to those that will actually reduce the need for residents to drive off the island for services, more than the services increase the desire for others to drive to the island for these services. Driving long distances from the mainland and paying Bay Bridge tolls and possible congestion fees to enter and leave the island does not seem probable anyway and we are concerned that additional commercial spaces, along with its parking spaces (see 5 below) will provide additional parking for residents. This commercial limit should not preclude essential services for visitors and if regional-serving shopping is provided it should not be perceived as requiring a car to take purchases home.
5) Reduced supply of off-street parking with market rate fees for commercial services for: a) Hotels at 0.1 parking spaces per room; b) Retail and “Flex” (commercial) Space at 0.2 spaces per 1,000 square feet, same as downtown San Francisco; and c) Marina at 0.3 parking spaces per berth; and reduced open space parking based on greater use of shuttles and transit. Any commercial off-street parking provided should incur parking fees that are at least as high as downtown San Francisco so that the availability of cheap parking will not induce people to drive.
6) Reduced curbside parking to provide pedestrian ambiance improvements (mini parks etc.); and 24/7 metering with market rate fees to induce drivers to park off-street rather than cruising around looking for cheaper parking along with night rates high enough such that residents will not chose curbside parking over residential off street parking.
7) Complete transit equity relative to: island residents, Muni and AC and their riders and TI ferry riders vs. bus riders. The EIR should show the total amount of subsidy over fare box revenue for the: ferry; the Muni 108 bus and AC buses serving TI. This should be broken down, in two ways, to show the subsidy contributed by TI and all other sources. We note that when this project was initially conceived the subsidy for each ferry ride from Marin was greater than the subsidy for each bus rider. It was not equitable, at that time, to provide a greater subsidy, from Golden Gate Bridge tolls, for those willing to pay more for a more luxurious ride than those who could only afford the bus. This inequity has since been corrected. In the same way it is not equitable for the subsidy for TI ferry riders to be greater than the subsidy for bus riders on essentially the same route. The EIR should be revised to analyze ridership for the bus and ferry when ferry fares are increased to over all ferry costs less the same amount of subsidy per ride as the 108 bus. It is good that the TI congestion charges will be used to fund transit. However the distribution of these funds should be equitable and also fund improvements for: pedestrians; bicyclists; sailors (see 16 below); additional recreational shuttles; bus transit and not used mostly for ferry subsidies. The EIR should analyze driving changes with this redistribution of funding.

8) Providing one ramp to the bridge in each direction that will allow buses and HOV vehicles to bypass all other traffic approaching the bridge and including a flashing warning light indicating an entering bus on the bridge right side lanes.

9) Adequate bus service because the EIR shows additional service increases use.

10) Stop-on-request Muni bus stops on Yerba Buena so that more YBI residents can use the bus without having to transfer from the shuttle.

11) Fareless shuttle service, as proposed, and nearly fareless Muni bus service on the island. The Muni bus could appear fareless for all island residents and visitors and fareless for those with a fast pass at the bus terminal, proof of payment boarding area. Those entering the POP area with a transfer will pay their return fare in advance. Those entering the POP area with neither a fast pass or transfer will purchase a two-way ticket as they enter the boarding area. This will speed up bus service and increase ridership.

12) A community service area including: library depot; minimum post office and UPS; food court and coffee shops; religious and community meetings areas etc. This will further reduce the need to drive off the island and increase the commercial viability of other services.  

(Howard Strassner, Emeritus Chair, Transportation Committee, Sierra Club, San Francisco Group) [35.4]

Reduced Parking alternatives: One or more alternatives should include reduced parking. San Francisco has consistently used reduced parking as a strategy to meet its environmental, transportation, and housing affordability goals, as well as the objectives of the city’s General Plan and area plans, in every neighborhood plan approved over the past decade and before, including the Downtown Plan (1985), Rincon Hill Plan (2005), Downtown Parking reform (2006), Market & Octavia Plan (2006), Mission Plan (2008), Eastern SoMa Plan (2008), Showplace Square/Potrero Hill Plan (2008), Central Waterfront Plan (2008), and Balboa Park Plan (2009) MEA’s conclusion that a reduced parking alternative is “infeasible or did not meet most of the Proposed Project’s basic objectives.” (p. S.86) is laughable. If it is feasible in every single other neighborhood plan in San Francisco, why is it infeasible for TI? Also, this plan is the first to contain explicit sustainability goals, and is the first neighborhood plan to be undertaken since the Passage of AB 32 and SB 375, which make reducing greenhouse gas emissions a requirement of state law. A reduced parking alternative will better meet ‘The proposed project’s basic objectives’ than the alternatives assessed in the DEIR.
Similarly, the document’s rejection of “Measures to Reduce Automobile Ownership” as “infeasible or did not meet most of the Proposed Project’s basic objectives.” (p. II.7) is not supported by evidence, and renders the DEIR’s evaluation of alternatives inadequate.

A reduced parking alternative should include:

* limiting residential parking to less than one parking space per residential unit. Residential parking ratios in recently adopted plans range from one space for every four units to three spaces for every four units.
* limited commercial and visitor parking.
* unbundled residential and commercial parking.
* limiting on-street and public parking, and pricing it in keeping with SF park program standards.
* mandatory participation in transportation demand management programs, including transportation brokerage services, providing transit passes to all residents workers, etc.
* other transportation management strategies which further the project’s land use, transportation, and sustainability goals, and reduce the environmental impacts of the project. (Tom Radulovich, Livable City) [37.2]

It is also not clear why this document fails to identify an alternative that utilizes parking formulas employed in the rest of San Francisco. It seems wholly inappropriate for a community with limited access to provide not only 1:1 residential parking, but an additional 3100 spaces for other uses.

Recommendation:
Provide an environmentally superior alternative that, at minimum, utilizes existing downtown parking ratios, reinstates neighborhood serving retail uses, and includes ferry service as means to reduce bridge congestion due to the project. (Jennifer Clary, President, San Francisco Tomorrow) [38.10]

Only by increasing public transit in the form of non-road transit, i.e. ferries, can auto trips be decreased. A regional shopping mall would increase, not decrease, the intensity of use. Further, it is not just by reducing the number of dwelling units and the number of parking spaces that transportation impacts would be lessened, as long as road-based (and bridge-based) travel is all that exists. Such a reduction would require a different mode, that is, ferries, a water-based mode. This mode of transit was envisioned from the very beginning of planning efforts for the islands more than twenty years ago; this has been the only way to bring numbers of people to Treasure Island without severe impacts to the Bay Bridge. (Jennifer Clary, President, San Francisco Tomorrow) [38.20]

The DEIR considers three (3) alternatives to the Proposed Project. In addition to the “no project alternative,” it includes an analysis of a “reduced development alternative” and a “no ferry service alternative.” The DEIR is inadequate because it fails to consider a “Minimum-Impact Alternative” or and “Environmentally Superior Alternative” that reduces or avoids the significant traffic impacts of the Proposed Project.

As it is clear from the DEIR, neither the reduced development alternative nor no ferry service alternative would reduce the significant environmental impacts of the project. In fact, they increase the significant traffic impacts. (Vedica Puri, President, Telegraph Hill Dwellers) [39.80]

Without the inclusion of a “Minimum-Impact Alternative” or “Environmentally Superior Alternative” the DEIR is inadequate under CEQA because it fails to inform the decision makers and public citizens of a potentially feasible alternative that would reduce or avoid the significant
traffic and air quality impacts of the Proposed Project identified in this DEIR. Without a “Minimum-Impact Alternative,” the decision makers and the public cannot make an informed decision. (Vedica Puri, President, Telegraph Hill Dwellers) [39.82]

- Please include a “Minimum-Impact Alternative” or “Environmentally Superior Alternative” instead of the “Reduced Development Alternative.” The Minimum-Impact Alternative should call for less use of the private automobile and higher goals for energy efficiency, carbon neutrality, water quality and resource conservation. The Minimum-Impact Alternative would include all of the characteristics listed by Mr. Jared Blumenfeld, Director, SF Environment, to Mr. Bill Wycko, dated February 25, 2008, which letter is attached hereto as Exhibit C, and by this reference incorporated herein (the “Blumenfeld Letter”). (Vedica Puri, President, Telegraph Hill Dwellers) [39.84]

- Is there a scenario with enough density for the residents to meet their basic retail and service needs on the islands with a maximum of transit options and a minimum of cars? Please discuss in detail. (Vedica Puri, President, Telegraph Hill Dwellers) [39.87]

**Response**

The Draft EIR included a discussion of a “Reduced Parking Alternative” and concluded that such an alternative would be infeasible. Since the alternative was considered infeasible, the Draft EIR did not include lengthy and detailed discussion about the transportation-related effects of implementing it. As explained in CEQA Guidelines Section 15126.6(c), an EIR should briefly explain the reasons underlying alternatives that were considered but rejected during the public scoping process; this brief explanation was provided in the Draft EIR in Section VII.D.3. However, in response to the above comments requesting more analysis and detail related to a reduced parking alternative, the discussion of the “Reduced Parking Alternative” has been expanded and revised, analysis of the alternative has been performed, and additional information has been provided about the feasibility of such an alternative.

The description of the Reduced Parking Alternative has been modified based on the comments received. Comments proposed a variety of reduced parking ratios. Reduced parking ratios proposed by commenters generally focused on the number of off-street spaces provided per residential unit and ranged from 0.75 to 0.25 spaces per unit. As explained below, the Reduced Parking Alternative uses a figure of 0.50 spaces per residential unit because this ratio represents the approximate mid-point of those suggested by commenters. Some commenters also requested reductions in non-residential parking ratios. For the purposes of this analysis, the non-residential parking ratios for the Reduced Parking Alternative were generally reduced by 50 percent from those proposed under the Proposed Project. However, some areas, such as Open Space and Retail, were not reduced because of the unique nature of the proposed land uses (e.g. Public Trust policies that require public roadway access to the shoreline) or because the proposed parking ratios are already significantly lower than similar San Francisco Planning Code ratios.

Commenters also suggested a number of other features that might be included in the Reduced Parking Alternative. Some of these features are already features of the Proposed Project (or are
already identified as mitigation measures to reduce impacts to the Proposed Project) and are therefore, also included in the Reduced Parking Alternative, while others specifically related to reductions in parking supply, have been included in the Reduced Parking Alternative only. These include:

Features Included in Both Proposed Project and Reduced Parking Alternative

- High-density, mixed-use, transit oriented development, including 8,000 residential units, sufficient to support a robust transit system and an adequate supply of neighborhood-serving retail to reduce the need for trips off of the Islands. Both of these are included as part of the Proposed Project and the Reduced Parking Alternative. See the responses in Subsection 2.1.4, Project Land Use, in Section 2.1, Project Description for a full description of land uses proposed as part of the project. See also EIR pp. IV.E.55 – IV.E.61 for a discussion of the way in which the density of development and the provision of neighborhood-serving retail affect the project’s vehicle trip generation.

- Prepaid transit voucher program for all residents of market-rate units regardless of age, and for all types of trips. (Residents of affordable units could choose to purchase prepaid transit vouchers, but would not be required to do so.)

- Market-driven pricing for all on-street parking. Transit-only on-ramp to the westbound Bay Bridge

- Robust bus service to and from the Islands

- Fare-free on-island shuttle service and reduced-fare bus service. Although neither the project sponsors nor the Treasure Island Transportation Management Agency (“TITMA”) would have the authority to set the fares that AC Transit or Muni charge for rides, as noted throughout the EIR, residents of market-rate units of the Islands would receive a pre-paid transit voucher for transit rides, effectively achieving the same goal as suggested in comments (i.e., reduced or no out-of-pocket cost to ride transit).

- Community facility space including library, post office, food/coffee shops, community meeting space. As noted throughout the EIR, the Proposed Project and therefore, the Reduced Parking Alternative, includes over 200,000 square feet of such local, neighborhood-serving retail uses.

Features Included in the Reduced Parking Alternative Only

- Reductions to Hotel, Office/Flex, and Marina parking spaces:
  - Some comments suggested hotel parking should be provided at 0.1 spaces per room. As discussed below, the Reduced Parking Alternative does include reduced parking for hotel uses at 50 percent of the rate included as part of the Proposed Project, which equates to 0.4 spaces per room and is slightly higher than the rate proposed in some comments, but still represents a reduction from the Proposed Project.
  - Some comments suggested that parking for Office and Flex uses both be provided at 0.2 spaces per 1,000 square feet. Parking for Office and Flex uses are proposed at 1.0 space per 1,000 square feet as part of the Proposed Project. The Reduced Parking Alternative would provide the same Office Flex parking rate of 1.0 space per 1,000 square feet, which is higher than the rate proposed in some comments.
Other proposed features were not included because, while they may be policy proposals appropriate for consideration by decision-makers, no quantifiable reduction in impacts (e.g., quantifiable reduction in trip generation rates) could be associated with them, or they have been considered and determined to be infeasible. Features in this category include:

- Some comments suggested that parking for Marina uses be provided at 0.3 spaces per berth. Due to the uniqueness of this land use and the fact that it represents such a small portion of total project-related parking and a very small portion of trip generation on the Islands, no adjustments were made to the proposed parking rate of 0.59 spaces per berth. (As noted in footnote 2 in Table IV.E.4: Person-Trip Generation by Land Use, on EIR p. IV.E.58, the Marina uses are not considered part of the Proposed Project, since they have already been analyzed in a previous EIR.)

- Some comments suggested that parking for Retail uses be provided at a lower rate. Parking for retail uses is proposed at 2.0 spaces per 1,000 square feet as part of the Proposed Project. This ratio is already 50 percent lower than the minimum generally required by the San Francisco Planning Code for buildings greater than 20,000 square feet. As a result, no adjustments to the Retail parking rates are proposed as part of the Reduced Parking Alternative. (Please also see discussion titled Non-Residential Parking Supply below on p. 2.21.21).

- Restrictions on retail uses and commercial services such that all retail or commercial uses provided on the Islands be designed to reduce trips onto or off of the Islands. The retail uses proposed as part of the project would include both local-serving and regional retail. For more discussion on why regional retail uses are included in the Proposed Project, please see the response to comments in Subsection 2.1.4, Project Land Use, in Section 2.1, Project Description.

- Reductions in on-street parking to provide more open space (mini-parks) and enhanced pedestrian amenities. While it would be technically feasible to reduce on-street parking and instead provide more open space and pedestrian amenities, the Proposed Project already includes adequate sidewalks with landscaped buffers separating pedestrians from roadways, as well as fully separated bicycle and pedestrian paths throughout both islands. The Proposed Project also includes a substantial amount of recreational open space (300 acres), complete with pedestrian paths for both recreational use and non-recreational travel by foot. The Proposed Project’s supply of on-street parking already includes on-street parking restrictions to accommodate pedestrian amenities, such as corner bulb-outs, at the most logical locations. Therefore, no additional reductions to on-street parking have been included.

- Transit-only on-ramp to the eastbound Bay Bridge. Unlike the westbound direction, where two on-ramps will be in place, allowing for conversion of one ramp to transit only, there will only be one on-ramp to the eastbound Bay Bridge. Conversion of this ramp to transit-only would preclude private automobiles from entering the eastbound direction of the Bay Bridge.

- Stop on request Muni bus stops on Yerba Buena Island, such that users would not have to transfer to the on-island shuttle. While this may make bus travel more attractive to the relatively small number of residents on Yerba Buena Island, it would also increase travel times for the larger number of residents on Treasure Island who would have to travel through Yerba Buena Island. In addition to being inconsistent with Muni policies, which
do not allow stop-on-request service, it is unlikely that this arrangement would reduce auto impacts through increased transit ridership, because it would increase transit travel times for the majority of projected riders.

- Requirement that unbundled parking spaces be rented or leased, and not purchased. This is not included as part of the Proposed Project or the Reduced Parking Alternative, and there is no clear evidence suggesting how this policy difference would affect peak hour vehicle trip generation, and therefore how or whether it would reduce any significant impacts associated with the Proposed Project or the Reduced Parking Alternative.

Several comments included in this section referenced topics that have been discussed elsewhere in this Comments and Responses document. Those comments are described below and cross-references to the location where the respective response discussions are provided.

Several comments noted that AB 32, AB 981, and SB 375 have been adopted by the State legislature and are being implemented by various state and local agencies. The response in Subsection 2.7.13, Regulatory Framework, in Section 2.7, Transportation, includes a discussion of the relationship between AB 32 and AB 981 and this EIR. Subsection 2.10.3, Greenhouse Gas Analysis Data and Assumptions, in Section 2.10, Air Quality, contains a discussion of the relationship between SB 375 and this EIR. No additional changes have been made.

Comments also suggested that the EIR does not include an environmentally superior alternative. Subsection 2.21.9, Environmentally Superior Alternative, and Subsection 2.22.4, Public Scoping, contain discussion regarding the identified environmentally superior alternative in the EIR and what is required under CEQA as part of developing and identifying this alternative.

A number of comments noted that the mechanism proposed for financing for TITMA to provide a number of the Proposed Project’s transportation demand management programs, including the funding of new or increased transit service, relies, in part, on revenues generated by automobile traffic. Commenters suggested that this provides an incentive for TITMA to encourage automobile travel to and from the Islands. Subsection 2.21.2.1, Reasons for Rejecting Reduced Parking Alternative, includes a discussion of the funding mechanisms and their relation to automobile travel on the Islands.

Some comments queried whether an adequate project density and mix of uses had been proposed, such that neighborhood-serving retail would be adequate to serve the needs of residents on the Islands. The discussion on EIR pp. IV.E.55 – 61 describes the way in which both the Proposed Project’s density and mix of uses affect travel demand, including the interaction between retail and residential uses. The response in Section 2.7, Transportation, Subsection 2.7.3.6, Accounting for Density, includes additional discussion of the way in which the Proposed Project’s density has been accounted for, and the response in Subsection 2.7.3.15, Trip Generation – Retail and Sports Facility, includes additional discussion regarding the neighborhood serving retail component of the Proposed Project. The retail component of the Proposed Project would be a mix of regional

April 21, 2011
Case No. 2007.0903E
2.21.12
Treasure Island / Yerba Buena Island
Redevelopment Project Final EIR
Chapter IX
2. Comments and Responses
21. Alternatives

and local-serving space. The EIR analysis made a reasonable estimate of how much of the retail space would be primarily local-serving. If in the future there were a greater demand for local-serving retail uses as the new residential units on the Islands were occupied, some of the regionalserving retail space might change to local-serving insofar as this would be allowable on non-Tidelands Trust properties. Note that the alternatives selected for analysis in an EIR should describe and analyze alternatives to the Proposed Project that reduce one or more significant impacts identified for the Proposed Project (see the response in Subsection 2.21.9, Environmentally Superior Alternative). The EIR describes a reasonable range of alternatives, as discussed in the response in Subsection 2.21.1, Purpose of Alternatives in EIRs, above.

As a result of the revisions and expansion of the reduced parking alternative, the following new alternative is added to Chapter VII, Alternatives, as Alternative D, Reduced Parking Alternative, beginning on EIR p. VII.72. Section VII.D, Alternatives Considered But Rejected, is redesignated E, and subsections D.1 and D.2 are redesignated E.1 and E.2. Subsection D.3, Reduced Parking Alternative, on pp. VII.75 – VII-76, is deleted, as it is replaced with the new alternative presented below, and subsections D.4 and D.5 are redesignated E.3 and E.4. Section E, Environmentally Superior Alternative, is redesignated F. Other minor revisions are made in the text of the Alternatives Chapter to reflect the addition of this alternative. The new text for Alternative D is not underlined to make it easier to read.

D. REDUCED PARKING ALTERNATIVE

DESCRIPTION

The Reduced Parking Alternative would reduce the maximum total amount of off-street parking that could be provided on the Islands. The alternative would provide a maximum of 0.5 parking spaces per residential unit, for a total of 4,000 parking spaces available to residents on an Islands-wide basis. It would provide a maximum of 1 parking space per 1,000 sq. ft. of commercial/flex space in Buildings 1, 2, and 3 and for office uses, and a maximum of 0.4 parking spaces per hotel room. Retail parking would continue to be provided at a maximum of 2 spaces per 1,000 sq. ft., as in the Proposed Project. The amount of parking for open space uses and the marina and Sailing Center would also remain as in the Proposed Project. On-street parking, all of which would continue to be metered spaces, would remain at 1,035 spaces because the on-street parking supply is a function of the layout of the street network, which was not assumed to change. On-street parking spaces represent less than 10 percent of the overall supply. Taken together, the reduction in parking ratios for the above listed land uses in the Reduced Parking Alternative would reduce the total number of off-street parking spaces by about 4,030, from about 9,646 in the Proposed Project to about 5,616 spaces.

As with the Proposed Project, the parking supply discussed within this section refers to the Islands-wide maximums for individual uses, and as with the Proposed Project, there are no
parking minimums for individual uses. Table VII.19: Proposed Parking Supply Ratios and Supply by Land Use, compares, by land use, the amount of parking in the Proposed Project with the Reduced Parking Alternative. The Reduced Parking Alternative’s parking supply would be about one-half of that generally required by the City’s Planning Code for similar land uses. However, there are some areas of San Francisco, such as Downtown (e.g., the Rincon Hill and South of Market areas), the Eastern Neighborhoods, North Beach, and the Market/Octavia neighborhood, among others, where other public and private on-street and off-street parking facilities supplement parking provided by individual developments; these neighborhoods have parking maximums lower than required generally in other parts of the City. For comparison purposes, Table VII.20 summarizes a variety of different parking requirements from the City’s Planning Code, both generally for the City and for neighborhoods with unique requirements. However, it is important to note that supplemental parking facilities would not be permitted on Treasure Island under the proposed Design for Development, because the 1:1 residential parking ratio represents an Islands-wide cap, unlike the other San Francisco neighborhoods noted above.

Land uses would remain the same as in the Proposed Project, except that fewer parking spaces would be permitted to be constructed for residential and hotel uses and less parking would be permitted to be constructed for certain commercial uses. The numbers, types, and sizes of buildings would not change substantially with the alternative; some buildings might have fewer basement levels for parking, and some buildings that might have included above-ground parking wrapped by residential or commercial uses might not include parking. As in the Proposed Project, stand-alone parking garages with no other uses included were not proposed for off-street parking; any above-ground parking garages in residential or mixed-use buildings would be required to be wrapped by active commercial or residential uses, and parking would not be visible from public rights-of-way. Also as in the Proposed Project, parking would not be required to be included in buildings; therefore, while more buildings might be constructed with no parking in the Reduced Parking Alternative, some also might be constructed with no parking in the Proposed Project, as there are no parking minimums on either a building or Islands-wide basis.

The Reduced Parking Alternative would provide the same base transit service, with the Muni line 108 - Treasure Island bus service at existing headways, new bus service to the East Bay at approximately 10 minute peak headways, and ferry service to San Francisco at approximately 50 minute headways. Fare-free shuttle service throughout the Islands would be provided and would be available to residents and visitors as described for the Proposed Project. Bicycle and pedestrian networks on the Islands would remain the same as in the Proposed Project. Utilities

---

1 Treasure Island + Yerba Buena Island Design For Development, Draft dated March 5, 2010, Section 6.1.2, p. 204.
(New) Table VII.19: Proposed Parking Supply Ratios and Supply by Land Use

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Size</th>
<th>Proposed Project</th>
<th>Reduced Parking Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Ratio</td>
<td>Supply</td>
</tr>
<tr>
<td>Residential</td>
<td>8,000 d.u.</td>
<td>1 space/d.u.²</td>
<td>8,000</td>
</tr>
<tr>
<td>Hotel (Treasure Island)</td>
<td>450 Rooms</td>
<td>0.4 spaces/room³</td>
<td>180</td>
</tr>
<tr>
<td>Hotel (Yerba Buena Island)</td>
<td>50 Rooms</td>
<td>0.8 spaces/room³</td>
<td>40</td>
</tr>
<tr>
<td>Retail</td>
<td>207,000 square feet</td>
<td>2/1,000 square feet⁴</td>
<td>414</td>
</tr>
<tr>
<td>Open Space (Athletic Fields)</td>
<td>40 acres</td>
<td>5.1/acre⁵</td>
<td>204</td>
</tr>
<tr>
<td>Open Space (Other)</td>
<td>260 acres</td>
<td>1/acre⁵</td>
<td>260</td>
</tr>
<tr>
<td>Marina</td>
<td>400 slips</td>
<td>0.59/SLIP⁵</td>
<td>236</td>
</tr>
<tr>
<td>Flex¹</td>
<td>202,000 square feet¹</td>
<td>1/1,000 square feet⁶</td>
<td>202</td>
</tr>
<tr>
<td>Office</td>
<td>100,000 square feet¹</td>
<td>1/1,000 square feet⁶</td>
<td>100</td>
</tr>
<tr>
<td>Police/Fire</td>
<td>30,000 square feet</td>
<td>None⁷</td>
<td>N/A</td>
</tr>
<tr>
<td>School</td>
<td>105,000 square feet</td>
<td>None⁷</td>
<td>N/A</td>
</tr>
<tr>
<td>Community Center</td>
<td>48,500 square feet</td>
<td>Street parking⁸</td>
<td>N/A</td>
</tr>
<tr>
<td>Cultural Park/Museum</td>
<td>75,000 square feet</td>
<td>Street parking⁸</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Off-Street Parking Subtotal</strong></td>
<td></td>
<td></td>
<td>9,646</td>
</tr>
<tr>
<td><strong>General On-Street Parking</strong></td>
<td>N/A</td>
<td></td>
<td>1,035</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>10,681</strong></td>
</tr>
</tbody>
</table>

**Notes:**

General note: Land uses where parking rates differ from the Proposed Project are shaded in gray.

1. Includes 22 ksf food production/industrial/manufacturing, 150 ksf entertainment, and 30 ksf community/office uses.
2. Consistent with San Francisco Planning Code for neighborhoods in San Francisco without specific and unique requirements except that Treasure Island parking requirements are a maximum and thus, not required, whereas Planning Code requirements are a minimum. See (New) Table VII.20 for comparison of parking requirements for various land uses in several districts in San Francisco.
3. Hotel rate is the same as or less than the rate for hotels in Neighborhood Commercial District, San Francisco Planning Code.
4. Lower than permitted in San Francisco Planning Code for comparable neighborhoods, which permits up to 2 spaces per 1,000 square feet and up to 4 spaces per 1,000 square feet above 20,000 square feet. (Retail parking rates were not adjusted between the Proposed Project and the Reduced Parking Alternative, as explained in footnote 9).
5. Consistent with Parking Generation, Third Edition, Institute of Transportation Engineers. As somewhat unique land uses compared to retail, hotel, housing, and office uses, parking rates for the open space and marina uses were not adjusted from standard rates.
6. Consistent with San Francisco Planning Code rate for Office uses, although for flex space, in addition to office space, uses could include entertainment and some production, distribution, and repair uses, some of which have higher and some of which have lower parking rates than included in the San Francisco Planning Code.
7. Parking for police/fire and school facilities expected to be provided separately within the respective sites. Neither parking demand nor supply for these uses is included in this analysis.
8. These uses would share from the available pool of 1,035 on-street parking listed under the general on-street parking.
9. Although requested by some commenters, the retail rate was not adjusted in the Reduced Parking Alternative because the rate included in the Proposed Project is already 50 percent lower than what is permitted by the San Francisco Planning Code. Under both the Proposed Project and the Reduced Parking Alternative, the proposed retail parking rates do represent a reduction from the Planning Code – see footnote 4 above. In addition, parking for retail uses (414 spaces) represents a relatively small percentage (under 4 percent) of the overall supply of parking for the Proposed Project.

**Source:** TICD, 2009; Fehr & Peers, 2010
### (New) Table VII.20: San Francisco Off-Street Parking Required or Permitted as Accessory for Select Districts and Uses

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Permitted or Required Parking¹</th>
<th>Parking Permitted with Planning Commission Approval</th>
<th>Parking Maximum</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Citywide Parking (except as below)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>1 space / unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office²</td>
<td>2.0 spaces/1,000 square feet</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail (&lt;5,000 square feet)</td>
<td>None required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail (between 5,000 and 20,000 square feet)</td>
<td>2.0 spaces/1,000 square feet</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail (for each 1,000 square feet in excess of 20,000)</td>
<td>4.0 spaces/1,000 square feet</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail devoted to handling bulky merchandise (&gt;5,000 square feet)</td>
<td>1.0 space/1,000 square feet</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Restaurant, bar, nightclub, pool hall, dance hall, bowling alley, or other similar enterprise (&gt;5,000 square feet)</td>
<td>5.0 spaces/1,000 square feet</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Commercial Districts (C-3)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.25 space/unit</td>
<td>.75 space/unit</td>
<td>.75 space/unit</td>
</tr>
<tr>
<td>Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)</td>
<td>.25 space/unit</td>
<td>1.0 space/unit</td>
<td>1.0 space/unit</td>
</tr>
<tr>
<td>Non-residential uses</td>
<td>None required</td>
<td></td>
<td>7 Percent of Gross Floor Area</td>
</tr>
<tr>
<td><strong>Van Ness and Market DTR Special Use District</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.25 space/unit</td>
<td>.50 space/unit</td>
<td>.50 space/unit</td>
</tr>
<tr>
<td><strong>Neighborhood Commercial Transit (NCT)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.5 space/unit</td>
<td>.75 space/unit</td>
<td>.75 space/unit</td>
</tr>
<tr>
<td>Non-Residential</td>
<td>None required</td>
<td></td>
<td>1.0 space / 1,500 square feet</td>
</tr>
<tr>
<td><strong>Residential Transit-Oriented (RTO)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.75 space/unit</td>
<td>1 space/unit</td>
<td>1 space/unit</td>
</tr>
<tr>
<td>Non-Residential</td>
<td>None permitted</td>
<td>None permitted</td>
<td>None permitted</td>
</tr>
<tr>
<td><strong>Rincon Hill DTR District</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.50 space/unit</td>
<td>1.0 space/unit</td>
<td>1.0 space/unit</td>
</tr>
<tr>
<td><strong>Eastern Neighborhoods: Mixed Use General, Mixed Use Office, and Mixed Use Residential</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.25 space/unit</td>
<td>.75 space/unit</td>
<td>.75 space/unit</td>
</tr>
<tr>
<td>Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)</td>
<td>.25 space/unit</td>
<td>1.0 space/unit</td>
<td>1.0 space/unit</td>
</tr>
<tr>
<td>Office</td>
<td>None required</td>
<td></td>
<td>7 Percent of Gross Floor Area</td>
</tr>
</tbody>
</table>

---

April 21, 2011
Case No. 2007.0903E
2. Comments and Responses

21. Alternatives

Table VII.20 (cont.)

<table>
<thead>
<tr>
<th>Description</th>
<th>Proposed Project</th>
<th>Reduced Parking Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail (where any portion of the parcel is less than ¼ mile from Market, Mission, Third, and Fourth Streets, except grocery stores &gt;20,000 gross square feet)</td>
<td>1.0 space / 1,500 square feet</td>
<td>1.0 space / 1,500 square feet</td>
</tr>
<tr>
<td>Eastern Neighborhoods: Urban Mixed Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>.75 space/unit</td>
<td>.75 space/unit</td>
</tr>
<tr>
<td>Dwelling Units (with at least 2 bedrooms and at least 1,000 square feet)</td>
<td>1.0 space/unit</td>
<td>1.0 space/unit</td>
</tr>
<tr>
<td>Office</td>
<td>1.0 space/1,000 square feet</td>
<td>1.0 space/1,000 square feet</td>
</tr>
<tr>
<td>Office (where the entire parcel is greater than ¼ mile from Market, Mission, Third, or Fourth Streets)</td>
<td>2.0 spaces/1,000 square feet</td>
<td>2.0 spaces/1,000 square feet</td>
</tr>
</tbody>
</table>

Notes:

1. Parking rates shown for “Citywide” are minimum parking requirements. Parking rates shown for other special districts are parking maximums.
2. Section 151 of the Planning Code makes a distinction between several different types of office. The rate presented here is for the “Other Business Office” category and is intended to illustrate the rate that is most commonly applied. Please refer to Planning Code Sections 151 and 151.1 for details or rates for other types of office use.
3. Retail grocery stores with over 20,000 square feet of occupied floor area are permitted 1 space/500 square feet and can receive Planning Commission Authorization for up to 1 space/250 square feet.

Source: San Francisco Planning Code

and infrastructure included in the Proposed Project would be the same in the Reduced Parking Alternative. Geotechnical stabilization would occur in the same manner and in the same locations as in the Proposed Project. The Reduced Parking Alternative would require all of the same approval actions as those listed for the Proposed Project on pp. II.83 – II.84.

The Proposed Project’s basic objectives include: a) to implement a land use program with high-density, compact residential and commercial development located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles; b) to provide high-density, mixed-income housing consistent with transit-oriented development; c) to create a circulation and transportation system that emphasizes transit-oriented development, discourages automobile use, and supports and promotes the use of public transportation; d) to create a development that is financially feasible, that allows for the delivery of infrastructure, public benefits, and affordable housing subsidies; and that is able to fund the Proposed Project’s capital costs and ongoing operation and maintenance costs relating to the redevelopment and long-term operation of the project site; and e) construct a high-quality development project that is able to attract investment capital and construction financing and produce a reasonable return on investment.

The Reduced Parking Alternative would not meet some of these basic project objectives. In particular, the project sponsors believe that the Reduced Parking Alternative would not “create a development that is financially feasible, that allows for the delivery of infrastructure, public
benefits, and affordable housing subsidies; and that is able to fund the Proposed Project’s capital costs and ongoing operation and maintenance costs relating to the redevelopment and long-term operation of the project site.” In addition, the project sponsors believe that the Reduced Parking Alternative would not result in “a high-quality development project that is able to attract investment capital and construction financing and produce a reasonable return on investment.” The alternative would not “minimize the…impacts of private automobiles” more than would the Proposed Project, as significant traffic impacts identified for the Proposed Project would not be substantially reduced. Therefore the alternative would not be more effective at meeting this basic project objective than would the Proposed Project.

ENVIRONMENTAL ANALYSIS

Transportation

The Reduced Parking Alternative would include the same transportation improvements as the Proposed Project, as described in Section IV.E, Transportation, beginning on p. IV.E.30, with the exception of the reduced parking program as described above. The Reduced Parking Alternative would include the same roadway network as the Proposed Project, and the developed area would be on the same footprint. With the Reduced Parking Alternative, the total number of off-street parking spaces would be up to about 5,615 compared with up to about 9,645 spaces included in the Proposed Project. Both alternatives would include 1,035 on-street parking spaces. All other uses would be the same as those for the Proposed Project.

Methodology

A number of comments requested a Reduced Parking Alternative be analyzed and suggested that such an alternative would likely reduce transportation impacts by reducing automobile trips. This section summarizes the available methodologies for assessing the effects of reduced parking supplies on peak hour vehicle trip generation based on a literature review conducted by the EIR preparers. Additional discussion of the travel demand methodology for the Reduced Parking Alternative is included in the memorandum titled *Supplemental Transportation Analysis for Reduced Parking Alternative Treasure Island/Yerba Buena Island Redevelopment Plan EIR*, February 25, 2011 ("Supplemental Transportation Analysis memorandum").

---

Comments suggested reductions to both residential and non-residential parking supply. As the effects of residential and non-residential parking supply on travel demand are somewhat independent with respect to the Proposed Project, each is discussed separately below.

**Residential Parking Supply**

As part of the transportation analysis effort for the Proposed Project, a literature review was conducted on the effects that parking supply has on trip generation (documented in Fehr & Peers letter to Planning Department dated February 15, 2010) to determine whether independent research has established a direct correlation between parking supply and vehicle trip generation. Although reducing parking supplies may be an effective land use strategy, particularly in areas well-served by transit like Downtown or the Market/Octavia area of San Francisco, where public and private on-street and off-street parking facilities supplement parking provided by individual uses, there is inadequate data to accurately predict and quantify reductions in vehicle trip generation associated with the individual effect of reduced parking supply.3

One of the reports included in the literature review, published by the Transit Cooperative Research Program (“TCRP”), a cooperative effort of the Federal Transit Administration, the Transportation Research Board, and the Transit Development Corporation, Inc., TCRP Report 128 – Effects of TOD on Housing, Parking, and Travel (“TCRP Report”),4 did identify relationships between residential parking supply and peak hour trip generation, although the identified relationships are statistically very weak. In fact, it is precisely because these relationships are very weak that transportation engineers and planners who study them do not commonly use them in forecasting travel demand. Because of the weak linkages in the study, caution should be exercised in using them to make major land use or policy decisions. However, in light of the public comments received on the Draft EIR, the City elected to analyze the potential effects of a reduced parking supply on trip generation based on the data available from the TCRP Report, even though the limitations of that study and generally low confidence in the data are acknowledged.

The equations in the TCRP Report predict some reduction in peak hour vehicle trip generation based on reductions in residential parking supply. Generally, as residential parking supply ratios decrease from 1 space per dwelling unit to 0.5 spaces per dwelling unit, the TCRP Report’s equations predict a vehicle trip reduction for residential uses of 24 percent daily, 30 percent in the AM peak hour, and 16 percent in the PM peak hour. Although the TCRP report does not include

---

3 Supplemental Transportation Analysis memorandum, 2/25/11.
data regarding Saturday peak hour travel demand, Fehr & Peers derived relationships and applied the weekday data from the TCRP Report to Saturday peak hour travel demand. The result of this analysis suggests a 10 percent reduction in Saturday peak hour residential travel demand associated with the reduced residential parking.

However, the City does not believe it would be appropriate to rely on the TCRP Report’s predictive equations to quantify trip reductions for a number of reasons outlined in the Supplemental Transportation Analysis memorandum. Specific reasons described in the memorandum are if:

- The relationships are described in the TCRP report itself as “fairly weak;”
- The relationships are derived primarily from areas with parking supplies higher than what is proposed in the Reduced Parking Alternative, which may mean that the TCRP data is not entirely applicable to the Reduced Parking Alternative; and
- The sites that were surveyed to derive the relationships were not consistent with respect to density, land use diversity, and other variables that may have a greater effect on trip generation, which suggests that other factors may be affecting the relationships and not exclusively parking supply.

Thus, for the reasons stated above, the City has concluded that it would not be appropriate to assume that the trip reductions predicted by the TCRP Report’s equation would materialize, and therefore, the Reduced Parking Alternative could not be relied upon to reduce traffic impacts. The trip generation assumptions for the Proposed Project included in the EIR already account for many of the more influential factors noted in the TCRP Report, such as the project’s density, development scale, diversity of uses, and design of its street network (collectively referred to as the 4D’s throughout the EIR).

However, the City also acknowledges that despite the lack of conclusive data demonstrating a link between parking supply and trip generation, it is possible that such a link could exist for the Proposed Project. The Proposed Project is unique in a number of respects from other projects. The Proposed Project is located on two islands and isolated from other peripheral parking lots and garages. The Proposed Project uses an Islands-wide cap on parking supply, rather than the building-by-building parking limits that are more commonly found in parking codes that seek to restrict parking supply. (All of the parking ratios in the current San Francisco Planning Code that are summarized in (New) Table VII.20 are applied on a building-by-building basis.) Together, these factors mean that parking supply restrictions on the Islands may produce different results from those in many downtown San Francisco projects. In downtown San Francisco, for example, individual buildings have limitations on parking supply, but there are other nearby free-standing parking facilities, surface lots, or street parking that can serve the building occupants, allowing

---

5 Refer to the Transportation Impact Study in Appendix C of the EIR for additional discussion of the 4Ds.
some residents who do not have parking in their building to secure parking in another location. This would not be possible on the Islands, as constructing any additional reservoirs of parking exceeding the Islands-wide maximums would not be permitted, no additional parking would be available on the periphery or in an adjacent neighborhood, and all on-street parking would be priced for short-term usage by both residents and visitors. While the City acknowledges it is possible that the unique conditions of the Proposed Project might make it more likely that the reductions in parking supply would influence vehicle trip generation, the City does not have data to support this conclusion. Further, there are not adequate examples in the United States of neighborhoods located on islands with the mix of land uses, proximity to transit supply, and regional connectivity characteristics similar to the Proposed Project from which additional studies could be performed or data could be obtained.

While the City is not able to rely on trip reductions in its impact analysis, the analysis of the Reduced Parking Alternative includes a discussion as to how the reduced parking supply might affect the travel behavior and resulting impacts discussed in the EIR. The quantification of potential reductions associated with the Reduced Parking Alternative included in the discussion below is not meant to suggest a confident forecast of travel behavior changes that may be expected due to a reduced parking supply, nor does the City intend to use the quantification for the purposes of evaluating travel demand for future projects. Rather, the purpose of the discussion is meant to illustrate how reductions in trip generation might affect the impacts concluded for the Proposed Project, if in fact, they were to materialize, despite limited empirical evidence.

In the absence of other independent, verifiable data, the City relied on the TCRP Report’s predicted traffic generation reductions as the basis for this discussion.

Non-Residential Parking Supply

Comments also requested that the Reduced Parking Alternative examine the effects of reduced parking supply for non-residential uses. In response, as discussed earlier in this section, the Reduced Parking Alternative includes reductions to maximum parking supply rates for Flex, Hotel, and Office uses compared to the rates in the Proposed Project. No adjustments to the Retail parking rate are proposed as part of the Reduced Parking Alternative, because unlike other uses, the rate proposed as part of the Proposed Project is already 50 percent lower than the minimum generally required by the San Francisco Planning Code for buildings greater than 20,000 square feet. As a result, the Reduced Parking Alternative includes maximum parking supply rates for Residential, Hotel, Retail, Flex, and Office uses that are approximately 50 percent lower than the minimum generally required by the San Francisco Planning Code.

As shown in Appendix D2 to the Project’s Transportation Impact Study, the Flex, Hotel, and Office components of the Proposed Project generate relatively small amounts of vehicle trips,
compared to the Proposed Project as a whole. Combined, these uses generate 15 percent of the project’s total vehicle trip generation in the AM peak hour and 11 percent in the PM peak hour. Therefore, even if reductions to parking supplies for these non-residential uses were to result in a reduction in peak hour vehicle trip generation, the overall effect to the number of vehicle trips generated onto and off of the Islands would be relatively small.

However, in response to numerous comments on the subject, the literature review conducted for the Proposed Project also looked for studies that examine the links between non-residential parking supply and vehicle trip generation. No studies were found that identified such links specifically and exclusively for non-residential parking supply. However, a few more comprehensive studies were found that identified the total vehicle trip reductions that have been observed associated with a number of different travel demand management strategies (including parking supply reductions) individually and combined. These studies suggest that there are limits as to how much total vehicle trip reduction can be achieved, and that the Reduced Parking Alternative, including vehicle trip reductions associated with residential parking reductions, would meet or exceed those limits, even without accounting for non-residential parking reductions.

One of the more exhaustive studies on the effectiveness of various strategies at reducing vehicle trip generation was a report prepared by Fehr & Peers for the California Air Pollution Control Officers Association (‘CAPCOA’), *Quantifying Greenhouse Gas Mitigation Measures – A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*. The CAPCOA report summarized a number of other studies, including one conducted by Nelson\Nygaard Consulting Associates that specifically discussed the general relationship between parking supply and vehicle trip generation. Although not specific to non-residential parking supply, the Nelson\Nygaard study could be applied to the non-residential uses for purposes of assessing the effects on vehicle trip generation of the Reduced Parking Alternative. The Nelson\Nygaard study developed a model that uses the ITE *Parking Generation* handbook as the baseline figure for parking supply.\(^6\) The Nelson\Nygaard study assumes data in the ITE research to represent unconstrained demand (or, the parking demand in a typical, auto-oriented, suburban setting), since ITE parking rates are based on suburban development and have tended to overestimate the demand for parking in more urbanized areas. However, the literature suggests no reductions to trip generation associated with reductions in parking supply should be taken once trip generation forecasts are below 50 percent of typical rates as suggested by ITE. That is, once the forecast of trip generation rates has been reduced by 50 percent by virtue of the high-density, mixed-use, or transit-oriented characteristics of the project, as compared to standard ITE trip

\(^6\) Nelson\Nygaard, 2005. *Crediting Low-Traffic Developments* (p. 16)
generation rates, no data supports further reductions beyond 50 percent by virtue of constraining the parking supply available to the project.

In the case of both the Reduced Parking Alternative and the Proposed Project, the reductions already taken to account for the Proposed Project’s characteristics (density, diversity of uses, robust transit supply, and reductions to residential parking supply exceed 50 percent of the unadjusted ITE trip generation forecasts. For example, as shown in Table IV.E.4: Person-Trip Generation by Land Use, on p. IV.E.58 of the EIR, in the PM peak hour the combined effect of adjustments made for the projects’ density, diversity of uses, etc. (collectively, the 4D’s) is 39 percent. As shown on Table IV.E.5: Person-Trip Generation by Mode, on p. IV.E.60 of the EIR, 25 percent of the trips coming to or leaving the Islands would be by transit. This represents 15 percent of total trips (internal and external) generated during the PM peak hour. The combined effect of the 4D’s and the reduction associated with transit is 54 percent (39 percent associated with the 4D’s and 15 percent associated with transit use). Therefore, since the analysis has already included reductions of more than 50 percent due to other features of the Proposed Project, the data suggests additional trip reductions should not be taken as a result of non-residential parking supply reductions; and, as noted earlier, even if reductions to vehicle trip generation were to materialize, the effect would be relatively small since the affected uses generate a relatively small portion of overall vehicle trips associated with the Proposed Project. In summary, although the Reduced Parking Alternative includes reductions to the parking supply for the flex, hotel, and office uses, no associated reductions were made to the trip generation associated with these uses.

Travel Demand

As described above, the potential changes to trip generation associated with the reduction in parking supply included in the Reduced Parking Alternative have been quantified. Overall, except for the accounting for reduced parking supply as described above, the methodology for assessing travel demand of the Reduced Parking Alternative was the same as that used for the Proposed Project. Table VII.21 summarizes the project travel demand for the Proposed Project and the Reduced Parking Alternative that would occur if the reduction in vehicle trips associated with the reduced parking supply implied by the TCRP Report data presented above were to materialize. The TCRP Report does not quantify whether the reduced automobile trip generation would result from a net decrease in total person-trips or whether all of the trips that would no longer be made by auto would still be made during the peak hours, but via different mode. To be conservative, this analysis assumes the total person trip-generation would not change; instead there would be a shift from auto use to bus and ferry use, resulting in a decrease in vehicle trips but an increase in transit trips. The allocation of those new transit trips between buses and ferries was done using the same methodology as that of the Proposed Project, based on the type of land use generating the trips (in this case, residential) and the type of trips generated by that land use during the peak hours (50 percent work and 50 percent non-work). In this case, all of the
additional peak-hour transit trips were residential, which are more likely to be work trips than the average trip generated by the project. Because work and non-work trips have different propensities to choose buses or ferries, the ferry and bus ridership did not increase proportionally to the ferry and bus ridership of the Proposed Project. The data presented in Table VII.21 are for the same base transit service proposed by the Project, without expanded transit service as proposed in Mitigation Measure M-TR-2. Table VII.22 compares the same information under conditions with Mitigation Measure M-TR-2 in place. The percentage reduction in vehicle trips associated with congestion pricing has not been re-analyzed because the change would be very small. Instead, the trip generation forecasts assume the same percentage reduction to total vehicle trip generation associated with congestion pricing for the Proposed Project would apply to the Reduced Parking Alternative.

(New) Table VII.21: Person-Trip Generation by Mode – Proposed Project and Reduced Parking Alternative

<table>
<thead>
<tr>
<th>Peak hour</th>
<th>Person-Trip Generation¹</th>
<th>Total Vehicle-Trips²</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ferry</td>
<td>External</td>
</tr>
<tr>
<td>Proposed Project</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM</td>
<td>641</td>
<td>621</td>
</tr>
<tr>
<td>PM</td>
<td>817</td>
<td>898</td>
</tr>
<tr>
<td>Saturday</td>
<td>473</td>
<td>595</td>
</tr>
<tr>
<td>Reduced Parking Alternative</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM</td>
<td>948</td>
<td>991</td>
</tr>
<tr>
<td>PM</td>
<td>1,003</td>
<td>1,125</td>
</tr>
<tr>
<td>Saturday</td>
<td>580</td>
<td>754</td>
</tr>
</tbody>
</table>

Notes:
1. This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.
2. Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.
3. Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

Source: Fehr & Peers 2010

Mitigation Measure M-TR-2 would increase peak period ferry service from 50 minute frequencies to as much as 15-minute frequencies. It would increase peak period frequencies on the 108-Treasure Island bus route from 15 minutes to between 5 and 7 minutes. It would also create a new bus route to another location in San Francisco, such as the Civic Center area, with frequencies as low as 12-minutes during peak periods. Bus service to the East Bay would not be affected.
### (New) Table VII.22: Person-Trip Generation by Mode – Proposed Project and Reduced Parking Alternative (With Implementation of Mitigation Measure M-TR-2)

<table>
<thead>
<tr>
<th>Peak hour</th>
<th>Person-Trip Generation¹</th>
<th>Total Vehicle-Trips²</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ferry</td>
<td>Bus</td>
</tr>
<tr>
<td>Proposed Project (With M-TR-2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM</td>
<td>958</td>
<td>1,075</td>
</tr>
<tr>
<td>PM</td>
<td>1,235</td>
<td>1,567</td>
</tr>
<tr>
<td>Saturday</td>
<td>718</td>
<td>1,078</td>
</tr>
<tr>
<td>Reduced Parking Alternative (With M-TR-2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM</td>
<td>1,186</td>
<td>1,365</td>
</tr>
<tr>
<td>PM</td>
<td>1,369</td>
<td>1,746</td>
</tr>
<tr>
<td>Saturday</td>
<td>807</td>
<td>1,223</td>
</tr>
</tbody>
</table>

**Notes:**

¹ This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.

² Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.

³ Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

**Source:** Fehr & Peers 2010

For conditions without Mitigation Measure M-TR-2, compared to the Proposed Project, there would be 336 fewer vehicle trips during the weekday AM peak hour (a reduction of 21 percent), 207 fewer vehicles during the PM peak hour (a reduction of 8 percent), and 133 fewer vehicle trips during the Saturday peak hour (a reduction of 5 percent). Also, compared to the Proposed Project there would be 677 more person-trips by ferry or bus during the AM peak hour, 413 more ferry/bus trips during the PM peak hour, and 266 more ferry/bus trips during the Saturday peak hour. Although the number of internal trips is expected to be the same between the Proposed Project and the Reduced Parking Alternative, the increased transit ridership in the Reduced Parking Alternative may result in an increased number of bicycle and pedestrian trips on the Islands.

For conditions with Mitigation Measure M-TR-2, compared to the Proposed Project, there would be 312 fewer vehicle trips during the weekday AM peak hour (a reduction of 25 percent), 156 fewer vehicles during the PM peak hour (a reduction of 8 percent), and 118 fewer vehicle trips during the Saturday peak hour (a reduction of 5 percent). Also, compared to the Proposed Project there would be 518 more person-trips by transit during the AM peak hour, 313 more ferry/bus trips during the PM peak hour, and 234 more ferry/bus trips during the Saturday peak hour.
Construction Impacts

Construction activities associated with the Reduced Parking Alternative would be similar and only somewhat reduced due to the slightly lesser amount of overall construction as compared to the Proposed Project. Mitigation Measure M-TR-1, a Construction Management Program, described in Section IV.E, Transportation, beginning on p. IV.E.69, would minimize the alternative’s contribution to construction-related traffic impacts. However, some disruption and increased delays could still occur even with implementation of M-TR-1, and, as with the Proposed Project, construction-related traffic impacts would remain significant and unavoidable (Impact TR-1).8

Operational Impacts

Traffic

During the peak study periods, the Reduced Parking Alternative would reduce peak hour vehicle trips by approximately 336 trips in the AM peak hour (from 1,613 to 1,277), 207 trips in the PM peak hour (from 2,462 to 2,255), and 133 trips in the Saturday peak hour (from 2,861 to 2,728). Because the analysis assumes that these reductions would be to residential trip generation, they would most likely occur in the peak direction of travel during each peak hour, since travel associated with the Proposed Project would be highly influenced by the residential component.

The Draft EIR included an analysis of the traffic impacts of the Reduced Development Alternative. The person trip generation under the Reduced Development Alternative and under the Reduced Parking Alternative is summarized in Table VII.23, below. As this table shows, the vehicle trip generation for the Reduced Parking Alternative is predicted to be very similar to that of the Reduced Development Alternative, described in Chapter VII, Alternatives as Alternative B, Reduced Development Alternative, beginning on EIR p. VI.15. Further analysis was performed to confirm that the overall geographic distribution of these vehicle trips would also be very similar.9

Due to the similarity in vehicle trip generation between the Reduced Development Alternative and the Reduced Parking Alternative, it is possible to use the traffic impact analysis from the Reduced Development Alternative to understand the possible impacts for the Reduced Parking Alternative. Accordingly, if the trip reductions associated with the Reduced Parking Alternative were to materialize, traffic impacts would be nearly identical to those described in the Reduced

8 The identification of an impact number (i.e., Impact TR-1) refers to the enumeration of impacts in the EIR associated with the Proposed Project. It is provided to facilitate the comparison of impacts of the Reduced Parking Alternative to the Proposed Project. However, the traffic impacts of the Reduced Parking Alternative would be most similar to the impacts of the Reduced Development Alternative.

9 Supplemental Transportation Analysis memorandum, 2/25/11.
(New) Table VII.23: Person-Trip Generation by Mode – Reduced Development Alternative and Reduced Parking Alternative (Without Implementation of M-TR-2)

<table>
<thead>
<tr>
<th>Peak hour</th>
<th>Person-Trip Generation</th>
<th>Vehicle-Trips²</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ferry</td>
<td>Bus</td>
</tr>
<tr>
<td>Reduced Development Alternative</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM</td>
<td>522</td>
<td>486</td>
</tr>
<tr>
<td>PM</td>
<td>696</td>
<td>766</td>
</tr>
<tr>
<td>Saturday</td>
<td>426</td>
<td>527</td>
</tr>
<tr>
<td>Reduced Parking Alternative</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM</td>
<td>948</td>
<td>991</td>
</tr>
<tr>
<td>PM</td>
<td>1,003</td>
<td>1,125</td>
</tr>
<tr>
<td>Saturday</td>
<td>580</td>
<td>754</td>
</tr>
</tbody>
</table>

Notes:
1 This analysis assumes no external pedestrian or bicycle trips onto or off of the Islands. With construction of the new east span bicycle/pedestrian path, it is possible that some bicycle trips may occur. However, this number is not likely to affect the overall conclusions of this study. Further, the potential new bicycle facility on the west span of the Bay Bridge is still in the Project Study Report (PSR) phase, and is not assumed to be in place in this analysis.
2 Vehicle-trips include passenger vehicles and vans. Refer to EIR for discussion of methodology for calculating net vehicle trip generation increases.
3 Includes internal bicycle and pedestrian trips, and a relatively small number of internal auto trips (e.g., between Yerba Buena Island and Treasure Island).

Source: Fehr & Peers 2010

Development Alternative. Thus, for comparison purposes, the discussion below summarizes the results of the transportation impact analysis conducted for the Reduced Development Alternative, as presented on pp. VII.20 – VII.33, above.

The Reduced Parking Alternative could result in similar significant and unavoidable impacts related to extensive queues and vehicle delays as the Reduced Development Alternative (summarized in Tables VII.4: Ramp Junction Analysis – Existing, Existing plus Proposed Project, and Existing plus Reduced Development Alternative, and Table VII.5: Maximum On-Ramp Queues and Average Delays – Existing plus Project and Existing plus Reduced Development Alternative Conditions, on pp. VII.23 and VII.24), at the following study ramp locations:

- At the eastbound off-ramp on the west side of Yerba Buena Island during the PM peak hour (Impact TR-2);
- Under conditions without the Ramps Project, at the two westbound on-ramps during the AM, PM and Saturday peak hours (Impact TR-3); and
- Under conditions with the Ramps Project, at the ramp meter at the westbound on-ramp on the east side of Yerba Buena Island during the AM and PM peak hours (Impact TR-4).

Similar to both the Proposed Project and the Reduced Development Alternative, under conditions without and with the Ramps Project, the Reduced Parking Alternative would result in less-than-
significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island (Impact TR-5). Similarly, under conditions without and with the Ramps Project, the Reduced Parking Alternative would also result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM peak hour (Impact TR-6), and on San Francisco streets approaching the Bay Bridge during the PM peak hour (Impact TR-7).

Table VII.6: Intersection Levels of Service – Existing and 2030 Cumulative Conditions, on pp. VII.25 – VII.26, presents the comparison of intersection Levels of Service (“LOS”) for Existing plus Project and Existing plus Reduced Development Alternative conditions. Since the Reduced Parking Alternative would be nearly identical to the Reduced Development Alternative in terms of traffic impacts, similar to the Reduced Development Alternative, the Reduced Parking Alternative would result in significant impacts at eight study intersections (compared with nine for the Proposed Project).\(^\text{10}\)

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would result in project-specific impacts at six signalized study intersections that operate at LOS D or better under Existing conditions and would deteriorate to LOS E or LOS F under Existing plus Project conditions, or that operate at LOS E under Existing conditions and would deteriorate to LOS F under Existing plus Project conditions (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp) (Impacts TR-8 through TR-13).

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would have less-than-significant contributions at four signalized study intersections that operate at LOS E or LOS F under Existing conditions and that would continue to operate at LOS E or LOS F under Existing plus Project conditions (First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, The Embarcadero/Harrison, and Second/Folsom) (Impacts TR-14 and TR-15).

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would have less-than-significant contributions at five signalized study intersections that would operate at LOS D or better under Existing plus Project conditions (Impact TR-16).

- Similar to the Reduced Development Alternative, the Reduced Parking Alternative would contribute considerably to two uncontrolled study intersections that operate poorly under Existing conditions, resulting in a project-specific impact (Folsom/Essex and Bryant/Sterling) (Impacts TR-17 and TR-18).

As with the Proposed Project and the Reduced Development Alternative, the traffic impacts at ramps and intersections would be minimized but not eliminated with implementation of Mitigation Measure M-TR-2 (Expanded Transit Service) as discussed in Section IV.E,\(^\text{10}\)

---

\(^{10}\) The project-specific impact at Second/Folsom would be less-than-significant under the Reduced Development Alternative and, therefore, under the Reduced Parking Alternative.
Transportation, pp. IV.E.74 – IV.E.75. This mitigation measure would reduce vehicle trip generation and would reinforce the proposed TDM practices included as part of the Reduced Parking Alternative, including ramp metering, congestion pricing, etc. As with the Proposed Project and the Reduced Development Alternative, because of uncertainties regarding sources for full funding to implement M-TR-2, its feasibility is uncertain and the impacts that could be mitigated by implementation of M-TR-2 are assumed to remain significant and unavoidable. Aside from increasing the availability of transit service, as proposed by Mitigation Measure M-TR-2, there do not appear to be other proven and/or feasible techniques that are not already part of the Proposed Project that would achieve a substantial increase in transit ridership.

In sum, the Reduced Parking Alternative could potentially have traffic impacts similar to the Reduced Development Alternative, which would be similar to those of the Proposed Project except for one intersection, Second/Folsom (Impact TR-14). That intersection would experience a significant and unavoidable impact with mitigation under the Proposed Project, but the impact could be less-than-significant without mitigation under the Reduced Development Alternative and the Reduced Parking Alternative. However, as noted above, the City has very low confidence in the predictions of the TCRP data, and because of the uncertainty in the estimates, the City cannot reliably conclude that reductions in impacts would occur.

Transit Impacts

The Reduced Parking Alternative transit conditions assume implementation of Project-related transit improvements as described in Section IV.E., Transportation, p. IV.E.94. If travel demand characteristics of the Reduced Parking Alternative shown in Table VII.23 were to materialize, transit ridership in the Reduced Parking Alternative would exceed what was projected for the Proposed Project. Table VII.24 presents the transit ridership and capacity utilization information for the Reduced Parking Alternative (with the base level of transit). As shown in Table VII.24, similar to the Proposed Project, the Reduced Parking Alternative would have a significant impact on transit capacity for Muni service between the Islands and San Francisco because Muni’s transit capacity utilization standard of 85 percent would be exceeded. This was also identified as a significant impact associated with the Proposed Project (Impact TR-19, p. IV.E.95). However, the impact would be exacerbated with the Reduced Parking Alternative, since transit demand would increase. Similar to the Proposed Project, implementation of Mitigation Measure M-TR-2 would increase transit capacity and ridership; however, the capacity increases would be far greater than the ridership increases, and with implementation of Mitigation Measure M-TR-2, the capacity would be adequate to serve projected demand. However, as explained in Section IV.E, Transportation, implementation of M-TR-2 is uncertain, and therefore, the impacts to Muni capacity utilization would remain significant and unavoidable.
(New) Table VII.24: Transit Ridership and Capacity Utilization – Existing plus Project and Existing plus Reduced Parking Alternative (Prior to Implementation of M-TR-2)

<table>
<thead>
<tr>
<th>Route</th>
<th>Existing plus Project</th>
<th>Existing plus Reduced Parking Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Capacity</td>
<td>Rider-ship</td>
</tr>
<tr>
<td><strong>AM Peak Hour</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AC Transit EB 2</td>
<td>324</td>
<td>107</td>
</tr>
<tr>
<td>AC Transit WB 2</td>
<td>324</td>
<td>67</td>
</tr>
<tr>
<td>Muni EB Bus Service from SF 3</td>
<td>252</td>
<td>261</td>
</tr>
<tr>
<td>Muni WB Bus Service to SF 3</td>
<td>252</td>
<td>384</td>
</tr>
<tr>
<td>Ferry EB 4</td>
<td>839</td>
<td>238</td>
</tr>
<tr>
<td>Ferry WB 4</td>
<td>839</td>
<td>403</td>
</tr>
<tr>
<td><strong>PM Peak Hour</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AC Transit EB</td>
<td>324</td>
<td>96</td>
</tr>
<tr>
<td>AC Transit WB</td>
<td>324</td>
<td>134</td>
</tr>
<tr>
<td>Muni EB Bus Service from SF</td>
<td>252</td>
<td>515</td>
</tr>
<tr>
<td>Muni WB Bus Service to SF</td>
<td>252</td>
<td>431</td>
</tr>
<tr>
<td>Ferry EB 4</td>
<td>839</td>
<td>479</td>
</tr>
<tr>
<td>Ferry WB 4</td>
<td>839</td>
<td>343</td>
</tr>
<tr>
<td><strong>Saturday Peak Hour</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AC Transit EB</td>
<td>324</td>
<td>79</td>
</tr>
<tr>
<td>AC Transit WB</td>
<td>324</td>
<td>90</td>
</tr>
<tr>
<td>Muni EB Bus Service from SF</td>
<td>189</td>
<td>328</td>
</tr>
<tr>
<td>Muni WB Bus Service to SF</td>
<td>189</td>
<td>320</td>
</tr>
<tr>
<td>Ferry EB 4</td>
<td>839</td>
<td>221</td>
</tr>
<tr>
<td>Ferry WB 4</td>
<td>839</td>
<td>252</td>
</tr>
</tbody>
</table>

**Notes:**

N/A = Not Applicable

1 **Bold** indicates capacity utilization exceeds the 85 percent capacity utilization standard for Muni line 108-Treasure Island, and the 100 percent capacity utilization standard for new ferry and AC Transit service. Exceedance of the capacity utilization standard is considered a significant impact. Implementation of Mitigation Measure M-TR-2 would result in adequate transit capacity reducing the impacts to less than significant levels.

2 New AC Transit bus service between the Islands and downtown Oakland at 10-minute peak headways.

3 Muni line 108-Treasure Island service at 15-minute headways during peak periods.

4 New ferry service between Treasure Island and San Francisco at 50-minute peak headways.

**Source:** Fehr & Peers 2010
Similar to the Proposed Project, impacts on the new AC Transit bus service and ferry serving the Islands, and impacts on other AC Transit, BART, Golden Gate Transit, SamTrans and other ferry lines would be less than significant (Impacts TR-20, TR-21, and TR-23). As presented in Table IV.E.18 on p. IV.E.98, the Muni downtown San Francisco screenlines are not expected to operate near their capacity utilization threshold of 85 percent under conditions with the Proposed Project. The additional transit riders that would occur with the Reduced Parking Alternative would not be enough to cause the downtown screenlines to exceed capacity utilization thresholds and therefore, the Reduced Parking Alternative’s impacts to the downtown screenlines would be less than significant (Impact TR-22).

As with the Proposed Project and Reduced Development Alternative, some transit impacts would result from increased traffic congestion at the approaches to the Bay Bridge on-ramps at Yerba Buena Island (Impacts TR-24, TR-25, TR-26, and TR-27). As noted earlier, if reductions in vehicle trip generation associated with the Reduced Parking Alternative were to materialize, traffic impacts would be nearly identical to the Reduced Development Alternative. Thus, similar to the Proposed Project and the Reduced Development Alternative, under conditions with and without the Ramps Project, vehicle queues extending from the Bay Bridge on-ramps at Yerba Buena Island may impact Muni line 108-Treasure Island and AC Transit bus operations during the AM, PM and Saturday peak hours, causing delays to bus service. With implementation of Mitigation Measure M-TR-24 (Transit and Emergency Vehicle Only Lane) described in Section IV.E, Transportation, on p. IV.E.100, the impact on Muni operations would be reduced to a less-than-significant level (Impacts TR-24 and TR-26). Implementation of Mitigation Measure M-TR-24 would improve operations for AC Transit buses destined for the eastbound on-ramp. However, because this improvement would extend only to the transit and emergency vehicle-only westbound on-ramp on the west side of Yerba Buena Island, and because sufficient right-of-way is not available to extend a transit-only lane beyond the transit and emergency vehicle-only westbound on-ramp, AC Transit vehicles would continue to experience congestion between the transit and emergency vehicle-only westbound on-ramp and the eastbound on-ramp. Therefore, similar to the Proposed Project and the Reduced Development Alternative, the impact on AC Transit operations would remain significant and unavoidable (Impacts TR-25 and TR-27).

Similar to the Proposed Project, implementation of the Reduced Parking Alternative would result in less-than-significant impacts to the existing and proposed ferry services on the San Francisco Bay (Impact TR-28).

As with the Proposed Project and the Reduced Development Alternative, transit impacts would occur from traffic congestion delay in downtown San Francisco with the Reduced Parking Alternative. The transit delay conditions with the Reduced Parking Alternative would affect the same lines as the Proposed Project and the Reduced Development Alternative (27-Bryant, 30X-Marina Express, and 47-Van Ness), resulting in significant and unavoidable impacts (Impacts
TR-29 through TR-31). As with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would not adversely affect operations of Golden Gate Transit or SamTrans bus lines (Impact TR-32).

Implementation of Mitigation Measure M-TR-2 would reduce, but not eliminate, traffic impacts at the study intersections, and therefore, the transit delay impacts of the Reduced Parking Alternative on the Muni lines would remain significant and unavoidable.

In summary, the Reduced Parking Alternative would have the same number of significant transit-related impacts as the Proposed Project, although the severity of the impacts may be somewhat different. If automobile trip generation reductions associated with reduced parking supply were to materialize, the significant impacts due to transit ridership increases would be more severe than the Proposed Project and the significant impacts due to traffic congestion would be less severe than the Proposed Project (and comparable to those of the Reduced Development Alternative). However, as noted earlier in the discussion of traffic impacts, the City has very low confidence in the predictions of the TCRP data, and because of the uncertainty in the estimates, the City cannot reliably conclude that differences in the severity of impacts would occur.

**Bicycles**

The Reduced Parking Alternative bicycle trips would be accommodated within the proposed street network on the Islands and on mainland San Francisco, and similar to the Proposed Project, impacts related to bicycle accessibility would be less than significant, and no mitigation measures are required (Impacts TR-33 and TR-34). Also, as with the Proposed Project, implementation of Mitigation Measure M-TR-24 would result in the removal of the proposed bicycle lane on a portion of Treasure Island and Hillcrest Roads to accommodate a transit-only lane (Mitigation Measure M-TR-24 would only be implemented if queues on Treasure Island Road materialize and substantially affect transit operations); however, cyclists would continue to have a continuous Class I shared bicycle and pedestrian facility connecting Treasure Island and the Class I shared bicycle and pedestrian facility currently under construction on the Bay Bridge east span, from the intermodal transit hub to Treasure Island Road across the causeway and continuing along Macalla Road on Yerba Buena Island.

As discussed in the methodology section above and presented in Table VII.20, the analysis assumes that the reduction in vehicle traffic would manifest itself entirely in a mode shift to transit. It is possible that a small portion of the mode shift would be to bicycle instead of to transit; however, given the lack of a bicycle connection to San Francisco, the only travelers this mode shift would affect would be those traveling between the Proposed Project and the East Bay. Further, it is likely that an increase in bicycling would not be so substantial as to affect the analysis of other modes.
Pedestrians

The pedestrian network and improvements would not change materially between the Proposed Project and the Reduced Parking Alternative. Generally, similar to the Proposed Project, the pedestrian environment would be improved compared to existing conditions. As such, the Reduced Parking Alternative would not create potentially hazardous conditions for pedestrians (Impact TR-35). Although the data is uncertain, if the travel characteristics of the Reduced Parking Alternative materialized as summarized in Table VII.21, the Reduced Parking Alternative would result in more pedestrian trips near the Ferry Building in San Francisco than the Proposed Project because there would be increased ferry ridership.

Further, the increased transit ridership may result in an increase in bicycle and pedestrian trips on the Islands. However, the on-island bicycle and pedestrian circulation network would remain adequate to serve expected demands.

Compared to the Proposed Project, the Reduced Parking Alternative would result in 307 more ferry trips during the AM peak hour, 181 more ferry trips during the PM peak hour, and 107 more ferry trips during the Saturday peak hour. With implementation of Mitigation Measure M-TR-2 there would be even more pedestrian trips since the increased transit service would attract more riders.

As shown in Table VII.25, these pedestrians would be accommodated at the crosswalks in the vicinity of the Ferry Building, most of which were projected to operate at LOS C or better under the Proposed Project. Under the Reduced Parking Alternative, the crosswalk at Market Street across from the Ferry Building is projected to operate at LOS D, which is still considered acceptable. Therefore, impacts related to pedestrians would be less than significant, and no mitigation measures are required (Impact TR-36).

Loading

Similar to the Proposed Project, development associated with the Reduced Parking Alternative would be subject to the freight loading space requirements to accommodate the loading demand, and would be designed to minimize impacts on autos, transit, bicyclists and pedestrians and to ensure that loading activities do not result in hazardous conditions. The Reduced Parking Alternative impacts related to loading operations would be less than significant, and no mitigation measures are required (Impact TR-37).
(New) Table VII.25: Pedestrian Crosswalk Levels of Service – Existing plus Project and Existing plus Reduced Parking Alternative

<table>
<thead>
<tr>
<th>Crosswalk</th>
<th>Existing plus Project</th>
<th>Existing plus Reduced Parking Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Project Trips</td>
<td>Density</td>
</tr>
<tr>
<td><strong>AM Peak Hour</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington Street¹</td>
<td>26</td>
<td>27.4</td>
</tr>
<tr>
<td>Ferry Bldg (North)</td>
<td>87</td>
<td>6.6</td>
</tr>
<tr>
<td>Market Street</td>
<td>427</td>
<td>6.7</td>
</tr>
<tr>
<td>Don Chee Way</td>
<td>29</td>
<td>17.3</td>
</tr>
<tr>
<td>Mission Street¹</td>
<td>72</td>
<td>9.9</td>
</tr>
<tr>
<td><strong>PM Peak Hour</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington Street¹</td>
<td>46</td>
<td>13.0</td>
</tr>
<tr>
<td>Ferry Bldg (North)</td>
<td>67</td>
<td>7.2</td>
</tr>
<tr>
<td>Market Street</td>
<td>614</td>
<td>3.9</td>
</tr>
<tr>
<td>Don Chee Way</td>
<td>33</td>
<td>12.9</td>
</tr>
<tr>
<td>Mission Street¹</td>
<td>61</td>
<td>9.9</td>
</tr>
<tr>
<td><strong>Saturday Peak Hour²</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Market Street</td>
<td>334</td>
<td>4.0</td>
</tr>
<tr>
<td>Don Chee Way</td>
<td>28</td>
<td>6.9</td>
</tr>
</tbody>
</table>

**Notes:**
1 Since the intersections of The Embarcadero with Washington Street and Mission Street each have two crosswalks, the north and south legs of each intersection were averaged.
2 The Ferry Building hosts a farmers market on Saturdays.
3 Density measured in square feet per pedestrian

*Source:* Fehr & Peers 2011

**Emergency Access**

The Reduced Parking Alternative impacts on emergency access would be the same as for the Proposed Project. Local police and fire facilities would provide first response to incidents on the Islands, and existing emergency routes would be maintained in their existing locations or rerouted as necessary. Similar to the Proposed Project, impacts to emergency access would be less than significant and no mitigation measures are required (Impact TR-38).
Cumulative Conditions

The Reduced Parking Alternative would result in similar construction activities to that of the Proposed Project. As with the Proposed Project, given the overall magnitude of development, the project’s prolonged construction period, and the lack of certainty of timing of other construction projects on the Islands, the Reduced Parking Alternative would also result in significant contributions to cumulative construction-related traffic impacts (Impact TR-39).

Overall, if vehicle trip generation reductions associated with the Reduced Parking Alternative were to materialize as described in this section, 2030 Cumulative Conditions traffic operational impacts would be nearly identical to those described for the Reduced Development Alternative. In those circumstances, under 2030 Cumulative conditions, as with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would contribute to significant cumulative traffic impacts at the following locations:

- At the eastbound off-ramp on the west side of Yerba Buena Island (Impact TR-40);
- Under conditions without the Ramps Project, at the two westbound on-ramps (Impact TR-41); and
- Under conditions with the Ramps Project, at the ramp meter at the westbound on-ramp at the east side of Yerba Buena Island (Impact TR-42).

Similar to the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would result in less-than-significant impacts at the eastbound on-ramp and eastbound off-ramp on the east side of Yerba Buena Island, and the westbound off-ramp on the east side of Yerba Buena Island (Impact TR-43).

Similar to the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative would also result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM and PM peak hours, and on San Francisco streets approaching the Bay Bridge during the weekday AM and PM and Saturday peak hours (Impacts TR-44 and TR-45).

Table VII.6, on pp. VII.25 – VII.26, includes the comparison of intersection LOS for 2030 Cumulative plus Proposed Project and 2030 Cumulative plus Reduced Development Alternative conditions. The Reduced Parking Alternative would be nearly identical to the Reduced Development Alternative in terms of vehicular trip generation and therefore, would result in the same significant impacts at study intersections as the Reduced Development Alternative and the Proposed Project. Although the Reduced Development Alternative had one fewer project-related impacts than the Proposed Project, the Reduced Development Alternative, and therefore the Reduced Parking Alternative, would have the same number of cumulative impacts as the Proposed Project.
Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would result in project-specific impacts at six signalized study intersections that operate at LOS D or better under Existing conditions and would deteriorate to LOS E or LOS F under Existing plus Project conditions, or that operate at LOS E under Existing conditions and would deteriorate to LOS F under Existing plus Project conditions. Because the Reduced Parking Alternative would result in significant project-related impacts at these intersections, it would also result in cumulative impacts at these six intersections (First/Market, First/Mission, First/Folsom, First/Harrison/I-80 Eastbound On-Ramp, Bryant/Fifth/I-80 Eastbound On-Ramp, Fifth/Harrison/I-80 Westbound Off-Ramp) (Impacts TR-46 through TR-51).

Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would contribute considerably to critical movements at one study intersection that would operate at LOS E or LOS F under 2030 Cumulative plus Reduced Parking Alternative conditions, resulting in a project impact (Second/Folsom). (Impact TR-52)

Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would have less-than-significant contributions at seven study intersections that would operate at LOS E or LOS F under 2030 Cumulative No Project conditions (Fremont/Howard, Fremont/Folsom, Fremont/I-80 Westbound Off-Ramp/Harrison, First/Howard, Essex/Harrison/I-80 Eastbound On-Ramp, Second/Bryant, and The Embarcadero/Harrison). (Impact TR-53).

Similar to the Reduced Development Alternative and the Proposed Project, the Reduced Parking Alternative would contribute considerably to significant cumulative impacts at two uncontrolled study intersections (Folsom/Essex and Bryant/Sterling) (Impacts TR-54 and TR-55).

As with the Proposed Project and the Reduced Development Alternative, the Reduced Parking Alternative’s contribution to cumulative traffic impacts at ramps and intersections would be lessened, but not eliminated, with implementation of Mitigation Measure M-TR-2.

Under 2030 Cumulative conditions, implementation of the Reduced Parking Alternative would have transit impacts similar to those of the Proposed Project, although transit ridership would be higher than under conditions with the Proposed Project. Similar to the Proposed Project, ridership under this alternative would also exceed the capacity of the Muni screenline between the Islands and Downtown San Francisco. Impacts to this screenline would be the same as identified for Existing plus Reduced Parking Alternative conditions, and summarized in Table VII.21. The Reduced Parking Alternative would also add more transit trips to the standard Muni downtown San Francisco screenlines than the Proposed Project; however, the increase is not expected to be severe enough such that ridership demand would exceed capacity, and cumulative impacts on the standard downtown San Francisco screenlines would be less than significant (Impact TR-56). The Reduced Parking Alternative’s contributions to cumulative transit trips on AC Transit, BART, Golden Gate Transit, SamTrans, Caltrain, and other ferry routes would not increase demand in excess of available capacity (Impact TR-57). Transit impacts would result from traffic congestion delay in downtown San Francisco and would affect the same lines as the Proposed
Project and Reduced Development Alternative would (10-Townsend, 27-Bryant, 30X-Marina Express, and 47-Van Ness) (Impacts TR-58 through TR-61). While implementation of Mitigation Measure M-TR-2 (Expanded Transit Service) would somewhat reduce delays at the downtown study intersections, the impact on transit would remain significant and unavoidable. Increased traffic congestion delay in downtown San Francisco would not affect operations of Golden Gate Transit or SamTrans bus lines (Impact TR-62).

Parking Information

Similar to the Proposed Project, development associated with the Reduced Parking Alternative would be subject to parking space maximums; however, those maximums would be substantially lower than the Proposed Project. As summarized in Table VII.19, the Reduced Parking Alternative would include 6,651 parking spaces, including 4,000 off-street spaces for residential uses, 1,616 off-street spaces for non-residential uses, and 1,035 on-street parking spaces. If travel behavior materialized as summarized in Table VII.21, although the overall demand for spaces would be less than the Proposed Project, parking shortfalls associated with the Reduced Parking Alternative would likely exceed those projected for the Proposed Project.11

As with the Proposed Project, implementation of the reduced parking supply maximums would result in secondary physical impacts caused by increased traffic congestion and a mode shift to transit that would exacerbate the degree to which capacity utilization standards were exceeded on Muni line 108-Treasure Island. As with the Proposed Project, impacts on the transit capacity utilization would be less than significant with implementation of Mitigation Measure M-TR-2. However, because implementation of Mitigation Measure M-TR-2 is uncertain, impacts would remain significant and unavoidable.

Aesthetics

Off-street parking facilities constructed in mixed-use or residential buildings as part of development in the Reduced Parking Alternative would continue to be wrapped by residential or commercial uses and not be readily visible from public rights-of-way, as with the Proposed Project. Land uses would be the same as the Proposed Project, and heights and densities would also be the same. The numbers, types, and sizes of buildings would not change substantially with the alternative. Therefore, the visual impacts identified for the Proposed Project in Section IV.B, Aesthetics, would not change with the Reduced Parking Alternative.

---

11 Since parking supply is reduced for residential units by 50 percent, there would also have to be a reduction in residential trip generation of 50 percent to maintain the same parking shortfall. Since trip generation is not expected to decrease by as much as the parking supply is decreasing, the shortfall under the Reduced Parking Alternative would be greater than under the Proposed Project.
Chapter IX
2. Comments and Responses
21. Alternatives

Noise

As discussed under “Transportation” above, the City has very low confidence that traffic would be substantially reduced if less parking were provided on the Islands. If there were a reduction in vehicle trips as a result of reducing the amount of parking provided, there would be a slight reduction in traffic noise compared to operational traffic noise levels estimated for the Proposed Project in Section IV.F, Noise, in Impact NO-3. The reduction in daily vehicle traffic would not be more than approximately 10 percent. A reduction in traffic volumes of about 10 percent would not reduce the significant noise impacts identified in Impact NO-3 to less-than-significant levels, because the change in noise levels would continue to be 5 dBA or greater (see Table IV.F.6 on p. IV.F.23). Other operational noise impacts would remain the same as those identified for the Proposed Project. Construction noise impacts would not change with the Reduced Parking Alternative, and would remain significant and unavoidable. Mitigation measures identified for the Proposed Project would be applicable to the Reduced Parking Alternative.

Air Quality

As discussed under “Transportation,” the City has very low confidence that traffic would be substantially reduced if less parking were provided. If there were a reduction in vehicle trips as a result of reducing the amount of parking available, there would be a slight reduction in emissions of criteria pollutants compared to emissions from motor vehicles in the Proposed Project. Reducing motor vehicle emissions by approximately 10 percent would not reduce any of the significant air quality impacts identified in Impact AQ-5 and shown in Table IV.G.5 on p. IV.G.41, as the emissions from other sources would continue to be the same as for the Proposed Project. A reduction of over 50 percent in motor vehicle emissions would be required to reduce the significant impacts of PM 2.5 emissions to less-than-significant levels, and substantially greater reductions in motor vehicle emissions would be necessary to reduce the other significant air quality impacts to less-than-significant levels. A reduction of 50 percent in motor vehicle emissions would not be achieved under the Reduced Parking Alternative. The possible reduction in vehicle trips with reduced parking would not substantially change the amount of diesel particulate emissions, as few of the trips removed would be in diesel-fueled vehicles. Construction air emissions would not change substantially with the Reduced Parking Alternative. Therefore, the air quality impacts identified as significant and unavoidable in the analysis of the Proposed Project would continue to be significant and unavoidable with the Reduced Parking Alternative, and mitigation measures identified for the Proposed Project would be applicable to the Reduced Parking Alternative.

Greenhouse Gases

As described for noise and air emissions, greenhouse gas (“GHG”) emissions might be reduced somewhat with the Reduced Parking Alternative if the alternative were to result in reductions in
vehicle trips. Motor vehicle emissions are the largest single source of CO2e during operation of the Proposed Project (see Tables IV.H.3 and IV.H.4 on pp. IV.H.36 and IV.H.37); however, reductions of 10 percent in motor vehicle emissions would not make a substantial difference in the overall amount of annual CO2e emissions and therefore would not substantially change the emissions per year per service population presented on p. IV.H.45. The Proposed Project would have a less-than-significant impact on GHG emission, as discussed in Impact GHG-1 on pp. IV.H.44 and IV.H.45. Therefore the Reduced Parking Alternative, if it were to result in fewer vehicle trips, would not cause a significant impact to be reduced to less-than-significant levels.

**Other Topics**

The Reduced Parking Alternative would have essentially the same impacts as the Proposed Project in the areas of Land Use, Population and Housing, Cultural Resources, Wind and Shadow, Recreation, Utilities, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards and Hazardous Materials, Agricultural Resources, and Minerals and Energy Resources. Any mitigation measures identified in the subsections of Chapter IV covering these topics would be applicable to the Reduced Parking Alternative.

**Conclusion**

Overall, the Reduced Parking Alternative would have the same significant impacts as those identified for the Proposed Project except for a possible reduction in one significant traffic impact from significant and unavoidable with mitigation to less-than-significant. In addition, the project sponsors believe that the reduction in parking would undermine the market acceptance of the alternative, yielding a reduced rate of return that is commercially infeasible and a reduction in funding available to support transit services that make this alternative infeasible.

**2.21.2.1 Reasons for Rejecting Reduced Parking Alternative**

**Comments**

The DEIR notes that members of the public had requested that the EIR consider a reduced-parking alternative, but summarily rejects it as an infeasible alternative. The DEIR’s explanation for why the reduced-parking alternative is infeasible, however, is inadequate and internally inconsistent. *Christopher Pederson* [5.3]

Finally, page VII.76 of the DEIR asserts that reducing parking supply would result in less transit use, more automobile use, and greater impacts to air quality. These conclusions, however, rest on the unexplained and unexamined assumption that less parking means less revenue for the TDM program. Elsewhere (page IV.E.140), the DEIR points out that reduced parking supply will tend to increase transit ridership, so, using the DEIR’s own assumptions, a reduced-parking alternative that is structured to minimize loss of revenue for the TDM Plan would actually reduce traffic and air quality impacts. *Christopher Pederson* [5.7a]
LSA queried data for vehicles per household in the City of San Francisco from the 2006–2008 American Community Survey conducted by the United States Census Bureau. The latest data available reveal that 29 percent of households in the City have no car, 43 percent have one car, and 28 percent have two or more cars. The average number of vehicles per household in the City of San Francisco is approximately 0.65. Because the average number of vehicles per San Francisco household is 0.65, an alternative providing 0.75 parking spaces per residential unit likely deserves more analysis than is currently provided in the “Alternatives Considered but Rejected” section. (Saul Bloom, Arc Ecology) [28.3]

The reasons offered for not analyzing an alternative with reduced parking and reduced automobile ownership are flimsy at best. It cannot be said that such an alternative would “not meet most of the Proposed Project’s basic objectives.” (page S.86) It has been demonstrated that reducing parking reduces driving, and reducing the number of automobile trips on the islands as well as to and from the islands would meet several of the project objectives (pages II.4 and II.5) significantly better than the Proposed Project does:

- Implement a land use program with high-density, compact residential and commercial development located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles.
- Provide a high-quality public realm, including a pedestrian and bicycle-friendly environment with high design standards for public open spaces, parks, and streetscape elements.
- Include enough residential density to create a sustainable community that supports neighborhood-serving retail, community facilities, and transit infrastructure and service.
- Demonstrate leadership in sustainable design and provide new benchmarks for sustainable development practices in accordance with the Treasure Island Sustainability Plan.
- Create a circulation and transportation system that emphasizes transit-oriented development, discourages automobile use, and supports and promotes the use of public transportation and car-sharing, through a comprehensive transportation demand management program. (Ruth Gravanis) [31.1b]

Another possible reason for MEA’s refusal to even study reduced parking or reduced automobile ownership is that those options might be considered infeasible. If infeasible means unrealistic, a reduced parking alternative could not possibly be less realistic than the no-project, reduced development, or no ferry service alternatives.

The DEIR states, on p. VII.76, that the Reduced Parking Alternative was not considered for further study because TIDA and the City “concluded that it could exacerbate significant traffic impacts and would be financially infeasible.” Is it appropriate for the Office of Environmental Review to accept the conclusions of the Project Sponsor without independent analysis?

Please provide detailed documentation of factors that led to MEA’s conclusion that it would be economically infeasible to reduce parking spaces to numbers that would avoid the many instances of significant and unavoidable impacts cited in the Transportation section. (Ruth Gravanis) [31.4]

Please also address the illogical circuitousness of the argument on the same page [EIR p. VII.76] that says that the only way to achieve the project objective of “discouraging automobile use and
promoting the use of public transportation” is to encourage more driving and parking as the way to generate enough revenue to make it possible for people to take transit. This argument suggests that the Project Sponsor believes that it is economically infeasible for the Proposed Project to meet its own objectives. The implication that we should not try to encourage non-car owners to move to the islands because of the potential negative impacts on the 108 defies understanding of the development’s claims to be environmentally sustainable. How can greater use of public transit be considered a negative? Consider the City’s Transit First Policy objectives:

Objective 8 -- New transportation investment should be allocated to meet the demand for public transit generated by new public and private commercial and residential developments.

Objective 14 -- Develop and implement a plan for operational changes and land use policies that will maintain mobility and safety, despite a rise in travel demand that could otherwise result in system capacity deficiencies.

These objectives seem to be at odds with the statement on page IV.E.141 that a parking shortfall on the islands could result in a shift from auto to transit modes, resulting in an increase in transit travel and therefore in a negative impact on the 108. How can a mode shift from private autos to transit not be a good thing for the environment? If there’s an increase in transit demand, it is the City’s policy to meet that demand.  

(Ruth Gravanis) [31.7]

Rejection of reduced parking and reduced auto ownership alternatives was inappropriate. The reasons provided for rejecting these alternatives do not conform to San Francisco’s General Plan considerations or priorities, most significantly the City’s Transit First policy; further, no evidence is provided to justify the reasoning provided – it is all supposition.  

(Jennifer Clary, President, San Francisco Tomorrow) [38.11]

➢ Without a pro forma for the development, it is difficult to counter the economic argument used; however, redevelopment areas rely on a variety of revenue streams to pay for needed infrastructure. Relying on parking revenue to generate a majority of the funding for transit in a small area is a formula for a failed transit system, since the balance of parking revenue and transit availability will always restrict transit opportunities. This fails to achieve the sponsors’ objectives of “providing a high-density, compact residential development located within walking distance of transit...” Under this scenario, the project will be auto-driven rather than transit-driven.

➢ The statement that “some prospective residents would not be able to easily reach their place of employment via public transit” is first, unlikely, given the availability of transit options in downtown San Francisco; and second, runs counter to San Francisco’s transit first policy.

➢ The concern about home values being depressed because of lack of parking has been consistently proven false in San Francisco, where property values retain their greatest value in neighborhoods with limited parking. No evidence to the contrary is presented in this document.  

(Jennifer Clary, President, San Francisco Tomorrow) [38.12]

- On what empirical basis did TIDA and the City and County of San Francisco conclude [Page VII.76] that a “Reduced Parking Alternative” would “exacerbate significant traffic impacts and would be economically infeasible”?

- Given all of the significant auto-related negative impacts of this Proposed Project identified in this DEIR that cannot be mitigated, how did the City and TIDA determine not to consider a “Reduced Parking Alternative” in this DEIR?
Upon what expert evidence did the DEIR conclude that parking levels cannot be reduced because “the fees to be collected from commercial parking in the Proposed Project are necessary to fund transit improvements?”

Please discuss the basis for the following statements in the DEIR:

“Removing or reducing this source of revenue planned to be used to support construction of the ferry quay and subsidize the on-island shuttles and off-island ferry and bus transit service would make the proposed level of transit service economically infeasible.”

“...if reductions in funding based on reduced commercial parking were to lead to reductions in transit service, some residents may shift to automobile use, making more severe the significant traffic and air quality impacts identified for the Proposed Project.”

Why is the Proposed Project financially structured so that all of the proposed transit improvements (the only possible way to lessen the regionally significant transportation impacts from the Redevelopment Project) are to be paid for from parking fees on Treasure Island?

Please analyze how many cars must come onto the Island and park each day/week/year in order to pay for all of the transit improvements and services identified in the 2006 Transportation Plan and in the 2006 Sustainability Plan.

How can it be that the only way to reduce automobile use (and the resulting significant transportation and air quality impacts) is to increase parking on Treasure Island in order to generate funds to pay for the transit improvements in order to reduce the number of cars coming onto the Island to park? How is this financial scheme sustainable? Will the taxpayers of the region ultimately end up with this bill? (Vedica Puri, President, Telegraph Hill Dwellers) [39.89]

Response

The reasons given in the Draft EIR for including a Reduced Parking Alternative in Subsection D, Alternatives Considered and Rejected, rather than a fully-analyzed alternative in Chapter VII, Alternatives, are found on Draft EIR pp. VII.76-VII.77. As explained in the response in Subsection 2.21.2, Reduced Parking Alternative, above, Chapter VII is expanded with a new Alternative D that provides a more detailed analysis of a Reduced Parking Alternative and its potential impacts, and the limited discussion in former Section D.3 is deleted, in response to public comments on the Draft EIR. This and the next response include a more detailed discussion of the feasibility of this alternative.

The discussion of parking on EIR pp. IV.E.140-IV.E.141 referenced in several comments concerns the parking shortfall that would result with the Proposed Project. As currently proposed, the Project would not provide sufficient parking to accommodate all of the estimated demand from the various proposed uses. The total shortfall would be approximately 1,150 spaces, as shown in Table IV.E.23 on EIR p. IV.E.139. That analysis concludes that this shortfall could result in more people using transit than might occur if the estimated parking demand were fully met. Additional use of transit with the Proposed Project would exacerbate the significant impacts on Muni line 108-Treasure Island identified in Impact TR-24 on P. IV.E.99, resulting in
overcrowding on Muni buses during peak commute hours. If the parking supply were reduced, as in a Reduced Parking Alternative, there could be further demands on transit and additional overcrowding that is likely to result in some riders shifting back to automobile use which would result in greater air quality impacts, as stated on EIR p. VII.76. Thus, the analysis in the EIR on pp. IV.E.140-IV.E.141 and p. VII.76, addresses travel demand behavior that could result in two distinct outcomes related to increased transit demand and parking shortfalls. Increased transit ridership would meet the objectives of the Proposed Project stated in the comment, and would also address the City's Transit First Policy. Nonetheless, if parking supply and availability is reduced to a certain level, travel behavior may result in increased transit use, which could cause overcrowding on transit. Overcrowding indirectly increases transit travel times, degrades transit reliability and encourages travel behavior that could cause riders to shift to back to automobile use.

One comment states that the average number of vehicles per household in San Francisco is approximately 0.65, sourced from the American Community Survey (“ACS”), based on U.S. Census Bureau data for 2006 – 2008. This statement is incorrect. When all households are taken into account (i.e., the total number of occupied households), the average number of vehicles available per household is close to 1, at about 0.95 per household. Recent ACS information for the 2005 to 2009 time frame shows an average of 0.99 vehicles available per household, based on a total number of occupied households of 324,185, and 29.4 percent with access to no vehicles, 41.5 percent with access to 1 vehicle, and 29 percent with access to 2 or 3 vehicles.12

As explained in the analysis of transportation impacts of the Reduced Parking Alternative in the response in Subsection 2.21.2 above, reducing the amount of available parking might reduce the total number of vehicle trips during the AM and PM peak commute periods; however, the reduction would not be sufficient to substantially reduce the significant transportation impacts identified for the Proposed Project. Therefore, while a Reduced Parking Alternative would meet some of the basic objectives of the Proposed Project, it would not meet the objective of minimizing the impacts of private automobile use, since the alternative would result in essentially the same significant traffic impacts (except for one traffic impact) as the Proposed Project. Although considerable amounts of the funding for public transit systems for the Islands is expected to be generated by congestion pricing fees and pre-paid transit vouchers, reducing commercial parking would reduce the amount of funding available to the Treasure Island Transportation Management Agency intended to be used to support transit operations and TDM programs for the Islands, thereby making it more difficult to meet objectives to support the use of

public transportation. Other objectives also would not be met, as explained in the new Reduced Parking Alternative analysis presented in Subsection 2.21.2.

Although it is the City’s policy to increase transit service to meet demand, increased service to fully meet all demand is not always economically feasible. Other economic feasibility issues related to reduced parking are identified and addressed in the response in Subsection 2.21.2.2. They are based on analyses prepared by four separate, independent economic consulting firms. A financial pro forma was prepared for the 2010 Term Sheet Update endorsed by the San Francisco Board of Supervisors on May 18, 2010; this information is available on the Treasure Island Development Authority web site at www.sftreasureisland.org/index.aspx?page=26. For additional discussion of the economic analysis of a reduced parking alternative, please see the response in Subsection 2.21.2.2, below.

The comment requesting an analysis of the number of cars coming to the Islands that would be needed to pay for transit improvements and services identified in the 2006 planning documents appears to incorrectly assume that there would only be two variables in the equation establishing the income to TITMA for transportation services: the number of vehicles using commercial parking and the price they would pay for that parking. There would be multiple variables, including the amount of commercial parking, the price charged for the commercial parking and amount of use of the commercial parking, the demand for and use of transit services (which affects both the cost of operation and fare box revenues), the congestion pricing fee charged, and the number of vehicles paying the congestion pricing fee, among others. The income from all of TITMA’s sources would likely vary from year to year. Therefore, it is not possible to do a simple calculation of a number of vehicles using the commercial parking and the amount they would pay for parking and arrive at an income level to compare with the estimated cost of providing the transportation services that TITMA would manage.

For a discussion of other economic topics please see the responses in Section 2.23, Fiscal and Economic Issues.

2.21.2.2 Economic Analysis of Reduced Parking Alternative

Comment

The DEIR states (page VII.76) that “less than one parking space per residential unit could adversely affect the marketability of the units ...”

---

13 Alex Galovich, Wilson Meany Sullivan, Memorandum to TI/YBI EIR Team dated December 17, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
Please consider that what may be marketable today may change in a few years. Consider advances in education, attitudes and circumstances that will lead to greater acceptance of and even the embracing of a car-free lifestyle. Consider, for example, the observations in this article:

It’s a rarely acknowledged transformational shift that’s been going on under the noses of marketers for as long as 15 years: The automobile, once a rite of passage for American youth, is becoming less relevant to a growing number of people under 30. And that could have broad implications for marketers in industries far beyond insurance, gasoline and retail....

The share of automobile miles driven by people aged 21 to 30 in the U.S. fell to 13.7% in 2009 from 18.3% in 2001 and 20.8% in 1995, according to data from the Federal Highway Administration’s National Household Travel Survey released earlier this year. Meanwhile, Census data show the proportion of people aged 21-30 increased from 13.3% to 13.9%, so 20-somethings actually went from driving a disproportionate amount of the nation’s highway miles in 1995 to under-indexing for driving in 2009.

William Draves blames (sic) the internet. Mr. Draves, president of Lern, a consulting firm which focuses mainly on higher education, and co-author of “Nine Shift,” maintains that the digital age is reshaping the U.S. and world early in this century, much like the automobile reshaped American life early in the last century.

His theory is that almost everything about digital media and technology makes cars less desirable or useful and public transportation a lot more relevant. Texting while driving is dangerous and increasingly illegal, as is watching mobile TV or working on your laptop. All, at least under favorable wireless circumstances, work fine on the train. The internet and mobile devices also have made telecommuting increasingly common, displacing both cars and public transit.

The environment is the reason Gen Y-ers most often give for wanting to drive less, Mr. Draves said. But he sees the fundamental economic transformation wrought by the internet (and, apparently on the internet; research firm J.D. Power & Associates found that Gen Y-ers don’t talk about cars nearly as much as their elders in social media). This demographic will be working on “intangibles” in professional jobs, not on tangible things that require physical presence, Mr. Draves said. ‘Time becomes really valuable to them,” he said. “You can work on a train. You can’t work in a car. And the difference is two to three hours a day, or about 25% of one’s productive time.”

Ford Motor Co. sees the trend as well ... “I don’t think the car symbolizes freedom to Gen Y to the extent it did baby boomers, or to a lesser extent, Gen X-ers;” said Sheryl Connelly, global trends and futuring manager. “Part of it is that there are a lot more toys out there competing for the hard-earned dollars of older teens and young adults.”

Digital technology “allows teens to transcend time and place,” she said, “so they can feel connected to their friends virtually.” New options like Zipcar also make it easier to do without permanent car ownership, she said.

… “This new generation, their first thought is not let’s drive to the store to get these things,” [Draves] said, “but ‘let’s get them the easiest, fastest, cheapest way.’ We call them internet-first people. We think that’s an important segment for us ...”

Of course, the trend is mainly bad news for an auto industry struggling to recover from its steepest downturn since the Great Depression. The combination of Millennials driving less and boomers retiring led Carlos Gomes, economist with ScotiaBank in Toronto, to
issue a downbeat forecast for long-term vehicle sales in North America in February. He projects growth in U.S. new vehicle sales of only around 0.6% annually over the next decade, cutting nearly by half the 1.1% growth rate of the prior decade. While the need to replace a fleet that averages 9.4 years old in the U.S. favors the auto industry short-term, demographics and driving trends argue against a robust recovery, he said. Citing his own teenage children and their friends in Toronto, Mr. Gomes said, “they just prefer taking the train.”

---”Is Digital Revolution Driving Decline in US Car Culture? Shift Toward Fewer Young Drivers Could have Repercussions for all Marketers”
http://adage.com/digital/article?article id=144155

Please provide a thorough assessment of parking-related marketability of residential units as well as commercial space, taking into account future trends. (Ruth Gravanis) [31.6]

Response

Analyses of the Reduced Parking Alternative and its effects on the marketability of the proposed residential units have been prepared. These analyses are based on the pro forma presented in the 2010 update of the Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island with Treasure Island Community Development, LLC (“2010 Term Sheet Update”) that was presented to the San Francisco Board of Supervisors in April 2010. The Proposed Project’s financial pro forma is and has been available to the public in documents that can be found on the Treasure Island Development Authority web site at http://www.sftreasureisland.org/index.aspx?page=26, including the 2010 Term Sheet Update. The information was presented in public meetings held from February through May 2010, including the Board of Supervisors’ public hearing on April 6, 2010.

Feasibility

In response to comments on the potential impacts to the economic feasibility of the Proposed Project, TIDA commissioned an independent real estate economic and marketing firm to provide information on market acceptance and conduct economic analyses of the Reduced Parking Alternative.14 That study concluded that, compared to the Proposed Project, the reduced parking ratios for residential uses would result in both decreased market acceptance and slower absorption of residential units and lower average sales prices.

The study considered the sensitivity of potential home buyers to the availability of parking with their new home, and concluded that there would be a correlation between the Islands’ desirability and the availability of secured parking. The study further concluded that a ratio of 0.5 parking stalls per residential unit would be considered to be less desirable by a large segment of the

14 Pacific Marketing Associates, Inc., Treasure Island Reduced Parking Memorandum, prepared for TIDA, February 14, 2011 (hereinafter “PMA 2010”). A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
potential home buyer market (e.g., professionals and dual-income young families) who would purchase homes as a full-time residence. Market acceptance and sensitivity also would be exacerbated because there would be no other on-Islands reservoirs of parking, either proposed or existing, that a household without parking would be able to access.

The study also states that some recent stand-alone development projects in downtown San Francisco that have fewer than 1:1 parking space ratios per residential unit have experienced slower sales than buildings with one space per unit. In addition, some of those development projects with a reduced parking ratio have provided parking in nearby public parking garages for residents in order to increase sales, resulting in an effective parking supply higher than the constructed parking ratio within the individual project. This opportunity would not be available on the Islands, as additional parking reservoirs would not be permitted beyond the parking maximums provided on the Islands. The lack of additional parking reservoirs on Treasure Island and Yerba Buena Island increases the market risk associated with the reduced residential parking ratios compared to other San Francisco neighborhoods where lower parking ratios have been adopted.

The market analysis conducted for TIDA concluded this would have the effect of reducing the project sales absorption over the life of the project by a significant margin, reducing the likely pool of buyers, limiting the project’s market share capture, and a reduction in sales prices translating into slower sales. The study concluded that absorption rates would decline by about 37 percent as compared to the absorption rates from the Proposed Project.

In addition to the TIDA study, TICD also retained three real estate economic and marketing firms to conduct economic analyses of the Reduced Parking Alternative. Each of these three studies also concluded that the Reduced Parking Alternative would result in a reduction in home sale prices compared to those expected for the Proposed Project, by about 10 percent, on average. The studies concluded that absorption rates would decline by about 30 to 35 percent, as compared to the absorption rates of the Proposed Project, which was slightly less conservative than the study conducted by TIDA.

---

15 PMA, 2010, p. 4.
17 Alex Galovich, Wilson Meany Sullivan (hereinafter “WMS”) Memorandum to Rick Cooper, Senior Planner, San Francisco Planning Department, and Barbara Sahm, Principal, Turnstone Consulting, “Market Studies on Reduced Parking,” February 10, 2011. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
18 WMS, 2011, p. 2.
Conclusions for both the TIDA study and TICD studies are based on market conditions and factors which indicate that many of the potential Islands residents would consider access to the personal vehicle an important element when deciding where to live. For example, they may be families who would consider access to a personal vehicle essential to address emergencies related to their children and access to activities for their children (daycare, schools, sports, music, and other afterschool or Saturday activities) that may not be accessible by transit; young professionals who would expect to stay on the mainland after the main commute hours and after the last ferry run at 9:00 PM; dual-income households, at least one of whom might work during off hours or in a location not well served by transit, and therefore would need a car for transportation to and from work; or older couples who would consider access to a personal vehicle essential for mobility outside of commute periods and/or to destinations not easily reached by transit. The market studies also noted that the potential buyers or residents of the Proposed Project would likely have a heightened awareness of mobility issues because of the island location. Concerns about safety, either in a personal emergency or a natural disaster, could make potential occupants consider access to an automobile essential, even if they did not intend to use it for daily commuting. (One comment suggested that the reduction in parking could lead to an increase in the desirability of living on and visiting the Islands due to greater safety, especially for families; this hypothesis was not supported by the market studies.)

Overall, the four economic and market analysis studies concluded that, with reduced parking, the pool of potential residents interested in moving to the Islands would be substantially reduced. A reduction in the pool of potential home buyers would, in turn, necessitate price reductions and result in slower absorption rates, both of which would severely undermine the financial feasibility of the Proposed Project.

TIDA also commissioned an independent peer review by Economic & Planning Systems ("EPS") of all four economic and market feasibility studies for the Reduced Parking Alternative.¹⁹ EPS's findings supported the conclusions of the previous studies; key findings concluded that:

- total land sales would be lowered by 20 to 30 percent;
- revenues from public financing, including tax increment and special taxes, would be reduced by about ten percent;
- rates of return for the project would fall, ranging from 5 to 10 percent and absorption rates would be reduced by 25 to 50 percent; and
- investment returns would be substantially reduced, from about 20 percent to about 4.7 – 8.2 percent.

¹⁹ Economic & Planning Systems, Inc., Financial Feasibility Impacts of Reduced Treasure Island Parking, Memorandum to Michael Tymoff, Office of Economic and Workforce Development/Treasure Island Development Authority, February 14, 2011. A copy of this memorandum is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
Slower absorption would mean that there would be less funding available in the early phases of the Proposed Project for the project sponsors to use to construct infrastructure. It would also result in overall lower project-generated revenues to pay for the public infrastructure and associated public benefits. With the reduced home sale prices combined with slower absorption,
in combination, and accounting for rental as well as for-sale housing and for the affordable housing components, the total revenue would be reduced by about 22 – 27 percent and the rate of return would be reduced from about 20 percent to about 5 percent or less. This would result in the inability to attract the amount of private equity investment required to launch the first phases of the development. Without this upfront capital investment in the Proposed Project, the tax exempt public financing mechanisms that are necessary to fund the $1.5 billion in project costs could not be accessed.\textsuperscript{20} The Reduced Parking Alternative therefore, could not be implemented without additional modifications to other elements of the program to substantially reduce costs. Based on the types of adjustments that have previously been made by the project sponsors during the planning process for the Proposed Project analyzed in the EIR, likely cost reduction measures would be to reduce affordable housing, community facilities, sustainability features, economic development and job opportunities, parks and open space improvements, transportation infrastructure and transit subsidies, some of the components of the Proposed Project that are supported by the sale of market-rate housing.

In summary, the analyses of the economic effects of providing less residential parking, prepared by four different financial consulting firms, concluded that home sales prices on Treasure Island and Yerba Buena Island would be lower and that absorption of the units would be substantially slower compared to the prices and absorption in the 2010 Term Sheet Update. This would result in reduced revenues and substantial reductions in investment returns, from about 20 percent to about 4.7 – 8.2 percent. In addition, TIDA's economic peer review consultant, EPS, has determined that a returns of this level are not acceptable to investors in projects of this scale, magnitude, and risk; returns of approximately 8% or less would render the project financially infeasible, since private investment capital would not be available for construction involving such low rates of return in relation to alternative, risk-free rates of return.

Other comments requested that these analyses take into account potential future trends in the marketability of residential units and commercial space associated with the requested reductions in parking ratios. Future trends are difficult to predict accurately and necessarily involve forecasting changes in the current market. Such forecasting is considered too speculative, and would provide no objective information regarding the Proposed Project's current economic feasibility, which is based on current economic conditions, capital market requirements and trends in the residential housing market.

\textsuperscript{20} Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island with Treasure Island Community Development, LLC (“2010 Term Sheet Update”), April 2010 Term Sheet Update, Exhibit R-1. This document is available on the Treasure Island Development Authority web site at www.sftreasureisland.org/index.aspx?page=26.
2.21.3 ALTERNATIVE B, REDUCED DEVELOPMENT

Comments

Of the Alternatives [VII.1-78], the only one deserving any consideration would be the Reduced Development Alternative [VII.3]. However even this scenario is subject to the same comments above regarding the over-emphasis of auto use. (Ron Miguel, President, San Francisco Planning Commission) [7.8]

The Project’s alternatives, including but not limited “Reduced Development Alternative” (as identified therein), include a review of reduced densities, but not at a level that would actually reduce impacts to traffic. The primary difference between the Project and the Reduced Development Alternative is that residential development would be reduced from up to 8,000 dwelling units (which proposes a population density equal to that of the City of San Francisco’s most populous areas and likely to cause many issues beyond traffic) to 6,000 units (see VII. Alternatives, page VII.15). The Reduced Development Alternative was included to determine if a reduced number of residential units on TI/YBI would avoid or substantially lessen traffic (and related air quality and noise) impacts, as well as an aesthetic impact on scenic vistas of the Project (VII. Alternatives, page VII.18). Pages VII.31 and VII.32 describe cumulative impacts of traffic under a reduced development alternative. In addition, no financial information was located to determine if a further reduction in dwelling units could still produce enough user fees to support wastewater and water services (this topic is further discussed below).

It is obvious that there would still be significant cumulative traffic impacts, and such should be addressed; however, it is also clear that even at 6,000 units, the Project is much too dense considering the traffic impacts it will generate. The DEIR should have studied a much lower density, including the creation of more open-space as a way to reduce the significant traffic impacts. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.25]

Vol. 2, VII.1, Alternatives: The 2006 Term Sheet and Transportation Plan, Land Use -, Sustainability and Infrastructure Plan work with a different set of program assumptions than what is used for the Proposed Project in this DEIR. Why were the numbers so drastically changed and why were the many Plan documents that are being referenced never amended? There is a 25% increase in dwelling units and a 22% increase in parking.

Vol. 2, VII.3, Alternatives: Why is “Reduced Development Alternative” not studied as the Proposed Project? The program summarized for this alternative is the basis for all studies that have been supported and formed the basis for numerous approvals by different public bodies, including the Board of Supervisors, the TI Board, the TI CAB, the Planning Commissions, etc. (Kathrin Moore, San Francisco Planning Commission) [20.35]

The label “Reduced Development Alternative” is a falsity: is it possible to present proofs that there would be a reduction of impacts due to creation of a Regional Shopping Mall? If not, then inclusion of a regional shopping center cannot be considered a reduced-impact alternative. If so, the reasons are not found in this DEIR. (Jennifer Clary, President, San Francisco Tomorrow) [38.19]

As described in the DEIR, the reduced development alternative “reduces” only the number of residential units (from 8,000 units to 6,000 units). The DEIR explains that this would result in a 25% reduction in the amount of the “neighborhood-serving retail uses” and a 25% increase in “regional serving retail uses.”
The “reduced development alternative” would not only necessitate more trips off-island by the residents, but the 25% increase in “regional serving retail uses” would attract more non-residents to the island. Logically, this alternative would result in even greater impacts related to private automobile use, as would the “no ferry service alternative.” (Vedica Puri, President, Telegraph Hill Dwellers) [39.81]

- Please explain exactly why the “reduced development alternative” included in the DEIR requires a 25% reduction in neighborhood serving retail uses and a 25% increase in regional serving retail uses. How many additional private automobile trips will this generate? Please provide the source for your answers to these questions. (Vedica Puri, President, Telegraph Hill Dwellers) [39.83]

Response

The comment regarding the over-emphasis of auto use is related to the parking ratios and the amount of parking provided in the Proposed Project. Refer to the response in Subsection 2.21.2, Reduced Parking Alternative.

One of the comments infers that the Project proposes a population density equal to densities of the most populous areas of the City. Instead of population density, the San Francisco Planning Department typically measures density by residential units per net acre because in a dense, compact city such as San Francisco, population density varies widely based on demographics, particularly changes over time in the number of persons per household. The northeastern area of the City has the largest stock of the City's high-density housing. This area encompasses the Downtown and South of Market Planning Districts, and the Northeast Planning District which includes the Chinatown and North Beach neighborhoods. Other areas of high-density housing include the Van Ness Avenue corridor. In San Francisco, housing density (measured as average units per acre) ranges from a low of 14 units per acre in single-family unit neighborhoods such as the Sunset, to a high of 283 units per acre in higher-density neighborhoods in the downtown. Moderate high-density housing along major transit corridors such as Van Ness Avenue and Upper Market Street and in major redevelopment areas such as the Western Addition, Golden Gateway and the northern edges of Mission Bay is about 91 units per acre. As stated in Section IV.C, Housing and Population, on EIR p. IV.C.10, the Proposed Project would have an average overall residential density of about 100-110 housing units per acre, which is comparable to moderate high-density areas of the City.

As stated in one comment, Alternative B, the Reduced Development Alternative, would have similar impacts as the Proposed Project pertaining to traffic, traffic-related air quality and noise, and aesthetics. The EIR did consider an alternative with much lower density development, Alternative D.2, the 2800 Housing Unit Alternative with an Amusement Park, as described on

---

21 San Francisco Planning Department, Draft 2 Housing Element, Part 1: Data and Needs Analysis, June 2010, pp. 66-68.
EIR pp. VII.74 - VII.75. That alternative was rejected as infeasible because the Treasure Island Development Authority ("TIDA") and the Board of Supervisors determined that an amusement theme park would not be a desirable use for the long-term redevelopment of Treasure Island and Yerba Buena Island. The alternative with 2,800 residential units and an amusement park would not meet the project sponsors’ objectives of providing a high-density, compact residential development located within walking distance of transit and providing high-density, mixed income housing with both ownership and rental opportunities. The 2800 Housing Unit Alternative also would not provide a sufficient population base to maximize transit use and support project feasibility and viable retail, transit, open space, community services, and infrastructure improvements.

The Reduced Development Alternative and the No Ferry Service Alternative each would include approximately 300 acres of athletic fields and open space, which would comprise 65 percent of the Development Plan Area on Treasure Island, and about 90 percent of the Development Plan Area on Yerba Buena Island (see EIR p. IV.J.15, Figure IV.J.1, Proposed Open Space). As such, a considerable amount of open space is included in these alternatives. Development of an alternative with substantially more open space than the Proposed Project would not be feasible without a corresponding increase in residential development to provide the population base, economic feasibility, and land use efficiencies to support open space amenities. Therefore, a significantly more dense alternative would be needed to support more open space than is currently proposed.

As stated in one of the comments, the 2006 Term Sheet and its associated exhibits such as the Transportation Plan, Land Use Plan, Sustainability Plan and Infrastructure Plan, are based on a different set of program assumptions than what is used for the Proposed Project in this EIR. This same comment also asks why the numbers in the Proposed Project changed so drastically from those in the 2006 Term Sheet, and why the Plan documents referenced in the EIR have not been amended. The comment is correct in noting the differences between the development program in the 2006 Term Sheet, which proposed 6,000 residential units and approximately 7,840 total off-street and on-street parking spaces, and the Proposed Project analyzed in the EIR, which would increase the number of allowable residential units by 25 percent, and increase the number of allowable parking spaces by 36 percent.

As discussed in Chapter I, Introduction, on EIR p. I.6, the Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island ("Term Sheet") was endorsed by the TIDA Board and the Treasure Island and Yerba Buena Island Citizens Advisory Board ("CAB") in October 2006 and by the San Francisco Board of Supervisors in December 2006. The 2006 Term Sheet presented a proposed development plan based on several years of discussion among various parties, including Treasure Island Community Development, LLC (TICD), the TIDA Board, the
Chapter IX

2. Comments and Responses

21. Alternatives

CAB, the Land Use and Economic Development Committee of the Board of Supervisors, multiple City agencies, and interested members of the public regarding the future of NSTI.

At the time of the endorsement of the 2006 Term Sheet, the City had not yet reached agreement with the Navy on the terms for the transfer of the property to TIDA, and the 2006 Term Sheet explicitly anticipated a need to update the terms of the 2006 Term Sheet to reflect materially changed conditions, such as terms of the deal with the Navy and/or changes to economic assumptions.

The 2006 Term Sheet, and the endorsement by the TIDA Board, CAB and Board of Supervisors, acknowledged that there was considerable work remaining to be done over the next several years to reach final project approvals, including among other things: project-specific environmental review as required by CEQA; adoption of a Redevelopment Plan and Design for Development; negotiation of the final TICD Disposition and Development Agreement (“DDA”) and related transaction documents between TIDA and TICD; negotiation of the terms of a property conveyance agreement with the Navy; negotiation of a Trust Exchange Agreement with the State Lands Commission; the design and engineering of infrastructure and utility systems required to support development; and the development of design guidelines and standards to control development in the Development Plan Area.

Additionally, as discussed on EIR p. I.6, the City received comments on the Notice of Preparation (“NOP”) of the EIR suggesting that a project or alternative should be analyzed that would increase density in order to support project feasibility as well as increase the viability of transit, open space, community retail, and neighborhood oriented services.

Since the 2006 Term Sheet was endorsed, economic market conditions changed considerably as project planning and due diligence activities by TIDA and TICD, in coordination with numerous City agencies and stakeholders, continued to move forward. The studies and analyses from these planning efforts were publicly presented in numerous forums, including public workshops and open houses, resident meetings on Treasure Island, publicly noticed meetings of the CAB, TIDA, Land Use and Economic Development Committee of the Board of Supervisors, and in informal presentations to the Planning Commission and the Bay Conservation and Development Commission. These meetings included detailed presentations and supporting documents on the key aspects of the development program analyzed in the EIR, including, but not limited to, updates on the following exhibits in the 2006 Term Sheet: the Transportation Plan, the Land Use Plan and Design Guidelines, the Sustainability Plan and the Infrastructure Plan. Presentations on the Infrastructure Plan also included information on changes to the proposed geotechnical approach included in the Project. The revised approach was also selected to improve geotechnical performance and account for potential future sea level rise. The new approach increases the infrastructure costs of the Proposed Project by $150 million.
TIDA and the Navy reached a conceptual agreement on the terms of property conveyance in December 2009. While the 2006 Term Sheet anticipated that the Navy would receive no monetary compensation for the property, the December 2009 agreement requires compensation estimated at $117 million. Due to the terms of the property conveyance agreement with the Navy, the changes in economic conditions, and the increased costs of geotechnical improvements, the redevelopment plans were updated in a manner that TIDA and TICD have concluded would allow for a financially feasible project consistent with the project objectives. These updates to the 2006 Term Sheet increased overall density, which is consistent with and in response to, public comments on the NOP that requested that the EIR study a project with an increased number of residential units.

The 2006 Term Sheet has been amended with a number of updates that were formally endorsed in 2010. More specifically, the following updates to the Proposed Project have been incorporated as part of the Update to the Development Plan and Term Sheet for the Redevelopment of Naval Station Treasure Island with Treasure Island Community Development, LLC ("2010 Term Sheet Update"): (i) the terms of the Navy conveyance agreement; (ii) updates to the Development Program to include: (a) up to 8,000 homes; (b) up to 11,155 total off-street and on-street parking spaces; (c) up to 100,000 sq. ft. of office space; and (d) up to 207,000 sq. ft. of retail, comprised of 122,000 sq. ft. of neighborhood serving retail and 85,000 sq. ft. of regional serving retail; (iii) changes to the geotechnical and flood protection approach to mitigate geotechnical and sea level rise conditions; (iv) adjustments to the open space budget; (v) more efficient approaches to financing transit capital; (vi) agreements with the San Francisco Public Utilities Commission and San Francisco Fire Department on infrastructure and public facilities as part of the redevelopment project; (vii) an updated affordable housing program; and (viii) updates to the cost revenue and timing assumptions to be consistent with the program scope and budget adjustments just described, updated market revenue and public financing assumptions, and adjustments to the transaction structure consistent with the terms of the Navy agreement. The 2010 Term Sheet Update was endorsed by the TIDA Board and CAB in April 2010, and by the Board of Supervisors in May 2010.

As noted on EIR p. VII.15, Alternative B, the Reduced Development Alternative, is similar to the development program in the 2006 Term Sheet, with slightly less retail space. The Reduced Development Alternative would include the same amount of total retail space (207,000 sq. ft.) that is included in the Proposed Project. However, the proportion of neighborhood-serving and regional-serving retail space would be altered due to the decrease in the number of residential units (see chart below).
In comparison to the Proposed Project, the percentage of neighborhood-serving uses would decrease by about 25 percent because there would be 2,000 (25%) fewer residential units that would support or require neighborhood serving uses such as grocery stores, dry cleaners, and local serving eateries. Therefore, in comparison to the Proposed Project, a higher proportion of retail uses, approximately a 36 percent increase, would be devoted to regional- and visitor-serving uses such as specialty food stores and destination restaurants. While the change in retail mix is not a requirement, it is assumed as the likely market reaction if residential uses were reduced by 25 percent. The increase (31,000 sq. ft.) in regional serving retail uses would generate approximately 75 additional external trips during the weekday PM peak hour, and approximately 90 additional trips during the Saturday peak hour. Table VII.3 on EIR p. VII.21 compares the total vehicle trips generated by the Reduced Development Alternative to the Proposed Project. During the peak hours, the total number of vehicle trips generated by the Reduced Development Alternative would be 2,218 trips during the PM peak, and 2,565 during the Saturday peak, as compared to 2,462 trips during the PM peak and 2,861 trips during the Saturday peak for the Proposed Project.

The traffic analysis for the Reduced Development Alternative is presented on EIR pp. VII.20 - VII.24. That analysis indicates that traffic impacts, even with the higher percentage of regional-serving retail uses, would be similar to the Proposed Project because significant traffic impacts would occur during weekday AM and PM commute peak hours that do not coincide with peak travel demand for visitor-serving uses. Therefore, the number of vehicle trips associated with increased regional-serving retail uses would not substantially affect traffic impacts. Visitors to regional-serving retail uses on the Islands would also be served by bus and ferry transit.

The Reduced Development Alternative would not create a “regional shopping mall," as one of the comments suggest. Under this alternative, approximately 116,000 sq. ft. of regional-serving uses would be provided. Regional shopping malls typically contain between 400,000 and 800,000+ sq. ft. situated on 40 or more acres, and are anchored by 2 to 3+ major retail stores. For example, the San Francisco Stonestown Galleria is a 42-acre regional mall that contains 862,000

---

22 Fehr & Peers, *Treasure Island and Yerba Buena Island Redevelopment Plan Transportation Impact Study*, July 7, 2010, Table 18- Net Person-Trip Generation by Land Use, p. 72, and Table 29 - Net Person Trip Generation by Land Use (Reduced Development Alternative), p. 92. A copy of the *Transportation Impact Study* is included as EIR Appendix C.

23 Appraisal Institute, CoStar and the International Council of Shopping Centers, April 2009.
sq. ft of retail space anchored by 3 major retail stores. The 116,000 sq. ft. of regional serving uses that would be provided under the Reduced Development Alternative would likely be distributed among several regional, special purpose retail outlets that would be distinctly different than a regional shopping mall.

As shown in Table VII.3, on EIR p. VII.21, the Reduced Development Alternative would generate fewer vehicle trips in comparison to the Proposed Project, and would not result in increased impacts related to private automobile use. Nor would the No Ferry Service Alternative increase impacts related to private automobile use. As stated in the fourth paragraph on EIR p. VII.48, the No Ferry Service Alternative assumes that bus transit alone would be adequate to accommodate forecasted transit ridership without increasing peak-hour automobile travel, as compared to the Proposed Project. This assumes the same amount of bus capacity as in the Proposed Project's mitigated enhanced transit service scenario. The No Ferry Service Alternative is discussed more in Subsection 2.21.4, below.

### 2.21.4 ALTERNATIVE C, NO FERRY SERVICE

**Comments**

2. Pg. S.53 (Summary of Project Alternatives), Section C (No Ferry Service Alternative). The CAB adamantly disagrees with this as an “alternative”, and we cannot stress strongly enough that neither the city nor TIDA consider a “no ferry” option. We feel the DEIR should be changed with all No Ferry Alternative references removed. (Treasure Island/Yerba Buena Island Citizens’ Advisory Board) [8.2]

15) We applaud the study of the no ferry alternative because other EIRs show that the average ferry service consumes more energy per passenger mile than a typical Bay Area automobile with 1.2 passengers, including the driver. However, this alternative should be re-analyzed with at least 8,000 units to provide the number of residents required to support a level of, on island, neighborhood services necessary for most residents. This alternative should also be reanalyzed with the components 1) to 12) above. The EIR for this alternative should show how all of the funds available from the congestion pricing will be used while complying with AB 981. One good use will be contributions to Muni because TI residents will use other lines besides the 108 and the typical mainland Muni funding sources of meters and parking taxes will not flow from TI to Muni. This alternative should eliminate most needs for the shuttles, because all of the shuttle passengers will be transferring to a bus. During peak hours about 25% of the Muni buses could cover each half of TI with 50% turning back at the transit center, where it will be easy for most riders to access this bus on foot. Off peak more of the buses will have to serve the outer island or shuttles can be used. The EIR should analyze the extent that reducing the need to transfer will increase transit use. Only AC passengers would have

Response

The first comment disagrees with including an analysis of the No Ferry Service Alternative in the EIR. As stated in the response in Subsection 2.21.1, Purpose of Alternatives in EIRs, the CEQA Guidelines Section 15126.6(a) requires that an EIR “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 merit of the alternatives.”

As noted on EIR p. VII.52, the No Ferry Service Alternative could feasibly meet most of the key objectives of the project sponsors and would avoid significant unavoidable impacts on the U.S.S. Buttercup training facility, an historical resource for purposes of CEQA, that is individually eligible for inclusion in the California Register of Historical Resources. With the No Ferry Service Alternative, the U.S.S. Buttercup would be retained; it is also assumed that the training facility would be stabilized; repaired in conformity with the Secretary of the Interior’s Standards for Rehabilitation; and reused and made accessible to the public. In addition, the No Ferry Service Alternative would reduce significant air quality, noise and biological impacts associated with ferry operations that would occur under the Proposed Project. Therefore, for purposes of CEQA, the Planning Department determined that it is both appropriate and reasonable to include an analysis of the No Ferry Service Alternative in the EIR.

As stated on EIR p. VII.1, final determination of feasibility of an alternative will be made by project decision-makers based on substantial evidence in the record, which includes, but is not limited to, information presented in the EIR, comments received on the Draft EIR, and responses to those comments. The City must also consider approval of an alternative if that alternative would substantially lessen or avoid significant environmental impacts identified for a proposed project and if that alternative is determined to be feasible.

Refer also to Subsection 2.21.6, Proposed Project With No Ferry Service Alternative for additional discussion of the No Ferry Service Alternative with 8,000 units.

Administration of a congestion pricing fee is discussed on EIR p. IV.E.45. As part of implementation of the Proposed Project, a transportation management agency, authorized under the Treasure Island Transportation Management Act of 2008 (AB 981), would administer a variable congestion fee to residents of the Islands for accessing the Bay Bridge. Fees would be charged to Island residents for auto access between the Bay Bridge and the Islands during periods of peak congestion. The designated transportation management agency would be responsible for determining the use of funds collected from congestion pricing fees.
Funds for the San Francisco Municipal Transportation Authority ("SFMTA") to operate the Muni Line 108-Treasure Island bus route would continue to come from the San Francisco General Fund. Under the base transit scenario, Muni Line 108-Treasure Island is assumed to operate on its existing headways. With the expansion of Muni bus service proposed as part of Mitigation Measure M-TR-2, there would be an incremental cost increase to Muni; however, that cost increase is currently projected to be substantially less than the amount of revenue generated by the Proposed Project that would go to the General Fund through property taxes, sales taxes, hotel taxes, and other sources. Ongoing economic feasibility studies related to revenue projections and discussions between TIDA and SFMTA regarding funding and service levels will be documented as part of the final record for EIR certification.

Regarding the extent to which a reduction in the need to transfer would increase bus transit use, bus service routing and operations are the responsibility of the SFMTA. As described in the Project Description on EIR pp. II.39-II.44, the proposed shuttle routes are designed to be flexible, which allows for easy adjustments in service operations to meet changes in demand, unlike Muni fixed-route bus transit service. The street cross sections of the Major Arterials along Avenue C and California Avenue have been designed with sufficient width to accommodate buses should SFMTA choose to extend service into the neighborhoods, as one of the comments suggests. The proposed shuttle routes are shown on Figure II.9: Proposed Shuttle Routes on EIR p. II.40; the proposed street cross sections are shown on Figure II.11: Representative Street Cross Sections on EIR p. 41. The Proposed Project includes a number of elements to increase transit use, as described under the Transportation Demand Management Plan ("TDM") on EIR pp. IV.E.45 - IV.E.47. Specifically, the TDM measures, transit routes, and intermodal transit hub have been designed to minimize delays riders would experience in making transfers from shuttles to buses or ferries. All of these elements were considered, to the extent feasible, in the travel demand assumptions for the Proposed Project to the potential to increase transit ridership.

2.21.5 PRESERVATION ALTERNATIVE

Comment

II. The FEIR Should Evaluate Less Harmful Alternatives to Complete Removal of the USS Buttercup Battleship Simulator

The proposed project calls for the demolition of the USS Buttercup; as such, its character-defining materials and features would be removed entirely and it would no longer convey historic significance. Although Mitigation Measure M-CP-9 calls for documentation and interpretation of the Damage Control Trainer, it would not lessen the impact of demolition to a less-than-significant level.

The DEIR finds that moving the USS Buttercup is not feasible because the Damage Control Trainer includes a large concrete sump, much like a swimming pool, which is partially built into the grade. Heritage requests that the Final EIR include more detailed analysis of partial preservation alternatives, such as relocation of the simulator onto a reconstructed sump and/or
into a museum setting. As noted in the DEIR, the proposed Development Program reserves over 100,000 square feet for recreational, interpretive, cultural and museum uses.* If relocated, the USS Buttercup could be an interesting addition to one of these areas and would convey to the public information about the island’s past use as a naval base. The FEIR should also assess the feasibility of transferring the USS Buttercup back to the Navy for active use. Any of these options is preferable to documentation and interpretation alone, and would potentially reduce impacts to a less-than-significant level.

[The comment letter includes the following footnote:

- The Development Program would provide space for a variety of community programs in the historic former Administration Building (Building 1), in some of the proposed residential buildings, and in a new 35,000-sq.-ft. building near Pier 1 expected to provide space for recreational or interpretive center activities. Space for public offices, such as TIDA, and child care also would be provided. Space for an up to 75,000-sq.-ft. museum or other cultural institution is planned in the Cultural Park north of Building 1.” DEIR at II.33.]

If preservation options prove infeasible after detailed evaluation, Heritage proposes enhanced and creative interpretation of the USS Buttercup as part of Mitigation Measure M-CP-9, such as a video installation or other interactive media in the Treasure Island museum illustrating the use and function of the battleship simulator. (Mike Buhler, Executive Director, San Francisco Architectural Heritage) [18.2]

Response

The U.S.S. Buttercup was identified as an historical resource for the purposes of CEQA in the Historic Resource Evaluation undertaken specifically for the Proposed Project. It was not identified as an historical resource in any earlier study of historic resources. As the comment notes, EIR p. IV.D.56 explains that retention of the Damage Control Center referred to as the U.S.S. Buttercup cannot be accommodated as part of the Proposed Project because its retention would preclude construction on two development blocks, resulting in a substantially different project than the Proposed Project.

However, while demolition is unavoidable under the Proposed Project, retention of this historic resource, by itself, is not infeasible. For these reasons, retention of the resource is not identified as a feasible mitigation measure for the Proposed Project, but is considered and analyzed as a component of Alternative C, the No Ferry Service Alternative. Retention of the U.S.S. Buttercup would also occur under the No Project Alternative. Retention of the resource could also feasibly be a component of the Reduced Development Alternative, but was not considered since retention was addressed as a component of Alternative C, the No Ferry Service Alternative.

As the last comment notes, Mitigation Measure M-CP-9, which is presented on EIR pp. IV.D.57 - IV.D.58, calls for documentation and interpretation of the Damage Control Trainer. Documentation would require the project sponsor to provide a permanent display of interpretive materials concerning the history and architectural features of the historical resource within public spaces of Treasure Island. The specific location, media, and other characteristics of such an
interpretive display would require approval by TIDA prior to any demolition or removal activities, and could include provisions for video installation and other interactive media illustrating the use and function of the battleship simulator. Implementation of Mitigation Measure M-CP-9 would lessen the impact of demolition of the *U.S.S. Buttercup*; however, as discussed on EIR p. IV.D.56, it would not mitigate adverse impacts on this historical resource to a less-than-significant level.

Partial retention of the Damage Control Trainer, as suggested by the comment, could be accomplished by disassembling the deck and hull assembly and reassembling it elsewhere. Assuming a suitable location could be identified to house and display the 48-foot-long by 24-foot-wide deck and hull assembly (either on Treasure Island or off-site), the deck and hull assembly would become a disconnected object, removed from the context of the building that now houses it, its concrete sump, and other water infrastructure that allowed it to simulate stormy ocean conditions. As a result, the Damage Control Trainer would lose its integrity of location, design, setting, materials, workmanship, feeling, and association such that it would no longer be eligible for inclusion in the California Register of Historical Resources. Similarly, if the Damage Control Trainer were partially preserved by relocating it into a museum setting, there would be a similar loss of historic features deemed eligible for inclusion in the California Register of Historical Resources. Therefore, partial preservation of the Damage Control Trainer, would still result in a significant and unavoidable adverse impact under CEQA. As such, partial retention of the resource would not effectively mitigate the significant impact on the historic significance of the resource and its ability to convey its significance.

At the time the Draft EIR was being prepared, TIDA contacted the Navy to assess the feasibility of transferring the *U.S.S. Buttercup* back to the Navy for either active or interpretive uses. The Navy responded that it is not interested in retaining the *U.S.S. Buttercup*. Moreover, even if the trainer facility was transferred back to the Navy for active or interpretive uses, the facility would no longer be eligible for inclusion in the California Register of Historical Resources because it would not retain its historic location and context on Treasure Island. As such, transferring the *U.S.S. Buttercup* to the Navy would continue to result in a significant and unavoidable adverse impact as defined by CEQA.

### 2.21.6 PROPOSED PROJECT WITH NO FERRY SERVICE ALTERNATIVE

**Comment**

In particular, the proposed ferry service relies on another agency to approve and conduct that service, while Alternative C includes no ferry service and provides fewer residential units and less neighborhood-serving retail space than in the Project. The DEIR should include an analysis of impacts of the preferred Project (such as traffic, air quality, evacuation plans) if no ferry service is provided. (See - VII. Alternatives, pages VII.48 through VII.60). *(Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters)* [19.19]
Response

The first part of the comment discusses implementation of ferry service, and the development program for the No Ferry Service Alternative. As discussed on EIR p. VII.48, Alternative C, the No Ferry Service Alternative, would provide 2,900 fewer residential units and less neighborhood-serving space than the Proposed Project. This reduction to 5,100 total residential units was determined by estimating the level of transit service that could be provided, assuming Muni service goals of buses operating at an average of 85 percent of seated and standing capacity would be met. Based on these factors, the residential portion of the Development Program was reduced to an amount such that bus transit alone (i.e., no ferry service) would be adequate to accommodate forecasted transit ridership, without increasing peak-hour automobile travel in comparison to the Proposed Project.

Development of the No Ferry Service Alternative with 5,100 residential units also assumes that funding would be available to provide the level of bus service that is described in transportation Mitigation Measure M-TR-2, Expanded Transit Service on EIR pp. IV.E.74 - IV.E-75 since, unlike the Proposed Project, project funding would not be required to construct a Ferry Terminal, lease ferry vessels or subsidize ferry operations. Instead, this funding could be available to provide additional buses and operators for increased bus service during the peak hours. As noted on EIR p. IV.E.20, the Water Emergency Transportation Authority (WETA) is responsible for implementing its Ferry Implementation and Operations Plan (the “IOP”) which proposes new ferry service between the San Francisco and Treasure Island.

The second part of the comment requests that the EIR include an analysis of the Proposed Project with no ferry service. As part of the analysis of alternatives in the EIR, the Proposed Project was analyzed with elimination of ferry service and assuming implementation of increased bus transit as in Mitigation Measure M-TR-2, Expanded Transit Service, as would occur with the No Ferry Service Alternative. Providing no ferry service but adding more bus service to San Francisco would reduce one-way transit capacity on the Islands to and from San Francisco by 71 percent during the AM peak hour, from 3,917 to 1,121 passengers per hour, and by 66 percent, from 4,239 to 1,443 passengers per hour, during the PM and Saturday peak hours. Elimination of ferry service and adding bus service would result in a reduction in overall transit mode share from 43 percent to 25 percent. As a result, if the Proposed Project were to eliminate ferry service, approximately 70 percent of ferry riders would be estimated to switch to private vehicle and 30

---

25 The total amount of retail space under the No Ferry Alternative would be 207,000 sq. ft., the same amount provided by the Proposed Project; however, the alternative would likely include less neighborhood-serving retail uses (about 25 percent less) and more regional-serving uses due to the reduction in the amount of residential units. See also the discussion of neighborhood-serving retail for the Reduced Development Alternative in Subsection 2.21.3, above.
percent of ferry riders would switch to bus transit service.\textsuperscript{26} Based on this assumption, the number of bus and auto trips to San Francisco would increase; the number of bus and auto trips to the East Bay would remain constant as the elimination of ferry service from Treasure Island to San Francisco would not result in changes in mode share for off-island trips destined for the East Bay.

Eliminating ferry service with development of 8,000 residential units would cause the number of external vehicle trips to increase between 150 and 500 vehicles during the peak hour, which would result in a greater number of vehicles than analyzed for the Proposed Project in the EIR. The number of Muni riders would increase between 150 and 350 peak hour riders.

Therefore, development of the Proposed Project with 8,000 residential units and no ferry service would result in increased traffic and traffic-related air quality impacts above those described for the Proposed Project in the EIR, as elimination of ferry service would increase the number of auto trips as described above. Emergency evacuation with no ferry service would be similar to conditions described for the EIR project, including implementation of an Emergency Response Plan or Evacuation Plan described on EIR pp. IV.P.38 - IV.P.39 in Section IV.P, Hazards and Hazardous Materials, and emergency access is described on EIR pp. IV.E.116 - IV.E.117 in Section IV.E, Transportation. However, water access would be limited to use of the existing Pier 1 facility on the east side of Treasure Island, as there would be no Ferry Terminal on the west side of the island. To the extent that the Proposed Project without ferry service resulted in increased vehicle traffic on the Bay Bridge off- and on-ramps, access for emergency vehicles could be impeded.

If it were to be assumed that all ferry riders shifted to bus transit (i.e., all riders made their trip despite the absence of the ferry, but none made auto trips), as with the No Ferry Service Alternative, increased transit ridership generated from development of 8,000 units with no ferry service would not meet Muni service goals, and would have substantial adverse impacts on transit. To accommodate additional transit ridership, development of 8,000 units without ferry service would further increase funding required for transit improvements beyond the levels described for implementation of Mitigation Measure M-TR-2, Expanded Transit Service in the EIR.

For the reasons discussed above, implementation of the Proposed Project with no ferry service would not be feasible, and was not considered for analysis in the EIR.

\textsuperscript{26} The analysis of transportation impacts of the Proposed Project with no ferry service is based on Fehr & Peers, \textit{Treasure Island and Yerba Buena Island Redevelopment Plan, Transportation Impact Analysis - No Ferry Service Alternative}, Memorandum to Viktoria Wise, San Francisco Planning Department, July 7, 2010. A copy of this memorandum is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2007.0903E.
2.21.7 ALTERNATIVE A, NO PROJECT

Comment

On page VII.13, it states that the impacts of the No Project Alternative on the biological resources would be insignificant. While the resources have indeed been “ecologically compromised” the health of the remnant ecosystems could still deteriorate drastically over time if nothing is done. The same significant negative impacts would occur under the Proposed Project and other alternatives if funding does not become available to implement the Habitat Management Plan. Please provide a more thorough discussion of the impacts on YBI’s biodiversity that will result if the invasive introduced species are allowed to continue to out-compete, smother and displace the naturally occurring biotic communities. (Ruth Gravanis) [31.19]

Response

While the potential biological impact of the No Project Alternative is acknowledged in the EIR, it is appropriately identified as a less-than-significant impact as described below.

As stated by the comment and on EIR p. VII.13, the existing terrestrial biological resources on the Islands represent a baseline that is already ecologically compromised. This is detailed in the description of existing habitats and species in the Setting section of IV.M, Biological Resources, particularly pp. IV.M.4 – IV.M.9 and IV.M.16 – IV.M.23.

The analysis of impacts on biological resources for the Proposed Project as well as for all alternatives is based on the significance criteria used by San Francisco pursuant to CEQA and the CEQA Guidelines. These criteria are presented in Section IV.M, Biological Resources, on pp. IV.M.39 – IV.M.40. The criteria focus on impacts on species listed in local, regional, state, or federal plans, policies, or regulations; sensitive natural habitats or natural communities identified in local, regional, state, or federal plans, policies, or regulations; protected wetlands; or migratory species. The criteria also identify conflicts with adopted local policies or ordinances, habitat conservation plans, or natural community conservation plans as significant impacts. Finally, the CEQA Guidelines define a potential significant impact if a project has the potential to significantly degrade the quality of the environment, reduce the habitat of a fish or wildlife species, threaten to eliminate a plant or wildlife community, or substantially reduce the number of a special-status species.

As stated on EIR p. IV.M.21, there are no known federally- or state-listed terrestrial wildlife species known to breed on the Islands. Several special-status birds may use the Islands for foraging and roosting. There are no federally- or state-listed special status plant species documented on the Islands. There is only one plant species listed by the California Native Plant Society (CNPS) as a “species of conservation concern” – the dune gilia (see EIR pp. IV.M.19 – IV.M.20)—which is found in two small areas that are part of the Proposed Project and two other areas located on U.S. Coast Guard property. And there are several special-status plants of local
significance, listed by the local chapter of the CNPS. As noted in the EIR on p. IV.M.20, these plants have no protected status in local policies or ordinances, but are discussed in the EIR because of their small populations within San Francisco. Thus, there is a relatively small component of sensitive habitats or terrestrial plants and wildlife on the project site.

The No Project Alternative would not include implementation of the Habitat Management Plan for Yerba Buena Island ("HMP"), as stated on p. VII.13. The EIR text goes on to explain that without the HMP, there would be increased degradation of the remaining biological resources on the island, resulting in further degradation of the terrestrial biological resources than would occur if the Proposed Project, with the HMP, were implemented. This means that in areas where invasive species have begun encroaching into natural habitats, such as the areas of central coast riparian scrub (see EIR p. IV.M.7), this invasion would continue unchecked. However, as noted in the description of this habitat, the areas generally have low plant species diversity. Therefore, neither this habitat nor any other of the habitats on Yerba Buena Island are listed anywhere as significant or protected.

The dune gilia is a special-status plant found in several of the natural habitats on the island, including both the California annual grassland and the northern coastal scrub (see EIR p. IV.M.20). Two of the dune gilia communities are located on U.S. Coast Guard property in the grassland areas27 and would not be affected whether the HMP is implemented or not. Therefore neither the Proposed Project (with or without the HMP as a component) nor the No Project Alternative would impact these populations. The other two are located on the west slope of Yerba Buena Island below the Treasure Island viaduct. One of these populations is found in the northern coastal scrub area,28 which is relatively undisturbed and has a high diversity of native plant species (see EIR p. IV.M.7); therefore, the No Project Alternative would not be expected to result in substantial loss of this special status species in the reasonably foreseeable future. This would also be true under the Proposed Project with no HMP. The other population is found in a part of the eucalyptus woodland area that is also located on the west slope of the island.29 This area is described in the HMP as follows: “Eucalyptus woodland with areas of iceplant [a non-native plant] in the understory. Includes small patches of dune gilia.”30 Because this is not the only, or even the main stand of dune gilia, if the small patch were affected by invasive species not removed because the HMP would not be implemented, the impact would not be considered significant.

28 Ibid.
29 Ibid., pp. 16-17.
30 Ibid., p. 18.
Existing birds and bats that may nest or roost on Yerba Island would not be significantly affected if the No Project Alternative were selected or the HMP not implemented as part of the Proposed Project. Conditions would remain generally the same as or similar to those described in the existing Setting in IV.M, Biological Resources, and no active nests would be disturbed.

If stands of the one CNPS-listed plant species or any of the locally important plant species were to be affected by invasive species, this would occur over a long period of time. During that time other development programs might be considered, and/or sources of funding to implement the HMP activities may be found, either separate from any development program or as part of another development program.

In summary, failure to implement the HMP would not result in a significant environmental impact as defined by CEQA because there would be no substantial change in existing conditions. Thus, while the potential biological impact of the No Project Alternative is acknowledged in the EIR, it is appropriately identified as a less-than-significant impact.

2.21.8 OTHER ALTERNATIVES

Comments

The traffic mitigation analysis focuses on transit options, not on providing the services on TI/YBI that would reduce transportation. (Nick S. Rossi, Esq., representing Kenneth and Roseanna Masters) [19.21]

Uses. The Reduced Development option should come in two sizes and made into two separate Alternatives: one the 2003 version which had approximately 3000 units and the 6,000-unit version of 2007. These alternatives should also consider a mix of uses that would help mitigate the extreme impacts of the preferred alternative. We recommend an alternative that replaces the commercial office use (large peak-hour traffic generator) with visitor attracting use (off peak traffic) that would be more likely to utilize a regular ferry service. The success of the “F” Embarcadero line shows how unique transportation alternatives attract visitors – a short ferry ride that also provide opportunities for unique views would be extremely popular and help subsidize the cost of the service. Both of these alternatives should show full ferry service as described in the document. A major justification for full ferry service has not been studied as such, which is the entertainment/tourism component. This is the one factor which would make ferry service marketable and feasible.

The tourist attraction of the islands should be studied in various mixes to see what quantity of visitor use is required to make full ferry service viable. (Jennifer Clary, President, San Francisco Tomorrow) [38.16]

Recommendation:
- Study at least two alternatives which reduce or eliminate commercial office space, and vary visitor and resident numbers so that the important role of water transit can be seen to play a large part in mitigating the development of the islands. (Jennifer Clary, President, San Francisco Tomorrow) [38.18]
Response

The Proposed Project sets forth a comprehensive development program that includes a range and mix of uses, and specific development components to support the level of retail services, infrastructure improvements, open space, public services, community-serving uses and transit improvements that are planned for development. The EIR transportation and mitigation analysis evaluates the Proposed Project, including the types and mix of uses, proposed by the project sponsors. The project sponsors may choose to modify the development program based on the EIR analysis; however it is not the role of the EIR to identify the services and types of uses that are appropriate for development.

Analysis of reduced development options suggested in the comment are addressed, respectively, in Chapter VII. Alternatives, EIR pp. VII.74 - VII.75 and VII.15 - VII.48.

A reduced development option with approximately 3,000 units and an entertainment/tourism component is discussed under Alternative D.2, 2800 Housing Unit Alternative with an Amusement Park, on EIR pp. VII.74 - VII.75. Under this alternative, residential land use would occupy about 30 percent of the Project Area, publicly oriented uses 35 percent, open space/recreation 26 percent, and community services 9 percent. The major publicly oriented development on Treasure Island would be a themed attraction with the potential to attract an average of 13,700 daily visitors and to employ up to approximately 3,500 seasonal and permanent workers. The plan would include 3 hotels, totaling 1,450 rooms. Existing film production facilities would be expanded by 100,000 square feet. No commercial office space is included in this alternative. As stated on EIR p. VII.75, Alternative D.2 was rejected from further consideration because TIDA and the City and County of San Francisco decided that an amusement theme park would not be a desirable use for the long-term development of Treasure Island and Yerba Buena Island. This alternative, with 2,800 residential units and an amusement park, also would not meet the project sponsors’ objectives, and also would not provide sufficient revenue to support construction of the infrastructure improvements necessary for development and transit facilities, including revenues for construction of a ferry terminal and leasing ferry vessels, and project-generated revenues for ferry operations.

Alternative B, the Reduced Development Alternative, described on EIR pp. VII.15 - VII.48, would develop 6,000 residential units; no commercial office space would be built. Development of 6,000 units would not be compatible with a major regional-serving entertainment/tourism component; nor would it be able to accommodate a major entertainment/tourism use without reducing the amount of neighborhood and community-serving uses that would be needed to support the residential development. The Reduced Development Alternative would include a number of entertainment/tourism uses comprised of up to 150,000 sq. ft. of entertainment uses, 500 hotel rooms, 75,000 sq. ft. of cultural/museum space, a Sailing Center, and 360 acres of
athletics fields and general open space. Ferry service would be provided with this alternative, including construction of a ferry terminal, to serve both local- and regional-serving uses on the Island.

Tourist-attracting uses could increase the demand for ferry service to the Islands; however, due to the reduction in residential units, both reduced development options described above would decrease or make infeasible the ability to fund ferry service at the level proposed or at an expanded level in the future under Mitigation Measure M-TR-2.

### 2.21.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

#### Comments

The subject DEIR fails to identify, describe and analyze the CEQA-required “environmentally superior” alternative. What the DEIR calls the environmentally superior alternative - the no-ferry service alternative - clearly is not. As pointed out by many participants in the scoping process, the way to achieve fewer negative environmental impacts would be with a project with enough density for the residents to meet their basic retail and service needs on the islands, a maximum of transit options, a minimum of car trips, and a reduced level of car ownership. The “no ferry service” alternative, on the other hand, includes less density, fewer transit options, a 1:1 residential parking ratio and far too much commercial and visitor parking. A 1:1 residential ratio is no longer considered anywhere near the cutting edge of sustainability or carbon neutrality.  

*(Ruth Gravanis)*

Vol. 1.S.86, Summary: Why does the DEIR fail to evaluate an Environmentally Superior Alternative? An environmentally superior alternative is a Smart Growth alternative that balances sufficient density with the minimum number of cars, supporting ferry service and other modes of mass transit.  *(Kathrin Moore, San Francisco Planning Commission)*

We believe that the EIR is inadequate in several regards. Principally, it does not analyze an environmentally superior alternative or alternatives, as required by CEQA.

In order to comply with CEQA, the EIR should evaluate at least two alternatives which would meet the CEQA requirements for an “environmentally superior” alternative, and which will better accomplish the Project Objectives, as adopted by TIDA and TICD (DEIR pp. II.4 - II.6), as well as the policies and objectives of San Francisco’s general plan.  *(Tom Radulovich, Livable City)*

**Project Lacks an Environmentally Superior Alternative.** The identification of the “No Ferry” alternative as the environmentally superior alternative is flawed, as it fails to mitigate the extreme traffic impacts that make the preferred alternative so problematic.  *(Jennifer Clary, President, San Francisco Tomorrow)*

**Recommendation:**

- Use the one of the two reduced auto alternatives as the environmentally superior alternative  
  *(Jennifer Clary, President, San Francisco Tomorrow)*

The most serious deficiency of this DEIR is that, although it identifies the Redevelopment Plan’s impacts on aesthetics, historic resources, transportation, noise, air quality, wind and biological resources as “Significant and Unavoidable,” it fails to even consider a “Minimum Impact
21. Alternatives

Alternative” or an “Environmentally Superior Alternative” that would reduce or avoid these significant impacts.  *(Vedica Puri, President, Telegraph Hill Dwellers)* [39.1]

- How can the DEIR conclude that the “No Ferry” alternative is the environmentally superior alternative -- with fewer transit options and with a 1:1 residential parking ratio?  *(Vedica Puri, President, Telegraph Hill Dwellers)* [39.88]

…but the one thing I would like to put on the public record today is the fact that the CEQA required environmental superior alternative is really not enclosed in this document.  And I’m actually surprised.  *(Kathrin Moore, San Francisco Planning Commission)*  [TR.20.1]

The project is very strong, and I think it should have dared to, indeed, address the environmentally superior alternative.  Throughout the years of creating this project, there has been a strong emphasis on green, on the first truly green neighborhood of San Francisco.  And the record shows that during the scoping process, scoping documents pointed out that the superior alternative would be one that would plan for enough density to support a robust public transit system, and basic neighborhood serving retail would minimize cars.  *(Kathrin Moore, San Francisco Planning Commission)*  [TR.20.2]

If the intent is to create an alternative that reduces or avoids the significant impacts of the Proposed Project, then we would recommend that the EIR include a “Minimum-Impact Alternative” instead of a “less intensive development” alternative.

The Minimum-Impact Alternative would call for less use of the private automobile and higher goals for energy efficiency, carbon neutrality, water-quality and resource conservation.  This alternative would include the following characteristics:

**Transportation**

- A reduction in the number of parking spaces, including reducing retail and commercial parking;
- Lowest feasible targets for vehicle miles traveled;
- Targets for minimizing automobile ownership, not just car use;
- Lockers at the transit hub so that visitors would be able to leave packages, extra shoes etc., there instead of in the trunks of cars – allowing fuller enjoyment of the variety of activities that the islands have to offer;
- Visitor draws that encourage ferry use, and marketing that encourages full ferries in both directions, to help assure economic viability of the ferry service;
- Weather-protected space for bikes on the ferries;
- Bus service to, from and on the islands that minimizes the number of transfers required;
- Dedicated bus access on the bridge; and
- Fully prepaid public transit passes for residents and employees, and transit fares bundled into the price of hotel rooms and any special events tickets

**Resource Conservation**

- Building standards to assure that high-rise buildings will be durable in an earthquake, avoiding the carbon emissions and waste of resources that would result from having to deconstruct, haul and re-build; performance standards that specify what is expected to happen to the buildings in quakes of various magnitudes; and
- On-site use of any clean excavation spoils
Energy Conservation and Carbon Neutrality (non-transportation)

- Remediation process to be as carbon neutral as possible, including hauling by rail instead of truck when long-distance hauling is required;
- Higher renewable energy generation targets, including on-island generation;
- Higher green building standards – higher LEED and Green Point Rated levels; and
- Maximum use of distributed energy systems

Water Conservation and Water Quality

- Higher standards for storm water discharges: higher level of treatment, greater detention times; more storage and reuse of roof runoff;
- Accommodation of flows greater than the 5-year storm event;
- Minimum of dredging;
- Tertiary-level treatment of all sewage;
- Maximum use of recycled water;
- Minimum use of Hetch-Hetchy water;
- Gray water systems in all residential buildings and hotels; and
- Climate-appropriate landscaping, requiring minimal supplemental water

Biology

- Biodiversity targets that protect and restore ecosystems, not just sensitive species; and
- Highest Green Point Rated points (or equivalent) for Bay-Friendly landscaping – for water conservation, Bay water quality, and habitat value. (Jared Blumenthal, Department of the Environment, letter of February 25, 2008, submitted as an attachment to comment letter from Vedica Puri, President, Telegraph Hill Dwellers) [39.90]

Response

The EIR includes identification and discussion of the “environmentally superior” alternative on p. VII.78, as called for in Section 15126.6(e)(2) of the CEQA Guidelines, which states: “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.” An EIR must describe a reasonable range of alternatives that avoid or substantially lessen one or more of the significant effects that would be caused by the Proposed Project, while accomplishing most of the project sponsor’s objectives (see also EIR p. VII.1). CEQA does not require an EIR to provide a minimum-impact alternative, or a “smart-growth” alternative.

The No Project Alternative analyzed on EIR pp. VII.4-VII.14 would reduce or eliminate most of the significant impacts identified for the Proposed Project. Therefore, it would be the “environmentally superior” alternative, and another of the alternatives analyzed in the EIR is identified as the environmentally superior alternative, as required in Section 151256.(e)(2) of the CEQA Guidelines.

31 CEQA Guidelines section 15126.6(c).
Among the other alternatives, the No Ferry Service Alternative is identified as the environmentally superior alternative because it would eliminate the significant impact on the historic resource the *U.S.S. Buttercup*, and would substantially reduce the Proposed Project's air emissions impacts, noise impacts, and impacts on biological resources. Without ferry service, the emissions of diesel particulate matter, and the associated health risks would be substantially reduced compared to the Proposed Project and would be less than significant with no mitigation measures required (see EIR p. VII.62). Emissions of criteria pollutants (reactive organic gases, nitrogen oxides, and fine particulates) would be reduced by 24 percent or more, but the impacts would remain significant and unavoidable, as with the Proposed Project. Impacts on marine biological resources from construction and operation of the ferry service also would not occur; the significant impact on rafting birds would be eliminated. Biological mitigation measures identified for impacts resulting from construction and operation of the ferry service would not be necessary (see EIR p. VII.70). The No Ferry Service Alternative would not result in unavoidable, permanent increases in project-related ferry noise levels, and would not require implementation of a Ferry Terminal Noise Reduction Plan by WETA (Mitigation Measure M-NO-4) to reduce this impact to a less-than-significant level. The fact that the No Ferry Service Alternative would provide a 1:1 parking ratio for the residential units does not make it unsuitable for designation as the environmentally superior alternative. As explained in the Reduced Parking Alternative analysis presented in the response in Subsection 2.21.2, there is very limited evidence to support the assumption that reducing parking would substantially reduce traffic impacts. Because the No Ferry Service alternative does reduce or eliminate several significant impacts, it is appropriately identified as the environmentally superior alternative.

The other alternatives analyzed in the EIR in Chapter VII would reduce some of the significant impacts identified for the Proposed Project, but would not reduce as many significant impacts and would not reduce any impacts to less-than-significant levels, unlike the No Ferry Service Alternative. Therefore, the No Ferry Service Alternative was properly identified as the environmentally superior alternative.

See the response in Subsection 2.21.2 for an analysis of a Reduced Parking Alternative. It is not identified as the environmentally superior alternative because, unlike the No Ferry Service Alternative, it would not eliminate any significant impacts identified for the Proposed Project.

One comment notes that documentation submitted during the public scoping process for the EIR identified features of a superior alternative, including planning for sufficient density to support robust public transit and basic neighborhood-serving retail. The Proposed Project includes substantial additional public transit and plans considerable amounts of neighborhood-serving retail located in the historic Buildings 1 and 2 and in new retail space.
The final comment, from Telegraph Hill Dwellers, includes pages from a letter dated February 25, 2008, that appears to be from the San Francisco Department of the Environment, addressed to Bill Wycko, the Environmental Review Officer, regarding public scoping for the Treasure Island/Yerba Buena Island Redevelopment Project EIR.

A comment letter dated February 25, 2008, was received by the Planning Department from the San Francisco Department of the Environment during public scoping. A copy of that letter is provided in Appendix B, the Public Scoping Report, in the EIR. The letter attached by Telegraph Hill Dwellers includes the same first page as that received by the Planning Department; however, the second page of the letter attached by Telegraph Hill Dwellers is different from the second page in the Planning Department’s official copy. (There is a third page in the letter attached by Telegraph Hill Dwellers, which is addressed in the response in Subsection 2.21.1, Purpose of Alternatives in EIRs; there is no third page in the official copy).

The issues raised in the Department of the Environment’s official scoping comments were taken into consideration when preparing the Draft EIR. As discussed above, there is no requirement in CEQA for a “minimum impact alternative” suggested in the Department of the Environment’s official letter as well as in the copy submitted with the Telegraph Hill Dwellers comment letter.

A number of the suggestions in the Department of the Environment’s official scoping comments are included in the Proposed Project that is analyzed in the EIR. With respect to transportation features, bicycle lockers would be provided at the Transit Hub (see EIR p. IV.E.33). Although not currently planned, lockers for personal effects could also be provided at the Transit Hub, depending on the final design of the facility. A more detailed analysis of an alternative with less parking is found in the response in Subsection 2.21.2, Reduced Parking Alternative than is provided in the Draft EIR in Section D.3. This expanded analysis includes reduced retail and residential parking, as suggested in the Department of the Environment’s official letter. Weather protected space for bicycles on ferries is discussed in the response in Section 2.7.6.5, Ferry, in Subsection 2.7.6.5.3, Ferry Vessel.

Bus service that minimizes transfers would be accommodated by the Proposed Project in a number of ways. The proposed on-island shuttle service and routes are designed to be flexible to address transfer requirements of the shuttle riders. Additionally, TDM measures, transit routes, and the intermodal Transit Hub have been designed to minimize delays riders would experience in making transfers from shuttles to buses or ferries.

Dedicated bus access to the Bay Bridge would be provided using a transit-only lane on the causeway and Treasure Island Road if vehicle queues result in delays to the Muni line 108 – Treasure Island route (see EIR pp. IV.E.99 – IV.E.100). The westbound on-ramp on the west side of Yerba Buena Island would be restricted exclusively to transit and emergency vehicle-use only if the Ramps Project is approved and implemented by Caltrans (see EIR p. IV.E.7 for a
description of the Ramps Project, and p. IV.E.35 for a discussion of restricting use on the on-ramp). Mandatory purchase of pre-paid transit vouchers by residents and hotel visitors is included in the transportation demand management program that would be administered by the Treasure Island Transportation Management Agency (“TITMA”) (see EIR pp. II.51 and IV.E.46), although they would not be required of island employees.

The suggestions in the Telegraph Hill Dwellers’ attachment include establishing “targets” for vehicle miles traveled and automobile ownership. The vehicle miles traveled used in the air quality analyses in the EIR are based on standard regional travel distances in the URBEMIS2007 computer model, adjusted for the fact that the project site is in the middle of the Bay and therefore, the majority of the vehicle trips would be destined for off-island locations and result in slightly longer trips than those from origins on mainland San Francisco (see EIR p. IV.G.39). The EIR does not use target vehicle miles traveled in its analysis. If the vehicle miles traveled were assumed to be less, then the analysis of air quality impacts would show less emissions and could misrepresent the potential impacts of the Proposed Project. Similarly, if automobile ownership were assumed to be substantially lower, such that vehicle trip generation was affected, the transportation and air quality impact analyses could present less impact than would occur with the Proposed Project. Indirectly, automobile ownership and vehicle miles traveled would be discouraged through implementation of TDM measures such as congestion pricing and prohibiting free parking on the Islands.

The suggestion that marketing materials and types of visitor-serving uses be focused on encouraging ferry use to ensure economic viability of the ferry is one of the operational details that may be considered by project sponsors, TITMA, and the Water Emergency Transit Authority as ferry service is implemented. The project sponsors would provide funding to construct the Ferry Terminal and would provide project-generated funding for the lease of one ferry vessel (see EIR p. II.38). The proposed congestion pricing program and parking fees would help to support the ferry service as part of the overall transit system planned as part of the Proposed Project (see EIR p. II.51).

The Proposed Project would incorporate resource conservation features related to the use of excavated soil. Any clean soil excavated as part of site preparation would be used on the Islands, as is typical in most construction projects to reduce the need to import fill. No excess dredging for either the Ferry Terminal basin or the Sailing Center would be expected, so the suggestion that a minimum of dredging occur would be implemented.

The suggestion that building standards require that buildings be “durable” in an earthquake appears to call for structures that would be habitable after an earthquake. This level of structural

32 Infrastructure Update, Section 5, Site Grading, Subsection 5.6.
safety is required for certain kinds of special-use buildings such as hospitals and other facilities that provide emergency services. The California and San Francisco Building Codes do not require this level for most buildings because it is not deemed appropriate by policy makers that create and adopt these codes, as well as being extremely expensive; the Building Code requires that buildings provide for life safety, allowing for evacuation following an earthquake, but does not require that a building be useable after a major event. Such a requirement is not necessary to avoid a significant impact of the Proposed Project. Compliance with a regulatory program, as is the case here with the Building Code, addresses the seismic issues raised in the comment.

Energy conservation and carbon neutrality features have also been considered in the Proposed Project. The suggestion that the remediation process use rail instead of trucks for long-distance hauling is appropriately directed to the U.S. Navy rather than the project sponsors, as the Navy is carrying out remediation as part of Base Closure (see EIR pp. IV.P.3 – IV.P.7 for a description of the base closure remediation requirements and procedures and the transfer process from the Navy to TIDA). Title 24 does not require or establish targets for the Proposed Project to provide on-island renewable energy generation; however, one of the objectives of the Proposed Project is to maximize opportunities for on-site renewable energy production. The Treasure Island Infrastructure Update includes a renewable energy component. The Proposed Project has a goal of providing a minimum of 5 percent of peak power demand created through on-site renewable resources, and includes strategies that would enable more than 5 percent of estimated peak demand to be generated on site (see EIR pp. II.67 – II.68). The Proposed Project also includes a new on-island energy distribution system described on EIR p. II.67. Energy Variants A2 and A3 also include options for satellite district energy plants and provisions for solar thermal energy (see EIR pp. VI.13 – VI.14). The Proposed Project would comply with Title 24 energy conservation requirements and would meet or exceed energy conservation requirements of San Francisco’s Green Building Ordinance (see section IV.Q, Mineral and Energy Resources, EIR pp. IV.12 – IV.14).

A number of the suggested water conservation and water quality elements are included in the Proposed Project. Stormwater treatment would incorporate Best Management Practices (including reuse of roof runoff) based on the SFPUC Stormwater Design Guidelines which, when combined with the water treatment requirements for stormwater discharge set by the Region Water Quality Control Board, would meet the highest standards for stormwater discharge, treatment, reuse, and storage; refer to EIR pp. II.64-II.66. Under Wastewater Wetland Variant D1, treated effluent to be recycled would be discharged to constructed (man-made) wetlands for tertiary treatment before microfiltration.

The Proposed Project also includes a program to use recycled water on Treasure Island that would be treated to tertiary levels. As described on EIR p. II.60-II.61, the recycled water would be used for irrigation of open space areas, the Urban Agricultural Park, roadside plantings, and
landscape water features, and in appropriate plumbing fixtures in commercial and residential buildings to the extent permitted at the time of construction. The use of recycled water and implementation of water conservation measures would minimize the use of Hetch-Hetchy water.

The amount of recycled water projected to be used for the project described in the Notice of Preparation was increased for the Proposed Project, from about 340,000 gallons per day\(^{33}\) to about 420,000 gallons per day (see EIR p. IV.K.17). Suggestions for full use of gray water systems in all residential buildings and hotels cannot be fully implemented under current state and local regulations. Title 24 of the California Code of Regulations allows the use of gray water (water from sinks, showers, and similar sources, captured for local reuse) in residential buildings under certain circumstances. Gray water use is not part of the Proposed Project at this time. Any future gray water in the Proposed Project would be required to conform to all applicable state and local regulations.

The \textit{Land Use Plan} of the Proposed Project includes a sustainability component for the use of native or regionally-appropriate species for landscaping which would include climate-appropriate landscaping that requires minimal supplemental water.

The Proposed Project also proposes implementation of a Habitat Management Plan for Yerba Buena Island that would protect and restore ecosystems. As discussed above, the Proposed Project would meet or exceed requirements of San Francisco’s Green Building Ordinance pertaining to landscaping.

The list of features of a “minimum impact alternative” would not reduce many of the impacts identified in the EIR as significant environmental impacts. For example, most of the water conservation and water quality suggestions listed in the comment are included as part of the Proposed Project. Incorporation of these features into a "minimum impact alternative" would not reduce or eliminate significant environmental impacts as defined by CEQA, but would further reduce an impact on water supply and water quality found to be less than significant (see Section IV.K, Utilities, EIR pp. IV.K.39 – IV.K.61, and specifically Impact UT-10 on pp. IV.K.56 – IV.K.60; and Section IV.O, Hydrology and Water Quality, and specifically Impact HY-1 on pp. IV.35 - IV.37). Therefore, an alternative that made greater use of recycled water and minimum use of Hetch Hetchy water, as would occur with the Proposed Project, would not reduce a significant impact. Similarly, no significant unavoidable impacts were identified as a result of storm water discharges (see EIR pp. IV.K.26 – IV.K.39, IV.O.45 – IV.O.46 and IV.O.47); therefore, imposition of higher standards for storm water discharges and accommodation of storm water flows greater than the 5-year storm event would not reduce a significant impact. As explained above, pursuant to the CEQA Guidelines, Section 15126.6(c), an EIR alternative must

\(^{33}\) \textit{Infrastructure Plan}, Exhibit I to 2006 Term Sheet, September 2006, Table 7.2, p. 32.
reduce or avoid one or more significant impacts of a proposed project. Therefore, while many of the suggestions might be environmentally beneficial, they are not required to be addressed in alternatives in the EIR.

2.21.10 NO REDEVELOPMENT PLAN

Comment

Planning Code alternatives: One or more alternatives should also study adopting amendments to San Francisco’s Planning Code to establish the land use controls and design standards and guidelines for the project site, rather than use a redevelopment Design for Development Document (D4D) (p. II-3). There is no requirement that land use controls within redevelopment areas be governed by design for development documents, rather than planning code amendments. Several recent redevelopment plans and survey areas have proposed amendments to the Planning Code to establish land use controls, including Transbay Redevelopment Area (partial), and the Mid-Market Redevelopment survey area. SB 1268, approved in 2004, explicitly permits the inclusion of form-based and illustrative codes in municipal planning codes, permitting a planning code to accomplish all of what a D4D document can.

Based on San Francisco’s experience of the past few decades, setting land use controls via the Planning Code, rather than Design for Development, is an environmentally superior alternative. The Planning Code has been continuously amended over the past decade to reduce environmental impacts of new development and improve their environmental performance, shift trips from autos to walking, cycling, and public transit, improve pedestrian-oriented street design, require projects and fees which improve streetscapes and sustainable transportation infrastructure, limit impacts of new development on walking and cycling and transit, promote car-sharing and expand bicycle parking, and adopt transportation demand management measures in new projects. The history of these legislative changes is summarized in Livable City’s “A Brief History of Parking Requirements in San Francisco” (http://www.livablecity.org/campaigns/parkinghistory.html).

In stark contrast, no Redevelopment Plan or Redevelopment Design for Development adopted over the past several decades has been amended to improve the environmental performance of the project, or to reduce environmental impacts from transportation. Currently, Redevelopment Plan areas remain stubborn enclaves of antiquated, traffic-inducing transportation policies, requirements, and standards in a sea of incremental improvement. At present, every redevelopment plan area in San Francisco requires or permits more parking than comparable neighboring districts governed by the Planning Code do.

Based on decades of evidence, an alternative or alternatives which rely on amendments to San Francisco’s Planning Code to establish land use controls will prove environmentally superior, and better able to meet the project objectives, than alternatives which rely on Design for Development, and will prove increasingly environmentally superior over time. Such alternatives are demonstrably feasible, and can demonstrably meet the proposed project’s basic objectives, and must be included among the alternatives studied. (*Tom Radulovich, Livable City*) [37.3]

Response

As the comment indicates there are a number of ways to incorporate land use controls associated with the approval and adoption of redevelopment plans. The Draft EIR analyzes the Treasure Island / Yerba Buena Island Redevelopment Plan as it was proposed by the project sponsors, TIDA,
the designated California Redevelopment Agency, and TICD, the prospective master developer. Given the uncertainties in the availability of tax increment financing through use of a redevelopment plan, TIDA, in consultation with the Planning Department, has determined not to adopt a Redevelopment Plan. Instead, it has determined that the Proposed Project’s land use controls would be implemented by adding an Area Plan to the City’s General Plan (which would contain objectives and policies that would set the foundation for land use development on the Islands), and by amending the City’s Planning Code to adopt a Special Use District for the area (which would contain zoning and height and bulk classifications within the Project Area and would reference the more detailed standards and guidelines in the Design for Development).

Under California Community Redevelopment law (CRL), the Treasure Island / Yerba Buena Island Redevelopment Plan would be required to be consistent with the San Francisco General Plan (“General Plan”) as is true for the Planning Code. Although no longer required by the CRL if the Proposed Project does not include adopting a Redevelopment Plan, to approve the Proposed Project, the Planning Commission would still have to make consistency findings stating that the Proposed Project is consistent with the General Plan and the Planning Code, Section 101.1 Priority Policies.

Land use controls based on the Planning Code would not be the environmentally superior alternative as defined by CEQA. CEQA Guidelines (Section 15126.6(a) and (e)(2)) require that an EIR analysis of alternatives identify the environmentally superior alternative, the purpose of which is to identify a superior alternative that has the fewest significant environmental impacts. This CEQA requirement does not pertain to how land use controls for a project are codified.