

July 17, 2017

Angela Calvillo, Clerk of the Board
San Francisco Board of Supervisors

RE: Appeal of the Certification of the Final Environmental Impact Report for One Oak Street (1500-1540 Market Street), Motion 19938, case 2009.0159E

Dear Ms. Calvillo,

I appeal Planning Commission certification of the One Oak Final Environmental Impact Report on June 15, 2017. I am appealing as an individual. I authorize Sue Hestor to submit this appeal as my agent. I filed written comments regarding the inadequacy of the EIR on January 4, 2017. I provided public comment at the January 5, 2017 public hearing on the Draft EIR. I also submitted a letter to the Planning Commission on May 26, 2017. All letters are attached. I missed the June 15 hearing because I was out of town.

The EIR for the One Oak Project is inadequate. Among other issues, the One Oak EIR does not adequately analyze an alternative with onsite inclusionary housing at this transit rich location. It fails as an informational document and does not adequately analyze the following issues:

Vehicle Miles Traveled & Traffic: The EIR does not adequately analyze per capita daily vehicle miles travel (VMT) and localized impacts of VMT. The EIR's reliance on MTC's regional-scale threshold of significance for VMT results in inadequate analysis because the location provides unique transportation corridors that need to be thoroughly studied. Van Ness and Market is not a Bay Area suburb.

By using this metric to absolve further analysis, the EIR fails to adequately study impacts on transit, bicyclists and pedestrians. This is a part of San Francisco where the tolerance for more VMT is zero. Nine important Muni bus lines, five Muni light rail lines, and one Muni streetcar line traverse the corridor, carrying almost 14,000 passengers in the weekday am peak hour and 13,500 in the weekday pm peak hour (DEIR, Table 4.C.3.)¹. Every weekday there are thousands of cyclists using Market Street, with 1,400 in the two-hour pm peak period alone (DEIR, 4.C.22).

The project sponsor proposes transportation demand management (TDM) to reduce per capita daily VMT, but no information is provided to benchmark VMT in the project. Since VMT is not adequately analyzed, understanding the success or failure of TDM is not possible.

Further, the LCW (2016) *One Oak Transportation Impact Study*, which is the basis for the EIR analysis, uses antiquated and inadequate methods for analysis of traffic impacts. Using 1990 data does not reflect two tech booms and the internet-based economy to the south of the City.

Wind Impacts: The EIR contains an extensive discussion of potential impacts of wind on pedestrians and public transit passengers waiting for buses at nearby bus stops, but it completely

¹ peak am and pm ridership calculated by adding inbound and outbound ridership columns in table 4.C.3.

omits analysis of the impact of wind on the thousands of cyclists using Market Street and other nearby streets. Thus, the DEIR fails as an informational document. The One Oak Project EIR must be revised to include a thorough analysis of wind impacts on bicyclists.

Loading Demand and Transportation Network Companies (TNCs): The EIR analysis of loading demand is inadequate and does not reflect present-day trends in retail delivery and TNCs such as Uber and Lyft. It does not consider the localized swarming of TNC's that may occur at the One Oak site. TNC's are omitted from the city's transportation analysis despite upwards of 45,000 operating in the city on a daily basis. Lack of understanding of TNC impacts on cyclists, pedestrians, and transit means the EIR is inadequate in identifying impacts and necessary mitigation. The EIR must discuss stronger mitigation for loading impacts for residential online shopping and TNC passengers.

Cumulative Impacts: The proposed 10 Van Ness project (Notice of Preparation issued 7/12/17), is directly across Market Street from the One Oak Project. The cumulative impacts study in the One Oak EIR is inadequate because it does not include the VMT/ traffic, wind impacts on bicycles, and TNC/delivery impacts on pedestrians, bicyclists and transit that will occur with both projects cumulatively, especially with 518 parking spaces proposed at 10 Van Ness.

For the reasons above, the San Francisco Board of Supervisors should overturn the San Francisco Planning Commission certification of the EIR for One Oak and direct the city planning staff to conduct a more realistic analysis of impacts.

Sincerely,

Jason Henderson
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94102