



*Laurel Heights Improvement Association of San Francisco, Inc.*

BY HAND

January 8, 2019

San Francisco Planning Department  
Attn: Kei Zushi, EIR Coordinator  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**RECEIVED**

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CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
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Re: Draft EIR for 3333 California Street, San Francisco, CA 94118  
Planning Department Case No: 2015-014028ENV  
State Clearinghouse No: 2017092053

As comment on the Draft EIR (DEIR), the Laurel Heights Improvement Association hereby submits for evaluation the Community Full Preservation Alternative and Variant (Community Alternative, unless otherwise indicated) along with the evaluation of that Alternative’s compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties: Rehabilitation (SOIS) by Nancy Goldenberg, Principal architect and architectural historian with TreanorHL. Ms. Goldenberg was formerly Principal architect at Carey & Company, Inc.

Ms. Goldengerg’s SOIS evaluation is attached hereto as Exhibit 1, and the Community Full Preservation Alternative/Variant is attached thereto as Appendix A.

The Laurel Heights Improvement Association specifically requests that the Environmental Impact Report evaluate the Community Full Preservation Alternative/Variant with the same degree of specificity as the DEIR used to evaluate the alternatives discussed in the DEIR.

At the December 13, 2018 hearing on the Draft EIR, members of the San Francisco Planning Commission stated that the Community Alternative should be evaluated during the environmental review process with the same degree of specificity that the DEIR used to evaluate the alternatives discussed in the DEIR. In addition, members of the San Francisco Historic Preservation Commission expressed interest in understanding more about the community alternative that was discussed by the public in the hearing held before that Commission on December 5, 2018. (See Ex. 2, December 11, 2018 Letter from Andrew Wolfram, President of Historic Preservation Commission to Environmental Review Officer; video of hearing on SFGOV-TV and transcript of hearing reported by court reporter. It is important that a full evaluation of the Community Alternative be performed because DEIR Alternative C: Full

Preservation - Residential Alternative would have 24 fewer residential units than the proposed Project and 210 fewer units than the proposed Project Variant. DEIR p. 6.75. Based on this discrepancy and other characteristics of the alternatives described in the DEIR, the Draft EIR failed to present a reasonable range of alternatives for evaluation in the DEIR.

The Community Full Preservation Alternative would meet the basic objectives of the project described at DEIR p. 2.12, as follows:

- Redevelop a large site into a new high quality walkable mixed-use community with a mix of uses on site including 558 new residences (744 in the Community Alternative Variant), an existing 1,183 asf café, an existing 11,500 gsf childcare center, 5,000 gsf of existing nonconforming office uses and substantial open space, while building these new residential units adjacent to the Laurel Village Shopping Center, one block from Trader Joe's grocery store and one block from the Sacramento Street neighborhood commercial uses.
- Create a mixed-use project that encourages walkability and convenience by opening the existing north/south throughway on the first floor of the main building to the public and maintaining other existing pathways that pass through the landscaping, building substantial new housing units adjacent to the existing Laurel Village Shopping Center, and providing on-site childcare and on-site office use.
- Address the City's housing goals by building the same number of new residential dwelling units on site as the proposed project (and proposed project variant), including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco.
- Open and connect the site to the surrounding community by opening the existing north/south throughway on the first floor of the main building to the public, designating the Eckbo Terrace as privately-owned, publicly accessible open space, maintaining other existing pathways that pass through the landscaping, and maintaining the extensive existing natural landscaping that provides a welcoming atmosphere for the public.
- Create complimentary designs and uses that are compatible with the surrounding neighborhoods by conforming with the scale of surrounding development and maintaining the active, natural landscaped, neighborhood-friendly spaces along the west, south and eastern perimeter of the site.
- Provide a high quality and varied architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's topography

and other unique characteristics.

- Provide substantial open space for project residents and community members by maintaining the existing welcoming, natural green space and walkable environment that will encourage continued use of the landscaped areas and community interaction.
- Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use.
- Include sufficient off-street parking for residential and office uses below grade and childcare center uses above grade to meet the project's needs.
- Work to retain and maintain the integration of the office building into the development to promote sustainability and eco-friendly infill redevelopment.

The Community Alternative would meet most of the basic project objectives and would be superior to the proposed project/variant because it would maintain the historically significant characteristics of the site by preserving the existing main building and integrated landscaping in its present, neighborhood-friendly, natural form.

The Community Alternative would redevelop a large site with the same amount of new residential units as the proposed project but with a lesser number of commercial uses, retaining the existing café, childcare center and 5,000 square feet of office use on site. The Community Alternative would construct the same number of new housing units as the proposed project/variant in a location that is rich with easily accessible retail uses at the adjacent Laurel Village Shopping Center and is located one block from a Trader Joe's grocery store and Sacramento Street neighborhood commercial uses. Also, a Target variety store is located approximately one-two blocks from the site. Given the location of the project site directly adjacent to the Laurel Village Shopping Center but not near the downtown, the lesser amount of on-site retail and office space that the Community Alternative would provide would not materially impair achievement of Objective 1.

The Community Alternative would meet Objectives 2, 4, 7 and 8 by enhancing the public open space by designating the Eckbo Terrace as privately-owned, publicly accessible open space, opening the existing north/south passageway to the public, maintaining the other existing pathways that pass through the landscaping, and maintaining the extensive existing natural landscaping that provides a welcoming atmosphere for the public. Due to the maintenance of the natural landscape, the welcoming atmosphere would be greater under the Community Alternative and the public accessibility would be similar under the Community Alternative with passageways open to walkers from the north, south and west of the site. On balance, the Community

Alternative would satisfy the Objectives 2, 4, 7 and 8 to substantially the same degree as the proposed project.

The Community Alternative would increase the City's housing supply to the same degree as the proposed project/variant but would better meet the Objective of including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco. The Community Alternative specifically includes 56 family-size units (average size 1,821 square feet) for middle-income families in the new California Street Front buildings and additional on-site affordable housing as determined by the Board of Supervisors. In contrast, the proposed project does not state the amount or type of affordable housing that it would have on-site or commit to build the amount of affordable units on-site that are currently required by the Planning Code. The ambiguity in the project description maintains other options, such as paying a fee in lieu of building a portion of the affordable housing on-site or requesting an adjustment under Planning Code provisions applicable to development agreements. Further, the proposed project does not indicate that it would build affordable housing for middle-income families on site, so the Community Alternative would better meet Objective 3 by providing housing for middle-income families, which is the income level for which the City's housing production is the most deficient under ABAG allocations. Thus, the Community Alternative would better meet Objective 3 than the proposed project.

The Community Alternative would better meet Objectives 5 and 6 than the proposed project, because the design of the Community Alternative would conform with neighborhood scale and complement its character by building new structures that conform with the scale and character of surrounding buildings and would maintain the landscaped set backs on the west, south and east of the site, which better integrate the site with the surrounding residential community. In contrast, the proposed project/variant would add two to three additional floors to the existing main building that would not be compatible with the predominant 40-foot height limit in the surrounding neighborhoods, would build 40-foot tall structures along the east side of Laurel Street (with rooftop decks) that would not be compatible with the scale of the residences on the western side of Laurel Street, and would remove portions of the landscaped buffer that now exists between the site and those residences by building new residential buildings on portions of that landscaping.

The Community Alternative would meet Objective 9 to the substantially same degree as the proposed project, because it would provide almost one on-site parking space for each residential unit, but the spaces provided would have direct access, so would be more accessible than the mechanically accessible spaces proposed for the project/variant. The Community Alternative would provide above-ground parking spaces for the on-site childcare use.

The Community Alternative would meet Objective 10 to a far greater degree than the proposed project because the Community Alternative would preserve the existing main building and the majority of its integrated landscaping, including maintaining large Monterey Cypress trees that

remain from the Laurel Hill Cemetery (California Registered Historical Landmark number 760). (Ex. 3, Memo from Denise Bradley concerning Location of Trees that were part of the Laurel Hill Cemetery) Thus, the Community Alternative would be a superior example of sustainability and eco-friendly development. In contrast, the proposed project would destroy character-defining features of the main building by dividing it in two, demolishing its wings, destroying its integrated landscaping by building on top of it and conducting substantial excavation including by removing large portions of the slope of Laurel Hill.

#### CONCLUSION

The Community Alternative meets all the basic objectives of the proposed project and is feasible. It would entail far less excavation for underground garages and be completed in approximately three years, as opposed to the seven to fifteen years which the developers request to construct the proposed project. Moreover, the Community Alternative is far superior as to compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. The project objectives do not even mention compliance with those standards as to rehabilitation of a historically significant resource, which is a telling omission and proof that the statement of project objectives in the DEIR is unduly narrow. DEIR p. 2.12.

Very truly yours,

Laurel Heights Improvement Association of SF, Inc.



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Attachments: Exhibits 1-3