Tips on Writing to the Planning Commission

When should I write?
The sooner the better. The Commission will hold a hearing on the Environmental Impact Report (EIR) on September 4. They will accept written comments until September 15.

To whom should I write?
Your letter should be addressed to:
Sarah B. Jones
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco CA. 94103-2414
E-Mail Address: Sarah.Jones@sfgov.org,
cc. Jonas Ionin:jonas.ionin@sfgov.org

Include the following on your letter: RE: 1333 Gough St/1481 Post Street Project   (2005.0679E)

You can send the letter by e-mail or regular mail. Be sure you identify yourself by including your street address AND the facility in which you live (e.g. The Sequoias, the Carlisle, Cleary Court, etc). This is particularly important if you choose to use e-mail.

How do I begin my letter?
Simply explain that you wish to offer comments on the EIR. (For example: “Dear Ms. Jones: Please accept the following comments on the Draft Environmental Impact Report for the 1333 Gough/1481 Post Project.”

While you will be critical of the EIR do not be argumentative or antagonistic. Simply explain that you feel the proposed EIR fails to adequately address concerns important to you as a resident of the neighborhood.

And what are those concerns?
It is important that you devote your initial comments to subjects covered by the EIR. This document is required by the California Environmental Quality Act (CEQA) and does not cover the aesthetic or zoning problems, which concern us so much. There will be subsequent hearings by the Planning Commission and the Board of Supervisors at which those concerns will be discussed in detail. But in replying to the current document, your comments should respond to the Environmental issues raised in this EIR. You can close your letter with a reference to “other issues which concern me such as spot zoning, violations of height limits, the loss of neighborhood parking, the lack of commitment to open spaces, etc.” We have listed many of those issues in Attachment B but the primary issues you will be addressing in your letter are “environmental” issues. There are a good many and we have outlined them in Attachment A. Do not try to cover all of them. Select one in which you have a particular concern and concentrate on that one. You can include several if you choose but do not try to cover all of them.

How do I get started?
Pick one or more issues from Attachment A and explain your objections. Close your letter by making reference to one or more of the items from Attachment B. See sample letter (Attachment C) as a guide.
Attachment “A” for first paragraph:

1) Shadow Impacts

A. The DEIR shows the enormous extent of shadows cast by the project on sidewalks, yards and parks. Four parks and two publicly accessible plazas in my neighborhood will be shaded during morning hours. We do not believe the City has ever before approved a project that cast new shadows on more than one park. The DEIR should consider these unprecedented new shadows as significant environmental impacts. To reduce shadow impacts, the City should approve the Reduced Tower Footprint and Height Alternative instead of the project.

B. The DEIR considers only new shadows on public open spaces. The DEIR must also evaluate shadow impacts on private open spaces that serve confined seniors unable to access public open space.

C. The EIR must also consider the impacts to frail seniors associated with the permanent loss of natural sunlight to windows at the Skilled Nursing Facility (SNF) on The Sequoias property, which are less than 20 feet away from the proposed tower. Residents of this facility are confined indoors and rely on light from these windows.

D. Gerontologists have determined that artificial light is not effective mitigation for shadow impacts. Moving the project farther from the Skilled Nursing Facility is the more effective mitigation measure. This could be accomplished by approving the Reduced Tower Footprint and Height Alternative instead of the project.

2) Construction Noise Impacts

A. Construction noise levels would be 101 decibels at the nearest residence, far in excess of what is allowed by the City’s own Police Code. Construction would last 27 months, with the noisiest phase lasting nine to ten months.

B. The DEIR concludes that construction noise impacts would be less-than-significant with implementation of certain “mitigation” measures, and because the building walls and windows of the Sequoia’s Skilled Nursing Facility would provide a noise level reduction of a minimum of 25 decibels. However, the suggested “mitigation” measure would reduce noise by only 5 to 10 decibels, and, because the SNF does not have air conditioning, most of the windows are operable and would be open during the warm season to maintain healthy temperatures for the residents. A building shell with open windows provides little or no sound reduction; thus, construction noise at the SNF would be 91 to 96 decibels for extended periods, and should be considered a significant impact even after mitigation.

3) Transportation Impacts

A. The project creates three new driveways on Post Street, allowing cars and trucks to cross the sidewalk at each driveway, in conflict with pedestrians using the sidewalk. The DEIR does not account for the special needs of elderly residents in the area, many of whom have impaired vision, hearing, and mobility. These pedestrians would be less able to avoid collisions with vehicles crossing the sidewalk to use the new driveways, especially in the windy conditions that exist near the project site. The analysis of pedestrian safety and hazards should be revised to account for the special needs of pedestrians near the proposed project.
B. To reduce the number of driveways to just one on Post Street, the City should approve the Reduced Tower Footprint and Height Alternative instead of the project.

C. The project, located on the major transit corridor of Geary Blvd, will have too much parking. Providing a parking space for every unit will create added traffic and more conflicts between pedestrians and vehicles.

4) Aesthetic Impacts

A. The DEIR does not consider aesthetic impacts in a city as significant effects on the environment, but acknowledges that the project is in conflict with the San Francisco General Plan and that decision makers can consider those effects when deciding whether to approve the project. Nevertheless, the photo-simulations in the DEIR demonstrate that this 416-foot tall project would be incompatible with surrounding buildings and have substantial adverse aesthetic effects based on its location away from downtown. The iconic scenic vista from Alamo Square and the south-facing scenic vista from Lafayette Park down Octavia Street would both be obstructed.

B. These impacts would be substantially reduced by adopting the Reduced Tower Footprint and Height Alternative instead of the project.

5) Wind Impacts

A. The DEIR considers only wind effects on public areas.

B. In this area, however, there are many frail seniors who are unable to access public open space and instead use private open space areas in their buildings. For example, The Sequoias has a third floor open space terrace for the Skilled Nursing Facility. Wind effects on these private opens spaces used by frail seniors must be evaluated.

6) Alternatives

A. The discussion of alternatives does not fully explain how the Reduced Tower Footprint and Height Alternative would reduce nearly all impacts compared to the proposed project. For example, the Reduced Tower Footprint and Height Alternative has 26 townhouses with stoop entrances, which, unlike the proposed project, would encourage additional pedestrian traffic.

B. Also, under the Reduced Tower Footprint and Height Alternative, the pedestrian connection between Post Street and Geary Boulevard at the west property line would be significantly widened from 10 feet to 40 feet.

C. The DEIR identifies the Reduced Tower Footprint and Height Alternative as the Environmentally Superior Alternative (the alternative that has the fewest significant environmental impacts). The City should approve this alternative instead of the project.
Attachment “B” for Second Paragraph

There are many objections to the proposal. Many of these are technically “non-environmental” and thus were not discussed in any detail in the EIR currently being considered. Because of their importance it is perfectly appropriate for you to select one or two of them to include in the second paragraph of your letter to the Planning Commission. Choose one or two and express your concern in your own words.

A. Current zoning in the area is 240 feet; the proposed project requires rezoning to at least 400 feet. This is another glaring example of “spot zoning” to enable the construction of luxury building at the expense of much-needed mid-range and lower-range affordable housing in San Francisco.

B. Tower separation in the city is currently a minimum of 115 feet (to avoid creating towering “walls”). Tower separation on Cathedral Hill has historically been 200 feet and it is only logical that tower separation for this project adheres to the 115-foot guideline.

C. Construction of new buildings should not block “view corridors” of civic landmarks. The proposed project would seriously impact the view of St. Mary’s Cathedral, an acknowledged landmark.

D. Currently the Geary block between Laguna and Gough is 470-feet long, a so-called “double block”. There is increasing unhappiness from pedestrians who cannot cross these double blocks. The proposed building claims to eliminate this problem by creating a narrow alley-like passage. The Reduced Height Alternative (Alternative D) creates a mid-block park-like esplanade (basically a pedestrian extension of Octavia) which would provide attractive open space and eliminate the undesirable impact of the current “double block”.

E. It would change the nature of our neighborhood, especially by ignoring the fact that many senior residents live nearby. The intersections around Cathedral Hill already are some of the most challenging and dangerous in the city for elder residents. Pedestrian traffic is already a problem and the increased traffic by the construction of CPMC Hospital will worsen it. The addition of a high-rise such as 1481 Post can only further increase the problem. (Feel free to add your own experiences as a pedestrian.)

F. Vehicular traffic would also be worsened since all entrances and exits of the proposed building are on Post Street. This would mean additional sidewalk “cuts” to accommodate cars arriving and leaving; the difficulty of making a left turn on to Post will be heightened by the increased traffic, particularly when construction of the hospital is completed.
Attachment “C” Sample Letter--Do Not Copy Word for Word

Ted Weber, Jr.
The Sequoias, Apt. 1409
1400 Geary Blvd.
San Francisco CA 94109
Tel: (415) 674-8771

August 15, 2014

Sarah B. Jones, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco CA. 94103-2414

RE: 1333 Gough St/1481 Post Street Project  (2005.0679E)

Dear Ms. Jones:

As a long term resident of The Sequoias, I would like to offer my comments on the July 31 Draft EIR on this project. I am particularly concerned with what appears to be inadequate consideration of problems posed by the location of the proposed project immediately adjacent to the Skilled Nursing Facilities (SNF) in The Sequoias. Patients in the SNF would be severely affected by the noise impact of construction and by the long term impact of deteriorated air quality and wind and shadow problems posed by construction of a facility less than 17 feet from their rooms. The EIR’s response that “the best possible” construction techniques would be employed to mitigate these problems is more a “hope” than a solution to these problems, many of which will, in any case, still be troublesome and serious for years and years after construction is completed.

There are many other criticisms of this project, many of which were not considered in the EIR (because its contents are limited to specific environmental issues). It is reassuring that on page S.42 of the EIR, the Planning Department acknowledges that:

“Comments expressing...opposition to it will be considered independent of the environmental process by City decision-makers, as part of their decision to approve, modify or disapprove the proposed project.”

At this time the extremely serious issue of “spot zoning” for a 416-foot high building in an area where the maximum height is 240 feet will be a major issue. The impact of a building so much “out of scale” with the neighborhood and its impact on the quality of life for residents in the area which includes Japantown are extremely serious issues which I m sure the Planning Department and Commission will weigh carefully in making a decision.

Thank you for providing an opportunity for residents to express their serious concern over this project.

Sincerely,
Theodore S. Weber, Jr.