SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION
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TO: Commissioners and Alternates

FROM: Will Travis, Executive Director (415/352-3653 travis@bcdc.ca.gov)
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SUBJECT: Staff Report, Preliminary Recommendation and Environmental Assessment Concerning Proposed San Francisco Bay Plan Amendment No. 1-11 to Modify the Bay Plan Waterfront Park Priority Use Area Designation at Candlestick Point in San Francisco
(For Commission consideration on July 21, 2011)

Preliminary Staff Recommendation

The staff preliminarily recommends that the Commission amend *San Francisco Bay Plan* Map 5 by modifying the waterfront park priority use area designation at the Candlestick Point State Recreation Area in San Francisco by:

1. Removing the park priority use area designation from a 9.5-acre area at the eastern boundary of Candlestick Point;
2. Adding a 1.5-acre area to the southern portion of the park priority use area designation near Candlestick Cove; and
3. Making necessary findings regarding environmental impacts outlined in the Environmental Assessment.

Staff Report

Reason for the Proposed Amendment. The California Department of Parks and Recreation ("State Parks") and the Redevelopment Agency of the City and County of San Francisco ("SFRA"), have applied to the Commission to amend San Francisco Bay Plan ("Bay Plan") Map 5 by modifying the waterfront park priority use area designation at Candlestick Point State Recreation Area ("CPSRA"). The requested Bay Plan amendment would modify the inland boundary of the waterfront park priority use area designation at Candlestick Point in San Francisco and reduce the designated area by approximately 8 acres.

As discussed below, this amendment would allow the park priority use area designation to match the boundary of CPSRA, as modified pursuant to legislative direction. This reconfiguration of the CPSRA boundary and the amendment of the priority use area designation area will facilitate the San Francisco redevelopment project at Candlestick Point and substantial improvement of CPSRA.

Statutory and Policy Requirements. Section 66602 of the McAteer-Petris Act states in part that "certain water-oriented land uses along the bay shoreline are essential to the public welfare of the Bay Area, and that these uses include ports, water-related industries, airports, wildlife refuges, water-oriented recreation and public assembly, desalinization plants, upland dredged material disposal sites and power plants requiring large amounts of water for cooling purposes; that the San Francisco Bay Plan should make provisions for adequate and suitable locations for all these uses, thereby minimizing the necessity for future bay fill to create new sites for these uses…"

Section 66652 of the McAteer-Petris Act states, in part, that "the Commission at any time may amend, or repeal and adopt a new form of, all or any part of the San Francisco Bay Plan but such changes shall be consistent with the findings and declarations of policy contained in this title. Such changes shall be made by resolution of the commission adopted after public hearing on proposed change, of which adequate descriptive notice shall be given…[i]f the proposed change pertains only to a map or diagram contained in the San Francisco Bay Plan, the resolution adopting the change shall not be voted on less than 30 days following notice of hearing on the proposed change… and shall …require the affirmative vote of the majority of the commission members."

The proposed amendment would modify only the inland boundary of the waterfront park priority use area at Candlestick Park in San Francisco, and would not affect Bay Plan stated policy. The amendment would be processed in a manner consistent with the requirements of Section 66652 of the McAteer-Petris Act quoted above and the Commission's regulations.

The Bay Plan states that substantial public benefits are provided by certain shoreline land uses, including parks and beaches. As stated in the Bay Plan, "shoreline areas suitable for priority uses…exist only in limited amount, and should be preserved for these purposes." Within these priority use areas, the Commission has concluded that some Bay filling may be justified for purposes that provide substantial public benefits if these same benefits could not be achieved equally well without filling.

Summary of Proposed Amendment. The proposed map change amendment of the priority use area would remove from waterfront park priority use area designation a 9.5-acre parcel of CPSRA that is currently paved stadium parking and a minimally improved grassy area (see Figure 1, "Area proposed to be deleted"). Part of this area is owned State Parks, while part is leased to State Parks by the State lands Commission to State Parks. Concurrently, a 1.5-acre parcel at the southern boundary of Candlestick Point that is roadway and paved stadium parking owned by the City is proposed to be added to the area designated in the Bay Plan for park priority use. This parcel would widen the park in an area now used for parking where the CPSRA boundary closely approaches the shoreline, thereby providing a buffer between proposed development and the shoreline (see Figure 1, "Area proposed to be added"). Figure 2 shows Bay Plan Map 5 as proposed to be amended, reflecting a net 8 acres removed from waterfront park priority use area designation.

The proposed amendment to Bay Plan Map 5 would generally bring the park priority use area boundary into conformance with the boundaries of CPSRA, as reconfigured under the agreements as described below, and with future uses of the lands (see Figure 3, Proposed Land Uses). The proposed amendment would remove a net 8 acres from the Bay Plan designation. Following the reconfiguration, this area would be outside of CPSRA and would be used for mixed-income residential development, neighborhood and regional park uses, and new multimodal access roads under the City's redevelopment program.

Background. The proposed change to the priority use area inland boundary is part of a larger reconfiguration of the CPSRA that results from agreements authorized by the State Legislature through SB 792 (Statutes of 2009, Chapter 203) whereby State Parks, the California State Lands Commission and the City would exchange land parcels to reconfigure some portions of CPSRA. The agencies recently completed and executed the agreements. In consideration for the net removal of approximately 20 acres of CPSRA for development, the Legislature also provided for State Parks to receive up to $50 million under the agreements. This funding would

provide $10 million for the ongoing operation and maintenance of CPSRA, with the majority $40 million dedicated to park improvements.

SB 792 and the resulting land transfers also facilitate the larger Candlestick Point – Hunters Point Shipyard Phase II Development Plan Project, which comprises two primary areas: the 421-acre Hunters Point Shipyard Phase II site and the 281-acre Candlestick Point site. Overall, the proposed project would involve the phased development (through 2029) of two currently separate sites that would ultimately function as one integrated area and include the following improvements: 10,500 residential units; a 300-slip marina; replacement of the Alice Griffith public housing facility; a new/replacement 69,000-seat stadium; 885,000 square feet of retail space; over 2.5 million square feet of office/research and development space; a 150,000-square-foot hotel; a 75,000 square foot performance center; and a 225,000-square-foot artist's studio facility and art center.

Proposed parks and open space throughout the redevelopment area would total between 327 and 336 acres. A Bay Plan and *San Francisco Bay Area Seaport Plan* amendment application has been submitted to the Commission to delete the port priority use area designation at Hunters Point, and will be the subject of a separate public notice.

At Candlestick Point, SFRA plans to develop a mix of primarily mixed-income residential, retail, office and community service uses. Also proposed are a 200-room hotel and a 10,000-seat performance venue, following demolition of the 49ers stadium. Future improved park and open spaces at Candlestick Point would total approximately 105 acres.

Staff Analysis

Candlestick Point. Currently, most of CPSRA is inaccessible, undeveloped or minimally improved for recreational uses. The land exchange between the State and the City and County of San Francisco will facilitate realization of the SFRA's redevelopment plans for CPSRA and Candlestick Point as a whole, and the transfer of funds to State Parks for park improvement and ongoing maintenance. Without the infusion of funding from SFRA, State Parks would be unable to improve and expand waterfront recreational opportunities to meet current and future needs at Candlestick Point.

Priority Use Area Designation. In response to the McAteer-Petris Act requirement that suitable shoreline areas be set aside for certain water-oriented uses, including water-oriented recreation and public assembly, the Commission, working with local, regional, state and federal agencies, identified sites around the Bay shoreline for park and recreation use. In 1971, the Commission designated part of Candlestick Point in San Francisco, including portions of CPSRA, for waterfront park priority use. If the Commission approves the proposed amendment, there will be an 8 acre net reduction of an approximately 144 acre area now designated in the Bay Plan for park priority use area in the Candlestick-Bayview neighborhood of San Francisco. The acreage would be taken from the inland boundary of the priority use area on Candlestick Point. No waterfront area would be removed from priority use designation (see Figure 1).

The proposed amendment encourages water-oriented recreation both by implementing the CPSRA agreements, thus providing funding for substantial park improvements, and by adding key lands to CPSRA and the waterfront park priority use area. The land added to CPSRA and the park priority use area will provide additional acreage along the shoreline of the existing park, where the increased width will allow space for the construction of a high quality segment of the Bay Trail and beach day-use facilities, thereby providing increased visitor access to the Bay shoreline. Currently there is not enough land above mean high tide to provide the desired

level of public access and there is no improved pedestrian access in this area. Moreover, the land in this area has eroded, necessitating the placement of riprap in order to stabilize the road fill bank. Continued erosion is expected to occur, in part due to sea level rise and storm surges. The additional land will provide opportunity for erosion control and shoreline stability solutions to be constructed.

The Candlestick Point Bay Plan Map 5 note refers to the multiagency planning effort to improve CPSRA in coordination with the area's redevelopment. The proposed amendment supports this effort in two ways: 1) The area proposed for removal from the designation would be made available for redevelopment purposes, consistent with the redevelopment program for Candlestick Point. Without the amendment, the redevelopment program would be inconsistent with the Commission's park priority use area designation; and 2) The proposed amendment also would facilitate the improvement of CPSRA, an essential aspect of the redevelopment program, through the funding and land transfers discussed above.

Additionally, State Parks is engaged in a General Plan Amendment process to determine the future improvements and specific uses within CPSRA. When this process is completed, 55 additional acres along the north shoreline of Candlestick Point and the north side of Yosemite Slough may also be available for the Commission's consideration as a further addition to the waterfront park priority use area.

The staff believes proposed Bay Plan amendment is consistent with Section 66602 of the McAteer-Petris Act because it will facilitate funding for improvements within the park priority use area that will increase and improve water-oriented recreation along the Bay shoreline. Moreover, the amendment could lead to the future designation of approximately 55 additional acres of park priority use area, which could result in a net increase of approximately 47 acres in BCDC's Candlestick-Bayview park priority use area.

For these reasons, the staff preliminarily recommends the Commission amend the *San Francisco Bay Plan* by modifying the waterfront park priority use area designation at Candlestick Point in San Francisco and revising Bay Plan Map 5, as shown on the following attachments:

Figure 1 – Detail of approximately 9.5-acre area at Candlestick Park State Recreation Area proposed to be removed from waterfront park priority use area designation, and of 1.5-acre area to be added to priority use area designation.

Figure 2 – Revised Bay Plan Map 5 as it would appear if the Commission votes to adopt Bay Plan Amendment No. 1-11.

Figure 3 – Proposed Land Uses at Candlestick Point

Environmental Assessment

Project Description

Proposed Bay Plan Amendment. The proposed amendment would modify the inland boundary of the Bay Plan waterfront park priority use area consistent with the City's Candlestick Point – Hunters Point Shipyard Phase II Project by:

1. Removing the park priority use area designation from a 9.5-acre area of the CPSRA (see Figure 1, "Area proposed to be deleted") that is currently paved stadium parking and a minimally improved grassy area. Part of this area is owned by State Parks and part is owned by State Lands and leased to State Parks to State Parks; and

2. Adding a 1.5-acre paved area owned by the City to the southern portion of the park priority use area designation near Candlestick Cove (see Figure 1, "Area proposed to be added"). This addition would widen the park priority use area in a location where the CPSRA boundary closely approaches the shoreline, thereby providing a wider buffer for waterfront recreation and Bay Trail access and habitat enhancements between proposed development and the shoreline.

Candlestick Point – Hunters Point Shipyard Phase II Redevelopment Project. According to the City and County of San Francisco, the overall Redevelopment Project will revitalize the former Hunters Point Naval Shipyard and the adjacent Candlestick Point area by delivering much needed public benefits to the Bayview Hunters Point community and the City as a whole. The Redevelopment Project will provide: (a) 10,500 residential units, approximately 32 percent of which (3,345) will be offered at below market rates and will include the complete rebuild of the Alice Griffith Public Housing facility, (b) approximately 327 to 336 acres of new and improved public parks and open space, (c) 885,000 square feet of regional and neighborhood-serving retail space, (d) 255,000 square feet of new and renovated studio space for Shipyard artists, including an arts education center within a new "Arts District" supporting the vibrant artist community, (e) 2,650,000 square feet of commercial, light industrial, research and development and office space, (f) 100,000 square feet of community uses, (g) new public and community facilities on the Shipyard and Candlestick Point, (h) improved land and supporting infrastructure for a new football stadium for the San Francisco 49ers, including necessary parking areas and transportation improvements, with alternative uses that either shift some residential uses from Candlestick Point to the Shipyard and expand by up to 500,000 square feet commercial uses on some of the areas of the Shipyard currently reserved for stadium uses or expand research and development uses by 2,500,000 square feet on the Shipyard, if the 49ers do not build a new stadium on the Shipyard, (i) a 10,000 seat arena on Candlestick Point, (j) a hotel, (k) a 300 slip Marina, and (l) a bicycle and pedestrian bridge over Yosemite Slough that can be used for game day automobile travel in the event the stadium is constructed.

Environmental Review under the McAteer-Petris Act. Amendments of the Bay Plan must meet the requirements of the McAteer-Petris Act and the Commission's standards for environmental review. BCDC is exempt from the requirements for preparing Environmental Impact Reports (EIRs) under the California Environmental Quality Act (CEQA), because its regulatory program has been certified by the Secretary of Resources as functionally equivalent to CEQA (14 CCR §15251(h)). BCDC regulations require the preparation of an Environmental Assessment in lieu of an EIR, and specify the scope of the environmental impact analysis that

must accompany any amendment of the Bay Plan (14 CCR §§ 11510-11521). In addition to discussing substantial[1] environmental impacts and measures to avoid, minimize or mitigate the impacts, the EA must describe alternatives to the proposed action that would attain most of the objectives of the project and avoid or substantially lessen one or more substantial effects.

In this case the proposed amendment is a minor map change necessary for a redevelopment project proposed by the City and County of San Francisco and the San Francisco Redevelopment Agency (SFRA). The environmental impacts of the overall Redevelopment Project have been thoroughly assessed in the Final Environmental Impact Report for the Candlestick Point – Hunters Point Shipyard Phase II project certified by the San Francisco Board of Supervisors on July 27, 2010 (Redevelopment Project EIR). The San Francisco Board of Supervisors approved all entitlements related to the project on August 3, 2010. (State Clearinghouse No. 2007082168.) A copy of the EIR is available on the San Francisco Planning Department's website: http://www.sf-planning.org/index.aspx?page=1828.

The Redevelopment Project EIR analyzed and disclosed the Redevelopment Project's potentially significant adverse environmental impacts, and identified feasible mitigation measures to avoid or minimize those impacts. The proposed Bay Plan map change would modify the waterfront park priority use area at Candlestick Point to make the boundary consistent with the reconfiguration of the Candlestick Point State Recreation Area (CPSRA). The reconfiguration and development are parts of the Redevelopment Project, the impacts of which are analyzed in the Redevelopment Project EIR. These impacts and the EIR are incorporated by reference in their entirety into this Environmental Assessment. The Redevelopment Project EIR considers the particular impacts of the map change proposed in the Bay Plan amendment and the development that would occur in the areas covered by the amendment, within the context of the overall Redevelopment Project. Supplemental analysis is provided in this EA where necessary to differentiate the amendment's impacts from those of the Redevelopment Project as a whole or to provide additional information for the Commission.

Finding of Substantial Environmental Impact. The EA as informed by the Redevelopment Project EIR finds that no substantial environmental impacts are directly created by the proposed map change in the proposed Bay Plan amendment. However, the EIR identifies significant secondary adverse impacts from the overall Redevelopment Project related to traffic, air quality and noise, which are summarized in this EA. These impacts and associated mitigation measures are summarized in the Impacts of Proposed Bay Plan Amendment section beginning on page 10. Although the EIR found that some of the adverse impacts of the overall Redevelopment Project were significant and unavoidable, the City concluded that the project had overriding considerations consisting of significant public benefits that contribute to the revitalization of the southeastern San Francisco waterfront. These public benefits are discussed in the section below.

The scope of BCDC's CEQA role for this map change amendment is limited, and does not include changes to the project within the responsibility and jurisdiction of various other public agencies. BCDC will have the responsibility to consider whether additional changes are required to avoid or lessen the significant effects identified in the EIR as part of its permit review of subsequent phases of the redevelopment project. At that time, BCDC will require feasible changes to the project necessary to avoid or substantially lessen significant environmental

[1] Substantial is the term used in BCDC's Environmental Assessment regulations for environmental impacts that are significant.

impacts for those aspects of the project within its jurisdiction or will make findings regarding specific economic, legal, social, technological or other considerations that make mitigation measures or alternatives infeasible. Therefore, the staff preliminarily recommends that the Commission find that approval of the amendment is consistent with CEQA because, for each of the significant impacts identified in the EIR and outlined in this EA, changes to the Redevelopment Project are within the responsibility and jurisdiction of other public agencies and BCDC in its permit review. Such changes, or findings of overriding considerations, have either already been adopted by another agency or can and should be adopted in connection with future approvals.

Public Benefits of the Proposed Amendment and Redevelopment Project. As stated above, the following benefits are among many identified by the San Francisco Board of Supervisors related to the Redevelopment Project contributing to the City's finding of overriding consideration. (*California Environmental Quality Act Findings: Findings of Fact, Evaluation of Mitigation Measures and Alternatives, and Statement of Overriding Considerations* adopted by the San Francisco Board of Supervisors, lists all benefits, impacts and mitigation measures related to the Redevelopment Project, and is available on the Commission's website at http://www.bcdc.ca.gov/BPA/1-11.shtml.):

1. The proposed amendment would facilitate the reconfiguration of Candlestick Point State Recreation Area by ensuring that future development of land to be removed from CPSRA is consistent with the Bay Plan and by including expanded sections of CPSRA in the park priority use area. The reconfiguration, in turn, will bring to CPSRA $50 million to fund future operations and park improvements.

2. The proposed amendment will contribute to the realization of the Redevelopment Project's open space plan, which would create or improve more than 300 acres of open space throughout Candlestick Point and the Hunters Point Naval Shipyard site. This open space includes the land to be added to CPSRA and the park priority use area, as well as parkland to be developed on some of the land removed from the park priority use area. Overall, the Redevelopment Project would represent the largest park improvement project in the City since the construction of Golden Gate Park. The parks and open space will create a linked system of promenades, plazas, overlooks and play areas providing a variety of public spaces and amenities for both passive and active recreation. The parks and open space plans include neighborhood parks within Candlestick and the Shipyard site, new waterfront parks around the entire perimeter of the Shipyard, restored habitat areas, and restored public access to the water. The Project will provide a network of pedestrian and bike pathways that connect Project uses to the adjacent neighborhoods and provide unrestricted public access to the parks and open space on the Project site and the Bay shoreline. Enhanced connectivity of on-site and off-site facilities and new neighborhood parks will allow integration of new and existing facilities into the citywide park network.

3. The land to be removed from the park priority use area will be developed with 566 housing units including affordable, moderate income, and market rate units. The proposed Bay Plan amendment is thus essential to the achievement of the Redevelopment Project's overall program of building 10,500 new housing units, approximately 32 percent of which will be offered at below market-rates in order to serve a range of household income levels. The below market-rate housing requirements of the Project exceed what is required under California Redevelopment Law and the City's affordable inclusionary housing laws.

Impacts of Proposed Bay Plan Amendment

Land Use. Amending the Bay Plan as requested would remove approximately 9.5 acres from waterfront park priority use area designation that comprises paved stadium parking or minimally improved low grassy area, and therefore does not currently provide significant recreational value or waterfront access for CPSRA visitors. Removing the park priority use designation from the property would enable a shift in land uses consistent with the City's redevelopment plan for the southeastern waterfront. Proposed development in the area would include medium- to high-density residential uses, public parkland owned and managed by SFRA, and public access roads. The 1.5-acre of City-owned land proposed for addition to waterfront park priority use area designation is currently roadway and paved stadium parking, and would be improved as part of a 5.9-acre recreation that would be added to CPSRA and serve as a buffer area between future development and the southern shoreline.

The proposed park reconfiguration would improve the land use pattern at CPSRA by allowing the State to transfer land that is not used for recreation out of the park, while adding land to the park that will allow the expansion of an extremely narrow strip along the shoreline, increasing the recreational value of those lands. The proposed amendment, in the context of the reconfiguration, would, overall, provide a benefit to park and recreational land use patterns.

As part of the approval of the Redevelopment Project, the San Francisco Redevelopment Agency and the City and County of San Francisco resolved any inconsistencies between those jurisdictions' preexisting land use plans and the project, including the lands subject to the proposed amendment. Similarly, the proposed amendment would resolve potential inconsistencies between the Redevelopment Project and the Bay Plan.

Several other agencies' land use plans may be inconsistent with the Redevelopment Project and the proposed future uses for the lands subject to the proposed amendment. Some plans (such as the Bay Trail Plan and the CPSRA General Plan) include maps reflecting the existing boundary of CPSRA. The proposed reconfiguration would alter the CPSRA boundary; however, not substantially. Amendment of these plans is proposed as part of the Redevelopment Project, and would include changes to any maps showing the CPSRA boundary to conform to the reconfiguration. The Redevelopment Project EIR determined that the proposed changes in the arrangement of land uses would not obstruct any environmental protection objectives of applicable land use plans; therefore, any inconsistencies do not give rise to a significant impact on the environment. (See Redevelopment Project EIR Section III.B Land Use and Plans, p. III.B-38.)

The Redevelopment Project's street pattern, open space network, and pedestrian facilities are specifically planned to facilitate connections between developed areas of Candlestick Point and the CPSRA, including the lands subject to the proposed amendment, other neighborhoods covered by the Bayview Hunters Point Area Plan, and the Hunters Point Shipyard portion of the Redevelopment Project. These designs would connect, rather than divide, a community. The Redevelopment Project EIR concluded that the Redevelopment Project would not contribute to any cumulative impacts related to land use.

Recreation and Public Access. In approving Bay Plan Amendment No. 2-06 in 2006, which amended the Bay Plan's recreation policies, the Commission concluded that additional waterfront recreational opportunities are needed to meet regional need. Waterfront parks, including those currently designated in the Bay Plan and those purchased and developed for park use, but not designated, comprise about 25,000 acres of regional supply, or slightly less than four percent of the total park acreage in the region. With greater population concentrations near the shoreline, the demand for useable, accessible waterfront parks will dramatically increase. Based

on emerging trends, such as the increasing popularity of bird watching, paddle sports and visiting nature centers, participation in water-oriented recreation of all types can be expected to grow in the coming years.

The proposed Bay Plan amendment would facilitate the replacement of some areas of stadium parking with park and open space designed to enhance public access to the Bay and shoreline. Although the overall reconfiguration of CPSRA could result in a reduction of approximately 20.62 acres in the area of the CPSRA, only a net 8 acres would be removed from the area presently designated by BCDC for park priority use. Further, the Commission, at the conclusion of the State Parks General Plan amendment process, could consider approximately 55 additional acres for addition to the park priority use area.

With the Redevelopment Project, $40 million would be provided to State Parks to renovate and improve CPSRA, and an additional $10 million provided for ongoing maintenance and operation. According to the California State Parks Outdoor Recreation Plan (CORP), there is unmet demand for parks and recreation opportunities, due to a lack of investment in facilities and explosive population growth. The long term funding associated with the Legislature-approved land transfers will provide for park operation, maintenance, planning and construction of improvements at CPSRA, and will greatly improve public access to the shoreline. The reconfiguration and other improvements associated with the Redevelopment Project also will facilitate the continued construction of Bay Trail linkages and providing connections to large portions of the San Francisco shoreline. Without this funding assistance, State Parks would not be able to improve and expand recreational and public access opportunities at CPSRA and thereby increase public benefits.

The net 8 acres proposed for removal from park priority use designation are part of approximately 144 acres now in Commission park priority use area designation (136 acres if the proposed amendment is adopted) in the Candlestick Point and the adjacent Bayview neighborhood, which extend inland and south beyond the CPSRA boundary. The current Bay Plan park priority use designation does not, however, include CPSRA in its entirety. When State Parks' planning at Candlestick Point has been completed, an additional 55 acres along the north shore of Candlestick Point and Yosemite Slough owned by State Lands and State Parks could be added to the park priority use area, which would increase the total Bay Plan designated area to roughly 191 acres, or a 40 percent increase.

Proposed development on the lands to be removed from the park priority use area will be outside CPSRA and will be designed to not interfere with recreational uses such as fishing, windsurfing, hiking and viewing opportunities, as well as a planned water trail camping site. The EIR concluded that the Redevelopment Project, including the development of the lands subject to the proposed amendment, would not contribute to any significant cumulative adverse impact related to recreation.

Appearance, Design and Scenic Views. The land to be removed from the park priority use area presently contains substantial paved parking areas and undeveloped parkland containing non-native grasses, and does not offer any special aesthetic features. It does provide park users some views of the Bay; however, this portion of the park is the furthest from the shoreline. Bay views will remain available from adjacent parts of CPSRA, which would be improved and made more accessible to the public through the funding attached to the reconfiguration of CPSRA. The 1.5 acres of land to be added to CPSRA and the park priority use area will increase public access to an area on the shoreline that features expansive views of the Bay. Overall, the

proposal would provide an aesthetic benefit to the park priority use area and to CPSRA as a whole.

Development proposed at Candlestick Point as part of the Redevelopment Project would change the existing visual character of the area by constructing new housing, including some mid- and high-rise structures. Bay Plan policies state, in part, that shoreline development "should be built in clusters" to allow "frequent" views of the Bay and shoreline. The layout for non-CPSRA development as proposed would be consistent with this policy. As discussed in Section III.E of the Redevelopment Project EIR, this development would be visually compatible with its surroundings and provide visually smooth transitions to existing neighborhoods. The proposed development would not have a significant adverse visual impact.

Mixed-use development of the currently generally vacant area to be removed from the park priority use area would increase lighting and nighttime glare. Mitigation Measures AE.7a1-4 will provide development standards, such as a requirement that landscape illumination and exterior sign lighting be accomplished with low-level, unobtrusive fixtures, to ensure that such impacts are reduced to a less than significant level.

The Redevelopment Project EIR concluded that the Redevelopment Project as whole, including the development of the lands subject to the proposed amendment, in combination with reasonably foreseeable future projects, will not a have significant adverse cumulative impact with regard to scenic vistas, visual character, or light and glare. The EIR further concluded that even if such cumulative impacts do occur, the Redevelopment Project would not make cumulatively considerable contributions to the impacts.

Bay Fill. Bay Plan Map 5 Policy 20 states, in part, that in developing the Candlestick site "[s]ome fill may be needed." Amending the Bay Plan designation would not directly lead to increased fill in the Bay, as the lands proposed for removal from and addition to the park priority use area are not located on the shoreline, and development of these lands would not involve any fill. However, the overall Redevelopment Project does include shoreline improvements that include placement and removal of fill. The lands proposed to be removed from and added to the park priority use area are not directly on the shoreline, and development of these lands would not involve any fill. The overall Redevelopment Project does include shoreline improvements that include placement and removal of fill.

Based on measurements at the high tide line performed for the EIR, the Redevelopment Project will result in permanent impacts to up to 23.47 acres of freshwater wetlands, non-tidal salt marsh and other waters overall. Proposed Bay fill acreages in the table below are approximate, and will be refined to reflect the MHW line as well as net changes to open water in the Bay. Detailed designs will be submitted with future permit applications that will include this information. Permanent impacts will result from the following improvements:

As measured at high tide line	**Candlestick Point**	**Yosemite Slough**	**Hunters Point Shipyard**	**Total**
New bulkhead support and shoreline improvements	4.63 ac	0.27 ac	18.26 ac	**23.16**
Bridge abutments,	—	0.14 ac	—	**0.14**

columns				
Bridge approaches, non-shoreline fill	—	---	0.17 ac	**0.17**
Total	**4.63 ac**	**0.41 ac**	**18.43 ac**	**23.47**

Source: Candlestick Point –Hunters Point Shipyard Phase II EIR Comments and Responses Document, May 13, 2010, Page 2350, Table III.N-4. Note: 2 acres of impacts associated with a future marina are not included above because they will not be included in the initial Redevelopment Agency/Project Sponsor permit applications. A marina operator will obtain a separate permit in the future.

In addition to the fill listed in the table above, there will be 1.48 acres of shadow fill associated with the Yosemite Slough Bridge. According to the EIR, the majority of the fill is needed for beneficial shoreline improvements that will increase public access to the shoreline. Moreover, Mitigation Measure BI-4a requires the replacement of the permanently filled areas with new or restored habitat at a 1:1 ratio, and shadow fill at 0.5:1. Any proposed fill will require a BCDC permit, and any required site-specific mitigation requirements will be identified through the regulatory process.[2] The EIR found that adverse environmental impacts related to Bay fill will therefore be less than significant.

Sea Level Rise and Safety of Fills. The following strategy for protection against sea level rise (SLR) has been incorporated into the Redevelopment Project. It recognizes the guidance from the 2009 Draft Climate Adaptation Strategy report prepared by the California Natural Resources Agency, the 2009 *Living With a Rising Bay* report by BCDC, project-specific coastal studies, literature review, and discussions with other City agencies (including SFPUC and DPW). The Project strategy is to:

- Design and build a project perimeter at an elevation such that a mid-term rise in sea levels (defined in the above referenced reports as 16 inches by 2050) can be accommodated without any additional adaptation measures until at least the year 2050 and possibly beyond;
- Design and build all significant assets such as building structures and infrastructure at an elevation that is more than 3 feet higher than what is required today for a 100-year level flood protection; and
- Create a project-specific adaptation and funding strategy over the long-term (defined in the above-referenced reports as 55 inches by 2100) that can begin to be implemented as needed to address sea level rise.

A portion of the area to be added to CPSRA and the park priority use area is also located within the 100-year flood hazard area (Figure II-21 of Redevelopment Project EIR). Park features associated with this area would not include housing, and would provide improved access (roadway and trails) for park visitors. Specific strategies for shoreline protection will be developed and permitted by California State Parks and will include measures to:

2 A summary of all Redevelopment Project impacts to wetlands and other waters may be found in the Candlestick Point-Hunters Point Shipyard Phase II EIR Comments and Response Document dated May 13, 2010, on pages 2350 and 2354.

- Grade park areas so that they do not flood when water levels are 16 inches above the existing 1 percent annual chance Bay water level (base flood elevation). This will protect these facilities in the event shoreline protection measures are compromised even with a 16 inch rise in sea level;
- Provide a flexible adaptive management zone that can be built as a levee as needed. Do not unnecessarily build levees in advance of sea level rise so as not to limit public uses and to minimize impacts to visual access to the Bay; and
- As critical shoreline elevations for wave run-up vary by location, construct and reinforce all shoreline edges as necessary so that they are protected from extreme waves today and extreme waves with 16 inches of sea level rise.

Redevelopment Project EIR Mitigation Measure HY-12a.2, by requiring that the design of all shoreline and public access improvements allow for future flood-protection modifications, would ensure flooding impacts associated with sea level rise within CPSRA would remain at a less-than-significant level.

Biological Resources

Terrestrial Habitats and Species. Much of the 9.5 acres proposed for deletion from waterfront park priority use designation is presently paved and provides virtually no habitat value. Other parts are characterized as landscaped/ornamental and non-native annual grassland.

A list of federal endangered and threatened species with the potential to occur within the Redevelopment Project area is included in the Redevelopment Project EIR at Appendix N-1. No listed animal species are associated with the habitats within the lands subject to the proposed amendment. The absence of suitable nesting habitat, human disturbance or predators have kept many species, including the California brown pelican, northern harrier, short-eared owl and tricolored blackbird, from nesting at CPSRA. Moreover, planned development is not expected to adversely affect any common species through substantial interference with the movement of any native resident or migratory wildlife species or with migratory wildlife corridors.

Migratory birds, including nesting raptors and songbirds, may be affected by the proposed development. Mitigation Measure BI-6a.1 from the Redevelopment Project EIR would require pre-construction bird surveys for all areas providing potential nesting habitat 15 days prior to construction activities that occur between February 1 and August 31. This mitigation will minimize potential effects to migratory birds. The addition of native plantings and trees would provide greater wildlife habitat, including potential nesting sites.

Rare plant surveys were conducted throughout suitable habitats in the Redevelopment Project area (Redevelopment Project EIR Section III.N Biological Resources, p. III.N-16). No sensitive plant species were identified within the lands subject to the proposed amendment.

Marine Habitats and Species. Aquatic marine habitat offshore of CPSRA in the vicinity of the lands subject to the proposed amendment comprise mudflats and open water. Elsewhere along the CPSRA shoreline are tidal salt marsh and nontidal salt marsh habitats, which provide potentially important habitat. Compliance with the requirements of the Construction General Permit and associated Best Management Practices (BMPs) in accordance with Redevelopment Project EIR Mitigation Measures HY.1a.1 and 2 would reduce pollutants in construction stormwater runoff, reducing effects to the marine habitats to less than significant.

Compliance with the requirements of the Municipal Stormwater General Permit and the associated Stormwater Management Plan, the San Francisco Stormwater Design Guidelines, and San Francisco Green Building Ordinance, as required by Redevelopment Project EIR Mitigation Measure HY-6a.1, would reduce pollutants in operational stormwater run-off, and effects on the surrounding aquatic habitats outside of the lands subject to the proposed amendment would be less than significant.

No marine mammal pupping site or major haulouts are identified at Candlestick Point. Development at Candlestick Point does not include substantial in-water components, therefore, no adverse direct impacts would result to marine species.

Cultural Resources. Based on current conditions and proposed development at Hunters Point Shipyard, the Redevelopment Plan EIR concluded that the Redevelopment Project as a whole, in combination with other reasonably foreseeable projects, would have a significant adverse impact on historical resources (structures) and that the project would make a cumulatively considerable contribution to that impact. The Redevelopment Project would not make a cumulatively considerable contribution to any cumulative impacts related to cultural resources, paleontological resources, or human remains.

According to the EIR, as well as the supporting archaeological and historic structure reports and evaluations completed for the analysis,[3] no historic structures were identified within or adjacent to the lands subject to the proposed amendment. Archival research indicated the presence of one previously recorded prehistoric archaeological site, CA-SFR-9, which was identified during the early 20th century by Nels C. Nelson at Candlestick Point in the area that is now the 49ers stadium. Modern development, however, has obscured the area and the extent of the site is unknown. Additionally, archival research has indicated the potential presence of the remains of historic Chinese fishing villages, dating from 1853 through the 1940s, located along the historic shoreline of CPSRA.

The northern areas of Candlestick Point are above sea level (+15 feet above San Francisco City Datum), and the historic and recent prehistoric surface has not been significantly altered. The southern area of Candlestick Point, which was submerged beneath Bay waters during the historic era, is currently covered with fill. The highest potential for intact cultural deposits, therefore, is in soils located either below the fill or above the original Bay shoreline. It is also possible that prehistoric resources may have been removed from their original location and may be found within fill deposits in the southern (southeastern) area of Candlestick Point, which would include the land to be added to CPSRA and the park priority use area. The northernmost portion of the land to be removed from the park priority use area is higher than the historic fill-line and therefore has a higher likelihood for the discovery of previously undiscovered intact archaeological resources.

The Redevelopment Project EIR, in Section III.J, notes the strong likelihood of the presence of subsurface archaeological resources dating from the Native American, Chinese fishing village, prehistoric, and maritime development periods within the Candlestick Point area,

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[3] Archeo-Tec, Historical Context for the Archaeology of the Bayview Waterfront Project, San Francisco, California, July 2008.
Archeo-Tec, Archaeological Research Design and Treatment Plan for the Bayview Waterfront Project, San Francisco, California, October 2009.
Circa Historic Property Development, Historic Context for the Bayview Waterfront Plan, December 2008.
Circa Historic Property Development, Bayview Waterfront Plan Historic Resources Evaluation, Volume II: Draft Historic Resource Survey and Technical Report, July 2009.

which includes the lands subject to the proposed amendment. These resources could be disturbed by development or park improvement activities in these areas. Identified and adopted mitigation, including Mitigation Measure CP-2a, from the Redevelopment Project EIR, requires archaeological testing and monitoring throughout the Redevelopment Project area, including the lands subject to the proposed amendment.

Under the mitigation measure, if cultural/historical resources were to be discovered, construction would cease in that vicinity until a qualified archaeologist has evaluated the find and implemented appropriate treatment and disposition measures in coordination with the State Historic Preservation Officer (SHPO). Presuming SHPO concurrence with the proposed findings and mitigation, implementation of these mitigation measures prior to any ground-disturbing activities would ensure that adverse effects to potential historic properties and cultural resources would be less than significant.

Hydrology and Water Quality

Construction. Mitigation Measure HY-1a1, identified in Redevelopment Project EIR Section III.M, requires development within the areas to be removed from and added to CPSRA and the priority use area to use BMPs during construction. Development of these areas would also require compliance with National Pollution Discharge Elimination System (NPDES) program pursuant to Section 402 of the Clean Water Act. Every construction project that disturbs one or more acres of land surface requires coverage under NPDES General Construction Permit requirements, which includes filing a Stormwater Pollution Prevention Plan (SWPPP) with the RWQCB. Compliance with the requirements of the Construction General Permit would reduce pollutants in construction stormwater runoff from development associated with the land subject to the proposed amendment. The Construction General Permit contains specific minimum required BMPs to reduce the potential for pollutants flowing off-site during a storm event.

In addition, and because permit conditions will depend upon the quality of the water discharged and the anticipated discharge rates during construction and operation, the Redevelopment Project as a whole, including the development of the areas subject to the proposed amendment, will require the preparation and implementation of a Groundwater Dewatering Plan to protect water quality, pursuant to Mitigation Measure HY.1a.3. Construction-related discharges to the City's combined stormwater system would comply with Article 4.1 of the San Francisco Public Works Code and meet the requirements of the City's Construction Site Runoff Pollution Prevention Program. Under the Construction Site Runoff Pollution Prevention Program as required by Mitigation Measure HY-1.a2, all construction sites must prepare a SWPPP.

These measures will ensure that construction activities related to the Redevelopment Project, including the development of the areas subject to the proposed amendment, would not violate any water quality standards or waste discharge requirements or cause substantial siltation or erosion. (Redevelopment Project EIR Section III.M Hydrology and Water Quality.)

Operation. Development of the lands subject to the proposed amendment would result in a change in land uses, from parking lot and park uses to residential and park uses (i.e. trails and landscaping,). This change in land uses would affect the types and amounts of pollutants that could be present in stormwater runoff. As shown in the Redevelopment Project EIR Table III.M-3, except for ammonia and total kjeldahl nitrogen (which show no change in loadings), the overall development of Candlestick Point would result in a reduction in annual stormwater

pollutant loads of between 8 and 67 percent. Table III.M-3 also shows that development of Candlestick Point would reduce stormwater runoff volumes by 37 percent, not accounting for volume reductions by BMPs. Pursuant to Mitigation Measure HY-6a.1, all development at Candlestick Point would be required to comply with the provisions of Municipal Stormwater General Permit and the associated Stormwater Management Plan (SWMP), the San Francisco Stormwater Design Guidelines, and San Francisco Green Building Ordinance. Consistent with these requirements, the project applicant would be required to submit a Stormwater Drainage Master Plan (SDMP) and Stormwater Control Plan (SCP) to the SFPUC, to identify the specific stormwater treatment BMPs that would be implemented.

These mitigation measures will ensure that operations related to the Redevelopment Project, including on the lands subject to the proposed amendment, do not exceed water quality standards, contribute to a violation of the applicable waste discharge requirements, exceed the capacity of stormwater conveyance systems, or cause substantial siltation or erosion. (Redevelopment Project EIR Section III.M Hydrology and Water Quality.)

Flood Hazards. The Redevelopment Project EIR determined that runoff from storms larger than the five-year storm and up to the 100-year storm event would be conveyed adequately on Candlestick Point via overland flow, i.e., through street gutters and swales. No Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) have been finalized by FEMA for the City and County of San Francisco; thus, the Base Flood Elevation (BFE) for a 100-year flood event has not been formally established. FEMA refers to the portion of the floodplain or coastal area that is at risk from a flood of this magnitude as a Special Flood Hazard Area (SFHA). In 2007, FEMA issued a preliminary FIRM for San Francisco, which tentatively identified SFHAs along the City's shoreline, including portions of the lands subject to the proposed amendment (see Redevelopment Project EIR Section III.M Hydrology and Water Quality). Although a BFE has not been formally adopted for areas subject to the proposed amendment, the BFE was estimated for floodplain analysis in the Redevelopment Project EIR. Portions of the land to be removed from the park priority use area and developed with housing may be within a 100-year flood zone at BFE (see Redevelopment Project EIR Figure III.M-4). However, pursuant to the preliminary grading plan for all development areas on Candlestick Point, including the land to be removed from the park priority use area, as required by Redevelopment Project EIR Mitigation Measure HY-12a.1a, the site would be graded such that the finished grade would be 3 feet higher than the estimated BFE, and building finish floors would be 6 inches above that. This will reduce impacts to a less than significant level.

Downstream flooding would not occur as the lands subject to the proposed amendment are directly upland from the Bay.

The Redevelopment Project EIR concluded that the Redevelopment Project, including the development of the lands subject to the proposed amendment, would not a make a cumulatively considerable contribution to any significant adverse cumulative impact related to hydrology and water quality.

Geology & Soils. The Redevelopment Project will be constructed on a variety of soil types, as discussed in Redevelopment Project EIR Section III.L. Mitigation Measure GE-5a will require site-specific geotechnical investigation for all construction, including the residential development on the land to be removed from the park priority use area. Standard construction techniques will likely prevent impacts related to settling. Mitigation Measures GE.10a and 11a will require additional investigation in areas of potential expansive soil or corrosive soil

hazards, including the area to be removed from the park priority use area. With the implementation of these mitigation measures, impacts related to geological resources and settling would be less than significant.

Development in the area to be added to CPSRA and the park priority use area would include access trail widening and other park aesthetic improvements (i.e., landscaping). These minor developments would not likely contribute to a significant impact related to geology and soils.

The Redevelopment Project EIR concluded that the Redevelopment Project, including the development of the lands subject to the proposed amendment, would not, in combination with existing and reasonably foreseeable future projects, have significant adverse impacts related to geology and soils.

Transportation and Traffic. Traffic impacts related to the future uses of the lands subject to the proposed amendment are analyzed in the attached letter report prepared by Fehr & Peers (Attachment 1), which uses data from the Redevelopment Project EIR. This report considers the traffic generated by future uses on these lands, as well as that traffic's contribution to the overall, cumulative impacts related to the Redevelopment Project as a whole.

The report determines that the new housing units on the lands removed from the park priority use area would generate approximately 1,777 new daily trips, including 142 new trips in the AM peak hour, and 158 new trips in the PM peak hour. The new parkland added to the park priority use area and developed by State Parks would generate about two new vehicle trips throughout the day. This traffic would not contribute to any significant impacts at study intersections in the vicinity as a result of the proposed amendment to the Bay Plan. The traffic analysis also concludes that cumulative traffic impacts in the vicinity of the proposed amendment and in particular at the study intersections are less than significant. This is the result of project design features, transportation demand management, and new and extended transit that will accommodate existing and future traffic.

The traffic report also considers the proposed amendment's impact on emergency and public access to CPSRA and its shoreline. The area around the new residential units and adjacent to the new parkland added to the park priority use area would be fully integrated into the existing and proposed bicycle and pedestrian network that will be developed through the Redevelopment Project. Residents and park visitors would share available on-street parking on the surrounding streets. Traffic volumes on the roads adjacent to the lands subject to the proposed amendment are forecast to be commensurate with that of typical neighborhood streets in San Francisco and emergency vehicles will have adequate ability to maneuver into and out of the area.

In combination with the rest of the Redevelopment Project and other likely future projects, development on the lands would contribute to a number of significant and unavoidable cumulative impacts related to traffic and transportation. (See Section III.D of the Redevelopment Project EIR.) These impacts include congestion at several intersections, roadways and freeway segments, excess vehicle traffic on a designated bicycle route, increased travel times and delays along various transit routes, and traffic congestion and transit crowding impacts related to events at the proposed stadium at the Hunters Point Shipyard site. These impacts are all related only secondarily to the proposed Commission action; that is, the future uses of the lands under the proposed amendment would not directly result in significant adverse effects.

Air Quality/Greenhouse Gas Emissions. The Redevelopment Project EIR considered cumulative impacts under two sets of standards: the BAAQMD CEQA Guidelines as they existed at the time of the analysis, and draft Guidelines that had not yet been adopted. The new Guidelines have since been adopted. The EIR concluded that the Redevelopment Project as a whole, including the development of the lands subject to the proposed amendment, in combination with existing and reasonably foreseeable future projects, would have certain potentially significant and unavoidable impacts related to air emissions.

The attached memorandum prepared by ESA (Attachment 2) analyzes impacts related to the air pollutant and greenhouse gas emissions of the construction and operation of the future uses of the lands subject to the proposed amendment, along with the cumulative impacts of the Redevelopment Project as a whole. The memorandum concludes that the development of these lands would emit criteria pollutants and greenhouse gases below the standards of significance set by the US EPA and by the Bay Area Air Quality Management District ("BAAQMD").

Overall, the Redevelopment Project would have a significant and unavoidable impact related to certain criteria pollutants (Redevelopment Project EIR, Section III.H); however, the development on the lands subject to the proposed amendment would not make a cumulatively considerable contribution to that impact.

Energy. Energy use would increase as a result of development of the land to be removed from the park priority use area. The developer of the Redevelopment Project has committed to including design features that would achieve 15 percent more energy efficiency than required by the 2008 Title 24 standards, as discussed in Redevelopment Project EIR Sections III.H (Air Quality), III.Q (Utilities), and III.R (Energy). With these features, the development and operation of the project, including the lands subject to the proposed amendment, would not have a significant impact on energy resources.

Construction of park improvements on the land to be added to CPSRA and the park priority use area would result in a minimal increase in energy usage. Operation of this parkland area is not likely to lead to increased energy use, as it is presently used for parking and would be used for recreation.

The Redevelopment Project EIR concluded that the Redevelopment Project, including the development of the lands subject to the proposed amendment, would not contribute to any significant cumulative impact related to energy consumption.

Hazardous Materials. Development of the lands subject to amendment would not require the demolition of existing structures. A Phase I site assessment of the Candlestick Point portion of the Redevelopment Project area, including the lands subject to the proposed amendment, was performed by MACTEC Engineering and Consulting Inc. The study, dated June 16, 2009 and updated July 26, 2010, concluded that nothing observed in the site visit would raise concerns regarding hazardous substances. The relevant databases, moreover, did not reveal any recognized environmental conditions of concern as defined by ASTM. The Phase I conclusions and recommendations suggest additional investigations may be required and that a soils management plan should be developed to describe procedures to follow in the event unexpected contamination is encountered during construction activities. EIR Mitigation Measure HZ-1a requires a site mitigation plan in accordance with Article 22A of the San Francisco Health Code for all development on Candlestick Point, including the development of the lands subject to the proposed amendment. With the implementation of this mitigation

measure, impacts on Candlestick Point related to hazardous materials would be less than significant.

The Redevelopment Project EIR concluded that the Redevelopment Project, including the development of the lands subject to the proposed amendment, would not, in combination with existing and reasonably foreseeable future projects, have significant adverse impacts related to hazardous materials.

Noise & Vibration. The Redevelopment Project EIR concluded in Section III.I that the overall Redevelopment Project, including the development of the lands subject to the proposed amendment in combination with other existing and reasonably foreseeable projects, would have significant and unavoidable cumulative impacts related to construction and operational noise and construction-related vibration.

Noise impacts related to the development and operation of the lands subject to the proposed amendment, along with the cumulative impacts of the overall Redevelopment Project, were analyzed in the attached memorandum prepared by ESA (Attachment 2). This memorandum concludes that construction of the project would have significant and unavoidable impacts related to both noise and vibration; Mitigation Measures NO.a.1 and 2 and NO-2a, identified in Redevelopment Project EIR Section III.I, will require a variety of sound-control techniques and devices, such as state of the art noise shielding on pile-driving equipment. This mitigation will reduce construction-related noise and vibration impacts, but not to a less than significant level. This impact is caused in part by the phasing of development on the lands to be removed from the park priority use area. Because housing would be developed in two phases, residents will be living in the first-phase units during construction of the adjacent second-phase units. The impacts, though significant, will be temporary.

After construction, operation of the project could contribute to noise impacts related to stationary sources and traffic. Moreover, residents of the housing built on land removed from the priority use area could be exposed to noise impacts related to those sources, in addition to events held at the stadium proposed for the Hunters Point Shipyard site as part of the Redevelopment Project, and air traffic in and out of San Francisco International Airport. The memorandum concludes that all of these impacts would be less than significant.

Wind. The land to be removed from the park priority use area could in part be developed with high-rise housing, which could, along with other project buildings on Candlestick Point, contribute to high winds at street level. See Redevelopment Project EIR, Section III.G. Site design, however, would ensure that tall buildings are not clustered and that the street grid is not oriented in alignment with prevailing winds. These features, along with Mitigation Measure W1-a, requiring wind analysis and design modifications in appropriate situations, will ensure that any wind effects from the development of the land subject to the proposed amendment and from the Redevelopment Project as a whole will be less than significant.

The Redevelopment Project EIR concluded that the Redevelopment Project as a whole, including the development of the lands subject to the proposed amendment, would not make a cumulatively considerable contribution to cumulative wind impacts.

Shadow. The land to be removed from the park priority use area could, in part, be developed with high-rise housing, which would cast some shade on CPSRA. According to the Redevelopment Project EIR, Section III.F, this effect, along with the shading effect of other project buildings on Candlestick Point, would be concentrated on winter afternoons and would not have a significant impact on the public's overall enjoyment of the park.

The Redevelopment Project EIR concluded that the Redevelopment Project as whole, including the development of the lands subject to the proposed amendment, in combination with reasonably foreseeable future projects, will not a have significant adverse cumulative impact with regard to shading effects.

Alternatives Analysis As It Relates to Proposed BCDC Bay Plan Amendment. This EA summarizes the FEIR analysis as it relates to the proposed map change plan amendment, and where necessary, supplements that analysis to describe the related environmental effects not anticipated in the FEIR. BCDC regulations require, in part, that the EA describe alternatives to the proposed action that would attain most of the objectives of the project and avoid or substantially lessen one or more of the substantial effects.

As described in the Redevelopment Project approvals, the Redevelopment Agency and the City's overarching goal for the Redevelopment Project is to revitalize the Bayview Hunters Point community by providing increased business and employment opportunities; housing options at a range of affordability levels; improved public recreation and open space amenities; an integrated transportation, transit, and infrastructure plan; and other economic and public benefits. In June 2008, the voters of San Francisco approved Proposition G, called the Bayview Jobs, Parks and Housing Initiative in furtherance of these goals. Proposition G outlined the elements that an integrated development plan for Hunters Point Shipyard Phase II and Candlestick Point should include and stated that the development of the area must be consistent with these objectives.

As discussed above, the Redevelopment Project includes the reconfiguration of CPSRA. The proposed Bay Plan amendment would align the boundaries of the waterfront park priority use area on Candlestick Point with the reconfigured CPSRA boundary. The overall project objective most directly related to the reconfiguration and proposed amendment to the Bay Plan is:

> "The integrated development of the Shipyard and Candlestick Point should produce tangible community benefits for the Bayview and the City and in so doing should:
>
> - Improve the Candlestick Point State Recreation Area to enhance public access to the waterfront and enjoyment of the Bay,
> - Create new public recreational and public open spaces in the Project Site, and
> - Preserve the shoreline of the Project Site primarily for public park and open space uses, including an extension of the Bay Trail along the Project Site's waterfront."

Alternatives to the Proposed Project. Pursuant to CEQA Guidelines Section 15126.6(a), the Redevelopment Project EIR considered a reasonable range of alternatives to the Redevelopment Project, which were evaluated in terms of their significant impacts and their ability to meet Redevelopment Project objectives. Four alternatives that did not include the reconfiguration of CPSRA or included a very limited reconfiguration are described below (Alternative 2, not included below, also assumed the CPSRA reconfiguration):

Alternative 1. The "No Project" Alternative, assumed that no new development would occur at Candlestick Point, (therefore no changes to CPSRA), and HPS Phase II would be developed with new uses consistent with the existing Hunters Point Shipyard Redevelopment Plan (HPS Redevelopment Plan). The Agency and Board determined that this alternative would fail to meet several of the objectives of the Redevelopment Project. This alternative would not

meet the Project and Proposition G objective of providing over 300 acres of new and improved park, open space and recreation areas. The proposed significant improvements to the CPSRA and ongoing operation and maintenance funding of the CPSRA envisioned by the Project would not occur. The Agency and Board further determined that the No Project Alternative would reduce or avoid some of the Redevelopment Project impacts, but would also result in many of the same potentially significant impacts requiring mitigation as the Project and many of the same significant and unavoidable impacts, including significant and unavoidable transportation and cultural resource impacts. It also would have some impacts that would not occur with the Project. Consequently, the Agency and Board determined that the No Project Alternative would not provide substantial environmental benefits in comparison to the Redevelopment Project, and rejected the alternative.

Alternative 3. Assumed the San Francisco 49ers would stay at the existing Candlestick Park Stadium (reducing development potential at Candlestick Point); a limited CPSRA reconfiguration; and a reduced version of the proposed bridge across Yosemite Slough. This alternative reconfiguration of CPSRA would remove a smaller amount of land from the Park than the proposed Project. Under this alternative, the lands subject to the proposed Bay Plan amendment would not change their status; therefore, the amendment would not be required. The site of the proposed amendment would remain as it is today, paved parking and minimally improved grassy areas. The Agency and the Board determined that this alternative would not meet several of the Redevelopment Project's objectives. For example, it would reduce the magnitude of improvements to CPSRA, as these improvements are tied to the reconfiguration. The portions of the CPSRA that are used for stadium parking, are undeveloped, or are inaccessible would remain in these underutilized conditions. Except for the Alice Griffith redevelopment area, other neighborhood parks or open space uses would not be developed in the Candlestick Point area.

The Agency and the Board further found that Alternative 3 would reduce the scope and intensity of many of the Redevelopment Project's potentially significant impacts, including all construction-related impacts, transportation, noise, aesthetics, wind, air quality, geology and soils, hydrology and water quality, hazards and hazardous materials, biology, public services, recreation, utilities, energy and greenhouse gas emissions. Nonetheless the Agency and Board determined, the Redevelopment Project's potentially significant impacts in these areas would still occur under this alternative and require mitigation measures identified for the Redevelopment Project to avoid or reduce these impacts to less than significant. Alternative 3 would eliminate several but not all of the Redevelopment Project's significant and unavoidable impacts. The Board and Agency therefore determined that Alternative 3 would not provide substantial environmental benefits as compared to the Redevelopment Project and rejected the alternative.

Alternative 4. Assumed land uses similar to those proposed under the Project; however residential densities and commercial intensities for most uses would be approximately 30 percent less than the Project's. This alternative included the preservation of more historic buildings than the Project would preserve. The proposed Yosemite Slough Bridge, marina, and new stadium would not be built. Additionally, the CPSRA reconfiguration would not occur. Under this alternative, the lands subject to the proposed Bay Plan amendment would not change their status; therefore, the amendment would not be required. The site of the proposed amendment would remain as it is today, paved parking and minimally improved grassy areas. The Redevelopment Project EIR determined that Alternative 4 was the environmentally

superior alternative. Nonetheless, the alternative would result in thirty significant unavoidable impacts. The Agency and the Board found that detailed comparison of the impacts associated with Alternative 4 and those associated with the Redevelopment Project demonstrated that the alternative would provide only limited environmental benefits. Because no improvements to the CPSRA would occur, this alternative would not provide for shoreline improvements and protective measures to avoid or reduce the potential for flooding and future sea level rise impacts at CPSRA. The Agency and the Board therefore rejected this alternative.

Alternative 5. Included the same land use program proposed with the Project, except that this alternative assumed that CPSRA would not be reconfigured, there is no agreement with the 49ers for a new stadium at Hunters Point Shipyard and the Yosemite Slough bridge would not be constructed. Under this alternative, the lands subject to the proposed Bay Plan amendment would not change their status; therefore, the amendment would not be required. The site of the proposed amendment would remain as it is today; paved parking and minimally improved grassy areas. The Agency and the Board found that the alternative would not meet the Project objective of improving the CPSRA to enhance public access to the waterfront and enjoyment of the Bay. The proposed significant improvements to the CPSRA including protective measures to avoid or reduce the potential for flooding and future sea level rise impacts at CPSRA would not occur. The Agency and the Board further found that Alternative 5 would reduce and avoid some of the Redevelopment Project's environmental impacts, but would also result in many of the same potentially significant impacts requiring mitigation and significant and unavoidable impacts, including significant and unavoidable transportation and cultural resource impacts. It would, moreover, have some impacts that would not occur with the Project. The Agency and the Board therefore determined that this alternative would not provide substantial environmental benefits in comparison to the Redevelopment Project. For these reasons, the Agency and Board rejected Alternative 5.

No Amendment of Resolution 16 Required

Resolution 16 sets the shoreline boundaries of the Bay Plan priority use areas. Because only a portion of the inland portion of the waterfront park priority use area is proposed for modification, and not the boundary fixed within the shoreline band, no amendment of Resolution 16 is required.

Response to Comments

As of June 17, 2011, no comments on the descriptive notice have been received at the Commission office.

FIGURE 1

Proposed Changes to the Candlestick Point Waterfront Park Priority Use Area

SUBJECT AREA BOUNDARY

EXISTING PARK PRIORITY USE AREA

AREA TO BE REMOVED FROM PARK PRIORITY USE AREA 9.55 AC

AREA TO BE ADDED TO PARK PRIORITY USE AREA 1.56 AC

FUTURE AREA TO BE ADDED TO PARK PRIORITY USE AREA 54.88 AC

FUTURE CPSRA BOUNDARY

0 350 700

BMS DESIGN GROUP

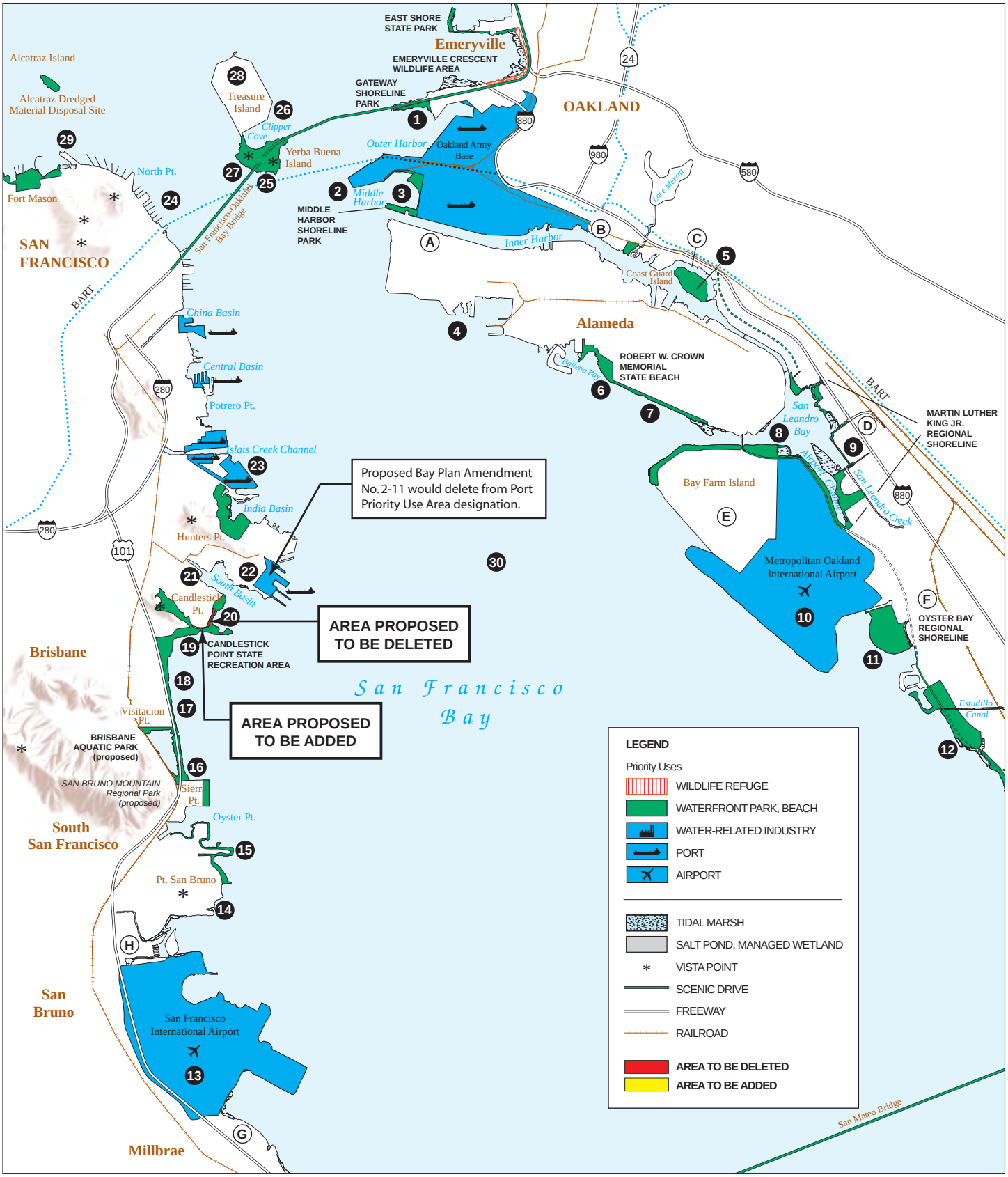
04/29/2011

FIGURE 2

Proposed Changes to the Candlestick Point Waterfront Park Priority Use Area

Plan Map 5

Central Bay



San Francisco Bay Conservation and Development Commission

~~Amended January 2007~~
Amended July 2011

FIGURE 3 – LAND USE PLAN / PARKS PRIORITY OVERLAY

Attachment 1

FEHR PEERS

June 16, 2011

Ms. Therese Brekke
Lennar Homes of California
One California Street, Suite 2700
San Francisco, CA 94111

Re: Traffic Impact Analysis for the Proposed Park Priority Amendment to the San Francisco Bay Plan

Dear Therese:

Fehr & Peers has prepared the following memorandum to summarize the traffic impacts associated with the proposed Park Priority amendment to the San Francisco Bay Plan (Bay Plan). The proposed amendment to the Bay Plan ("Project") modifies the Bay Plan Park Priority Use Area designation in the vicinity of the Candlestick Point State Recreation Area (CPSRA) in San Francisco, CA. The Project would lift the Park Priority designation from approximately 9.5 acres and apply the designation to approximately 1.5 acres; a net reduction of approximately 8 acres (See Attached **Figure 1**). The removal of 9.5 acres would facilitate the development of 566 residential units, planned as part of the larger Candlestick Point-Hunters Point Shipyard Phase II Redevelopment Project ("CP-HPS Project"). The CP-HPS Project was previously analyzed within an Environmental Impact Report (EIR) prepared pursuant to the California Environmental Quality Act (CEQA). The CP-HPS EIR was certified by the San Francisco Redevelopment Agency and the San Francisco Planning Commission on June 3, 2010. The San Francisco Board of Supervisors affirmed the Planning Commission's certification on July 13, 2010 and approved all entitlements related to the project on August 3, 2010.

The transportation impact analysis is based on travel demand forecasts and cumulative analysis prepared for the CP-HPS EIR. This letter report describes the project-related travel demand forecasts with and without the Project, resulting traffic intersection delay and Level of Service ("LOS") at nearby intersections, and the methodology and criteria used to determine significant impacts resulting from the Project. The final section of this letter report describes potential issues, discussed by travel mode, associated with access to the proposed park land and housing units.

PROJECT DESCRIPTION

Under the CP-HPS Project, the approximately 9.5 acres of removed land is proposed to be a part of the Candlestick Park South neighborhood and include 566 homes, including townhomes, low-rise flats and high-rise flats (Lennar Urban, 2011). These units will include affordable, moderate income, and market-rate type units as classified by the San Francisco Redevelopment Agency ("SFRA"). The project is located fully or partially within the following Candlestick Park South Blocks: 1, 2a, 2b, 3, 4b, 5, 7a, and 12 (See Attached **Figures 2 & 3).** The development of Blocks 1, 2a, 2b, and 3 are scheduled to be completed by 2029 and the development of Blocks 4b, 5, 7a, and 12a are scheduled to be completed by 2025 (SFRA, 2009).

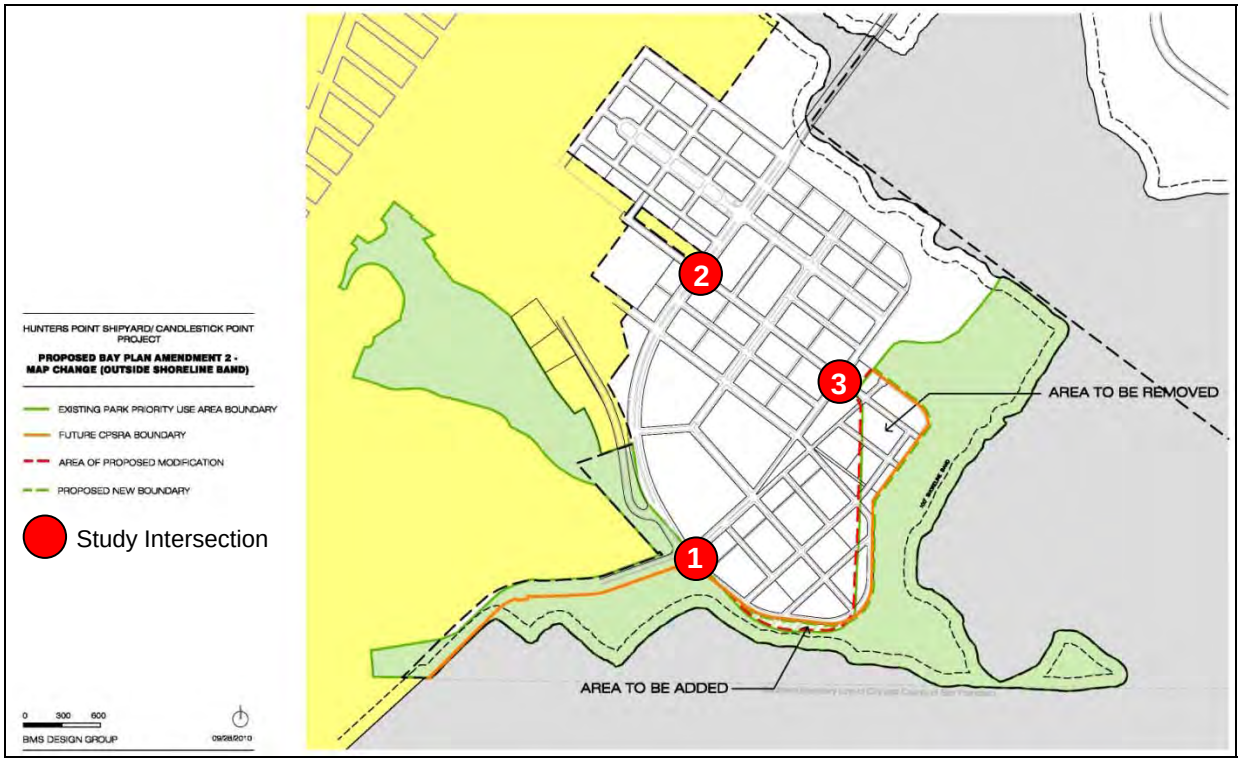
Approximately 1.5 acres of land added to the park priority use designation would be used for park purposes. The added land would allow for widening of the park access road and pathway where the CPSRA boundary closely approaches the shoreline.

FEHR PEERS

STUDY INTERSECTIONS

Study intersections were selected based their utilitarian importance and proximity to the Project site. The following intersections (as shown on **Inset 1**) were analyzed for potential AM and PM peak-hour impacts:

1. Harney Way/Arelious Walker
2. Arelious Walker/Gilman Avenue
3. West Harney Way/Gilman Avenue



Inset 1: Proposed Bay Plan Amendment Project Study Intersections

TRAVEL DEMAND FORECASTS

Travel demand forecasts for the Project were developed using trip generation rates developed for the CP-HPS EIR. These rates reflect an urban design pattern, along with Transportation Demand Management programs and additional transit service that encourages walking and biking for shorter neighborhood trips and transit use to and from citywide and regional destinations. The average vehicular trip generation rates per dwelling unit (regardless of style or income diversity), and park land trip generation rates are shown on **Table 1.** Based on these trip rates, the Project would generate 142 new AM peak hour vehicle trips and 158 new PM peak hour vehicle trips.

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TABLE 1
PROJECT VEHICLE TRIP GENERATION

Land Use	Size	Trip Generation Rates[1,2]			Trip Generation		
		Daily	AM Peak Hour	PM Peak Hour	Daily	AM Peak Hour	PM Peak Hour
New Housing	566 units	3.14	0.25	0.28	1,777	142	158
New State Park Land	1.5 acres	1.27	0.04	0.04	2	0	0
Total	--	--	--	--	**1,779**	**142**	**158**

Notes:

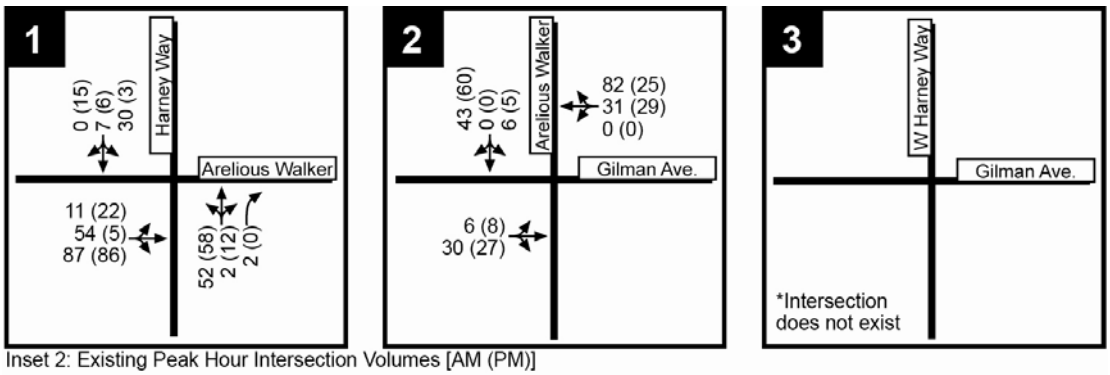
1. Vehicle trip generation rates derived from the effective trips rates identified in the CP/HPS Study, and assume build out of the overall CP/HPS Project and associated transportation improvements.
2. Trip generation rates presented as trips per unit.

Source: Fehr & Peers, 2011.

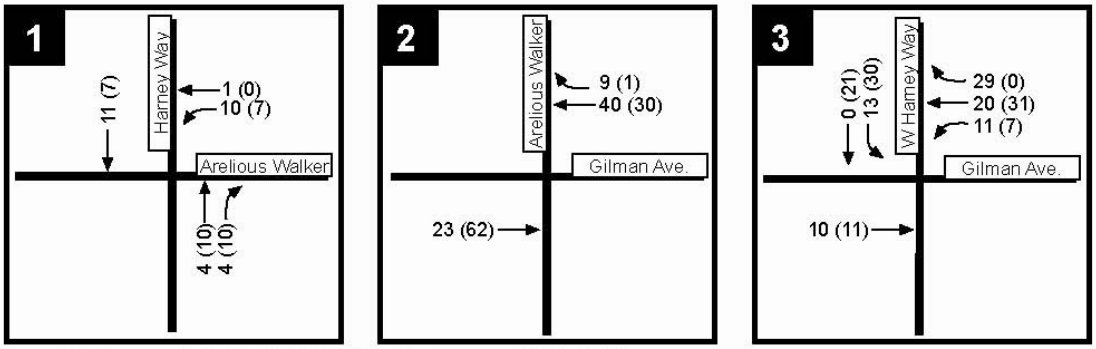
PROJECT TRAFFIC IMPACT ANALYSIS

Project traffic conditions were analyzed using existing traffic data for the area documented in the CP-HPS EIR. It should be noted that the Project is located in an area that is currently a part of the Candlestick Stadium parking lot areas, and the street network identified in the CP-HPS Plan does not exist as planned. Street improvements in the area near the Project will be constructed as phases of the Candlestick Point development build-out. The site of the proposed amendment is one of the final areas to be developed as part of the larger CP-HPS redevelopment.

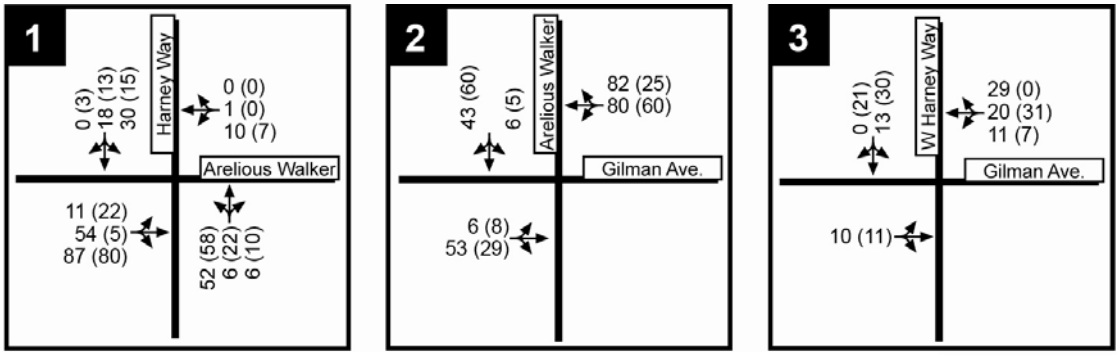
Inset 2 shows the existing intersection volumes and configurations. The traffic model developed for the CP-HPS EIR was used to assign the AM and PM peak hour trips at the Study Intersections (**Inset 3**) to develop Existing Plus Project intersection turning movement volumes (**Inset 4**). **Table 2** presents a comparison of the intersection LOS analysis for Existing and Existing Plus Project Conditions for the weekday AM and PM peak hours.



Inset 2: Existing Peak Hour Intersection Volumes [AM (PM)]



Insert 3: Proposed Project Vehicle Trip Assignment [AM (PM)]



Inset 4: Existing Plus Project Peak Hour Volumes [AM (PM)]

TABLE 2
INTERSECTION LEVEL OF SERVICE – PROJECT CONDITIONS

Intersection	Control	Peak Hour	Existing		Existing Plus Project		Project Impact
			Delay[1]	LOS[2]	Delay[1]	LOS[2]	(Yes/No)
1. Harney Way/Arelious Walker	Side-Street Stop	AM PM	10 9	A A	11 11	B B	NO NO
2. Arelious Walker/Gilman Avenue	All-way Stop	AM PM	8 8	A A	8 8	A A	NO NO
3. W. Harney Way/Gilman Avenue	Signal	AM PM	Intersection Does not Exist		8 < 8	A A	NO NO

Notes:
1. Delay measured in seconds per vehicle.
2. Level of Service

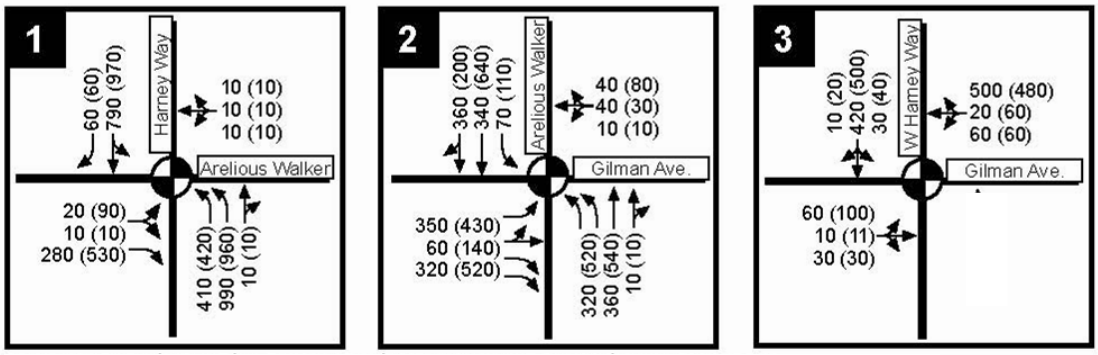
Source: Fehr & Peers, 2011.

The threshold for a significant adverse impact on traffic established, by the San Francisco Planning Department, is deterioration in the LOS at a signalized intersection from LOS D or better to LOS E or LOS F, or from LOS E to LOS F.

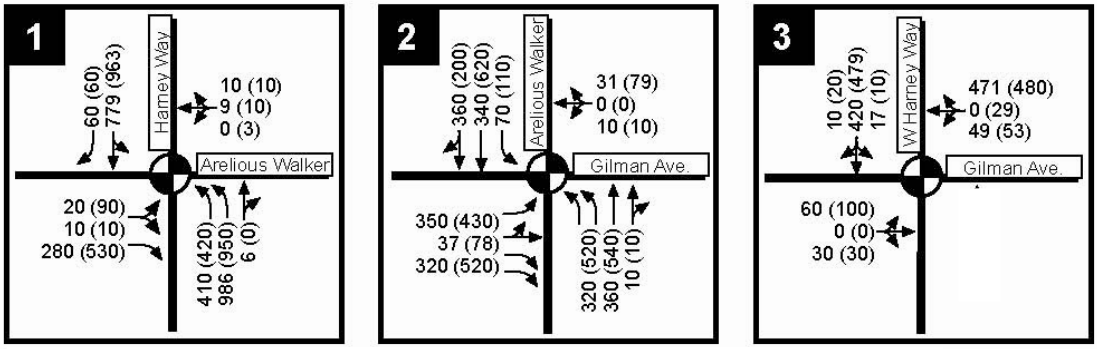
The addition of Project-generated vehicle trips to the study area roadway network would cause delay to increase slightly; however, the study intersections would continue to operate at LOS B or better. Therefore, the Project would have a ***less-than-significant*** impact to the study intersections.

CUMULATIVE TRAFFIC IMPACT ANALYSIS

Cumulative conditions were analyzed using traffic forecasts and distribution patterns from the CP-HPS EIR. The Cumulative Plus Project scenario encompasses the entire CP-HPS EIR (including the lands subject to the proposed amendment), along with other reasonably foreseeable projects in the area **(Inset 5)**. The traffic model developed for the CP-HPS EIR was used to assign the AM and PM Peak hour trips at the Study Intersections **(Inset 3)**. A 'Cumulative No Project' scenario **(Inset 6)** was developed by subtracting the net difference of new vehicle trips generated by the Project from the Cumulative Plus Project scenario **Table 3** presents a comparison of the intersection LOS analysis for Cumulative No Project and Cumulative Plus Project Conditions for the weekday AM and PM peak hours.



Inset 5: Cumulative Plus Project Peak Hour Intersection Volumes [AM (PM)]



Inset 6: Cumulative No Project Peak Hour Intersection Volumes [AM (PM)]

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TABLE 3
INTERSECTION LEVEL OF SERVICE – CUMULATIVE CONDITIONS

Intersection	Control	Peak Hour	Cumulative No Project		Cumulative Plus Project		Project Impact
			Delay[1]	LOS[2]	Delay[1]	LOS[2]	(Yes/No)
4. Harney Way/Arelious Walker	Signal	AM	22	C	23	C	NO
		PM	43	D	45	D	NO
5. Arelious Walker/Gilman Avenue	Signal	AM	28	C	30	C	NO
		PM	34	C	36	D	NO
6. W. Harney Way/Gilman Avenue	Signal	AM	23	C	24	C	NO
		PM	25	C	28	C	NO

Notes:
3. Delay measured in seconds per vehicle.
4. Level of Service

Source: Fehr & Peers, 2011.

The threshold for a significant adverse impact on traffic established, by the San Francisco Planning Department, is deterioration in the LOS at a signalized intersection from LOS D or better to LOS E or LOS F, or from LOS E to LOS F.

The addition of Project-generated vehicle trips to the study area roadway network and other cumulative traffic growth would cause delay to increase slightly; however, the study intersections would continue to operate at LOS D or better during the PM peak hour. Therefore, the Project would have a ***less-than-significant*** impact to the study intersections. This is the result of Project design features, transportation demand management, and new and extended transit that will accommodate existing and future traffic.

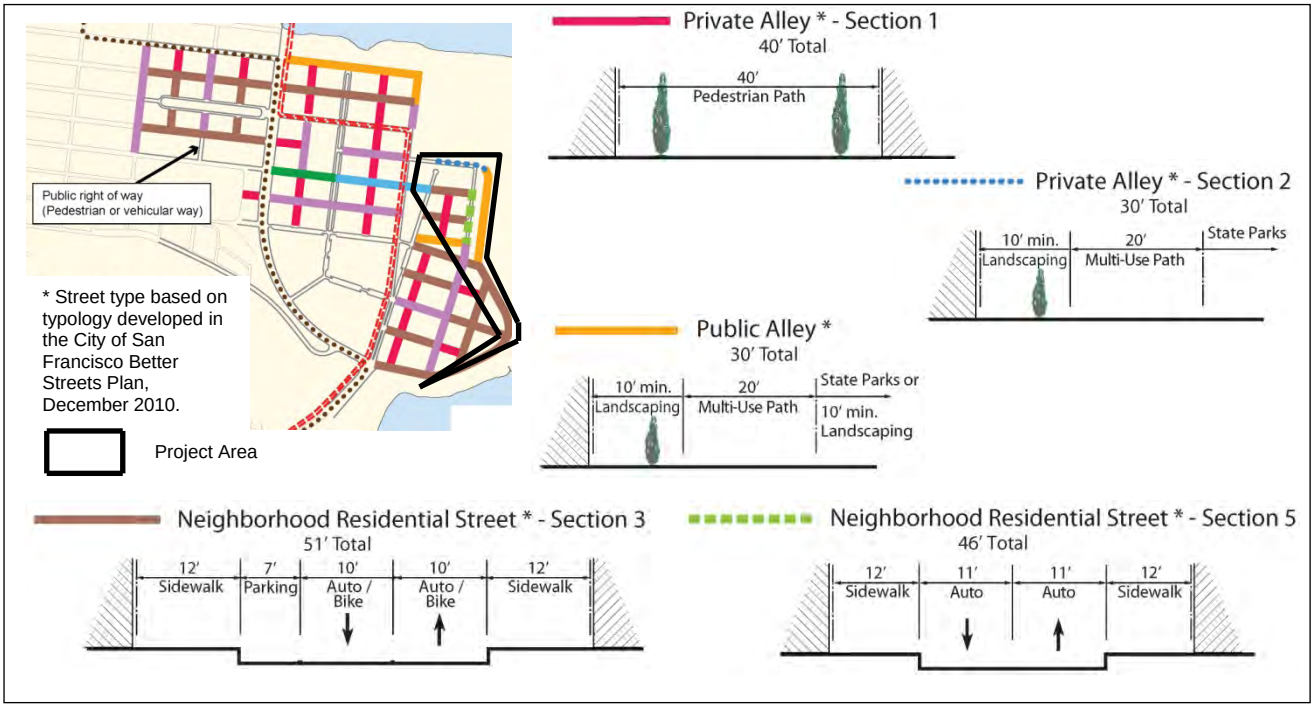
SITE ACCESS REVIEW

Residential development of the land to be removed from the Park Priority use area immediately adjacent to State Park lands may affect local circulation where the proposed residential development and access points to park areas coincide. This section summarizes emergency vehicle access, parking, and bicycle and pedestrian circulation in the study area. This qualitative assessment is based on the street classifications and cross sections that were developed for the CP-HPS Project.

Vehicular Access

The roadways located immediately adjacent to and within the lands subject to the proposed amendments would be classified as “Neighborhood Residential Streets” under the *San Francisco Better Streets Plan* (2010). These streets would generally provide one travel lane in each direction, parking on at least one side of the street, and either sidewalks or a multi-use pathway (i.e., shared pedestrian walkway and Class I bike path). There would also be a “Public Alley” street adjacent to the proposed housing pads on the lands to be removed from the Park Priority use area that provides for bike and pedestrian access only. Bicycles would share the travel lane with vehicle traffic (i.e., Class III bike route) on streets without a multi-use path. Between the blocks on this land, “Private Alleys” would provide pedestrian circulation. **Inset 7** shows the

proposed street classifications in the area near the Project, as well as the proposed cross sections of streets immediately adjacent to the Project.

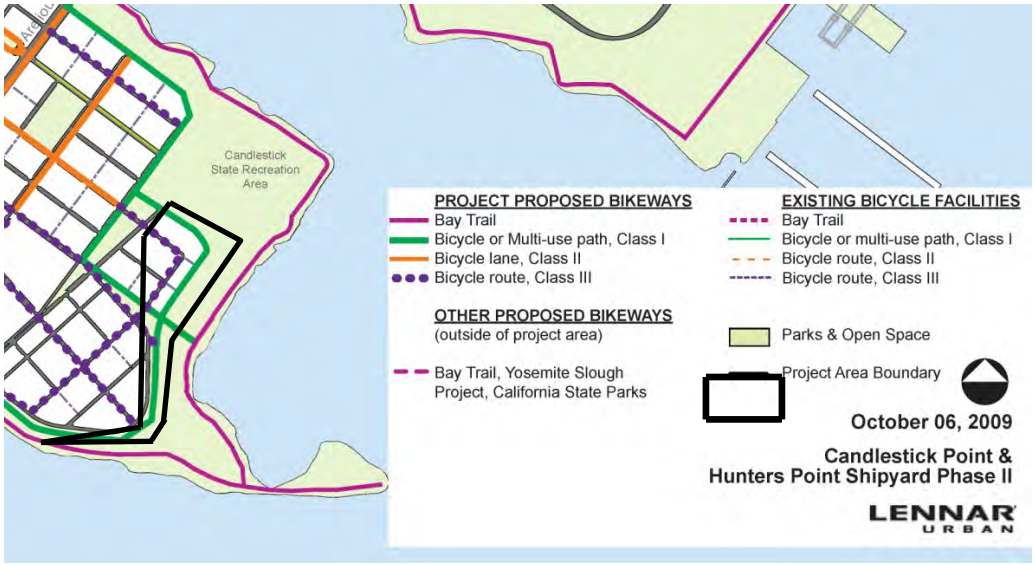


Inset 7: Proposed Street Network Near the Proposed Project

Bicycle and Pedestrian Access

Designation of the 1.5 acres of parkland for Park Priority use supports the reconfiguration of the Candlestick Point State Recreation Area (CPSRA) and facilitates public access to the shoreline and the extension of the Bay Trail. In that location, the current width of CPSRA is extremely narrow, with as little as 10 feet between the park boundary and the shoreline at high tide. This creates a "pinch point" without enough dry land to provide the desired level of public access.

The lands subject to the proposed amendment would be served by a robust bicycle and pedestrian network, fully integrated with the existing network in the area. The proposed cross sections are designed to promote non-motorized travel within the CP/HPS area. The proposed street cross sections would provide adequate facilities to accommodate these travel modes, including Class III bike routes and 12 foot sidewalks adjacent to the land to be removed from the park priority use area. Therefore, bicycle and pedestrian access to the lands affected by the Project is designed to be sufficient to meet expected demand. The proposed bike network for the area near the Project is shown in **Inset 8**.



Inset 8: Proposed Bicycle Network Near the Project

Parking

As described earlier, the land to be added to CPSRA and the park priority use area would generate approximately two vehicle trips throughout the day, with substantially more trips expected either by bike or on foot, as well as some by bus.

Parking is provided on the nearby neighborhood streets near the new State Park lands (see Inset 1); however, the CP/HPS Study did identify a substantial shortfall in area wide parking during certain periods of the day. The additional land is expected to generate only two daily vehicle trips and Park users and residents are not expected to experience substantial conflicts associated with searching for a parking space on adjacent streets.

Emergency Access

Emergency access to the lands subject to the proposed amendment would be primarily on the adjacent neighborhood residential streets, as well as along the primary auto routes within the CP/HPS area, including Arelious Walker Drive. The roadways in the area shown in Inset 5 are designed to support emergency access to the area using recommendations in the *San Francisco Better Streets Plan*. For example, the Public Alley on the land to be removed from the park priority use area is proposed to be 20 feet wide, would could allow emergency vehicles to enter the Park without any conflicts with private vehicles. Furthermore, traffic volumes on local residential streets are expected to be low, allowing room for emergency vehicles to maneuver around traffic. Therefore, the lands subject to the Project are expected to have sufficient emergency access.

CONCLUSION

After the Project, the new housing units on the lands removed from the park priority use area would generate approximately 1,777 new daily, 142 new AM peak hour, and 158 PM peak hour vehicle trips. The new parkland would generate about two new vehicle trips throughout the day.

The study intersections located near these lands would operate at acceptable levels of service during both peak hours, and the Project would not contribute to any significant traffic impacts.

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The area around the new residential units and adjacent to the new park land would be fully integrated into the existing and proposed bicycle and pedestrian network envisioned by the CP/HPS Study. Although some park visitors will drive, many would arrive without a car, and residents and park visitors would share available on-street parking on the surrounding streets, although parking may be constrained during certain periods of the day.

Traffic volumes on the roads adjacent to the Project lands are forecast to be commensurate with that of typical neighborhood streets in San Francisco and emergency vehicles will have adequate ability to maneuver into and out of the area.

We hope you find this information useful. Please do not hesitate to call for clarifications or additional information.

Sincerely,

FEHR & PEERS

Eric Womeldorff
Senior Transportation Engineer

Todd Henry
Transportation Planner

SF08-0407.04
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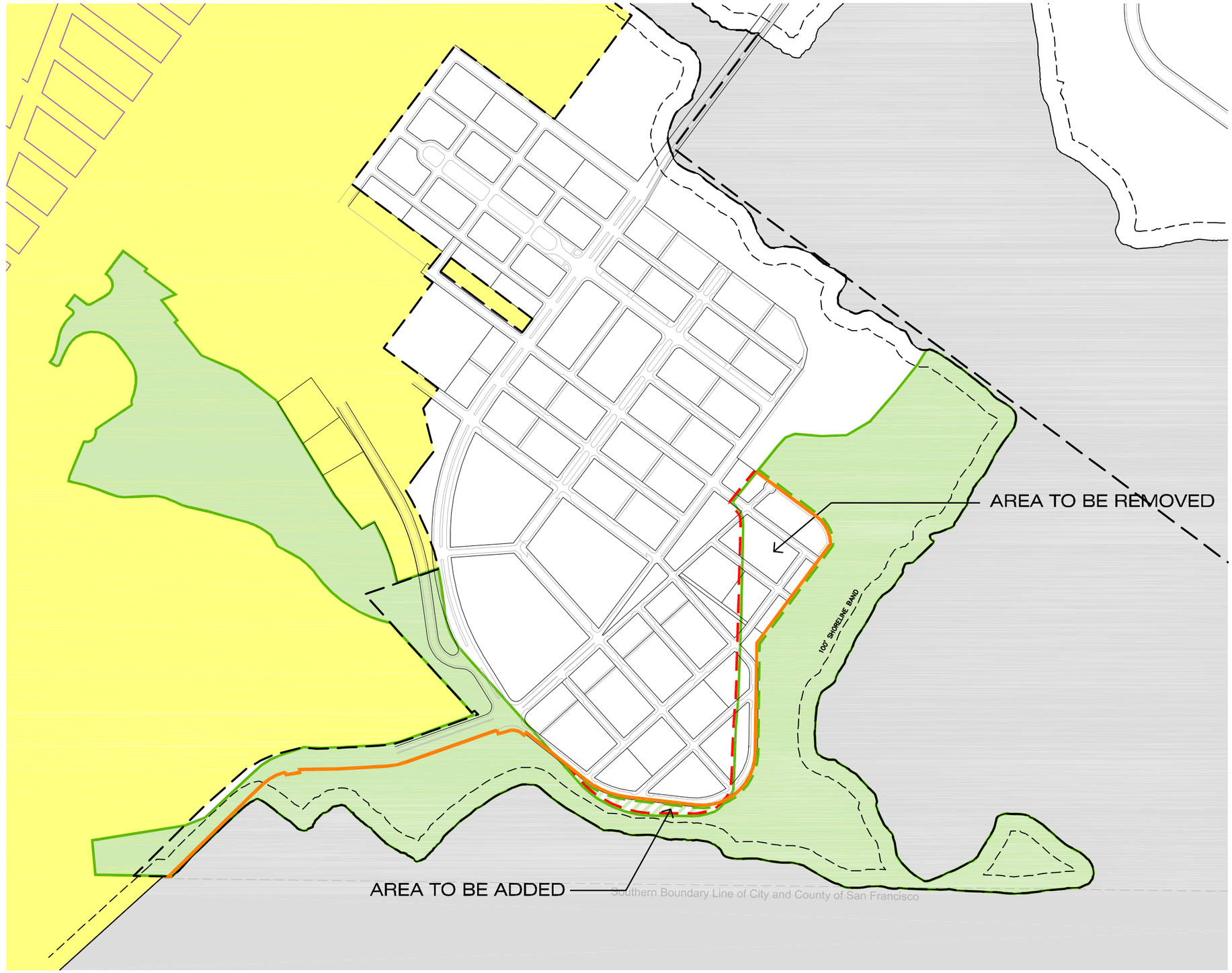
Figure 1.

HUNTERS POINT SHIPYARD/ CANDLESTICK POINT PROJECT

PROPOSED BAY PLAN AMENDMENT 2 - MAP CHANGE (OUTSIDE SHORELINE BAND)

- EXISTING PARK PRIORITY USE AREA BOUNDARY
- FUTURE CPSRA BOUNDARY
- AREA OF PROPOSED MODIFICATION
- PROPOSED NEW BOUNDARY



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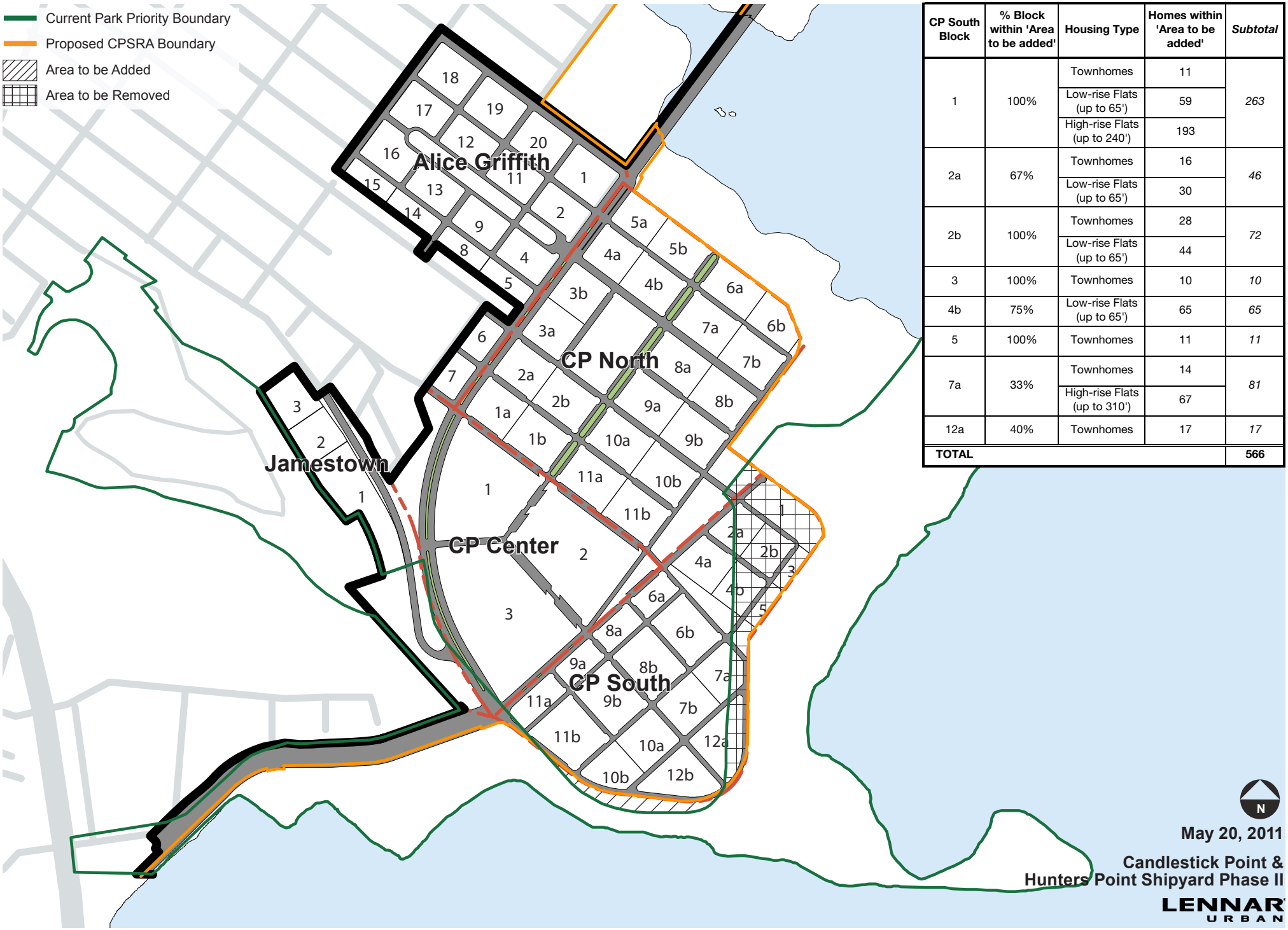
BMS DESIGN GROUP

09/28/2010

FIGURE 2 - KEY MAP / PARKS PRIORITY OVERLAY



CP South Block	% Block within 'Area to be added'	Housing Type	Homes within 'Area to be added'	*Subtotal*
1	100%	Townhomes	11	*263*
		Low-rise Flats (up to 65')	59	
		High-rise Flats (up to 240')	193	
2a	67%	Townhomes	16	*46*
		Low-rise Flats (up to 65')	30	
2b	100%	Townhomes	28	*72*
		Low-rise Flats (up to 65')	44	
3	100%	Townhomes	10	*10*
4b	75%	Low-rise Flats (up to 65')	65	*65*
5	100%	Townhomes	11	*11*
7a	33%	Townhomes	14	*81*
		High-rise Flats (up to 310')	67	
12a	40%	Townhomes	17	*17*
TOTAL				**566**

May 20, 2011

Candlestick Point & Hunters Point Shipyard Phase II

LENNAR URBAN

FIGURE 3 – LAND USE PLAN / PARKS PRIORITY OVERLAY