

**From: Parkmerced Residents Organization (PRO)
P.O. Box 27609
San Francisco, CA 94127-0609**

**Attn: Bill Wycko Environmental Review Officer
San Francisco Planning Department
1650 Mission St. Suite 400 S.F., CA 94103**

RE: Response to Parkmerced - Case# 2008.00021E Scoping Hearing NOP/EIR

June 18th, 2009

Mr. Wycko,

As residents of Parkmerced and citizens of San Francisco who would be directly impacted by the proposal (Parkmerced - Case # 2008.00021E Scoping Hearing NOP/EIR), we are pleased to have the opportunity to respond regarding our beloved home and community. We are members of the Parkmerced Residents Organization (PRO), which is a city recognized neighborhood organization representing 8 – 10,000 tenants and residents of Parkmerced and University Park South as a district and neighborhood community.

We are proud to be a diverse, unique and thriving community comprised of families, parents, grandparents, children, students, professionals, artists, teachers, disabled, civil servants, service industry, seniors, LGBT, veterans, service/military families, hi tech workers, union workers, health care workers, faith based families and individuals, socially aware families and individuals, an environmentally conscious community, and contributors to our city, state and country. We live here for the peace and harmony that the beauty of a residential community provides. Parkmerced is a multi-cultural community with every ethnicity and social group represented. We proudly call Parkmerced our home, our neighborhood, and our community here in San Francisco.

P.R.O. has the following concerns that are *not explained or addressed adequately in the current NOP/EIR document, nor the Parkmerced "Vision" documents and presentations to date*. The issues presented below are by no means all-inclusive and listed in no order of preference or priority but represent a selection of issues raised by our members. They are as follows:

I. Cumulative Impact per CEQA –

- a) Disparate Gaps in Current NOP/EIR: The total impact of all proposed projects and adjacent sites must be considered in terms of the cumulative impact on the original master-planned community of Parkmerced. Parkmerced's current NOP ignores the adjacent impacts of these developments on the original boundaries of Parkmerced, and the cumulative impacts on the existing remaining area in terms of promoting re-densification and redevelopment.
- b) Other Neighboring Development: Comprehensive Site Review is needed of adjacent Building Developments in process and on proposal phase and/or in the Scoping NOP/EIR with the San Francisco Planning Department. With these parallel Building Projects a TOTAL REGIONAL review is needed for an integrated overall impact study on actual housing needs to avoid the recent scenario of ghost town communities built for the short time gain of 'development' but under utilization (or complete vacancy) of actual residents, buyers and renters translating into zero population.
- c) A cumulative review of EIRs and NOP/EIRs of all neighborhoods and their combined impacts as a region. Such neighborhood sites are provided below but all neighborhoods may not be included (please ensure any other EIRs and NOP/EIRs of such neighborhoods would be included:
 1. The SFSU Master-plan affects on open space, housing and prior mentioned issues

2. 700 Font proposed future housing on SFUSD property [Former Frederick Burke Elementary and prior Amenity to Parkmerced residents]
 3. 800 Brotherhood Way affect on open space
 4. Recreational amenities to Parkmerced Density
 5. Cambon Drive shopping area and proposed prior development or future proposed developments or alternatives to this site's use
 6. Arden Wood housing project along 19th Avenue
 7. Sloat Blvd Housing project adjacent to the Zoo
 8. Stonestown proposed increased density and use of sites behind and in front of the mall areas
 9. City College proposed increases and effects of the Balboa Park Area Plan
 10. Growth corridors along Ocean Ave, West Portal, and bordering Daly City Developments.
- d) Alternative locations: for dense new re-urbanization and construction should be presented for viable alternatives and centralized density such as at the 19th and Brotherhood interchange, along 19th avenue, on/or adjacent to the Stonestown Mall, and density that is spread equally among all neighborhoods. This would include all areas within District 7, all areas shown per the Priority Development Designation recently approved by the SF Board of Supervisors (Legislation # 081281) and all areas immediately surrounding Parkmerced (including SFSU's original campus boundaries); to level, and equalize the dispersal of development required for housing goals of the project sponsor, SFSU Master-plan, and adjacent property owners.
- e) Options - Suggested Alternative Options that should be recommended and/or investigated further include:
1. The 'No Project Alternative' – Local Preservation Status and National Landmarking of the pre-sale outline of Parkmerced including SFSU/CSU purchased property.
 2. An alternative that addresses the Demolition and re-densification of the existing towers, and 100% preservation of the garden landscaped units
 3. Re-zoning of "sold-off" portions of Parkmerced to allow for required density while retaining 100% preservation of the existing Parkmerced's remaining areas.
 4. A reduced development alternative that looks at preservation of 50% or 75% retention of existing blocks, and provides alternative demolition of parking structures, to promote additional rezoned density based on the existing layout of Parkmerced.
 5. Land swaps, and alternative site proposals such as Stonestown, and equal density development throughout sites in district 7 that are adjacent to existing light-rail locations, and single family zoned neighborhoods (regardless of real estate value) to be redensified.
 6. 19th Avenue and Brotherhood Way interchange revision, to include large scale housing and transit, retail and development on the cloverleaf interchange and along the intersection of 19th, Juniperra Serra Blvd. and 280/101 areas for denser urban development and large scale transit upgrades for bi-county development and benefit adjacent to the newer constructed neighborhoods such as the Alma-Via, Oceanview Housing Complex, and Daly City Bart station and overpass areas.

II. Community partnered CEQA Impact Study Requested – Resident Involvement Required

- a) Overview: As residents directly impacted and faced with the loss of our homes, we request an independent CEQA Impact Study with no connections to self-interested entities or parties that stand to gain profits by the destruction of our community. Below we will quote the local San Francisco CEQA Report: **THE CASE FOR HOUSING IMPACTS ASSESSMENTS: THE HUMAN HEALTH AND SOCIAL IMPACTS OF INADEQUATE HOUSING AND THEIR CONSIDERATION IN CEQA POLICY AND PRACTICE**, PHES TECHNICAL RESEARCH REPORT, MAY 2004. This report was conducted by the City and County of San Francisco, Department of Public Health, Occupational & Environmental Health Section, Program on Health, Equity, & Sustainability.

b) San Francisco local CEQA calls for Human and Health and Environment Impact - Per the report:

- “The California Environmental Quality Act (CEQA)¹ requires governmental agencies to provide a public accounting of all potentially adverse impacts of decisions that change the environment. While some consider CEQA to be concerned exclusively with the physical environment, the aims of CEQA extend to human well being. For example, CEQA’s policy goals include maintaining “...conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations,” and “...providing a decent home and satisfying living environment for every Californian.” (California Government Code §21000) Under CEQA, a local agency must consider reasonably foreseeable “... environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.”²
- “Traditionally, health and human impact assessment within environmental review has focused on hazardous environmental agents such as air pollutants. While such impacts are important, the relationships between the physical environment and human health include many other neglected dimensions.”
- “Unmet housing needs in San Francisco result in particularly significant public health costs. Inadequate or unaffordable housing forces San Francisco residents into crowded or substandard conditions; requires them to compromise access to jobs and services, and quality education; and requires them to work multiple jobs to make ends meet. The Department of Public Health witnesses these effects when we care for the homeless, in the course of our enforcement of environmental health and housing standards, and through our efforts to improve the housing of those with environmentally related illnesses such as asthma.”
- “Unmet housing needs also have indirect environmental and economic consequences. High housing costs are disincentives for business development or expansion which also means reduced economic opportunities for residents. High cost housing in regional job centers such as San Francisco is one factor that drives development of lower cost housing on the urban fringe, contributing to traffic congestion and air pollution, as well as the loss of regional farmland and open space.³”
- “¹ CEQA, similar to NEPA, predated the more proscriptive environmental regulatory approaches such as the Clean Water Act aiming instead to ensure transparency and accountability in decision making. CEQA requires public agencies to produce an Environmental Impact Report (EIR) prior to making public decision that may have significant adverse environmental effects. (California Public Resources Code, Environmental Protection, §21000) An EIR must analysis on all potentially significant adverse environmental impacts, feasible alternatives, and steps to avoid or limit impacts. If an EIR concludes that a project would have significant impacts, the agency can not approve it until it either they determine that mitigation or alternatives are infeasible or that the project’s benefits outweigh the adverse impacts.”

c) Additional Justifications for Report: Please refer to our Residents’ Response at the NOP/EIR scoping hearing public comment, regarding the Developer’s misrepresentation, miscommunication and defamatory comments made in the portrayal of our community (see in this memo section XXIX). We cite later in the response the Developer’s commentary is made on insufficient data and therefore their project scope is based on false assumptions. As a result of misinformation (etc), there are direct negative consequences to their process regarding the incorrect data on our community demographics. This has catastrophic impact on our livelihoods and homes. Thus we request a balanced, fair and equitable analysis and report be conducted by objective non-biased parties not targeted to profit at the demolition of the Parkmerced community.

III. Housing

- a) Accurate Housing Data Needed: No information is provided on the current district, or local community needs for housing. The city of San Francisco’s state mandated General Plan and the Housing Element revision that is currently based on inadequate 2004 and 2009 data on the loss

of rental units must be addressed. The sale of +/-1,000 units to the SFSU/CSU University was data not included as part of the “fair-share” impacts and MOU (Memorandum of Understanding), negotiated prior this must be amended to include a thorough discussion on University and Institutional growth in neighborhoods. We request this to be accurately presented and included. In addition, the impacts and need generated through increased enrollment at SFSU and the effects on surrounding communities is critical data to provide a complete snapshot.

- b) Definition of the term “Unit” must be clarified and established - No specific understanding or definition of the term “UNIT” exists. Additionally, there is no data provided on the term “unit” and what size square footage constitutes this term. Therefore no accurate understanding of what will be provided in place of the existing units as a comparison can be determined.
- c) There is also no data provided on the number of “units” to be provided density wise. (Ex: studios, 1-bedrooms, 2-bedrooms, 3-bedrooms) and the break-down of these “units” in terms of what existed prior at Parkmerced to the SFSU increase in enrollment, and effects of SFSU housing policies that provoke students to migrate further into Parkmerced seeking un-controlled university housing.
- d) Number of Bedrooms per Unit must be provided. Once a working definition of “Unit” is established then related accurate data on the NUMBER OF BEDROOMS per Unit must be provided for a complete understanding of projected population and capacity.
- e) The “declared” Partnership of Parkmerced and SFSU: The implied partnership between SFSU and Parkmerced has been noted prior by University Officials in the press releases, thus there must be accurate data provided as to the current use of Parkmerced and UPS and UPN University Housing as dormitories instead of housing for the existing community.
- f) Displacement and Disparate Residential Impact: Displacement numbers, and increases in housing rental prices, due to renovations should be provided as part of this documentation to ascertain the impact of the increased SFSU developments on the prior areas of Parkmerced and Stonestown Apartments. This would include existing residents and their exodus since the initial land purchases in 2000/2001. Options should investigate integration of rental housing equally and balanced in price. The neighborhoods surrounding Parkmerced should be investigated for alternative sites to dampen the overall density increase proposed on Parkmerced’s site.

IV. Rent Control in regards CEQA Regulations

- a) Overview: As a pragmatic matter we are willing to engage in the following question regarding rent control, but we want to confirm this does not indicate we are in favor of the destruction of our homes. Although we appreciate initial exchanges and conversations with current representatives of Stellar Property Management claiming they will keep our rent control intact for all tenants there are technical/logistical questions that are legal and beyond our scope of understanding.
- b) No Legal Authority – Again we appreciate the diplomacy of Stellar Management spokespeople but are mindful that these representatives are employees only and not company owner(s) and/or officers and/or legally empowered executive staff of Management. Employee representatives cannot legally promise residents anything and should not do so. Legally binding documents should be reviewed by proper legal channels pertaining to the laws and regulations of this process carefully before any further possible additional miscommunications. We bring this issue up due to current tenant feedback and existing tenancy laws, which may be usurped by redevelopment.
- c) Understanding of CEQA/Rent Control – We were recently updated by a city worker that: **once a property manager and developer conducts a “Total Tear Down” of residences then Rent Control is no longer legally binding per existing law.** How does that work with the proposed complete demolition of ALL TOWNHOUSES and the promises of maintaining rent control?

- d) Parity of Current Space for Equal Space – We would like to know if we will maintain the exact exchange of bedrooms, bathrooms and square footage we currently reside in when there is the proposed relocation. Parkmerced’s apartments are some of the largest rental “units” square footage living spaces in the city and county of San Francisco. Therefore an equal exchange of current space of residents needs clarification regarding equitable proposed space in any relocation.
- e) Relocation: Per the NOP/EIR please clarify whether the proposed plan is to be relocating all tenants to new homes. Some Tower residents have inquired if they will be moving to a new unit. Please specify.

V. Affordable Housing / Loss of Urban Rental Housing

- a) Overview: Affordable Housing: Parkmerced was initially envisioned to provide families with an affordable and quality home experience. The development was completed in the 1950s and was a first home to many military families returning from the Second World War and the Korean War. This tradition and need of affordable rental housing and quality rental community continues to be an urgent need in the city and county of San Francisco.
- b) Loss of Affordable Housing/Rental Units in San Francisco is a crisis. The demolition of 1,538 homes and rental properties is an immediate loss to San Francisco. SFSU’s proposed expanded growth alternative into Parkmerced targets in University Park South an additional approximately 263 units in Parkmerced’s Blocks 1, 2,5,6,41,42. There are additional plans for University Park North, and the total loss here of affordable rental units.
- c) Affordable rental quality housing for all is the most fundamental requirement for a progressive and prosperous city. The need for quality rental housing affects quality of life for every San Franciscan at all incomes and in every neighborhood.
- d) Burden to residents in Projected timeline of 30 year Construction: With the noise, pollution, traffic, public health hazards, destruction of environment and gridlock that occurs in any construction project there is a total loss of community/and livability while construction goes on for decades.
- e) An Analysis and Report is Requested based on the feasibility of living in the non-ideal living conditions that such a tear down and 30 year construction would engender
- f) We Request Developers to confirm the target demographic for the projected development (as far as social, economic, family status, age, gender, occupation, disabled, etc.). Please respond to each request below for data. If there is no data, please respond with “not applicable”:
 1. Please specify the economic target for the proposed community
 2. Please confirm affordable rental unit and percent of the total units
 3. Please confirm affordable property/home ownership houses/units and percent of total
 4. Please detail amount of bedrooms per each unit per type of unit
 5. Please confirm the mixed use ratio of percent of affordable housing to total housing
 6. Please confirm ANY luxury housing and if this exists percent of total units
 7. Please confirm ANY median priced housing and percent of total units
 8. Please confirm ANY subsidized/section 8 housing and percent of total units
 9. An approximate price for each rental unit, based upon current construction costs
 10. An approximate price for each for sale unit, based upon current construction costs

VI. Parking Report and Analysis Requested

- a) Overview: We have mentioned the Developer's misrepresentation and their assumption made on erroneous resulting in planning decisions. Parking is a key example. Also, as 'Parking and limited car' use is a new buzzword/concept in the planning verbiage we would like to address this and confirm the Developers misrepresented and miscommunicated Resident car ownership and use substantially.
- b) An Analysis and Accurate Report is requested by an unbiased entity to conduct a car ownership and the current car usage behavior of Parkmerced residents.
- c) Resident Parking versus San Francisco State University (SFSU) Student Parking - A properly conducted analysis and study should reveal the over parking issues that exist in ParkMerced are a DIRECT RESULT of SFSU DAILY USE of our neighborhood used as a SFSU PARKING LOT for their commuter student population. Even to the extent that they illegally use/illegally rent our carport spaces and garage spaces.
- d) When SFSU is out of session (such as vacation and summer) -- street parking is opened up by at least 50% (if not more) and carports are opened up by at least that much.
- e) While Developer's erroneously claim they will improve our car usage (unfounded), instead a reason option and alternative is the City of San Francisco should be working with SFSU to encourage their students to be more environmentally responsible and use mass transit. (**See more details on SFSU in the next section below).
- f) Analysis and Report on Residents use of Mass Transportation - We request an Analysis and Accurate Report by an unbiased entity to conduct a mass transportation usage and behavior of Parkmerced residents. We are confident this will reveal a responsible, green approach, and robust use of Mass Transportation. The incorrect and mythical-high-car-use-resident scenario as incorrectly presented in the Developer presentation will be revealed. It will show the crowded parking conditions are SFSU student commuters who speed, over run, and pollute our neighborhood because SFSU provide no adequate parking or does not emphasis a green car policy that encourages day commuter students to use Mass Transportation. Also, as mentioned this could highlight an actual capacity issue with SFSU planning in general and over-enrollment (**Addressed in more detail in next section).
- g) Addition of Parking Spaces proposed in Current NOP/EIR - Overview: In lieu of the flawed assumptions based on erroneous data by the Developers, we want to highlight their proposed add/increase of 6,252 parking spots in their planned project to total 9,450.
- h) Confirm Total Parking - We request a total count of planned parking to include any underground garages and for each location to be broken out by type of structure. (e.g. x amount underground, x amount street, x amount resident parking, x amount to support proposed 2-3 MUNI Stops/Stations, x amount development employee parking, x maintenance worker parking, x handicapped parking, x parking if allotted per building type, x amount not mentioned but developer is aware of).

VII. Parking Gridlock is a Direct SFSU Capacity versus Enrollment Issue

- a) Parking also reveals possible issues of San Francisco State University/SFSU capacity: Does the SFSU student gridlock of our neighborhood parking areas reveal an over saturation/over enrollment of students? It is understandable SFSU increases enrollment to increase profits but

they currently under-resource their students (to clarify SFSU does not provide proper amenities and accommodations for them such as adequate University Parking).

- b) No community should bear unreasonable impact of a University or business entity that cannot properly resource their paying clientele (in the case with SFSU it is students). The question that should be resolved: is whether SFSU is unethically taking hard-earned money for tuition from parents and students (and/or student loans and grants) and not responsibility providing a quality experience for them.
- c) Report Requested re: SFSU Resource Capacity Review: Parkmerced or any community should not be the unfortunate recipient and bear the burden of poor planning of any business entity or institution who is not responsibly addressing the needs of their clientele/students directly or maintaining balanced community and city policy with neighboring communities. San Francisco State University/SFSU should be required to undergo a capacity study and analysis on capacity. Alternatives to reduce car use, their specific traffic gridlock, proper resourcing of commuting student could be another local city campus (or even East Bay location), upgrading their MUNI mass transportation directly to campus as planned in the SFSU Master-plan and maintaining enrollment codes based on the actual capacity of existing resources.
- d) Analysis and Report on Residents use of Mass Transportation - We request an Analysis and Accurate Report by an unbiased entity to conduct a mass transportation usage and behavior of Parkmerced residents and SFSU students. We are confident this will reveal a responsible, green approach, and robust use of Mass Transportation by Parkmerced residents and the over car use in our neighborhood are SFSU student. The incorrect and mythical-high-car-use-resident scenario as incorrectly presented in the Developer presentation will be revealed. It will show the crowded parking conditions are SFSU commuters who speed, over run, and pollute our neighborhood because SFSU provide no adequate parking or does not emphasis a green car policy that encourages day commuter students to use Mass Transportation. Also, as mentioned this could highlight an actual capacity issue with SFSU planning in general and over-enrollment.
- e) Data on SFSU Enrollment requested over 20 years for Analysis - We request data on the total enrollment number of SFSU students in the current school year, the past 5 - 10 years and the projected enrollment over the next 5 -10 years. Also provide the breakdown of: on campus housing, off campus housing, and students who commute. Please include all part-time and full-time enrollment(s).

VIII. Definition of Open Space – Confusion in Term Use

- a) Definition of ‘Open Space’ – We have recently been made aware that San Francisco is currently drafting their definition of ‘Open Space’, and that by 2010 the definition will be agreed upon. The move to redefine the term ‘open space’ moved forward on May 6, 2009 for the release of a draft of the recreation and open space element of the general plan. Public comments on the draft will be taken through fall. Officials hope to have a final draft of the policy adopted in 2010.
- b) New Terminology of Open Space and current NOP/EIR & Developer Plans - How does this affect the proposed redevelopment of Parkmerced and our loss of open space due to predatory land-grabs? Is this yet-to-be-determined-use-of-open space “grandfathered” into the Parkmerced development project? Please specify.
- c) Draft Proposed Definition for ‘Open Space’ - From this Draft we understand that ‘Open Space’ refers to concrete, driveways, paved areas, balconies, paved courtyards, roadways. Even “extra

pavement in plazas or streets” per the spokesperson for this project, “could be translated into open space”.

- d) Request for Confirmed Use and Definition in EIR - In lieu of political project momentum in “tweaking” the ‘Open Space’ terminology, we request a confirmation from Developers and Property Management regarding how exactly they define the “Open Space” term used in the NOP/EIR and how the term ‘Open Space’ will be defined in the EIR. Because we recognize this possible change in the City’s upcoming definition of ‘Open Space’ we require the Developers and Property Management to confirm their use and definition of this term in relation to proposed development.
- e) How We (Residents) Will Use this Term in this Response - We, as most Americans and even most environmentalists have associated open space with nature. Since this may not be the case now with City Planners and Developers promoting density levels beyond any capacity for humanistic scaled living and natural connection —Please NOTE: for the purpose of clarity in this response, we will use the term “Green Space” in this report the definition is to mean **earth, soil, vegetation and living green.**
- f) Finally we understand that the dialogue of increased ‘Open Space’ could indeed mean the ultimate loss and trade-off of ‘green space’ as in living earth and that is not our purpose or desire to achieve in any redevelopment of our possible site.

IX. CEQA and Global Warming – Environmental Green Space

- a) Report Highlights: The following bullets are quotes from a report per the Office of the California Attorney General, Global Warming Measures, (Updated: 12/09/08). EDMUND G. BROWN JR., State of California, Attorney General, DEPARTMENT OF JUSTICE, The California Environmental Quality Act - Addressing Global Warming Impacts at the Local Agency Level
 - “Under the California Environmental Quality Act (CEQA), local agencies have a very important role to play in California’s fight against global warming – one of the most serious environmental effects facing the State today. Where local agencies undertake projects directly, they can and should design sustainable projects from the start, incorporating global warming related considerations into their projects at the earliest stages.”
 - “Further, local agencies can encourage well-designed, sustainable private projects by analyzing and disclosing to the public the environmental benefits of such projects in any required environmental documents. And where projects as proposed will have significant global warming related effects, local agencies can require feasible changes or alternatives, and impose enforceable, verifiable, feasible mitigation to substantially lessen those effects. By the sum of their decisions, local agencies will help to move the State away from “business as usual” and toward a low-carbon future.”
- b) Green Space Requirements – In regards to Green/Open Space Element per the CEQA report:
 - To “Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits.”
 - To “Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance, e.g., requiring that trees larger than a specified diameter that are removed to accommodate development must be replaced at a set ratio”
 - To “Establish a mitigation program for development of those types of open space that provide carbon sequestration benefits. Require like-kind replacement for, or **impose mitigation fees on development of such lands. Use funds generated to protect**”

existing, or create replacement, open space.”

c) Safety Element

- To “Address expected effects of climate change that may impact public safety, including increased risk of wildfires, flooding and sea level rise, salt water intrusion; and health effects of increased heat and ozone, through appropriate policies and programs.”
- To “Adopt programs for the purchase, transfer or extinguishment of development rights in high risk areas.”
- To “Monitor the impacts of climate change. Use adaptive management to develop new strategies, and modify existing strategies, to respond to the impacts of climate change.”

X. Proposal of Tree Removal / Tree Landmarking

- a) Accurate Data Required - The current proposal is a de-forestation of Parkmerced and removal of all trees (NOP/EIR estimates this at 1,500 trees). It is important to have a verified report of how the trees are counted and if this is an all inclusive and accurate number. There has been no data presented on trees that have been removed or cut-down by management (prior and current). Numerous trees are eligible for Land-marking, and the process is controlled by the Owner of the Property per current city laws, and the current District Supervisor Sean Elsbernd. The Owner of the Property and Supervisor Elsbernd have not identified or listed one tree in this community. For a comprehensive, responsible and acceptable EIR, a thorough and vetted tree study must be conducted and documented. This would include noting significant trees (that have been removed and/or destroyed and/or are existing currently) which should be landmarked replaced with similar height/size and type of tree.
- b) CEQA Specific Requirement/Report Requested – An analysis and report must be made regarding the stipulation to: “Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance, e.g., requiring that trees larger than a specified diameter that are removed to accommodate development must be replaced at a set ratio”. We also request in this analysis and report another CEQA aspect to document trees on “space that provides sequestration benefits.”
- c) Adequate Nominations of Existing Trees that meet landmark status should be addressed by the Planning Department and accurate data provided on actual tree-loss on the site to include numerous obvious tree-stumps, and areas devoid of trees that formerly had trees on landscaped area medians and internal courtyards, that have undergone removal. This data should include the trees cut down on 800 Brotherhood Way, SFSU purchased property, and along right-of way areas controlled by the Department of Public Works. Alternatives that protect large canopy trees, based on age, and proper replacement in size and species should be provided in the documents based on the concerns for landscape integrity cohesiveness and essential tree canopy in urban areas.

XI. Tree and Green Space Carbon Offset re: Terrestrial Carbon Sequestration per the EPA

- a) Overview: The Environmental Protection Agency (EPA) states there is a documented benefit to Green Space (Trees, grasslands, forestry, agriculture) and its ability to offset Carbon Dioxide (CO₂). Per the EPA:
- b) "Terrestrial carbon sequestration is the process through which carbon dioxide (CO₂) from the atmosphere is absorbed by trees, plants and crops through photosynthesis, and stored as carbon in biomass (tree trunks, branches, foliage and roots) and soils. The term "sinks" is also used to refer to forests, croplands, and grazing lands, and their ability to sequester carbon. Agriculture and forestry activities can also release CO₂ to the atmosphere. Therefore, a carbon sink occurs when carbon sequestration is greater than carbon releases over some time period."

- c) "Forests and soils have a large influence on atmospheric levels of carbon dioxide (CO₂)—the most important global warming gas emitted by human activities. Tropical deforestation is responsible for about 20% of the world's annual CO₂ emissions (IPCC Special Report on LULUCF (2000))... NOTE: [Green Space] agricultural and forestry activities can both contribute to the accumulation of greenhouse gases in our atmosphere, as well as be used to help prevent climate change, by avoiding further emissions and by sequestering additional carbon. Sequestration activities can be carried out immediately, appear to present relatively cost-effective emission reduction opportunities, and may generate environmental co-benefits. At the same time...there is a finite amount of carbon that can ultimately be sequestered."
- d) Analysis and Report Requested – Based on the above documented benefits on Green Space (Trees, grasslands, forestry, agriculture), we request an accurate analysis and report on the impact regrading the destruction of the NOP/EIR projected 1,500 trees (this number needs to be verified), along with the paving over of green space and urban vegetation with the proposed Development project that represents a significant loss of green acreage in the current Parkmerced community. (see section XVI on open space inaccurate data)

XII. Planned Tree Loss by Developers re: Urban Trees, Vegetations, Forests: Benefits to Environmental Quality and Human Health

- a) **Overview:** The NOP/EIR report states a removal of ALL trees from Parkmerced. This following data per the EPA (Environmental Protection Agency) and the USDA Forest Service:
- b) **Benefits to Humans:** "Urban vegetation and its management can significantly influence human health and environmental quality in and around cities. Thus, optimal vegetation designs and management practices are essential to sustain human and environmental well-being for current and future generations."
- c) **Conservation Benefits:** "A reduction in tree canopy cover translates to an increase in storm water runoff, an increase in energy costs, and a loss of air quality."

XIII. Carbon Off-Set: Urban Tree Effects on Air Quality and Climate

- a) **Overview:** "Air quality in urban areas is often degraded due to emissions from various sources (e.g., cars, factories, power plants) associated with urban development and high concentrations of people. In addition, carbon dioxide emissions, which contribute to global climate change, are considerable higher in urban areas."
- b) **Trees offset Carbon.** Per the EPA and USDA Forest Service: "...Trees in urban areas have the ability to improve air quality and reduce greenhouse gas concentrations by both reducing emissions and directly removing pollutants from the atmosphere. Trees can reduce pollutant emissions by reducing building energy via tree shade, blocking winter winds and reduced air temperatures. Tree leaves (shade) and reduced air temperatures also affect the levels of ultraviolet radiation at ground level and human comfort."
- c) **Cumulative Beneficial tree effects on air quality**
Per the EPA and USDA Forest Service:
"Urban vegetation can also directly and indirectly affect local and regional air quality by altering the urban atmospheric environment. The four main ways that urban trees affect air quality and reduce greenhouse gases are:
- Temperature reduction and other microclimatic effects
 - Removal of air pollutants
 - Emission of volatile organic compounds (VOC) and tree maintenance emissions
 - Energy effects on buildings"

XIV. Parkmerced's current Resident Biological Entities and Natural Habitat (Birds, etc.)

- a) **Overview:** Parkmerced is home to an abundant, thriving and diversely rich avian/bird community. Note: Although we have requested accurate data regarding tree count for a complete EIR the current NOP/EIR states it will remove and destroy all trees which the report numbers at 1,500. With the proposed destruction, elimination, and deforestation of such a large acreage and open space, there is a direct threat to the well being and lives of well established bird species and other wildlife, beneficial insects (such as bees, dragonflies, butterflies) many who have been here for generations, and flora.
- b) **CEQA Specific Requirement/Report Requested** – An analysis and report must be made regarding: “wildlife habitat and corridors” (CEQA). Corridors refer to migratory paths. Parkmerced and Lake Merced is the western corridor for raptors and other birds.
- c) **Study and Data Required:** We request to a Study and Impact of regarding Parkmerced's Biological Resources: birds, wildlife, flora, fauna in regards to the proposed development and loss of habitat. In addition, we request this to be integrated into a **Regional General Impact Study** to include the surrounding and adjoining natural resource areas (both public and private) such as: Lake Merced, the Olympic Club and Golf Course, Stern Grove, Ocean Beach, the Pacific Ocean, Sutro Bath Park areas, Golden Gate Park, the Brotherhood Way religious organizations, the Alma Via of San Francisco retirement community, the Lake Merced Hill condominiums, the Lakewood Apartments @ Lake Merced, Lake Merced Rifle Range, the METNA Oceanview Terraces and neighborhood home-owners and rental units that reside around Lake Merced.

XV. Loss of Green Space Impact/ Acid Rain, Acidification effect re: Lake Merced, Ocean Beach, Pacific Ocean, Watersheds and other local natural areas

- a) **Overview:** The ecological effects of acid rain are most clearly seen in the aquatic, or water, environments, such as streams, lakes, and marshes. Acid rain flows to streams, lakes, and marshes after falling on forests, fields, buildings, and roads. Acid rain also falls directly on aquatic habitats. Most lakes and streams have a pH between 6 and 8, although some lakes are naturally acidic even without the effects of acid rain. Acid rain primarily affects sensitive bodies of water, which are located in watersheds whose soils have a limited ability to neutralize acidic compounds (called "buffering capacity"). Lakes and streams become acidic (pH value goes down) when the water itself and its surrounding soil cannot buffer the acid rain enough to neutralize it. In areas where buffering capacity is low, acid rain also releases aluminum from soils into lakes and streams; aluminum is highly toxic to many species of aquatic organisms.
- b) **Ecosystem Impact Report Requested:** We request an analysis and report on the potential loss of Parkmerced's current Green Space, its contribution as a 'buffering capacity' and the impact that the proposed scope and density of Development on the Ecosystems of: Lake Merced, Ocean Beach, the Pacific Ocean, groundwater, local watersheds, Stern Grove and other related natural areas.
- c) **Addition of Ecosystem's Biological Entities to Requested Report:** Additionally we request an analysis and report conducted on the impact to biological entities in these natural areas to include: Fish, Aquatic Life, Marine Life, Avian and Bird Life, Entomological Life (Insects), and microbiology impact. NOTE: There may be specific species we have not mentioned here, but the request is to include ALL related biological life in these ecosystems. Please include them for a complete study.

XVI. Landscape Historical Design Integrity and National Landmark Status

- a) **Overview:** No mention is made of the content or results of the Historical Resources Analysis completed by the Developer mentioned in the NOP/EIR. For any comprehensive EIR, we request and highlight the need to accurately review the entire site of Parkmerced's original layout and

specifically ensure that the internal courtyards and unique individual designed landscape elements are reviewed and documented. The categorization of the quality, cohesiveness and integrity of the existing landscape internal courtyards is not mentioned as part of this report. For an accurate EIR and Historical Resources Analysis of this site's report, the prior overall outline of Parkmerced and ALL internal/sold-off parcels landscape elements must be included. The SFSU purchased blocks to date, Cambon Drive, and 800 Brotherhood Way must be included in the overall report as integral features and amenities of the prior Parkmerced master-plan.

- b) On-going and ad-hoc landscape work: A halt to all permits should be conducted so as to ensure that the integrity and complete survey of the existing landscape elements and individual unique designs of the interior courtyards is fully determined. If the site is worthy of National Landmark Status than the no-project alternative should be followed the Secretary of the Interior Department of Historical Districts or Buildings/Landscapes should be immediately applied, and options that rely on the majority of the site being preserved and restored should followed as an alternative.

XVII. Parkmerced's Site Density re: Inaccurate Data

- a) Population: No mention or presentation of data is made of the current density population at Parkmerced. There is no complete or accurate data presented of the proposed prior and current density of the SFSU/CSU housing units and the current development project. Without accurate data of current and proposed density levels, a complete assessment of Environmental Impact is impossible.
- b) Housing Data Requested - We request that this data is assessed, presented and incorporated into any fair comprehensive analysis of housing density. Currently, there is no building department or owner monitoring and/or tracking of illegal sub-divisions of existing units. For example: tenants frequently build sub-walls and pack into units typically at 4-6+ people to a 2-bedroom and 3-4+ to a 1-bedroom unit. (This is in violation of occupancy codes).
- c) Building Code Compliance: The above examples exemplify that the current density levels are not building code compliant or verifiable by the (current or past) management and the San Francisco Building Department. We understand that Parkmerced (current and prior) Management and the SFSU/CSU Housing Department possess accurate numbers on the density of residents and students living in Parkmerced and UPS University Housing and request that data. If not then a study, analysis and report is needed and numbers ascertained. It is critical that the accurate numbers of density are provided, and that the San Francisco Building Department provides the actual maximum density/capacity levels per current zoning laws and codes in Parkmerced and include this data in the EIR documentation.
- d) Open Space/Green Space: There is no information on the current density per acre of open space, based on the original development of 191.5 acres including SFSU's purchased properties. This density ratio is critical to a credible EIR as to what is acceptable citywide for future density in all neighborhoods. If Parkmerced is the densest neighborhood currently, there should be reasonable alternatives and options in relocating or dispersing this density to nearby properties (ex: Stonestown, along Ocean Ave, West Portal, or a redesigned interchange at 19th and Brotherhood Way).

XVIII. Parkmerced's Open Space Inaccurate Data:

- a) The current mapping of Parkmerced's Open Space is inaccurate and not properly represented. For example, refer to Diagram Figure 5 of the NOP/EIR. This is one of many mapped diagrams presented to outlying neighborhoods, other organizations, and the Parkmerced community which did not indicate the loss of open space that has occurred in the sell-off of lands to SFSU/CSU, 800 Brotherhood Way, and Cambon Drive. The original 191.5 acres is noted and outlined at 116 acres currently, yet the original density of open space per tenant or unit should be calculated and density proposed being mindful of this original balance.

- b) Accurate numbers Requested in terms of open space reduced or lost must be presented and considered. The current plan omits and does not indicate open space located in the center courtyards that is hardscape and softscape areas. The totals given (project summary table 1) in the NOP/EIR states only a loss of about [-305,100 g.s.f.] with no accompanying data to back this claim. A quick calculation based on page 3 of the NOP's assertion that 75 acres is about 3,269,300 square feet means that due to a reduction of 191.5 to 116 we have lost approximately 3,291,045 square feet from a current shown total of 5,056,517 square feet approximately. That is a significant number or percentage of open space lost per individual or "unit" and a critical loss to the community.
- c) Correct Data is Requested: An accurate list of area spaces lost is required. Examples include: The areas marked as Playgrounds, center area courtyards of the block typologies, the roof-top area recently blocked off at the center west side of private Arballo Drive (a former sun-deck), and the open recreation area along Font that was Parkmerced's Open Space prior to the sale to SFSU. In addition the open space on both the commercial and 800 Brotherhood Way sites must be included to provide accurate information on TOTAL g.s.f./square footage loss. We request proposed alternatives that directly address this loss such as: re-acquiring land, or space to serve the Parkmerced community if equal density to open space/green space is to be achieved at a reasonable level. Finally, cumulative effects of land-sales and open space/green space lost to developers must be included in the calculations to realize the overall impacts on open space/green space.

XIX. Sustainability Soundness - Green Point Rated Program (Due Diligence Required)

- a) Missing Component and Report - A missing component in the sustainability issues presented to date is the actual wear and tear of the stated "past their useful life-span" suggested by the development team. To date there has been no full report published on the existing condition of the townhouse units. Prior to deciding which alternative or method would be "sustainably sound" it is important to determine based on the renovations that have occurred by Leona Helmsley (windows throughout property), renovations in 2002 as noted in the SF Business Times Article, and the current renovations to date.
- b) Report Requested and Necessary for Due Diligence - The SF Planning department has under their preview the "Soundness Report Requirements" document that is meant for the proposed demolition of a residential structure subject to the planning commission policy upon requiring mandatory discretionary review shall provide a soundness report. We request that this project be placed as a discretionary review project the form and fee waiver. Such an analysis report should be immediately documented by a third party that would analyze ALL renovations to date and construction waste sent off site due to current and past renovations, so that an accurate picture of the existing conditions and affects of the renovations is ascertained.

XX. Sustainability

No accurate data is provided by the Developer or SFSU/CSU group on the effects and total impact on the environment, human impact, biological impact (birds, flora, fauna) and the overall sustainability that would occur through the total tear down of all the townhouse units.

- a) Housing: Numerous units (towers and town homes) have been renovated currently, on both the interior and exterior. The total loss of materials both removed prior during renovations, and during any demolition of all units must be ascertained in the same method such as determining density levels and carbon waste.
- b) Ongoing renovations/ 'Capitol Improvements' - The Parkmerced community has undergone ongoing renovations over 10 years under the guise of "capital improvements". Originally this started in the replacement of all windows on site by Leona Helmsley, and than the \$35 Million

dollar makeover that occurred in 2002 by Carmel Partners where portions of Parkmerced were sold off to finance this “up-grade” during which in 2003 our former Recreation Site and Community Center was sold off, with no mention of the “loss-of-use” of the recreation site or community center was communicated to tenants with the relocation of the Montessori Children’s Center. The current renovations of the Parkmerced Investors LLP is noted as \$125 million to date on tower and townhouse units:

- Other Capital Improvements noted in the 2002 work included the painting of the towers, new signage, fountains, waterpipes, entrances, landscaping and Administration Building and the relocation and construction of a New Montessori school building was part of this effort.
 - The current tenants are still paying for the “pass-throughs” on these “improvements” that are discussed by the new owner as “faulty systems needing replacement”.
 - However the new 2007-2009 renovations include re-working parts of the 2002 renovations, including work on irrigation, landscaping, painting, entrances, signage, tower entries, life-safety systems, roofing, elevators, security systems, door hardware, lighting, laundry rooms, parking areas, exercise rooms, computer rooms, trash/recycling systems. (A substantial amount of upgrade investment is targeted for demolition.)
- c) Loss of Building Materials - There should be a key objective to accurately project the total loss of building materials and sustainability based on the history of renovations (under the guise of capital improvements) to determine what is essential in terms of capital improvements and allowable pass-throughs to tenants by multiple owners of this property to maintain the property.
- d) Landscape re-planting and construction - This is also a large water consuming activity. Therefore reduced water shown does not take into account the re-planting phases and needed water for construction to re-build and re-plant the large areas of buildings and landscape of Parkmerced.
- e) Destruction of Trees and established Landscape - Landscape re-planting and construction is also a large water consuming activity. Therefore reduced water shown does not take into account the re-planting phases and needed water for construction to re-build and re-plant the large areas of buildings and landscape of Parkmerced. The current proposal of destroying over 1,500 trees (or more with accurate data) and tearing up acres of well established landscape and grasslands that assist in retaining water would create run off and misuse of water conservation.
- f) Options - Alternatives that look seriously at the no-project alternative, or utilizing at least 75% preservation of existing housing have not been shown during presentations or in the NOP. All alternatives must be researched and accurate information provided on the sustainability impact of such a total tear-down of the neighborhood.
- g) Conservation - The energy along with water resources required in regrading, re-planting, re-establishing new landscape, and re-building must be calculated. This should include data on renovations completed prior to the current proposed work and to incorporate the waste material data of the already disposed of renovation materials of the current owner. Also, this should include the proposed plans to remove and destroy the current and newly installed water systems based on the prior capital improvements and pass-throughs; in the new proposed project that require data to be provided to determine the proper or acceptable level of sustainability.

XXI. Water Use and Conservation

- a) Overview: Despite inaccurate portrayals of our community, Parkmerced residents are environmentally conscious and practice water conservation. We cannot speak for the SFSU student who reside here on a high turn-over and temporary basis (often semester based chunks of time). Any discussions of water waste should be focused on current property owner water practices (such as landscaping, leaking water systems (in housing, laundry room, and landscape irrigation). Residents would welcome a program to work with SFPUC and property Management to maximize and conserve our water use. We have the following concerns and issue regarding

Water:

- b) Inadequate Data in NOP/EIR: Water use is not noted as a factor in the SFPUC changes, and proposals on pass-throughs to existing and new tenants on site. The current 'Scope and Density' of the project needs to be accurately ascertained and presented with data specifically referencing the overall water increase based on increased housing, commercial, school, maintenance and landscaping proposed.
- c) Water loss and reduced Water Conservation from the removal of large areas of established plant life should be included and quantified for this NOP/EIR. Water usage for demolition and new construction must also be calculated. The allowable density must be based on sound water, land-use proposed calculations and reasonable conservation.
- d) Massive Water Needs of Demolition and Construction over 30 year Plan - Excavation work proposed, demolition work, construction work, roadway work, and site removal work, require significant amounts of water increase to control dust and toxic elements. Accurate data needs to be provided on the projected construction/demolition/removal totals.
- e) Leaking Irrigation and Property Water Systems - Some tenants have consistently noted irrigation problems/leaks in their units or on the landscape grounds where water runs uncontrolled for days without repair. Watering of landscape areas in the hottest time of day is repeatedly witnessed on the property of Parkmerced and SFSU/CSU.
- f) We request that accurate data, analysis, and reporting of these issues regarding ALL water use on property are ascertained and verified.
- g) Regional Water Use Report – Additionally we request a Water Use Report on the TOTAL region to include: SFSU, and surrounding neighborhoods to identify an integral approach to conservation and sound water usage.

XXII. Commercial in a Residential Neighborhood

- a) Needs Assessment Study and Current Capacity Report Requested: The residents of Parkmerced have always supported retail and commercial areas within walking distance of our homes. We would like to remind the Developers that this commercial retail space currently exists and we encourage our Property Owners and concerned parties to reinvigorate existing zoned commercial real estate in Cambon Drive. Prior owners used un-sound business practices such as deferred maintenance and increased rents that resulted in the elimination of our commercial tenants at Cambon drive, forcing commercial tenants from these spaces. We believe sustainability exists by utilizing what you have to its fullest potential rather than over-building. Instead of tearing down, and re-building we should use the capacity that already exists. Alternatives that reinvigorate and possibly increase commercial density and use of the Cambon retail area with direct transit and pedestrian access from 19th avenue has been requested by the current owner of Cambon Drive a member of PRO.
- b) Include in above request Study/Report of all local Retail and Commercial Retail (to incorporate within walking distance, a 5 mile radius and outer areas accessible by Mass Transportation). It is critical to determine a 'capacity versus saturation versus redundancy' based on actual community need. This would avoid vacant 'ghost town' scenarios. We have highlighted a partial list below.
- c) SFSU's Master-plan suggests Buckingham and Holloway as new commercial areas and walking streets. This is not indicated in the proposed document on new commercial impacts cumulatively. Currently the Cambon Drive Area serves as neighborhood retail and is **more than adequate** to serve the neighborhood of Parkmerced.
- d) Locally, there is abundant established existing Retail and Commercial real estate and property in the area.

- The Stonestown Mall shopping area is walking distance, less than ¼ mile down the street
 - Ocean Ave (two distinct geographic areas): Lakeside and west of Juniperra Serra) within a mile and on a Bus Route
 - West Portal Avenue and neighborhood is within a mile and on the current Muni Line
 - LakeShore Shopping Center is within a one mile radius and on a Bus Route
 - There are four large mega shopping complexes in Serramonte shopping areas providing large regional commercial areas and are within a five mile radius.
 - WestLake Shopping Center is on the Bus Route and within a mile
 - Ocean Beach Shopping area is within 2 miles
 - Note SFSU has increased walking access from Parkmerced to Stonestown recently through their campus.
- e) Options - Alternatives that re-invigorate the existing commercial area of the current Cambon Drive Area in ParkMerced is an option should be investigated prior to adding and shifting commercial zoned areas. In addition alternatives that improve the SF Muni TEP to provide direct access, capacity and frequency to the already established commercial areas in the district would be a simple solution that invigorates and provides needed access to the existing commercial retail areas.
- f) Overdeveloped and underutilized commercial/retail real estate will have a negative impact throughout the neighborhood. These two uses are not compatible at the proposed scale, and alternative sites should be investigated for any retail component such as Cambon; or additional density and renovations at Stonestown which are currently accessible (and in walking distance) to residents of Parkmerced. **For the disabled and senior residents of our community unable to walk to the local retail, the owner's suggestion of a community "shuttle" system is sufficient to provide green alternatives to individual car use.
- g) Walking distance Cambon Drive Commercial Real Estate in Parkmerced is VACANT and prime for development – The essence of sustainability is to reinvigorate and develop existing vacant real estate that is already zoned and ready to go. The NOP/EIR must request a report on the large area of commercial underutilized retail area on Cambon Drive. It should work with the current owner to provide alternate designs from the prior original housing EIR submitted. This would provide better office/retail/commercial spaces at different scales to bring local business development into the community with jobs for local tenants. We request analysis and data focusing on the justified need to build more, when substantial retail area currently lies fallow.
- h) The Values of Residential Community ignored by Developers – We live as most Americans do purposely, and as a matter of choice in a residential rental community specifically for the natural beauty and serenity. We choose Parkmerced because it is not an over-urbanized and over-developed area. We choose as most American do, to not live in sprawl better known as 'urban sprawl'. Cities and citizens in this country have a right to residential diversity within an urban area and the option to choose from rental or for-sale units in all districts; to provide equal opportunities and choice in housing options, to live in the pursuit of happiness. The planning and values of the Parkmerced community was originally conceived to provide a quality rental/apartment and garden apartment (townhouse) affordable community in San Francisco. The original vision of the planners and architect did not intend to force residents to live in the shadow of commercial buildings, retail parking lots, unreasonable scale of density, or to be overtaken by public mass transportation.
- i) The 'Within Walking Distance' new mantra: If Parkmerced residents are forced to live in the shadow of retail and commercial districts then as a equitable approach we ask that the City of San Francisco treat ALL residents of the city in kind. In other words: the development and build out of retail/commercial within walking distance of all residents must be applied to all San Franciscans and equally dispersed throughout the city communities. Otherwise: If this is not the case then this constitutes disparate and inequitable impact on one community or neighborhood district versus the majority.

XXIII. New MUNI Rail Tracks proposed/New Addition of Stations/Stops in Residential Community/

Current Cuts in Service to Residents

- a) Overview: Proposed new Muni Tracks cut into the vital heart of a residential community. No community takes such a proposal of new city mass transportation and rail installation lightly. Mass transportation and construction is never welcomed in any neighborhood or community and therefore additional analysis and impact studies must be conducted. The current proposal is analogous to building a Freeway in a disenfranchised neighborhood population with total disregard to a community, or residential environment. Below, the need for additional data and issues will be outlined citing the extreme negative impact to any neighborhood or community of new installation and construction of public mass transportation. Currently there are (2) definite MUNI rail stops/stations proposed with (1) additional 'maybe' on the maps and graphic plans, to total three (3) projected stops/stations. The close proximity placing 2 – 3 stops/stations in such a small area of the targeted 116 acres is unprecedented anywhere is San Francisco and we question the fairness and compliance.
- b) Concerns of covert SFSU expansion and annexation into a residential area: In the current NOP/EIR it states explicitly that there is a proposed relocation of the current SFSU Muni rail stop platform located on the 19th Avenue thorough fare, to be relocated into the community of Parkmerced. It is specifically stated "to benefit SFSU students on campus" and no mention of residents. Per the NOP/EIR: *"The first would replace the existing SFSU station on 19th Avenue median... This replacement is intended to address the overcrowding issues at the station's current location and would afford SFSU with easier access, including longer pedestrian green times and the potential to have wider crosswalks"*. We request an accurate response as to whether this represents a backdoor expansion of SFSU as the original SFSU Master-plan showed the platform being placed adjacent to the curb west of the platform on SFSU property. In addition we have concerns regarding the adverse impact on the community at large of the proposed scale of increased density and unreasonable (student & public) pedestrian traffic in a residential community. (see also the SFSU/CSU MOU and related promised mitigation, and reporting on current increased enrollment regarding transit and MUNI impacts see section XXIII)
- c) Rise of Crime on MUNI: Project Sponsors need to provide an adverse impact study to include the relationship of MUNI stops/stations and the documented rise of crime on MUNI. Per an online 05/19/2009 report: Felony crimes Statistics from the SFPD show that all major felony crimes on Muni jumped during the last three months of 2008, compared to the same period the year before. Specific Police Reports are available regarding crime on transit online.

Per the report: To date, "Thefts increased about 50 percent, from 102 to 150. It was the same for robberies, jumping from 38 to 57. Aggravated assaults doubled, from six to 12". The rise of crime on MUNI is well known and well documented. Online access to this quote and report can be found at: <http://abclocal.go.com/kgostory?section=news/iteam&id=6814095&rss=rss-kgo-article-6814095>

- d) Other negative impact of building new MUNI rail tracks and Stop/Stations in a residential community include:
1. Increased Traffic of Unknown Persons: circulating in a residential community and possible predatory effect on children, women, seniors and general residents
 2. Increased potential victimless and victim related crime such as: vandalism, property theft (i.e. housing and cars), and increased violent crime
 3. Increased Student Traffic: Students are transitory and not mindfully respectful of community values. This is not personal but a prevalent characterization of youth and documented behavior specifically of SFSU students. (We can reference and provide data to include police reports and residents' complaints of student unlawful behavior, public intoxication, public exposure, public urination, substance abuse, vandalism, destruction of property, noise nuisance, loitering, and trespassing on private property).
 4. The negative effects of MUNI stops/stations as points of congregation and solicitation.
 5. Noise pollution. Trolley tracks have vibrational noise pollution and decrease property

values.

6. The unreasonable burden of noise, pollution, toxic materials and community health, traffic and parking issues, community integrity on a long term construction project
 7. Environmental affect – the resulting litter, trash and refuse that collects in public thoroughfares
 8. Transforming Parkmerced into Public Use Area and degrading the community and residential aspects.
 9. Public health issues, homelessness, drug trafficking, loitering. Please see Captain Chignells Taraval Police Reports that document the specific unlawful activities.
 10. Overflow Impact to adjoining neighborhoods. Adjacent neighborhoods must be part of this dialogue
 11. Finally we question the burden to ANY community regarding the proposed location of Muni Stops/Stations. Their proposed proximity of the Stops/Stations is extremely close to each other. This unreasonable short distance of Stops/Stations to be located in Parkmerced is NOT typical and does NOT currently exist for any neighborhood or area in San Francisco. This creates a disparate and unfair impact on a neighborhood and we question the compliance issues.
- e) Current MUNI Service cuts to Residents - While the proposal deems it necessary for 2-3 MUNI Stops/Stations and new Rail Tracks in a residential community, this defies the logic of the current MUNI services that have been cut to residents. For example:
We have had numerous bus services, and infrequent M-Line services cut or reduced. Originally there was a direct bus that accessed the downtown SF area, and provided 20 minute bus service directly from Parkmerced. We suggest such a route be investigated for use by tenants working in our community. A platform that is undersized, and does not permit access on both ends, and has ticketing booths that block access to the platform creating a dangerous situation for all involved. What alternatives are proposed in terms of transportation as options that circumvent Parkmerced as a neighborhood, providing direct access along Holloway, or Brotherhood Way and around Lake Merced, connecting back up to the BART station or around Lake Merced to bring transit to other apartment communities and Lake Merced back up Sunset Boulevard as a feasible short or long range option. St. Francis Circle still has turn-around locations down Sloat and on adjacent streets, so there is evidence of these prior routes that have been eliminated that can be re-activated.
- f) Community Impact Analysis Required - We request alternative studies to be conducted and documented along with impact studies to determine the best option for all citizens of San Francisco. Not just the well funded developer backed entities or special interest groups for their housing profit-motives. There is a right for the least destructive option(s) to be reviewed first before embarking on any decision or planning.
- g) Options - We must consider the need for alternate routing and design to benefit all, to be considered. Thus must include building on SFSU site as originally shown by SFSU Master-planners. Such considerations could include: overpass access bridging or a longer term underground solution up 19th Avenue.

XXIV. Noise

- a) Noise from Ongoing Construction: No mention is made on the sound and noise impacts of an ongoing 30 year construction project process, on existing tenants who remain on site during this work. SFSU construction on the Library renovations is heard across the Parkmerced site due to sound transmission. Increased student levels have been a noise nuisance to numerous residents consistently, and yearly increases in student enrollment, and Parkmerced co-housing of students has created an unreasonable burden and “quality-of-life issue” situation for many residents. These incidents have been relayed for years consistently by PRO to the SFSU Regents, and Taskforce installed to deal with this issue with only bare minimum results. (Refer to police data/reports and resident complaints as mentioned earlier).

- b) Noise of MUNI Track and Stop/Station Construction: Increased density, traffic, commercial re-zoning, and the installation of two (2) to three (3) MUNI Stops/Station within Parkmerced will only increase unacceptable levels significantly over the current noise levels. Even with the current MUNI rail system in place, there exists major noise concerns from residents regarding the inadequate track and vehicle maintenance currently documented by transit advocates on MUNI lines. Throughout the site that must be addressed based on Parkmerced's prior status as a residential QUIET community.

XXV. San Francisco State University Master-plan

- a) Overview: Here we reference a prior Memo sent regarding the SFSU Master-plan and EIR. This was sent by Anthea Hartig, Director of the Western Region Offices of the National Trust for Historic Preservation Sept. 10, 2007 addressed to Ms. Roberta Achtenberg Chair of the CSU Board of Trustees. The Memo states the SFSU Master-plan project IGNORED the Parkmerced master-planned community in its "programmatic cultural resource mitigation plan" of its EIR documents, and should undergo further environmental analysis through a "project EIR". It is critical that this be recognized, documented and reviewed.
- b) Clarification and Review required: We request an accurate review and report on the above mentioned Memo sent regarding the SFSU Master-plan and EIR. Focus must be placed on the EIR document which states "*confines discussion of the property to buildings controlled by SFSU, and offers no information about the potential for the entirety of Parkmerced to constitute a historic district... Similarly, the document makes no mention of the potential significance of site planning or landscape features associated with Parkmerced. Alternatives that maximize preservation were suggested.*" It is critical to review the cumulative impacts on Parkmerced based on the SFSU Master-plan, and its resulting affect and impact on the possible national landmark status of Parkmerced's original master-planned community.
- j) Open Space Lost by SFSU's Impacts: It is important to note that the overall open space lost or proposed as redevelopment by SFSU, (SFSU's impacts) were not addressed by the MOU (Memorandum of Understanding) dated 29th/30th of October 2007 by city agencies on housing, open space, "loss of use" of amenities and open space and prior community center for tenants, transit, parking, water, noise, sustainability, and essential services that have all been impacted by the increase in student enrollment and use of Parkmerced as university housing annexation.
NOTE: This was prior to and post the approval of the SFSU Master-plan by the CSU Regents.

XXVI. View Corridors

The following is in regards to a major increase in scope and height of current structures in Parkmerced. A quick summary is the proposal of building: 40 new towers to total 51 Tower Structures (with the current 11 Tower Structures), building 15 total 35 foot Rowhouse buildings, to build 60 3-6 story low rise buildings. Due to incomplete data we do not have confirmation that this comprises all tall buildings but will deal with these statistics per the incomplete NOP/EIR:

- a) Height and View Corridors: No mention is made of the numerous view corridors that will be impacted by the proposed towers throughout the complex on existing units. Parkmerced is visible from many areas of the city and adequate consideration of the proposed density and affects on neighborhood areas, like Brotherhood Way, Lake Merced, Mt. Davidson, Twin Peaks, Ingleside Terraces, and Home and Apartment Communities must be analyzed and incorporated due to visual corridors and effects of increased height and mass. These communities and neighborhoods surrounding the property should be addressed and density alternatives reviewed for alternative sites, or lower density and height in the proposed redevelopment.
- b) Skyline Impact: A proposal that looks at a tear-down and height increase for the existing towers should be reviewed as a sustainable alternative that limits the overall skyline impact on surrounding neighborhoods. As a further example the following neighborhood entities represent

differing view corridors not addressed in the EIR. The low-to-high setting of the Brotherhood Way religious organizations, the Alma Via of San Francisco retirement community, the Lake Merced Hill condominiums, the Lakewood Apartments @ Lake Merced, Lake Merced Rifle Range, the METNA Oceanview Terraces neighborhood and home-owners and rental units that reside around Lake Merced, represents views that will be impacted, and present glare and reflectivity issues on adjacent properties.

XXVII. Wind Tunnel Effect/Scope and Density of Proposal

- a) The proposal mentions increasing housing units threefold (three times current capacity based on current incomplete data). As mentioned, we need accurate data on units, number of bedrooms per unit, and proposed population to determine the impact for a complete and accurate EIR. Further noted, we have consistently cited that this data is completely absent from the current NOP/EIR and is unacceptable. With the incomplete data that is provided however, we will address the “Urban Wind Tunnel Effect” that is characteristic of high-rise buildings. The following proposed structures are mentioned in the current NOP/EIR:
 - To build 40 new towers to total 51 Tower Structures (with the current 11 Tower Structures)
 - To build 15 total 35 foot Rowhouse buildings
 - To build 60 3-6 story low rise buildings
- b) Although this is incomplete data and we cannot confirm this represents total build out, wind tunnel concerns are as follows: With the exponential increase of tall structures in this area, we request a full study to be conducted, completed and documented to determine impact of the “Urban Wind Tunnel Effect” to focus on potential negative impact. The wind tunnel is used to study a wide range of design, planning, and engineering problems including:
 - Natural ventilation within buildings as a function of the building orientation, configuration, and of the apertures in its envelope.
 - Air movement across landscapes, in urban areas, and around buildings for its effect on outdoor human comfort.
 - Air pollution dispersal.
 - Air Quality effects
 - Aerodynamic design of windscreens and shelterbelts.
 - Particle movement (rain, the occasional snow drifting, soil erosion, sand migration).
 - Building energy efficiency issues such as heat losses from surface convection, wind-induced infiltration, and the effectiveness of cooling towers operating in windy conditions.
 - Effect in avian population/bird population, beneficial insects and other airborne biology.
 - Microclimate affects such as Mold and Mildew.
 - Impact Report on Avian/Bird Migratory pathways

XXVIII. Earthquakes / Geological

- a) Overview: Repeated questions regarding the increased density, safety of existing towers, and the geological foundation of the area have not been investigated nor responded to in the documents provided. After the October 1989 Loma Prieta Earthquake in the Bay Area, the 55 Chumasero Tower was noted to have significant damage. In addition to major damage to the 55 Chumasero Tower, ALL Towers sustained some damage. It is important to note that the majority of the towers were built post World War II, which means they are structurally in-sufficient to deal with a major earthquake.
- b) Damage sustained by this Earthquake: The 1989 Earthquake was surface-wave magnitude 7.1. The earthquake’s epicenter was in the Santa Cruz Mountains (100 kilometers south of San Francisco). This major earthquake caused 63 deaths, 3,757 injuries, and an estimated \$6 billion in property damage. The earthquake was felt over most of central California and in part of western Nevada. The rate of aftershock activity decreased rapidly with time, but the total number of aftershocks are numbered at: Fifty-one (51) aftershocks of magnitude 3.0 and larger occurred

during the first day after the main shock, and 16 occurred during the second day. After 3 weeks, 87 magnitude 3.0 and larger aftershocks had occurred. NOTE: This was less than that expected from a generic California earthquake of similar magnitude.

- c) Severe Property Damage: The most severe property damage occurred in Oakland and San Francisco, about 100 kilometer north of the fault segment that slipped on the San Andreas. MM intensity IX was assigned to San Francisco's Marina District, where several houses collapsed, and to four areas in Oakland and San Francisco, where reinforced-concrete viaducts collapsed: Nimitz Freeway (Interstate 880) in Oakland, and Embarcadero and Embarcadero Freeway, Highway 101, and **Interstate 280 in San Francisco**. Communities sustaining heavy damage in the epicenter area included Los Gatos, Santa Cruz, and Watsonville.
- d) A Comprehensive Geological Study is Required Parkmerced's location is one (1) mile west of the San Andreas Fault: Alternatives that look at the tear-down of the existing towers, and the sub-soil conditions at Parkmerced should be investigated prior to any proposed densification of towers on site. The large excavation work proposed and density shown can greatly exacerbate the problems of a sand or unstable soil condition on site since this area was former dune, and watershed areas.
- e) Structural Issues: Building "sway" and distances between towers are critical safety factors in the bay area, and the need to address the existing construction, along with feasible financial alternatives to structural strengthening of the existing towers should be investigated. Cracking of existing tower foundations, and walls are a signal that the buildings are past their life-span. A major quake event could result in significant loss of life and property damage on site. The safety of current residents is a priority for our organization, and we strongly suggest looking into the alternatives of tower removal and replacement with stronger and newer built systems that prevent collapse, and **provide for structural integrity and retention to prevent existing building failure and large tenant displacement due to such foreseeable events**.

XXIX. Financial Feasibility

- a) Overview: Predatory Equity Lending is a major issue in regards to the current financial situation of large scale apartment complexes nationwide. The most recent Parkmerced purchase of \$700 Million by the current owner Stellar Management was an extreme increase based on the prior sale price of approximately \$300 million which itself was an extreme increase based on unrealistic market projections by real estate interests. The overall profit margin and increased costs of renovated units points to a process of gentrification through renewal or predatory equity lending.
- b) Analysis is requested on the financial underwriting standards used in this Stellar Management. This loan purchase should be investigated based on income from rent, operating costs, and turnover rate, including the annual debt service. If the site and development is not able to support the \$700 million dollar loan and interest payments the prior loan should not have occurred.
- c) Community concerns and Human Impact: Protection of renter's and rental communities from such actions have not been a part of the Parkmerced development issues in terms of financial feasibility. The effects of these loans and construction projects on existing low-mid income tenants, new tenants, and the composition for whom this apartment complex was built for initially, which was families and returning world war two vets unable to afford basic housing in San Francisco, were/are dire and should be recognized as such.
- d) Review of Alternatives is required that address financial costs, value-engineering of the plans to promote sustainable growth, and financial assistance through the Mills-Act by preserving portions of the property. Currently these are not investigated, and should be a part or viable option to the project as an alternative.

- e) Housing Impacts: Additional information on housing pricing in terms of the rentals and “for-sale” units per (square foot) g.s.f. is needed. This means construction estimates can provide an accurate approximate pricing for these units. We request verification that this housing will be accessible to existing community members as financially feasible housing for the neighborhood OR if displacement and gentrification will be the end result.

XXX. Developer’s decisions made on Insufficient Survey Data and Analysis/Insufficient & Inadequate Communication to Residents by Developers and Property Owners

- a) Insufficient Data to Base Developer Assumptions: In the Scoping Meeting for NOP/EIR on Monday June 8, 2009 the Developer Presentation mentioned they had sent 16,000 surveys out and their determinations were based on that feedback. The prevailing majority of Parkmerced residents have no recollection of receiving said survey. On the Developer’s website a PDF document of their declared survey is available. Per the opening paragraph of their document it states: *“Parkmerced Survey Results Are In: Thanks to all who participated in the survey and for providing input to help shape the sustainability plan that will guide future improvements at Parkmerced. Although there were a relatively small number of respondents, the results are helpful when added to the numerous comments we’ve received at our community workshops, meetings and via email.”* NOTE: The Developer’s website was never provided to the residents of Parkmerced via any proper channels such as the US Mail. Also note: in addition to no official notification via U.S. Mail no Multi-language translation to a multi-cultural community with non-English primary language speakers was provided. The Scoping NOP/EIR was conducted in English only.

- b) Website Parkmerced Vision was only learned of by informal channels on 06/08/2009 - A good example of non-inclusive communication behavior by the Developer and Property Management is their hosting of a Website: Parkmerced Vision where they allege conducting community outreach. Apparently community outreach in their definition is complete OMISSION of a DIALOGUE with THE COMMUNITY THAT IS DIRECTLY IMPACTED. This website was NEVER officially communicated to the Residents of Parkmerced. Only a select few may have been aware of it.

NOTE: Residents attending the June 8, 2009 Scoping Meeting – NOP/EIR first learned of this website NOT because the Developer or Management presented it, but because it was relayed to us in a casual conversation by a local contractor who happened to attend the meeting. The noted “200+ meetings to date” were often off-site, out of community and included many real-estate and private interests attending. Now when some of us (those who only have online access only) can, as of 06/08/2009 access the websites. Viewing the statements by some organizations, about Parkmerced (who are not residents); and its need for “for-sale” housing were made by self-motivated statements by special interests and lobbyists for the redevelopment. SFHAC, SPUR, SFSU/CSU and other land buying/redevelopment interested entities made comments and did not have their names assigned to those comments in the meeting summations on the Parkmerced “vision” website.

UNFAIR INFLUENCE: The above constitutes “un-represented” influence and lobbying with a focus on ‘FOR PROFIT over COMMUNITY CONCERNS AND ACTUAL NEEDS that promoted the effect of “CHANGE” over “SUSTAINABILITY/PRESERVATION”. No proper process such as SPEAKER CARDS, proper documentation of speakers, or organization affiliation was made during these meetings so comments are not documented on the reports of these meetings. How can we possibly trust the integrity of the proposed development with such unethical practices>

- c) Developer Must Correct the Record - We request the Developer to correct the record and provide the statistics and demographics of the actual respondents who are the few they claim responded to their surveys. For example: were they students/short term residents, non-student residents, how long residing in area, percent of respondents to actual total population, age/gender/family status, etc. We would offer that the percentage of actual respondents to actual total resident population is not representative and ask they not miscommunicate the will of our residents and

the Parkmerced community at large.

We demand a stop to any and all misrepresentations, mischaracterizations, and the resulting assumptions that Developer project decisions are wrongly made on such unvetted survey data/information. This is otherwise known as “spin” and is harmful and potentially defamatory to any individual, demographic and community at large.

- d) Adhoc Websites and Online Entities Do Not Constitute Proper Notification – While online access continues to grow as a tool it is unregulated, unvetted and does not constitute official channels of communication. The official channel is the U.S. Mail and neither Parkmerced Stellar Property Management nor the Developers adequately communicated to residents of Parkmerced in a timely manner on the future and fate of their homes.

No official notification or communication by (USPS Mail) or was ever sent by either entity (Stellar Property Management/Landlord or Developers) to notify residents/tenants that a development plan was in process that would effectively demolish their homes, their community and neighborhood environment with dire impact on their livelihoods and life planning.

Again ad hoc email lists are insufficient channels for such important communication, a legitimate business entity should never assume all parties have computer access. **This is inequitable and disparate impact particularly on those in the ‘digital divide’ such as: Seniors, Disabled, and families (many with young children) and those who cannot afford computers. Then there are even those individuals who do not choose to share their email contact information.**

- e) Definition of Digital Divide – source Wikipedia: “The term digital divide refers to the gap between people with effective access to digital and information technology and those with very limited or no access at all. It includes the imbalances in physical access to technology as well as the imbalances in resources and skills needed to effectively participate as a digital citizen. In other words, it is the unequal access by some members of society to information and communication technology, and the unequal acquisition of related skills. The term is closely related to the knowledge divide as the lack of technology causes lack of useful information and knowledge. The digital divide may be classified based on gender, income, and race groups, and by locations.”
- f) We Request that all notices be sent properly through the recognized communication channel in the United States of America, which is via U.S. Post/USPS Mail regarding official Landlord/Tenant related issues. It is mind boggling that we have to request this and require an explanation how 200 meetings went on in the past year(s) about the potential demolition of our home with not one letter being sent to a resident.
- g) Late Notification: The only single communication received by U.S. Mail/USPS was from the San Francisco Planning Department dated May 20, 2009 (received a few days later). This provided only a two week notice to residents. Such late notice constitutes covert planning regarding the fate of our homes on the part of Developers and Property Management.
- h) Inadequate Communication to all Parkmerced Residents who are Directly Affected by Housing Tear Down. The large scope and intricate details of this developed proposal were insufficiently communicated to the residents of Parkmerced—specifically those who would be directly impacted and displaced. There is inference in the above survey quote by the Developer Presentation (section XXVIII, a.), to “community workshops, meetings and via email”.
- As residents we have no documentation of proper notification (U.S. Mail) of any of the above events cited (*community workshops, meetings and via email*). At best a very small minority would have been involved and does not reflect the community at large. Residents only received a basic 2-page memo mailing from the San Francisco Planning Department of the NOP/EIR scoping Meeting that was dated May 20, 2009, but not the full report being 73 pages.
- The majority of residents noted hearing of these plans for the very first time. The SF Planning Department mailing, although we thank the department and appreciate ANY notice -- was not noted as **Important** and many re-cycled it as junk mail.
- All of the above is insufficient and unacceptable notification to individuals when their homes

are being proposed for demolition, to include a destruction of total environment and community and construction over a period of 30 years.

Many resident feel this project was conducted on the sly as a back-room deal, and that we may have intentionally been kept out of the loop as a community. In short we were not fairly or adequately communicated to on a timely or reasonable basis. In lieu of the recent melt-down of Wall Street and questionable business practices this does not shed a positive light on the proposed Development plans in general. Citizens deserve better by their constituents and due process.

XXXI. Tenant Issues / Reduction in Services / Change in Character of Community

- a) Overview: The reduction in services has a direct negative impact, specifically to Seniors, the Disabled and Families with young children. This negative impact ultimately drives down the quality of our community and causes displacement and disparate impact.
- b) Trash and Recycling Services Terminated (Overview): Parkmerced residents have proudly been recycling for over 15 years. Trash Collection Services Terminated – Parkmerced Residents were given a 1-2 week notice that on June 1st, 2009 their garbage and recycling service would be terminated.
- c) Inaccurate and False Communication to Tenants that Termination was mandated by City of San Francisco/ Mayor Gavin Newsom – We would like management to correct the record. They have falsely stated our termination of services was ordained (inferring by law) by the city.
While we are aware the City of San Francisco has enacted a composting program (and residents here LOVE to recycle), no such mandate to remove our trash cans and cut our services exists. In call to City Hall, the spokesperson for Mayor Gavin Newsom apologized and stated: “We did not intend for an enhancement in current SF recycling policy and the compost enhancement to be used as an excuse by your Landlord to cut services. Cutting services is a separate issue and Tenant/Landlord. They are saving a large amount of money.” A call to the Rent Stabilization, the advisor confirmed that a cut in Trash Collection Services which is a significant cost savings would constitute a re-imbusement back to tenants on rent.”
Another example of false information was presented in an email from a Tenant who wrote, “Parkmerced are saying that it is to comply with city ORDER # 176,964, but the Dept of Public Works, say it is not true”. We request that Parkmerced Management correct the record and communicate truthfully to the residents and tenants.
- d) Undue Hardship on Seniors, Disabled, Pregnant Women, Families with Young Children
Since the weekly termination of Trash & Re-cycling services at Parkmerced, residents are now required to carry their trash to common dumpsters. Locations of dumpsters are 100 – 200, and sometimes 300 feet away depending on location. Dumpsters are approximately 5 feet high. We are required to carry heavy bags long distances, many times up or down stairs (most with no railings). The structure of the dumpsters are on wheels and we must lift the lid up over our head, over at least 5 feet with one hand and use the other hand to lift the weighted bags. Then we swing and lift the bags further up (often heavy weights at 5 – 10 plus pounds) of waste, recycling (paper is very heavy) and compost. This is impossible for seniors, disabled and young people. It is also challenging to able-bodied individuals.
- e) Unreasonable Physical Demands with New Process – Issues: weight-bearing requirements, strength is required, mobility is required, good balance is required, proper height is required (Even at a height of 5 ft 8 inches it is painful to use the dumpster, lifting over head is a challenge, back strength is required, arm strength is required, shoulder strength is required. This may not comprise a complete list but should highlight some physical requirements.
- f) Injury Could Occur – To able-bodied individuals as well as further injury to seniors, disabled, expectant mothers, and the young who assist their parents. Back and shoulder injuries are especially vulnerable to the physical challenge of the Dumpster Structures.

- g) Health Hazards of Large Common Dumpsters – In an International Pandemic residents are exposed to communal refuse areas that are known to potentially carry disease. Even touching the lid of the dumpsters constitutes a contagion area of pathogens.
- h) Disease Carrying Aspects of Trash – Common areas that expose Residents to such household refuse as: baby diapers, senior depends/diapers, used feminine hygiene product, used condoms, dog feces, cat litter, decomposing garbage (including meat products contaminated by salmonella, e-coli, mad cow disease, etc.), used flu virus tissues, to name a few. These are huge health risks and we ask that the City examine the Public Health concerns regarding this program.
- i) Improper Staging Areas/No Containers Provided for Trash/Recyclables - Town House Tenants' outside Trash & Recycling bins were taken away and Tenants do not have proper containers to manage their Trash & Re-cycling prior to carrying across the distance to the dumpsters. AS A RESULT trash is being dumped willy-nilly all over the property and piling up in common areas. In other words it never makes it to the dumpster area.
- NOTE: While there are other aspects and hardships created by this termination of Trash/recycling services and new process these are the most prevalent. We would be happy to provide more input.

XXXIII. Other Highlights of Reduction in Services

- a) The Consistent Reduction in Services has been noted by numerous tenants in our community. These reductions started with the closing of businesses and reduction in public transportation that has consistently eroded access to areas prior served. The elimination of access to the open space areas of the prior recreation site and community center and consistent infringement on our ability to park on the street or in the vicinity of our homes has added to the problems facing many senior and disabled tenants on site.
- b) The Continual Re-arrangement of concierge, front office, maintenance and security staff have consistently become a hassle and problem to get management to address consistent maintenance and problems on site with prior and even current owners. (Again, the ongoing trash/recycling program implementation is a prime example of reduction in services residents enjoyed prior on site).
- c) The Reduction in Acreage per Person in terms of density reduces the open space/green areas on site. Other reductions in services include:
- Consistent poor maintenance of common areas, basement, laundry facilities, and grounds through deferred maintenance has also reduced the quality of living for many tenants on site.
 - The consistent negligent pruning, tree-removal and non-replacement, and planting re-work on poorly installed irrigation systems have marred our enjoyment and quiet and peaceful use of our rental units.
 - Currently the ongoing installation of video surveillance, and fencing around the site has turned an open natural landscape setting to one similar to a state prison.
 - We have not seen our rents reduced based on these changes and reduced services and most tenants cannot physically or financially deal with the process of rent-reductions and the forms and time it takes to fight the reduced services.
 - English as Second Language Tenants especially foreign born residents tend to be ignored or give-up by moving out.

- This consistent change in the character of the community and overall reduction in services and maintenance was never fully analyzed based on the prior amenities of ParkMerced.
- Advertisements show the neighboring planned SFUSD public school, full range of commercial tenants, landscape design, natural and open spaces as key elements to a community.
- The ongoing effects of tree-cutting, fencing, trash reduction in services, community amenities, and lack of response by the management on resolving issues repeatedly raised is key issues that need resolution.
- A rent roll-back would be a simple way to assign adequate reduction of rents to ALL tenants at Parkmerced and a removal of newly installed fencing and inconsistent entry features that enlarge signage rather the enforce the natural beauty of Parkmerced is key to comprehending the overall impacts of commercial/leasing signage and its impacts that make tenants feel more like a "used-car-lot" than the prior manicured community we had prior.

XXXIV. Incorrect and Unfounded Portrayal of our Community

- a) Finally, we need to correct the record. In the Scoping Meeting for NOP/EIR on Monday June 8, 2009 the Developer Presentation portrayed Parkmerced as a 'bedroom community' in the heart of San Francisco. In essence they presented us as a dead zone and we were summarized as a community to be written off and demolished. **We want to confirm that we are a thriving, passionate, living community.**

- b) The Developers presented Parkmerced as not family oriented and their project would somehow trigger a family based community. Again we have no idea about the data from which they are drawing such unfounded conclusions. We would like to re-affirm: **Residents have raised generations of San Franciscans here in Parkmerced and plan to continue to do so.** Again, we are proud to be a diverse unique community comprised of families, children, students, professionals, artists, teachers, disabled, civil servants, service industry, seniors, LGBT, veterans, service/military families, hi tech workers, union workers, health care workers, faith based families and individuals, socially aware families and individuals, an environmentally conscious community and contributors to our city, state and country. We live here for the peace and harmony that the beauty of a residential community provides. Parkmerced is a multi-cultural community with every ethnicity and social group represented. We proudly call Parkmerced our home.

Thank you for your time and consideration of these suggested issues/alternatives and required information. We want to ensure an adequate EIR is created. We have highlighted some of the critical information not provided by the project sponsor, or indicated in the NOP/EIR document to date and appreciate your time in reviewing this. Together we can work towards an accurate and comprehensive cumulative EIR process that will responsibly respect the integrity of our community. We look forward to implementation of our suggestions that reflect responsible community based planning and the CEQA process for an overall review of Parkmerced as a district and entity within the City of San Francisco.

Sincerely

The Parkmerced Residents Organization (PRO) Board of Directors

Aaron Goodman, Vice President of PRO, Interim Acting President of PRO

Cc: SF Board of Supervisors (12 Copies), SF Historic Preservation Commission (all members), Mayor Gavin Newsome, Senator Leland Yee, Senator Tom Ammiano, Senator Mark Leno, Senator Fiona Ma, Senator Barbara Boxer, Senator Nancy Pelosi, Anthea Hartig Director of the Western Chapter of The National Trust for Historic

Preservation, Charles Birnbaum President of The Cultural Landscape Foundation, Jack Gold @ SF Heritage, The SF Preservation Consortium (online Yahoo Group), West of Twin Peaks Central Council WOTPCC, Coalition of San Francisco Neighborhoods CSFN, Dwight Dutschke California State Historic Preservation Office CSU Projects, M. Wayne Donaldson State Historic Preservation Officer Dr. Charles B. Reed Chancellor CSU, Dr. Robert Corrigan President SFSU, Simon Y. Lam VP for Capital Planning Design and Construction SFSU, Jason Porth Government Relations SFSU, Bert Polacci Government Relations Parkmerced, Cindy Heitzman Executive Director California Preservation Foundation, Andrew Wolfram DOCOMOMO c/o Perkins + Will Architects, Sierra Club-SFGroup Conservation Committee, Golden Gate Audubon Society, SF Human Rights Commission, Fair Employment & Housing Commission, U.S. Department of HUD, Fair Housing Law Project, EarthJustice, PRO File