

August 15, 2012

Rodney Fong, President San Francisco Planning Commission 1650 Mission Street, Suite 400 San Francisco, CA 94103

RE: 55 Laguna Street Modified Conditional Use, Case No. 2012.0033.ACFEU

Dear President Fong and Commissioners,

The Hayes Valley Neighborhood Association (HVNA) is pleased to provide comments on the 55 Laguna Mixed Use Project (formally known as the UC Extension Campus). Over the past two years HVNA has met multiple times with Woods LLC and Mercy Housing/ Open House, and we have had collegial and respectful dialogue about the project. We also participated in collaborative meetings with the Mayor's Office of Housing last year and earlier this year. The result of those meetings was agreement about the need to work together to ensure the project moved forward in a timely fashion without losing the full affordable housing portion. HVNA most recently met with the project sponsors on August 13<sup>th</sup>, 2012 and were shown some new renderings of the proposal. We also toured the parcel on June 23<sup>rd</sup> with Supervisor Olague and the development team.

While HVNA supports the overall concept of redeveloping the site, we still have reservations about important aspects of the proposal. This includes <u>objections</u> to the total amount of <u>parking</u>, the <u>garage entrance on Buchanan Street</u>, the architecture and urban design of some of the new buildings, and the public access on the <u>mid-block of Haight Street</u>. The following comments are an elaboration of our specific concerns.

# Parking

A recent legislative analyst report titled *Performance Audit of San Francisco's Affordable Housing Policies and Programs* points out that too much excess parking is being allowed in the transit oriented zoning districts within the city, including the Market and Octavia Better Neighborhoods Plan area.<sup>1</sup> If San Francisco and the Bay Area are to meet the goals set out in SB 375 – to reduce greenhouse gas emissions and building with less parking – projects like this need to be rethought. Since 2004, when the redevelopment was first proposed, HVNA advocated that the site have zero parking and at most 0.5:1 parking, which is consistent with the NCT standards in the Market and Octavia Plan. The immediate neighborhood has over 50 percent car free

<sup>&</sup>lt;sup>1</sup> San Francisco Budget and Legislative Analyst (2012). Performance Audit of San Francisco's Affordable Housing Policies and Programs.

households and one of the guiding principles of the Market and Octavia Plan is to accommodate new infill development while maintaining neighborhood character and livability. In 2008 we objected when the planning commission allowed excess parking for the site, and we instead argued that the maximum parking ratio should not exceed 0.5:1. Unfortunately the site was zoned partly NCT and partly RTO, enabling the then developer (AF Evans) to insert an egregiously large amount of parking at the expense of the city's transit first goals, the integrity of the Market and Octavia Plan, and the livability of our neighborhood. Moreover the UC Dental School was also entitled to have 51 parking spaces, a further insult to the livability of the neighborhood.

Parking ruins density – all the benefits of this high density infill project will be negated by too many cars and garage entrances on Laguna and Buchanan Streets. The circulation for these additional cars will inevitably jam Haight Street, a key transit first street, causing more delay to transit passengers and more danger to pedestrians and bicyclists.

HVNA respectfully disagrees with Woods LLC and the Planning Department about how they have calculated the parking ratio (we've attached a parking table below). Both are calculating the ratio based on 440 units instead of the 330 market-rate units that will realistically use the parking. As it stands now, the residential market-rate portion of the project has 330 units and 249 parking spaces. This amounts to 0.75:1 parking ratio and is 84 spaces above what would be allowed in NCT zoning (0.5:1 parking). By including 15 of the dental school spaces, it increases to 265 spaces - or 0.8:1. This is a total excess of parking of 99 spaces above maximums allowed under NCT zoning!

		Number of		Excess Parking
Description	Housing units	parking spaces	Parking Ratio	from NCT
If project followed Market	330	165	0.5:1	0
and Octavia NCT zoning		(the right thing		
(what the calculation		to do)		
should be and what HVNA				
endorses)				
HVNA calculation of	330	249	0.75:1	84 spaces
market rate portion				
(without dental school				
parking & car share)				
HVNA calculation of	330	264 (249+15)	0.8: 1	99 spaces
market rate portion with				
15 additional dental				
school parking				
HVNA calculation with	330	310	0.93:1	145 spaces
ALL dental school and 10				
car share spaces (total				
parking)				
How Woods LLC	440 (330 + 110 senior	310	0.57:1	
calculates	affordable units from	(The WRONG	(Misleading	
	separate project)	thing to do!!!)	calculation)	

## Calculation of parking at 55 Laguna

HVNA also continues to object to how portions of the community center will be funded from revenue from the dental school parking. About 15 of the 51 Dental School spaces are to be market rate and publicly accessible beyond the dental school use, with revenues going to support the community center. This tells us two things:

1) The UC dental school does not need all 51 of the spaces they insist on. The 51 number is arbitrary as presently the dental school lot rarely gets even half full. Like the development, the school is very transit accessible. This seems like a back-door increase in the ratio for the market-rate project.

2) This is a dangerous precedent linking a laudable goal – community benefits – to an undesirable goal – encouraging more driving in a city already saturated with cars. This is a conflict in goals and using 15 dental school spaces to help finance the community center component is something we strongly object.

HVNA has politely asked Woods LLC to reduce the total parking ratio for the market rate portion from 260 to 165 maximum. That gets them to 0.5:1, the NCT zoning for parking in M & O plan. We have also asked that Woods further reduce their market rate parking by 15 spaces, to 150 spaces, to account for the 15 spaces that the dental school seems to deem excess parking but nevertheless insists on having. Woods has declined to do both of these, and so now we ask for leadership from the Planning Commission.

We urge the Planning Commission to stand with HVNA and push for at most <u>a maximum of</u> <u>0.5:1 parking</u> for the market rate portion of the site (3330 units) and reduced dental school parking. This can be done through coordinating with the Board of Supervisors over the required agreement over the right of way of Waller Street, or it can be part of the modification of the conditional use permit. We also urge the commission to advocate for <u>transportation demand</u> <u>management</u> programs and to initiate discussions about reforming on-street parking permits in the immediate area. There could be innovative conditions, such as requiring *all* residential offstreet parking spaces to be dependently accessible (stackers and tandem), and creating a new parking management district around the site and utilizing new SF Park technology to manage onstreet parking. A more expansive car share program, bicycle sharing, ample and secure bicycle parking, and a landlord-funded transit pass program should also be provided for the tenants in the future development. Lastly, since many of the Silicon Valley companies have their own buses, residents who work for them shouldn't need cars.

#### The Buchanan Street garage entrance

We applaud the adjustment made to the garage entrance on Laguna Street, by narrowing the curb cut, but the garage entrance on Buchanan remains a problem. It is too wide and overwhelms this segment of Buchanan Street. We ask that the curb cut and garage entrance be narrowed to the width of one car. This will bring about a more human interface with the sidewalk, as well as act as demand management for the garage.

### **Building design – market rate portion**

We applaud planning staff's efforts to suggest improvements to the design of the buildings in the market rate portion of the project. We remain concerned about the architecture of the new Open House building. While the ground floor portion facing Laguna is reasonable, the rest of the building left a lot to be desired. It must have an improved interface with Waller Park and Laguna Street and we encourage the developer to look at other low income housing projects with far superior design such as Octavia Court (corner of Oak Street and Octavia Boulevard) and the Richardson Apartments on Gough and Fulton Streets. Additionally it could step back up hill and not be so monolithic.

## Haight Street Mid-Block Access

HVNA has always maintained that the Haight Street facade of Woods Hall needs to interact better with the street and become less fortress-like. We understand that the historic resources of Woods Hall and especially the outer corridor make it difficult to extend stoops to the street, but many things can be done to put eyes on the street and activate this segment of the project. For example public access mid-block on Haight Street is important to the community. Public access into the interior could serve as the entrance to the community center (mid-block instead of near the corner of Haight & Laguna) and could connect to the central north-south mews. We've seen some recent proposals of a small entrance and are cautiously optimistic. We urge the commission to direct planning staff and the developer to continue working with us to ensure public access mid-block.

Lastly, we ask that the Olive trees be preserved along Laguna Street.

In sum, HVNA wants this to be a signature project. HVNA welcomes new infill housing, especially affordable housing. We have engaged with this proposal for eight years and the community has compromised considerably, especially considering that this is publicly-owned land. HVNA has signed on to the letter regarding inclusionary housing which you will receive from Woods LLC. We are proud to support as much affordable housing as possible.

Parking remains a disappointing issue. We ask that the planning commission strive for 0.5:1 parking and require innovative transportation demand management programs for the future residents, press for good design of new buildings and that Woods Hall be made less fortress-like and integrate the development into the fabric of Hayes Valley.

Sincerely,

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