

Crestmont - Mt.Sutro - Forest Knolls Neighborhood Preservation Coalition

CrestmontPreservation.org 415-640-3869

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San Francisco Overlook Development Residential Project

Planning Department Case No. 2004.0093E

As concerned members of the Crestmont Drive and Forest Knolls community, we take issue with the accuracy and adequacy of numerous statements in the Draft EIR, as follows:

Section IV Environmental Setting and Impact

G Emergency Access Issues pp. 18-20, & IV.G pp. 230-232

Emergency access will be impacted more greatly than suggested in these sections and is of great concern to the neighborhood. Contrary to the statement on p. 18, despite the 68 parking spaces (2 per unit), the project is likely to generate substantial numbers of vehicles that will park on Crestmont Drive, primarily in the current turnaround location at the street's terminus, closest to the project. Comparison with the on-street parking situation on Crestmont uphill from the Oakhurst stairs, where all units have 2 enclosed parking spaces, is relevant.

The SFFD study done in 2005 (SFFD letter, Aug. 4, 2005) was not carried out with cars parked in the turnaround, nor at peak traffic period, and thus underestimated the difficulties which would be posed under these circumstances. These difficulties would be markedly increased by the additional traffic and parking burden imposed by the Overlook Development in its current configuration.

Also, the impact of trapping drivers in the cul-de-sac when the street is blocked by emergency vehicles was not considered, nor the lack of downhill emergency pedestrian egress, which is lacking in this project. These factors increase the chance of fatality in case of fire emergency and are inadequately considered in the DEIR.

G Impacts on Emergency Access pp. 230 – 231

The 20ft. wide private road must be kept clear for emergency vehicle access, but the no-parking regulation will not be enforced by the SFPD due to the private nature of the street. The developer states “The restriction in on-street parking would be enforced through the CC&R’s of the new homeowners association.” No such association now exists and no mechanism for enforcement is proposed. Moreover, this developer has shown disregard for the CC&R’s of the existing homeowners’ association (Mt. Sutro Woods Owners Association – MSWOA), of which he is a member, failing to submit his proposals to or comply with guidelines of the Architectural Control Committee as required by the current MSWOA CC&R’s. Why should it be assumed that CC&R’s of a new owner’s association will be enforced and how will that enforcement be accomplished?

This critical issue should be addressed in depth in the EIR, despite the disclaimer on p. 22, since it directly impacts emergency access and public safety, as well as City liability.

Section IV Environmental Setting & Impacts

C. Transportation and Circulation

Pedestrian Conditions pp. 102-103

The DEIR misrepresents sidewalk width and ease of pedestrian usage of sidewalks on lower Crestmont. The report ignores narrowness, steepness, and irregularity of sidewalk in this section of the street, which results in almost all pedestrian traffic using the street instead of the sidewalk. The hazard to pedestrians using the street will increase with increased traffic from the proposed development and should be considered in the EIR.

Traffic Impacts pp. 108-109

An increase in vehicle trips on Crestmont during the peak P.M. weekday hour from the current level of 41 per peak hour to 91 per peak hour. Despite the fact that vehicle trips will be more than doubled on this narrow, winding street, this is stated as being “less than significant.” We reject this conclusion, which focuses on intersection operations and not the actual driving experience on the single-passage road itself.

Parking Conditions pp. 100-102

The Parking Study cited on p. 102 (LCW Consulting: Crestmont Hills Transportation Study – Final Report published February 2006) was conducted almost 7 years ago, in 2005, and does not reflect current conditions as increased numbers of cars on lower Crestmont have made parking more difficult in the interim.

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However, the study's major and insurmountable deficiency is the treatment of the entire length of the Crestmont cul-de-sac, from the Devonshire intersection to the terminus, as a single entity, rather than focusing only on the impacted area parallel to the projected development, i.e. from the blind curve to the terminus.

Incorporating the entire length of Crestmont from Devonshire totally skews and distorts the parking figures: the length of the street to the Oakhurst stairs consists of single family detached homes with 2 garages, and the available parking on the opposite side of the street is relatively sparsely occupied. This changes dramatically below the Oakhurst stairs as the housing density increases and many of the houses have rental units, with a marked increase in automobile number per structure, and concomitant increase in street parking requirements.

In consequence, this study is misleading and totally inadequate to reflect the actual parking situation on lower Crestmont Drive today, or to be utilized to determine actual impact of the projected development on parking in the most directly affected by the development.

Since parking is one of the critical areas which will impact on the existing community, as well as the anticipated new residents, this study should be repeated using the appropriate metrics as described above, and based on current conditions.

Section V Other CEQA Issues

A Growth Inducing Impacts pp. 255-256

Estimates development would have local census tract average of 2.34 persons per unit, and does not consider likely higher average given proximity to UCSF and probably rentals to students and trainees with at least 1:1 per bedroom occupancy. Similarly under-estimates likely population if adjoining lot 27 is developed.

States that increased population growth would "be consistent with the General Plan and would not be considered a substantial adverse impact." This boilerplate language totally ignores the actual impact of a doubling to tripling of the population at the end of an isolated cul-de-sac.

C Effects on Neighborhood Character p. 258, pp.71-72 & pp. 13-14 Appendix A

Describes density and height limits "similar to that of other buildings uphill and downhill from the project site." The height clearly exceeds that of the adjacent uphill homes on Crestmont Drive, and the 10 unit building at the west end is totally out of character with the neighborhood. Comparison with the large apartment complexes downhill to the north (Sunset Avalon and Kirkham Heights apartments) is completely irrelevant and misleading: these complexes are in a

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different zoning district (RM-2) and are not part of Forest Knolls or the Crestmont Drive cul-de-sac. Neither their population nor their traffic patterns have any impact on the uphill neighborhood affected by this development.

C Loss of ... Open Space & Children's Play Area p. 259

This section fails to take into consideration the increased risk to children on the existing Crestmont Drive cul-de-sac due to increased traffic, since the street itself is usually their "play area" in view of the fact that the hillside homes have no backyards. Further study required.

VI Alternatives

B Reduced Project Alternative pp. 274-279

This reduced alternative, 16 larger single family homes, would certainly be preferable and more acceptable to the community, reducing the density, traffic and parking requirements by half compared to the proposed 34 unit development, thereby having considerably less adverse impact on safety and quality of life. Far more preferable, however, would be a limited tract of 6-8 single family homes.

The developer's statement that the market for such homes in this location is "not established" is not substantiated by any referenced study and seems contradicted by the successful construction and sale of larger, more costly homes nearby (Clarendon Ave, Warren Drive.) in locations with less desirable features of seclusion and spectacular views than the proposed project site.

The developer's return on investment should be subject to proof and weighed against the dramatic benefit to the community if a much smaller number of larger homes or a variation of alternative B were to be chosen as opposed to the current project.

Sincerely,

Samuel M. Sobol, M.D.

Chairman

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