



## The Yerba Buena Neighborhood Consortium

c/o 230 Fourth St. San Francisco, CA 94107

A Council of the Yerba Buena Neighborhood's Residents and Community Organizations

MEMO: May 15, 2013

FROM: John Elberling, CEO/Chair  
TO: San Francisco Planning Department

RE: CENTRAL CORRIDOR (SOMA) EIR SCOPING COMMENTS

### 1. Pedestrian Issues – Setting, Impacts, Findings, Mitigations

We understand the CC EIR will generate the analysis that will also be utilized for the Moscone Expansion Project EIR. Therefore, for the legal adequacy of both EIR's, it must provide detailed and thorough supplemental discussion regarding the Yerba Buena Neighborhood Setting, Impacts, Findings, and Mitigations, that fully and honestly addresses the unique pedestrian issues focused on this specific Neighborhood and that specific Project. Failure to do so will leave both the CC and Moscone Expansion EIR's indefensibly open to legal challenge.

This supplemental analysis must be in addition the general "area" methodology that will be utilized for the entire CC Plan area. The area methodology can provide overall background information for the Yerba Buena district and adjacent areas, estimating its anticipated future overall growth, but it is utterly insufficient to evaluate the pedestrian impacts on specific locations in Yerba Buena that result from the activities uniquely located here and nowhere else in the CC – major conventions and special events. Therefore:

- a. A completely new supplemental "list based" cumulative pedestrian setting/impacts analysis is necessary for the Yerba Buena District (Fifth to Second Streets, Market to Harrison Streets). This analysis must include the cumulative impacts of all pedestrian travel

generating/focusing projects in the area, including but not limited to all those completed since the 1992 Second Supplement YBC EIR:

- Moscone West – big pedestrian impact
  - Westfield Center – big pedestrian impact
  - Several Hotels – modest pedestrian impact overall
  - Several Condo/ Apartment Buildings – limited impact overall
  - Metreon Renovation – modest pedestrian impact
  - Yerba Buena Subway Station – major future pedestrian impact
  - MOMA Expansion – big future impact (attendance will double)
  - Mexican Museum – modest future pedestrian impact
  - Moscone Expansion – significant future pedestrian impact
- b. A specific discussion in this supplemental settings/impact analysis of the specific issues relevant to the unique concentration of over 2000 elderly/disabled residents of the Yerba Buena District with regard to pedestrian safety and their limited mobility. In brief, this population cannot walk through the district as easily as non-senior/disabled under crowded sidewalk conditions, exacerbating the real life consequences of the impacts, and is also especially vulnerable to physical injury from falls due to crowds and obstructions on the sidewalks. It would be dishonest to ignore/omit these well-known facts from the analysis. See description of the Yerba Buena Senior community attached.
- c. A specific discussion in the settings/impacts of the specific current negative circumstances affecting pedestrians in the District, as described in our letter to the DPW of 4/19/13, attached.
- d. An impact analysis in the supplemental discussion that is fully evaluates three levels of convention/special event events (see chart attached):
- A “Medium” attendance event of 10,000 or less, which occurs about 90 days per year.
  - A “Large” attendance event of 10,000 to 30,000, which occurs about 61 days per year.
  - A “Very Large” attendance event of more than 30,000, which occurs about 24 days per year.

- (“Small” attendance occurs on the other days when there is no scheduled event, about 190 days per year).

It is undeniable that the impacts of the Very Large events exceed the current capacity of the Yerba Buena District sidewalks in many locations, causing severe congestion and very dangerous conditions for the elderly / disabled, and that even Large events exceed the capacity of the sidewalks at specific bottlenecks, especially Fourth Street. It would be blatantly dishonest for the CC EIR to fail to document these impacts.

- e. Based on all the above, a Finding of Significant Impact for both the cumulative pedestrian impacts AND the Moscone Expansion Project alone. There is no honest way that impacts of the Large and Very Large pedestrian loads that the convention center generates about 85 days throughout the year can be characterized as not “significant.”
- f. As the legal required Mitigations to address this Significant Impact, the CCEIR supplemental analysis must, among others, evaluate and consider the following specific measures:
  - Widen the west side Fourth Street sidewalk north of Mission Street that was narrowed by the Downtown Community College expansion project by removal of its arcade.
  - Widen the entire east side Fourth Street sidewalk from Howard Street to Market Street (see diagram attached).
  - Install standard “No Bicycles On Sidewalks” sidewalk signs throughout the YBC District.
  - Develop a Pedestrian Safety and Capacity Expansion Plan (physical improvements) and a companion Sidewalk Management Plan (use regulations) for the YBCBD area that will identify and resolve all issues affecting pedestrian capacity and safety, including sidewalk widening, new signalized crosswalks, street furniture placement optimization, sidewalk tables restrictions, drop offs / loading locations, etc. etc.
  - Identify and implement feasible legal alternatives for location of advertising signs by local merchants within the public streetscape,

with appropriate fees paid to City (e.g. signage on light poles, trash cans, etc.).

- Install a new signalized pedestrian crossing on Mission Street connecting Jessie Square to the Gardens Esplanade east walkway, a specific mitigation for 706 Mission Street project, necessary to provide a second alternative pedestrian route between Moscone Center and Market Street to relieve peak crowds on Fourth Street sidewalks.
- Install a new signalized pedestrian crossing at Folsom and Mabini Streets connecting to the Gardens access elevator, essential for pedestrian safety at this legal but dangerous unmarked pedestrian crossing frequently used by children/families and seniors.
- Overall, for the Moscone Expansion Project, implement a high-capacity second pedestrian route for convention attendees between the Howard Street lobbies and Market Street comprised of the East Esplanade Walkway, the new Mission Street crosswalk to Jessie Square (see above), Jessie Square and Yerba Buena Lane, to divert substantial amounts of attendees from Fourth Street, which is currently the only practical route.
- Install a new signal at Fourth and Clementina Streets to better control auto movements for pedestrian safety on the alley directly adjacent to the new Yerba Buena Central Subway Station at the alley's Fourth Street crosswalk.

## 2. Land Use/Zoning, Heights, and FAR Limits

The Planning Department's Draft CC Plan proposes certain zoning designations, height limits, and FAR development limits, to be evaluated by the EIR as the "Project." These parameters are necessary to generate the cumulative development scenario for EIR evaluation of cumulative impacts and urban design impacts. In general they represent a significant increase in development capacity compared to the area's existing zoning, height limits, and FAR-controlled development limits – notably office buildings – which existing regulations will be collectively evaluated as the "No Project" Alternative.

TODCO's Central SOMA Community Plan proposes more limited increases in heights (with one exception) and FAR's for the same areas, and

different zoning designations for much of the area as well (see attached). The overall “moderate” cumulative development and resulting environmental impacts, including transportation and urban design, that would result from these proposals are more than the “minimum” “No Project” existing regulations would permit, but less than the Planning Department’s “maximum” proposal.

The TODCO Plan “moderate” upzoning proposals are a credible alternative to the Department’s Draft Plan which would have reduced levels of environmental impacts in many regards. It may also be legally necessary for their alternative zoning designations to be evaluated by the EIR, such as NCT, MUG, and WSMUO, in order for those alternative designations to be considered for potential approval by the Planning Commission or Board of Supervisors instead of the Department’s proposals.

CEQA requires evaluation of credible Alternatives or Variants, especially if they may result in reduce environmental impacts while still meeting the Sponsor’s (the City) objectives. This is clearly the case with the TODCO Community Plan, as it would allow a substantial but still “moderate” total of about 5 million square feet of new office development as opposed to the Department’s “maximum” proposal that may allow as much as 8-10 million square feet.

Therefore, for legal adequacy – and sound planning practice – the CC EIR must include evaluation of the TODCO Community Plan proposals, or their equivalent, as an Alternative or Variant to the Department’s proposal. The EIR cannot evaluate only a single Plan and intentionally exclude all others, thereby possibly precluding their consideration in bad faith. Such a “stacked deck” EIR is not just bad planning, it would be dishonest – a pretense.