



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: April 20, 2013

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

RE: ADDITIONAL CENTRAL CORRIDOR (SOMA) EIR SCOPING
COMMENTS

1. B. Project Objectives

The Project Objectives as stated continue the fundamental flaw of the entire CC planning process to date – the reality and future of the existing Central SOMA Neighborhood and its communities is utterly ignored. There is literally no reference to the existing / future Neighborhood and its residents in the introductory paragraph. And the only reference to “neighborhood” in the Plan Area Objectives is with regard to “urban form” – which is completely unrelated to actual people.

A CC Plan and its supporting EIR cannot possibly be legally adequate by failing to treat the outcomes / impacts on actual residents of the Plan area with equal quantitative and quality analysis compared to transportation and all the rest. They would also be failed urban planning.

At a minimum:

- Plan Area Objective 2 in section B.1. needs to be expanded to state: “Maintain the Central Corridor’s vibrant economic, physical, social, and neighborhood diversity.”

- Plan Area Objective 5 in section B.1. needs to be expanded to state: “Create a model of sustainable growth and community building.”

2. Project Alternatives

The Scoping document does not discuss specifically the total build out of new commercial space that the Plan zoning proposals would permit, although of course that will have to be estimated for many of the EIR’s analyses. That total build out will result from a combination of several zoning parameters, principally height/bulk/design limits, FAR’s, and the base zoning categories areas, which the Scoping document does not fully detail.

In any event, this approach can lead to only two cumulative build out scenarios – a maximum build out based on the draft Plan and a minimum based on the No Project Alternative – the current zoning etc.

What is missing and required for legal adequacy of any EIR is a mid-range build out zoning scenario. Obviously many of the cumulative environmental impacts of such a mid-range scenario would be less than the draft Plan’s – certainly transportation impacts – and the public and decision makers must have this information available to them.

The TODCO Group Central SOMA Community Plan is in fact such a mid-range scenario. Its base zoning, FAR’s and other parameters would allow substantially more cumulative development than the existing zoning, but also substantially less than the Draft Plan.

For the Central Corridor EIR to be legally adequate, the TODCO Plan or a functional equivalent must be evaluated as the legally-necessary mid-range cumulative development scenario. This scenario may well prove to be the environmentally superior alternative, because its scale of impacts could be successfully mitigated with available resources whereas the Draft Plan’s impacts very possibly will exceed all those available mitigating resources.