

19TH STREET CEQA APPEAL

2750 19th Street at Bryant

Our Mission No Eviction requests that you uphold the appeal of the Planning Commission's decision to adopt a Community Plan Exemption and require a project level environmental review prior to further consideration of the this project.

SUBSTANTIAL ADVERSE EFFECTS

- This project with its **low percentage of on-site affordability (17.5% below 120% AMI)** furthers the disproportionate construction of market rate units and will further exacerbate the displacement of working class residents surrounding the project site.
- This project will **further exacerbate traffic congestion, pollution, greenhouse gases and noise** as a result of adding private cars, the heavy use of TNC ride-hails and constant household deliveries,
- Added vehicle congestion brought by this project will **directly endanger pedestrians and bicyclists.**
- With **no guarantee to the community for working class PDR manufacturing**, this project will contribute to further displacement of manufacturing businesses in the Mission industrial zone and the **loss of working class PDR jobs.**

2750 19TH STREET ENVIRONMENTAL EXEMPTION

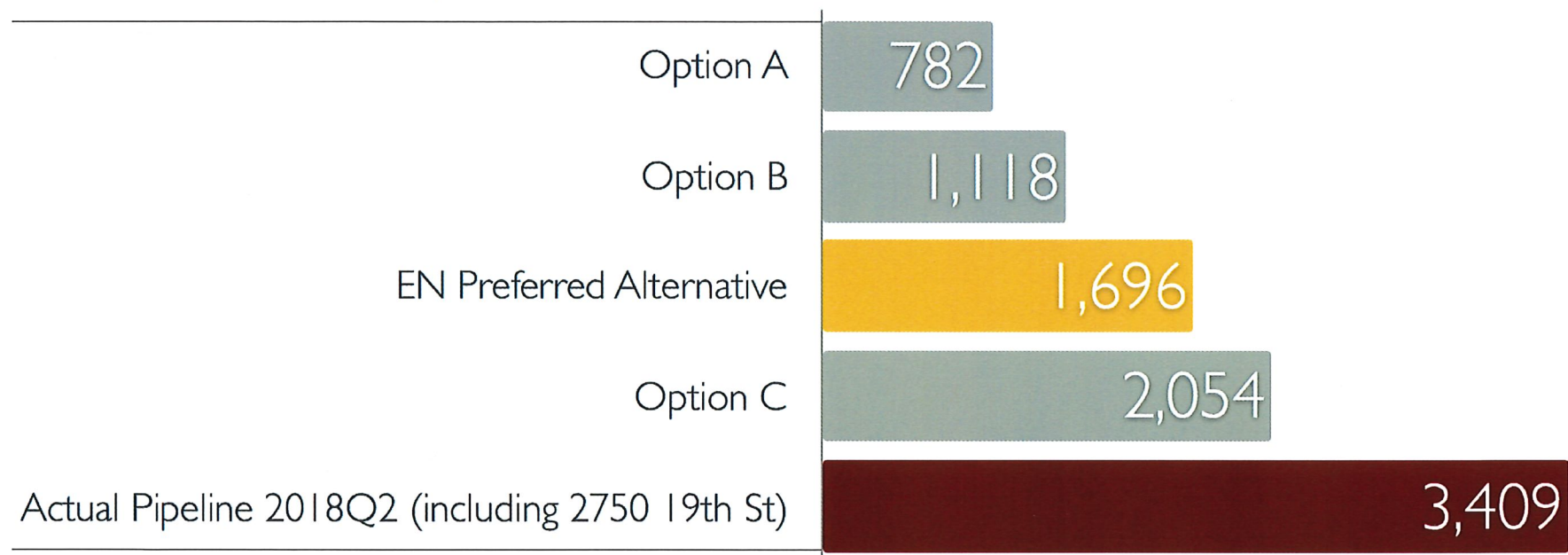
- 2750 19th Street was granted a Community Plan Exemption instead of requiring a project level environmental review to be conducted.
- The CPE approval rested on the cumulative impact studies of the Eastern Neighborhoods EIR that were **done between 2005-2008**
- **What is the problem with this?**

CONDITIONS HAVE SIGNIFICANTLY CHANGED

- Substantial new information affecting environmental analysis has become available since the adoption of the Eastern Neighborhoods Plan EIR (PEIR)
- CEQA Guidelines **require comprehensive analysis of new issues.** (CEQA Guidelines Section 15183)
- Since the Community Plan Evaluation (CPE) is tiered from the PEIR, it is imperative that the PEIR be reliable.
- If the underlying EIR is outdated or missing areas of study **it is no longer a viable tool for evaluating cumulative impacts.**

DOES THIS PROJECT HAVE IMPACTS THAT ARE CUMULATIVELY CONSIDERABLE?

PIER Mission Housing Options vs Actual 2018Q2 Pipeline



All housing options projected for PEIR timeframe of 2008-2025 have been exceeded with 7 years remaining.

WHAT ARE THE CUMULATIVE IMPACTS OF PIPELINE PROJECTS?

We do not know.

The PEIR has not analyzed the cumulative impacts of this project, the 326 units being built across the street or other Mission pipeline projects.

increased traffic, and increased circulation

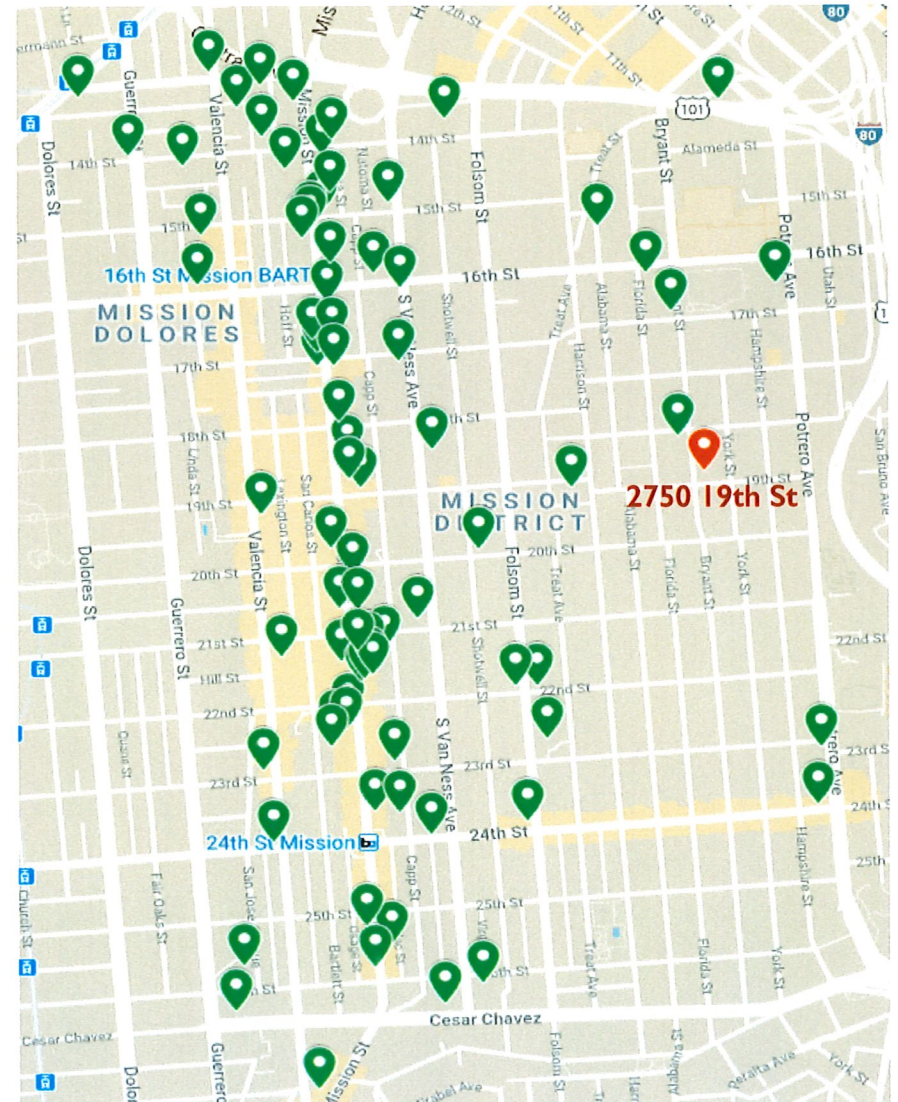
TNC ride-hails

delivery vehicles

private shuttle gentrification

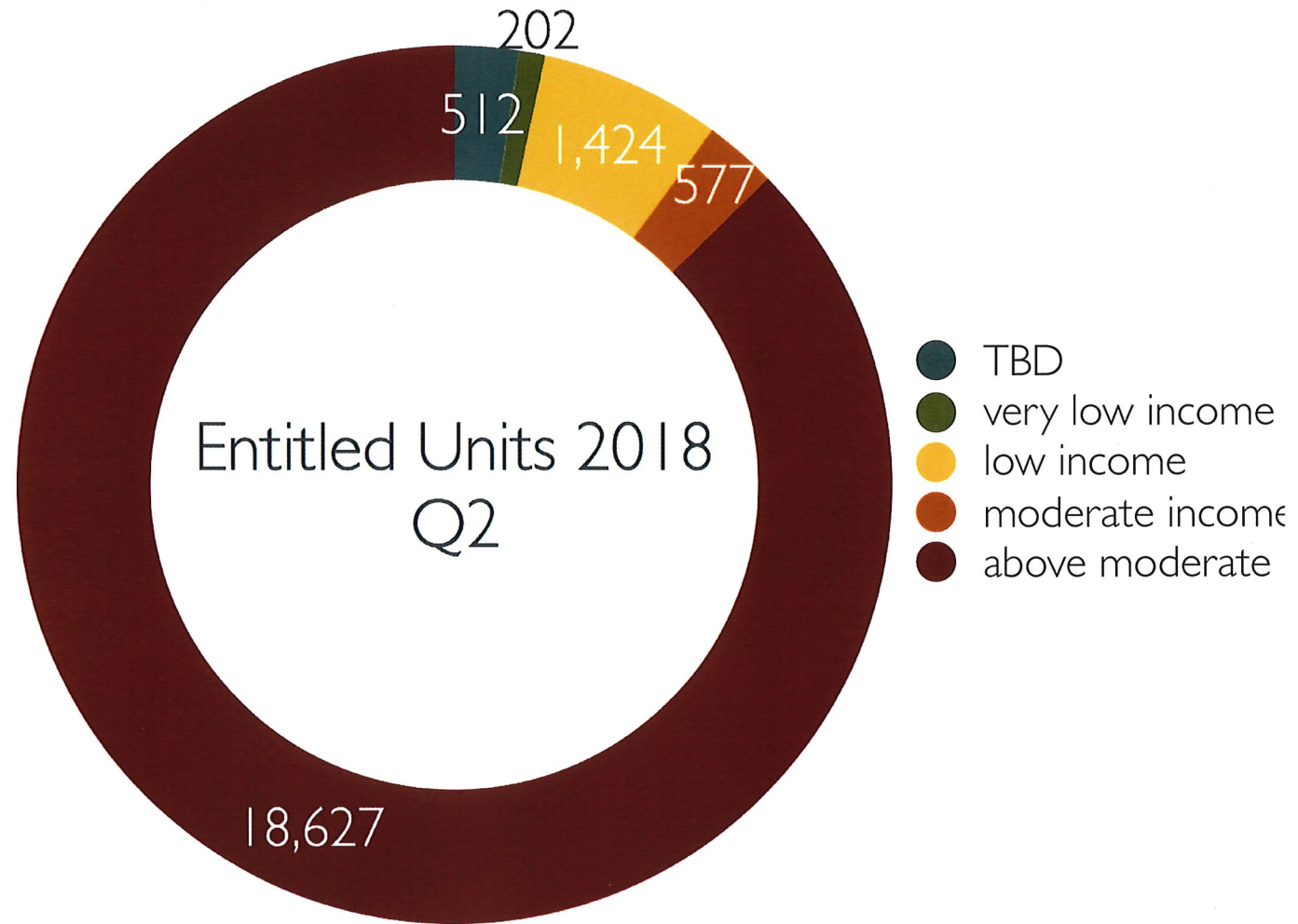
disproportionate construction of market rate units

unanticipated rapid pace of development



DISPROPORTIONATE CONSTRUCTION OF MARKET RATE UNITS

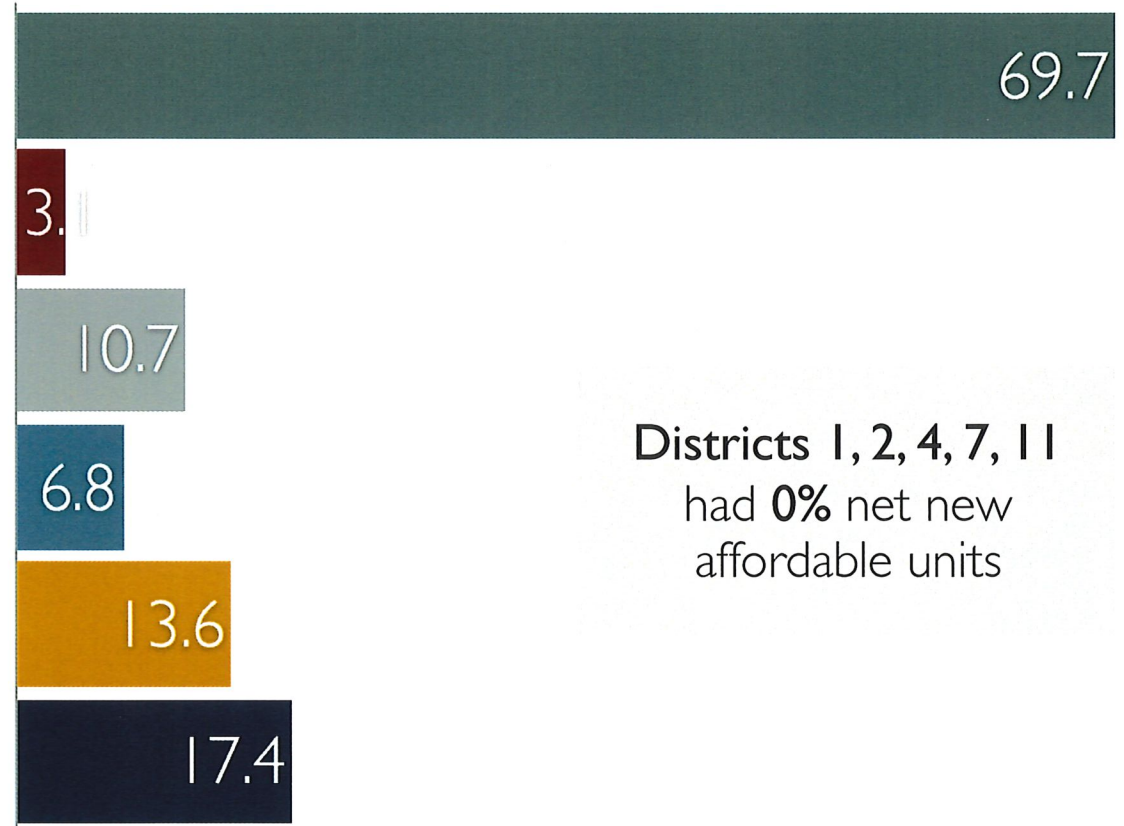
- As of 2018 Q2, San Francisco has exceeded 2015-2022 RHNA housing production goals of 28,869 units and entitled or built 35,300 units.
- San Francisco has exceeded its 2015-2022 RHNA housing production goals and built or entitled **218.9%** of its goals for **above moderate income housing (greater than 120% AMI)**.



PROJECTED HOUSING BALANCE

- Low income housing production in Districts 9 and 10 is well below targets.
- This imbalance has led to hyper-gentrification of the Mission
- Inequity due to overbuilding of luxury housing has created environmental impacts related to traffic, land use, health and safety that have not been studied.

Total Affordable Units as % of Net New Units, 2018 Q2



Districts 1, 2, 4, 7, 11
had **0%** net new
affordable units



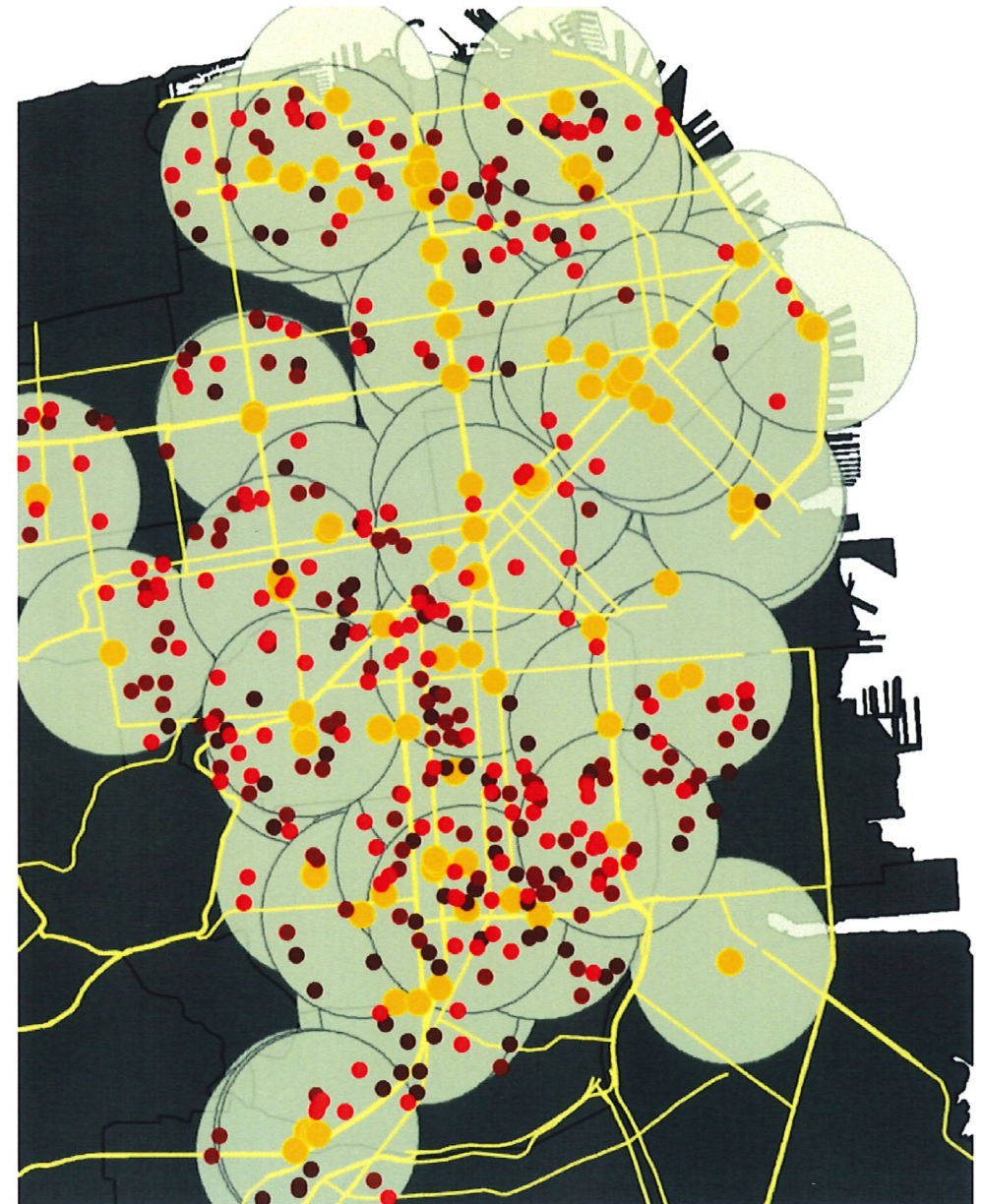
UNFORESEEN CUMULATIVE TRANSPORTATION IMPACTS

- Unanticipated increases in automobile ownership of high income earners.
- Displacement commutes of Mission families driving back long distances for their jobs and children's schools in SF, as well as new Silicon Valley reverse commutes.
- The advent of TNC ride-hails (2013) occurred well after the Eastern Neighborhoods Plan was adopted (2008).
- The advent of services for meals, groceries and online purchases has increased frequency of deliveries to affluent households.
- Private delivery drivers using personal vehicles are now being employed by Amazon and online retailers **because delivery companies** (UPS, USPS, FedEx, DHL, GSO, OnTrac) **cannot meet demand**.

TECH SHUTTLE DISPLACEMENT

- 80% of tech workers who utilize private shuttles live within walking distance of their stop
- 40% of tech workers in SF who utilize shuttles would move closer to their offices outside the city if there were no private shuttles
- 69% of no-fault evictions occurred within a four block radius of tech bus stops during 2011-2013
- **The PEIR did not study private shuttles and did not anticipate their impacts** from a traffic standpoint nor from the demand for housing in proximity to shuttle stops.

Shuttle Stops ●
2013 Evictions ●
2012 Evictions ●
2011 Evictions ●



OLD METHODOLOGY USED TO CALCULATE IMPACTS

- Impacts were **based on outdated modeling** from SF-CHAMP in **2010** and **2002 SF Guidelines** that **did not study TNC ride-hails**.
- Delivery vehicle impacts are vastly understated by **reliance on the outdated 2002 SF Guidelines** that show **.03 deliveries per 1000 GSF for residential uses**. The methodology in the SF Guidelines is based on analysis by the Center City Pedestrian Circulation and Goods Movement Study (Wilbur Smith & Associates for San Francisco Department of City Planning). **September 1980**.
- According to a recent report from the SF County Transportation Authority, **51% of the City's traffic congestion and 47% of increased VMT measured from 2010-2016 is attributable to TNC ride-hails**. These impacts are particularly acute in urban areas, throwing into question the accuracy of VMT analysis.

A recent INRIX Global Traffic scorecard shows that as of 2017 San Francisco driving is now ranked **5th most congested city in the world.**

ARE THERE PROPORTIONATE COMMUNITY BENEFITS?

- Are there adequate community benefits - **pedestrian/bicycle safety measures, open space, school improvements, support for upgrades to recreation facilities and affordable housing production** - to offset the cumulative impacts of this project?
- This project includes bicycle storage for residents, but is there adequate bicycle infrastructure to insure their safety? The San Francisco Bicycle Plan update used in the CPE **was adopted in 2009 before the advent of TNC ride-hails.**
- None of the intersections identified for improvements in the PEIR are within the vicinity of this project. Is there adequate pedestrian infrastructure to support this project?
- Are there adequate loading zones for the constant stream of deliveries and ride-hail loading that 60 households will generate?
- Have adequate impact fees been assessed to offset the cost of these benefits? ENCAC has detailed numerous unmet needs resulting from the inadequacy of impact fees and alternate funding has been inadequate.

LACK OF ADEQUATE ON-SITE COMMUNITY BENEFIT

- Project sponsor has refused to extend the terms of the Fitzgerald MOU to a community serving PDR business. There is **no guarantee that this project will meet 2016 Interim Control recommendations and remain a site with working-class PDR jobs.**
- Community has asked **only that the same terms be extended** in the event that Fitzgerald does not return or does not complete the terms of their 20 year lease.
- There is an unacceptable percentage of on-site affordability. The addition of a single unit at **150% AMI does not contribute to affordability** in this working class neighborhood - **\$124,350 (1 person), \$142,050 (2 person), \$159,850 (3 person).**
- Teaching the youth of the community to build unaffordable market rate housing that will cause direct and indirect harm to themselves and their families is not a community benefit.

EASTERN NEIGHBORHOODS
COMMUNITIES DESERVE
BETTER

- CEQA requires a **cumulative environmental analysis based on current circumstances.**
- **No studies were done for our current level of housing development in the Mission.** No studies were done for this project at 2750 19th Street.
- No cumulative transportation analysis based on current modes of transportation was done for this project. **TNCs are not addressed in the PEIR and there is no recognition of TNCs as a transit mode in the CPE.**
- Adequate analysis of noise, air quality, greenhouse gas emissions, bicycle and pedestrian safety is **dependent on accurate and realistic traffic and mode share projections,** so it too was not done.

- The Planning Department was incorrect in the conclusion that the environmental impacts of the project at 2750 19th Street have been “analyzed and disclosed in the Eastern Neighborhoods PEIR.”
- San Francisco has fallen short of its CEQA obligation and the result has been the approval of projects like this one that have unexamined environmental effects and insufficient mitigation measures, to the detriment of Mission residents.

The Planning Department should be requested to perform an Environmental Project Review or EIR to study the cumulative impacts resulting from this new information.

The appeal of this Community Plan Exemption must be upheld. Your affirmative action on this appeal is critical to the protection of the Mission's most vulnerable residents.

The City and Eastern Neighborhoods communities need additional study in order to move forward to 2025 armed with the data necessary to make informed decisions.