

# **TREASURE ISLAND / YERBA BUENA ISLAND REDEVELOPMENT PROJECT Volume 6 – Appendices J-K**



**CITY AND COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT  
CASE NO. 2007.0903E**

**STATE CLEARINGHOUSE NO. 2008012105**

**DRAFT EIR PUBLICATION DATE: JULY 12, 2010**

**DRAFT EIR PUBLIC HEARING DATE: AUGUST 12, 2010**

**DRAFT EIR PUBLIC COMMENT PERIOD: JULY 12, 2010 - AUGUST 26, 2010  
(EXTENDED TO SEPTEMBER 10, 2010)**

**COMMENTS AND RESPONSES PUBLICATION DATE: MARCH 10, 2011**

**FINAL EIR CERTIFICATION DATE: APRIL 21, 2011**

**TREASURE ISLAND / YERBA BUENA ISLAND  
REDEVELOPMENT PROJECT  
Final Environmental Impact Report  
Volume 6 – Appendices J-K**

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Changes from the Draft EIR are indicated by a dot (●) in the left margin.



**TREASURE ISLAND / YERBA BUENA ISLAND  
REDEVELOPMENT PROJECT FINAL EIR**

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## **APPENDIX J: DEIR COMMENT LETTERS**

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Making San Francisco Bay Better

August 4, 2010

President Owen Stephens & Commissioners  
Treasure Island Development Authority  
c/o Peter Summerville, Secretary  
1 Avenue of the Palms, 2nd Floor  
San Francisco, CA 94130

President Ron Miguel & Commissioners  
San Francisco Planning Commission  
c/o Linda Avery  
1660 Mission Street, #400  
San Francisco, CA 94103

SUBJECT: Treasure Island Draft Environmental Impact Report

Dear President Stephens, President Miguel and Commissioners:

I am writing to provide you with our staff's initial comments on portions of the Treasure Island Draft Environmental Impact Report pertaining to sea level rise. We will be providing further comments on or before the comment submission deadline of August 26, 2010, but I wanted to convey our overall support for the manner in which the issue of sea level rise is being addressed in the Treasure Island project.

We are proud that BCDC has been recognized as a leader in the development of sea level rise policy for the Bay Area. As part of our work, we actively participated with other departments in the California Natural Resources Agency in drafting the State of California's inter-agency 2009 Climate Adaptation Strategy, and we are currently working on amendments to our Commission's *San Francisco Bay Plan* to address this critical issue.

The Treasure Island project has already earned praise from local, state, national, and international governmental agencies and NGO's for its innovative approach to sea level rise and general sustainability measures. For example, as the attached letter indicates, Governor Schwarzenegger has recognized the City's approach on the Treasure Island project for its compliance and consistency with the State of California's Climate Adaptation Strategy.

Our staff has worked closely with the Treasure Island Development Authority (TIDA) and the project developer, Treasure Island Community Development, LLC (TICD), for the past three years on potential sea level rise issues and adaptation strategies to address this challenge. The TIDA's and TICD's ability to understand the complexities that must be confronted on this critical long-term issue has been impressive. In addition, their technical and engineering responses have been well thought-out and innovative, and their commitment to long-term adaption strategies, including funding those strategies, will ensure that this ABAG Priority Development Area will be well positioned to protect the community from future sea level rise. The implementation of the proposed anticipatory design and adaptive management approach offers the promise of becoming an example of techniques for sea level rise protection for other communities in the Bay Area and beyond.

Sincerely,

WILL TRAVIS  
Executive Director



GOVERNOR ARNOLD SCHWARZENEGGER

March 11, 2010

The Honorable Gavin Newsom  
Mayor  
City of San Francisco  
1 Dr. Carlton B. Goodlett Place  
Room 200  
San Francisco, California 94102

Dear Mayor Newsom,

Thank you again for assisting in the sea level rise announcement we made at Treasure Island last December. I've since been informed that the City and County of San Francisco have proposed many innovative adaptive management strategies to address the potential for sea-level rise for the city's forthcoming Treasure Island project, and I hope this work continues.

California's 2009 Climate Adaption Strategy sets forth several important preliminary recommendations for state agencies to follow in response to climate change impacts. Specifically, Preliminary Recommendation 3 calls for adaptive management strategies to protect existing developments that have regionally significant economic, cultural or social value and which promote new infill developments in such areas. While not bound by this advice, the Treasure Island project follows that preliminary recommendation well as it is both an existing development with important economic, cultural and social values and also an infill development that has proposed adaptive management strategies to address the long-term impacts of sea level rise in the Bay.

Appropriate infill development in our job-rich urban centers to reduce greenhouse gas emissions is a priority of my administration. As you know, Treasure Island was where I signed AB 32 and SB 375, two pieces of landmark legislation on climate change and sea level rise. I was also happy to bestow upon the Treasure Island project the 2008 Governor's Economic and Environmental Leadership Award (GEELA) for Sustainable Communities.

Please continue to have your staff work with the Natural Resources Agency and other state agencies on this project, which could provide some important local lessons for other jurisdictions to follow and implement in keeping with California's Climate Adaption Strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "Arnold Schwarzenegger".  
Arnold Schwarzenegger



To: San Francisco Dept. of Planning  
Attention: Bill Wycko, Environmental Review Officer  
Fr: Bernard Choden (em: choden@sbcglobal.net)  
Re: Response to the DEIR for Treasure Island  
Aug. 5, 2010

I believe that "due diligence" has not been exercised for findings regarding the ownership of Treasure Island and the proposed seismic safety mitigation for associated development proposals.

1. The State of California owns the development site in perpetuity by virtue of federal law "The Arkansas Act of 1850" gave all states stewardship of coastal wetlands below mean high tide as of September 1850. Authenticating correspondence by state officials involving Hamilton Airbase, an analogous situation, is appended. The DEIR on page IV.A 12 asserts that state legislation in 1942 and 1997 both empowered the transfer of Treasure Island to the Navy, a wartime exercise as with Hamilton Airbase, and the release of Treasure Island from the terms of the Tidelands Trust. State law does not trump federal law despite many invalid challenges by the state attempting to do so. The question of ownership underlies the legality and efficacy of the control of uses and resources needed to mitigate the impacts of the proposed development. This issue is fundamental to the integrity and accuracy of the DEIR.

2.1

The draft also indicates a legislatively approved trade of possible Tide Lands Trust sites for island perimeter sites that for the most part are very much below water and likely to remain so. The sea level is expected to rise 2.5 feet during the time expected for island's initial development and far more during the development's overall economic life. These deepening submerged lands traded to the Trust cannot be expected to be equivalent value for state purposes. This is a farcical replay of the fabled Florida scams related to sale of swamp lands in the 1920's.

2.2

2. The near liquefaction of Treasure Island during the moderate Loma Prieta earthquake of 1989 should give rise to the especial seismic safety requirements required to both ensure the survivability of occupants and structural developments. The DEIR on pages II.72 thru 76 raises skepticism as to this possibility. For one, compacting sand cannot reach the density of even sandstone or consolidated rock and therefore cannot be expected to provide a safe seismic underpinning. Further, foundation mats, while structurally useful, cannot be secure if their underpinnings are liquefiable.

2.3

One means of testing the viability of the proposed seismic security measure is for the developers and city to provide evidence of the fiscal insurability of both the survivability of the island's occupants and its development and to demonstrate so before the DEIR is approved. It is necessary to secure significant evidence of tests of these seismic safety measures before approval of the DEIR.

Letter 2

re of California

## Memorandum

APPENDIX: DEIR TREASURE ISLAND

Date November 21, 1975

Arnold C. Sternberg

Donald R. Crow

Wayne Schell

Jack Harrison

John Kramer (Counsel Resources Agency)

✓ Walter Cook (Counsel State Lands Commission)

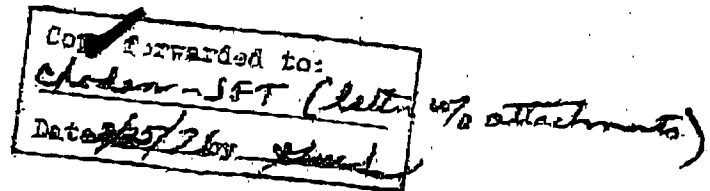
Committee with in 2/24/76

W 3909

5

m : DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF RESEARCH AND POLICY DEVELOPMENT

Subject: Hamilton Airbase Policy Proposal



## I. BACKGROUND

The attached maps A and B and legend indicate the types of parcels which underly the approximately 1800 acres of Hamilton Airbase. Discussions with Walter Cook have indicated that a substantial portion of this land is, with varying degrees of probability, recoverable by the state.

1. Submerged Lands

These lands are sovereign lands by virtue of having been ceded to the state when California joined the Union in 1850. By state law, the state's use of such lands is limited to fisheries, wild life, game, and navigational purposes. The areas to the east and including Parcel TLL 31, Map B, are lands which fall into this category and which can be readily reacquired by the state through legal action. Vegetation prior to 1851 ceased at the western boundary line of this parcel, thus implying the existence of mud flats on these parcels at that time.

Parcels TL 179, 178, 175, TLL 5(c), and TLS 210 represent patents for use which have lapsed and, therefore, these lands appear reclaimable without challenge. The remainder of this submerged land was patented with permission to build a levee. However, such patents did not negate the state's sovereign right to trespass for the maintenance of fisheries, navigation, wild life, and game.

2. Wet Lands

Congress, in the 1850 Arkansas Act, gave to the states sovereignty over wet lands which include lands below sea level, above mean high tide, and areas with salt marsh vegetation.

Early maps indicate the presence of numerous scattered salt ponds and sluices throughout the remainder of the runway and maintenance shop area extending northwest up to and including parcel S and O 69. The state granted patents for the use of this land. However, SLC

-2-

feels this area is worth litigation on the basis of the uses and of the ecological protection rights noted. The state argues that it has retained the rights to trespass in this area in order to maintain it for fisheries, wild life, game, and navigation.

### 3. The Ranchero

This area was originally above sea level and GSA has clear title. Therefore, it appears beyond litigation so far as potential reclamation by the state is concerned. This is the area contiguous to Highway 101 and which contains the Lanham housing site.

### 4. Previous Action

Title to the area bordering the northern side of the airbase was litigated by the state and the title rights were resolved with the California Packing Corporation in 1943. This area, therefore, is in an unchallengeable ownership situation with fee-simple title. Hamilton Airbase to the south, therefore, represents a defeasible fee, with reservations, subject now to litigation. This condition also applies to the area to the south of the airbase beginning with Parcel S and O 80.

## II. ACTION BY THE SLC

It is the intention of Mr. Cook to begin a recovery action first by notifying the GSA and, second, through possible litigation to recover the submerged and wet lands within the airbase. He does not wish to subject this area to negotiation with GSA which might involve a trade-off of claimed state rights for other areas or equities on the higher elevations such as Lanham site since this would prejudice his case with regard to claimed sovereign objectives and uses. In addition to notifying GSA, Walter Cook will notify Marin County and the City of Novato.

After the above action is initiated, to avoid prejudicial judgment with regard to the intent of the State Lands Commission to establish sovereign rights and use, HCD and SLC should enter negotiations with the GSA with regard to the possibility of trading part of the federal land debt (comprising a total of 121,000 acres) for the above sea level area of Hamilton Airbase. HCD and SLC will argue that the improvements are valueless and constitute a detriment to the future improvement and reuse of the site. The objectives to the GSA and the state administration, for the above sea level area then, will be posited as follows:

- a. Protect the ecology of the water shed, particularly the below sea level areas.
- b. Integrity of use in a manner harmonious with the maintenance of the wet and tide lands ecology and uses.

## Letter 2

- c. Establishment of development of a suitable ground rent return which, in part, can be used to maintain the ecology and state lands interest in the overall site.
- d. To return a surplus of such ground rents into a sinking fund for general statewide community development and housing purposes, and for intensive development of bay area fisheries.

## III. PHASING OF ACTION

- a. Letter by SLC claiming rights and threatening litigation to the GSA. *no*
- b. A second following letter from HCD jointly with SLC and Resources Agency to GSA with regard to an uplands trade-off for part of the federal school lands debt. *don't know about this*
- c. *not SLC* Initiate legislation declaring that low and moderate income housing and employment development are public purposes compatible with the existing authorized use of submerged and wet lands if those lands are no longer submerged or wet lands, are not required for restoration of the ocean, riverine, or seashore ecology, and the development would not adversely affect the use of other sovereign lands. It should be understood clearly that these additional proposed uses are offered only as a secondary priority to the existing authorized uses. Compatibility should be further defined as follows: *?*
1. Primarily for low and moderate income housing, community development, and employment.
  2. Having a monetary and/or functional benefit to present authorized uses.
  3. Recognizes the right of a possible or eventual reuse of community developed lands for presently authorized uses.

The legislation should also establish a sinking fund funded through ground rents or development rights for the reuse of state lands such as Hamilton Airbase. The funds may be used statewide for indicated public purposes such as stabilization of deteriorated communities, housing aids, and development of state fishery ecologies. Recommendations to the Legislature for allocations from the fund will be made jointly by the Resources Agency, SLC, and HCD. In order to carry out the housing and community development activities financed by the fund, the legislation should declare that HCD is a public housing agency with powers to carry out the authorized housing and community development programs.

We may also suggest recourse to Congressional action regarding the state possession of the uplands area and the discounting of existing equities.


## Letter 2

All of the above will establish precedent with regard to other shoreline properties, defense lands such as Susanville, Stockton, and Los Angeles. In particular, the SLC will follow up the above litigation action by challenging the San Francisco Harbor Subdivision Act of 1872 on the basis of English Common Law precedent which established that submerged and wet lands, after 100 years of an uninitiated purpose, should revert to state sovereignty. This relates to our previous memo regarding the Santa Fe Railroad lands and other lands within five miles of a point near the Ferry Building located on the eastern edge of San Francisco.

The higher areas can be expected to be fully developed except for small park areas. The sovereign use area can, in part, be leased from the SLC on a 99-year basis; Port and fisheries development would be permanent.

Presuming a 50% development coverage of the 1800 acres at Hamilton Airbase, we can expect about \$2/300,000,000 of development. In addition to my charges to the leaseholder for payment of in lieu taxes to local government, the state could expect to receive a ground rent of 8% on the value of the land and improvements.

Assuming half of the ground rents are allocated to HCD, Hamilton alone will generate a \$12,000,000 annual cash flow to HCD. This cash flow will be more than enough to carry out a significant program of housing and community development, including Hamilton.

  
Bernard Choden

Attachments



## Letter 2

Re: Hamilton Airbase

Cook has returned with the report that GSA is going ahead with disposition backed by the solicitor general's opinion regarding the state claim. GSA has indicated that they are willing to cede a shoreline portion to the state's Fish and Game Dept. and leave the remainder in open space use as an airport (of the state's claimed area) jointly operated by Marin Co. and the Coast Guard. The upland portion will be disposed of, piecemeal in an isolated manner, ie: Lanham, etc. There is an urgency therefore to present the GSA with a negotiable proposals to trade state lands for, at least, the non-airport uplands area in toto.

Letter 2

TO: ACS

SUBJECT: HAMILTON

Walter Cook briefed me this morning regarding his meeting with

Tony Pace, et.al, at GSA. The bottom line is that our opportunity

to move on Hamilton is alive and well but urgent.

1. GSA will proceed to ignore Walter's claim of state sovereignty based upon a solicitor general's interpretation in 1965 regarding adverse possession.

2. Walter will request litigation from the Commission based on

a. adverse possession only pertained to defense uses now being abrogated and recent enquiries from Washington expressing doubts about the title and desiring to clean up the situation.

b. Walter expects to need to post a \$1,000,000 bond to cover the maintenance of the base during the interval of the suit; he now favors extending the land trade concept to cover the entire area of Hamilton; thus, the uncontested areas will be paid for outright, by trade, the <sup>indeterminate</sup> ~~intermediate~~ areas will be paid by <sup>at</sup> ~~an~~ a court determined amount with the sums being represented by the state land's equities being held in escrow. No cash from the legislature, therefore, will be needed...our approach, therefore, becomes extremely desirable.

c. The suit bond needs pulls priority away from Northrup's priority for a trade away from the Imperial Valley <sup>h</sup> ~~terminal~~ <sub>A</sub> lands and makes SIC dependent on the eventual cash flow from Hamilton as a means of acquiring the <sup>h</sup> ~~terminal~~ <sub>A</sub> lands later (which they should do in any case since we can multiply the land equities faster by putting it into the Hamilton investment ~~than~~ letting it ~~wait~~ sit in abeyance in state title).

3. Walter will be at the 2 pm meeting on Thursday.

*Review - Thanks - last of this point - Don't lose interest - we have some time on the whole thing - as well as a more detail - \$ proposed - from - ACS - 3/1 - [signature]*

## Letter 2

TO: ACS

SUBJECT: HAMILTON

Walter Cook briefed me this morning regarding his meeting with Tony Pace, et.al, at GSA. The bottom line is that our opportunity to move on Hamilton is alive and well but urgent.

1. GSA will proceed to ignore Walter's claim of state sovereignty based upon a solicitor general's interpretation in 1965 regarding adverse possession.
2. Walter will request litigation from the Commission based on
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  - b. Walter expects to need to post a \$1,000,000 bond to cover the maintenance of the base during the interval of the suit; he now favors extending the land trade concept to cover the entire area of Hamilton; thus, the uncontested areas will be paid for outright, by trad, the interminate areas will be paid by an a court determined amount with the sums being represented by the state land's equities being held in escrow. No cash from the legislature, therefore, will be needed...our approach, therefore, become extremely desirable.
  - c. The suit bond needs pulls priority away from Northrups priority for a trade away from the Imperial Valley termal lands and makes SLC dependent on the eventual cash flow from Hamilton as a means of acquiring the termal lands later (which they should do in any case since we can multiply the land equities faster by putting it intoy the Hamilton investment shazn letting it ~~wait~~ sit in abeyance in state title).
3. Walter will be at the 2 pm meeting to back this and deal with THE BLM

## CALENDAR ITEM

 Title Letter 2  
 Date March 1978

1. Originator (indicate further routing) (TC) WC
2. Asst. Mgr./Supv. Eng. (TC)
- Legal ( )
- Unit Supervisor ( )
- Boundary Unit ( )
3. Section Head (JTW)
4. Asst. Exec. Officer (RSG)
5. Executive Officer (WFM)
- Calendar Unit-Sacto

## SUMMARY OF CALENDAR ITEM:

*Prelim. Draft.*

Request authorization to proceed with title litigation at Hamilton Air Force Base, Marin County, California.

\*\*\*\*\*

The Federal General Services Administration is proceeding with disposal of Hamilton Air Force Base which has been declared surplus by the Air Force.

A search of the records shows the existence of State sovereign titles within the Base. Exhibit A, attached hereto, shows the approximate location of the various categories of title, as follows:

1. Parcel A: No State patents have been issued for this portion of the Base. The parcel originally consisted of tidelands of San Pablo Bay owned by the State in its sovereign capacity. This parcel was blocked off from the Bay by levee construction many years ago. The Federal Government acquired private title claims but is unable to trace its title back to its source.
2. Parcel B: State tideland patents were issued in the last century for this parcel. The Federal title claims to this parcel are

based on their assertions of ownership as successors in interest to the State's tideland patents. The public trust easement was reserved in law by these tideland patents and continues to exist in the absence of its being terminated in some lawful manner. We find no such termination. The tidelands are within the City limits and the California Constitution (Art. V, Sec. 3) prohibits the alienation by the State of its right, title, and interest therein.

3. Parcel C: This area was patented by the State by Swamp and Overflowed Lands patents in the last century. However, the historical maps and charts show that the parcel was interlineated with sloughs and other tidelands over which the State's tideland easement exists.
4. Parcel D: ~~Remainder of the Base:~~ The remainder of the Base was within the confirmatory patent issued by the United States under the Treaty of Guadalupe Hidalgo for the Rancho Novato, the existence of which preceded statehood. The title review has not shown evidence of any State sovereign right, title, or interest therein.

Exhibit B shows the Base parcel along the northerly bank of Novato Creek. The evidence shows State ownership within this parcel as part of the natural bed of the Creek and as tidelands along said Creek.

A small portion of the Base may be held by the Federal Government by easement only and a portion may be included within real property the title to which may have been settled.

The Federal Government disputes the existence of any State titles within the Base and refuses to delay its disposition procedures. Further action may substantially jeopardize the State's titles and litigation appears to be essential



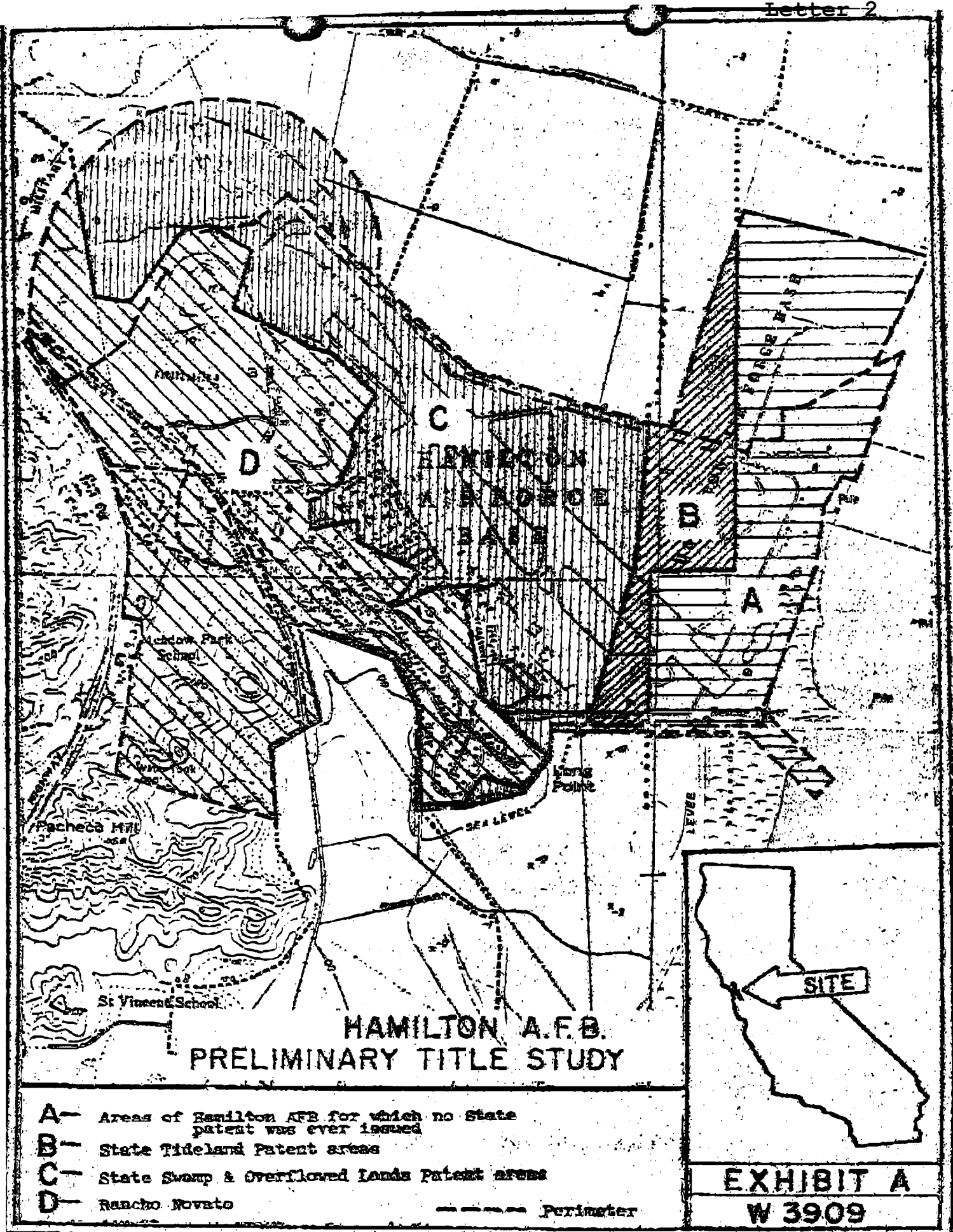
## Letter 2

to permit the dispute to be resolved according to the law and the evidence.

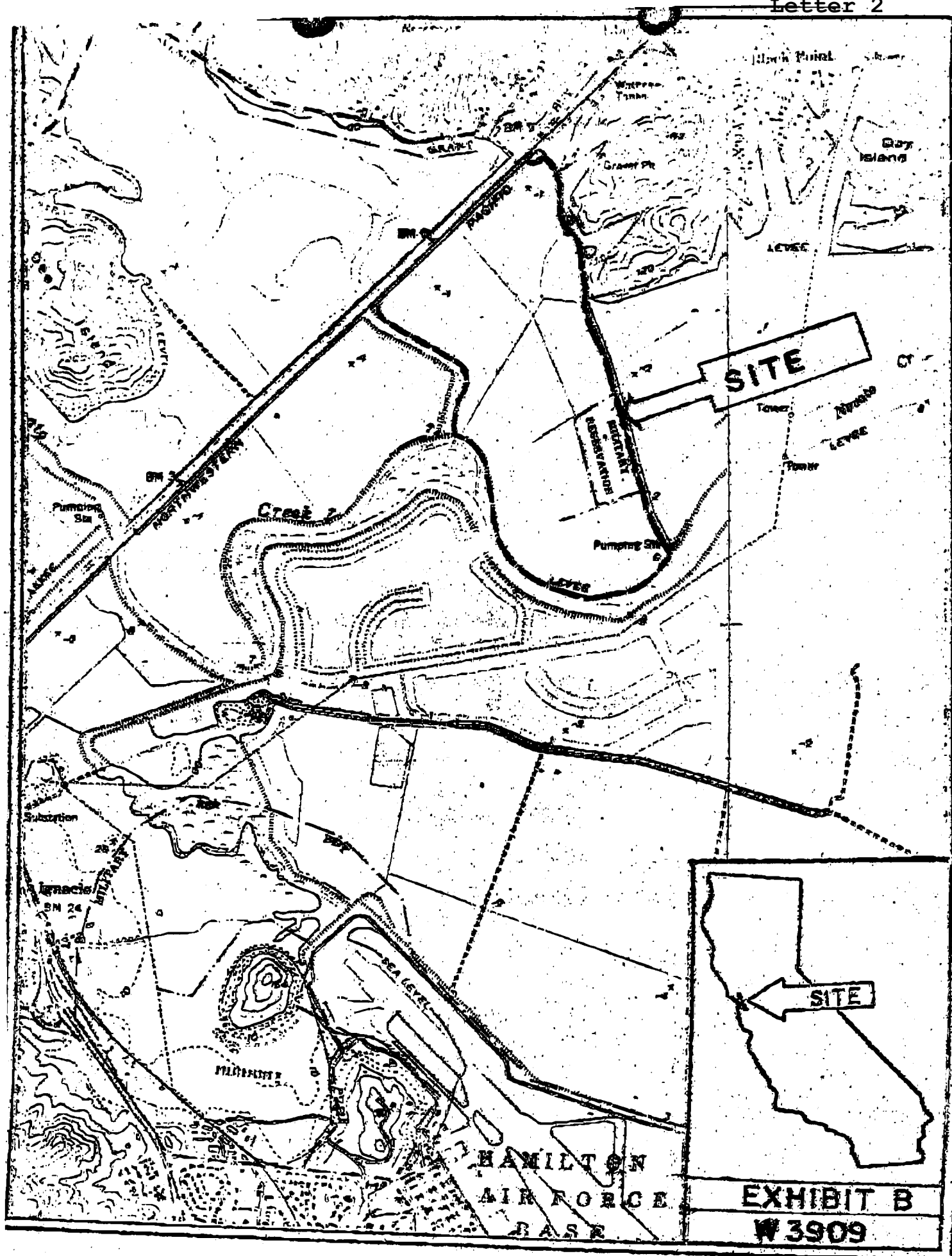
IT IS THEREFORE RECOMMENDED THAT THE COMMISSIONER APPROPRIATE THE ATTORNEY GENERAL TO INSTITUTE AND PROSECUTE LITIGATION AS MAY BE NECESSARY AND APPROPRIATE TO IDENTIFY AND PROTECT THE STATE'S TITLES WITHIN THE LIMITS OF HAMILTON AIR FORCE BASE.

- EXHIBIT A - SITE LOCATION (MAIN BASE)
- EXHIBIT B - SITE LOCATION (MOWATO CREEK PARCEL)
- EXHIBIT C - VICINITY MAP

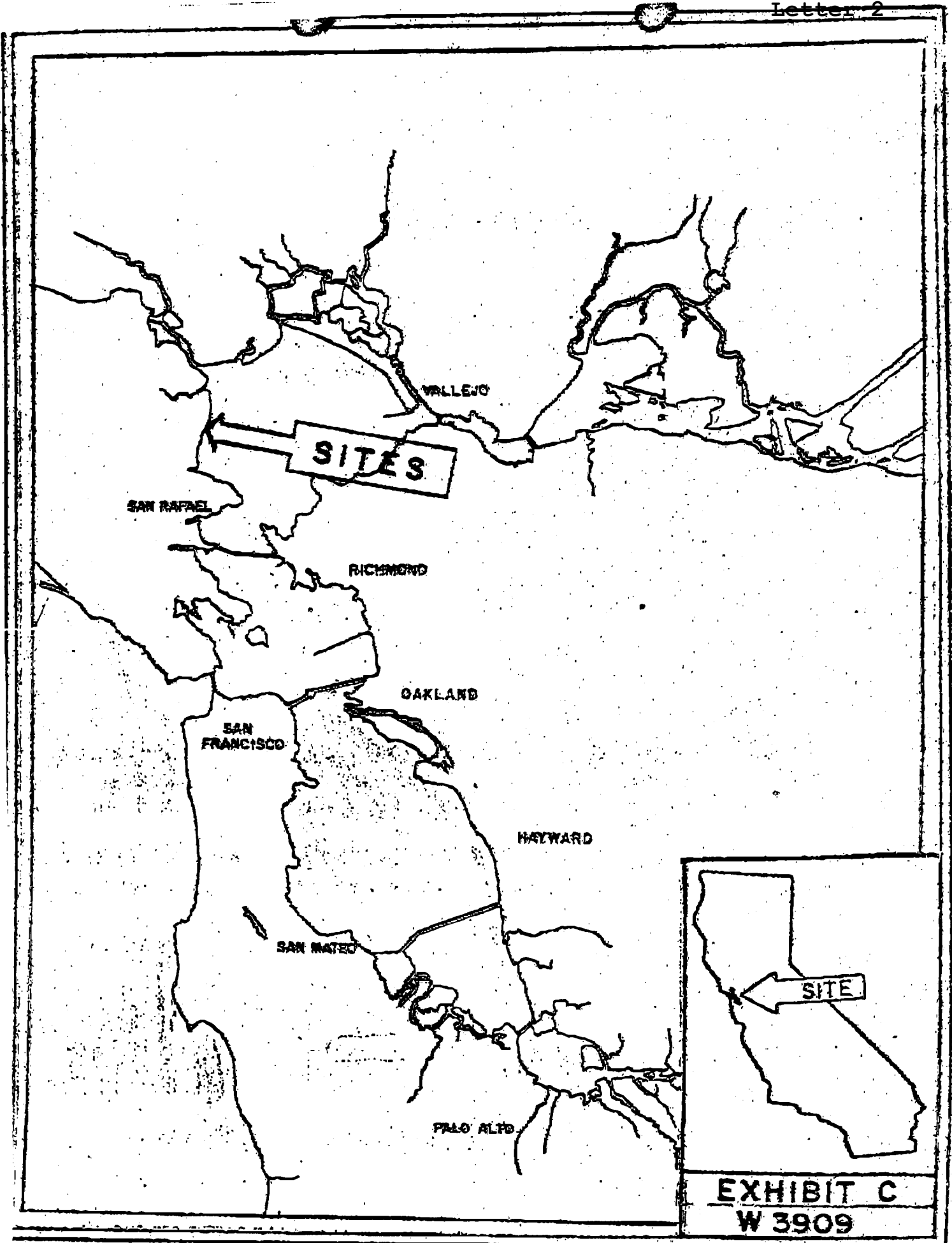
Letter 2



Letter 2



Letter 2







Notes of Decisions

1860

1860

Notes of Decisions

1860

1860

The statute of limitations does not begin to run against an action in the Court of Claims (now Claims Court) by a state to recover from the United States money received from the sale of swampy lands until six years after the expiration of the amount due the state, by the making of proof of the sale by the authorized agent of the state before the commissioners of the general land office. U.S. v. Louisiana, 123 U.S. 17, 123 U.S. 32, 31 L. Ed. 69. See, also, Louisiana v. U.S., 1887, 22 C. Cl. 284.

§ 982. Grant to States to aid in construction of levees and drains

To enable the several States (but not including the States of Kansas, Nebraska, and Nevada) to construct the necessary levees and drains, to reclaim the swampy and overflowed lands therein—the whole of the swampy and overflowed lands, made unfit thereby for cultivation, and remaining un reclaimed on or after the 28th day of September, A.D. 1850, are granted and appropriated to the several States respectively, in which said lands are situated: That said grant of swampy and overflowed lands, as to the States of California, Minnesota, and Oregon, is subject to the limitations, restrictions and conditions hereinafter named and specified in this chapter, and applicable to said three last-named States respectively.

(U.S. § 2472.)

Repealed Statute

U.S. § 2472, July 7, 1858, 22 Stat. 339, in which the following words were contained: "That said grant of swampy and overflowed lands, as to the States of California, Minnesota, and Oregon, is subject to the limitations, restrictions and conditions hereinafter named and specified in this chapter, and applicable to said three last-named States respectively."

to some other purpose, necessarily implying approval in advance of the State, and no approval in advance of the State is required in the case of a grant of swampy and overflowed lands to a State, subject to such conditions as the State may prescribe. U.S. v. Louisiana, 123 U.S. 17, 123 U.S. 32, 31 L. Ed. 69.

2. Provisions

The provisions of this act was the regulation of the lands included in it. See, also, v. Jackson, 1887, 37 N.W. 245, 69 Mich. 483, 12 Mich. 483.

Section 1482 of the act was the regulation of the lands included in it. See, also, v. Jackson, 1887, 37 N.W. 245, 69 Mich. 483, 12 Mich. 483.

1. GENERALLY

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H. Blair

San Francisco 1863





August 12, 2010

**For Delivery by Hand**

City of San Francisco  
Planning Commission  
Treasure Island Redevelopment Authority  
City Hall, Room 250  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

Re: Golden Gate Audubon – Oral Comments to Treasure Island Draft Environmental Impact Report

Planning Commissioners and TIDA Directors:

On behalf of Golden Gate Audubon and its 10,000 members and supporters, I am providing these initial comments to the Draft Environmental Impact Report for the Treasure Island redevelopment project. We appreciate this opportunity to provide input on this important project.

As an initial matter, we applaud recent steps by the City to address environmental problems, specifically Mayor Newsom's energy efficiency legislation and Supervisor Mirkarimi's proposal to ban plastic bags. However, a key element in the City's greening process remains absent: adequate consideration of and protection for native wildlife, plants, and their habitats. This has been most recently demonstrated in the decision by the Planning Commission to proceed with the construction of an unnecessary bridge over Yosemite Slough as part of the Candlestick Point-Hunter's Point redevelopment project.

Here, we have another large project with apparently unavoidable impacts on habitats and wildlife, especially native bird species and plant communities. In this process, we ask that the Redevelopment Authority and the Commission remember that native bird and plant populations in San Francisco continue to decline and that the need for jobs, housing, and new development ought to be balanced by preserving sustainable populations of our natural history. It is the responsibility of these bodies to do more than meet the meager requirements of CEQA; rather, it is your duty to ensure that San Francisco's natural history is preserved for future generations of Bay Area residents.

3.1

The EIR is accurate in stating that the habitat of Yerba Buena Island has been severely compromised by years of construction and occupancy on the island, and by a lack of stewardship for the area's natural values. This is why the Yerba Buena Island Habitat Management Plan must be completed before construction on the project begins, and why the Management Plan should be the guide for how the island's natural habitats are managed going forward.

On land, we are particularly concerned about the coastal riparian, coastal scrub, California buckeye, and coast live oak habitat types on the island. Each of these habitat types has been significantly reduced in the Bay Area, to the severe detriment of native bird populations and other

3.2

wildlife species. Offshore, the island's habitats include open water, rocky intertidal, and at least one eelgrass bed, all vital areas for birds and aquatic life.

3.3

While the DEIR does identify the major habitat types on the island, we are concerned about whether it adequately describes their values. We also note that the DEIR states that all eelgrass beds will be surveyed prior to construction. However, this should occur prior to completion of the EIR to ensure adequate avoidance and mitigation measures are developed.

3.4

The DEIR is inadequate insofar as it assesses impacts to birds resulting from collisions with new structures. It is estimated that more than 1 billion birds die in the United States each year due to impacts with man-made structures, such as the high rise structures proposed for the island. It is unclear why the DEIR states that this is a "less than significant impact" when, in fact, it should be considered both significant and unavoidable, especially when considered in cumulative effect with existing collision threats and proposed new structures (such as the redeveloped landscape at Hunter's Point and Candlestick Point. We applaud the inclusion of the requirement that measures, such as fritted glass, be part of any new building design, but are concerned that this measure will not be adequately implemented or enforced. The DEIR should be revised to address these impacts and to propose additional minimization and mitigation measures. Moreover, we note that the DEIR offers nothing substantive to offset the unavoidable impacts to rafting birds, who have already lost more than 40% of the open water habitat once provided by the Bay.

3.5

3.6

In addressing each Biological Impact, the DEIR states that impacts to these habitats are less than significant with mitigation, but given the City's recent track record of requiring insufficient mitigation measures, we are not convinced the mitigation measures proposed will be adequate to offset the impacts from the project.

3.7

As a final note, we echo the concerns raised by many others that the time to review the EIR is too short, particularly given the season. The Planning Department appears to have adopted the tactic favored by developers who wish to avoid close scrutiny of their projects by limiting the review of their DEIRs and setting hearings for inconvenient times and dates. We note that this EIR may come up for final certification during the holiday season as the Board of Supervisors is in flux. If this is indeed a tactic to circumvent potential opposition to the project, it is a very unfortunate development for the City and an attack on the transparent public process that is necessary for adequate CEQA compliance. At a minimum, we ask that the time to provide comments to the DEIR be extended by 30 days.

3.8

Thank you for your consideration of our comments.

Michael Lynes  
Conservation Director

From: "Jorge Garcia" <jorge.garcia@gmail.com>  
To: "william wycko" <william.wycko@sfgov.org>, "rick cooper" <rick.cooper@sfgov.org>  
Sent: Saturday, August 21, 2010 10:36:39 AM  
Subject: Treasure Island Environmental Review

Dear Mr. Wycko and Mr. Cooper SF Planning Department,

Greetings, and a brief note to formally submit my comments in reference to the Proposed Development at San Francisco Treasure Island/Yerba Buena as it relates to the EIR.

I have four areas of concern.

- 1) Project Density
- 2) Transportation Hurdles
- 3) Habitat Restoration
- 4) Air Quality levels

Project Density With the proposed increase in housing units (8,000 +) and the increased in businesses and hotels, etc. Will the increased Mass, have an effect in lowering the threshold of the island, as it relates to the pending Sea Level Rise?

4.1

Transit Oriented Development 1) Require the use of zero emission vehicles by government agencies and encourage their use by businesses and non profits on the island, preferred parking for visitors should be limited even more.

2) Develop alternative fuel infrastructure on Treasure Island to support the use of clean air vehicles, including the production of clean fuels such as bio-diesel and hydrogen and use of electric, bio-diesel, natural gas and hydrogen vehicles.

4.2

Habitat Restoration Further examination of the effects on plant and animal life while construction occurs in the various build out/up phases. Again the quality of the Air and Particular Contaminants in the air.

4.3

Air Quality Levels The proposed Environmental Impact Report clearly and distinctly states that the projects construction will violate new Bay Area Quality Management District thresholds for air pollution, with particulate matter smaller than 2.5. Microns. Further clarification as to why this will occur is needed and alternatives presented.

4.4

Impact AQ-4 page S-29

Thank you for your time and for accepting these comments and concerns into the record.

Jorge Garcia  
306 Fell Street  
San Francisco, CA 94102-5143





Christopher Pederson  
<chpederson@yahoo.com>  
08/22/2010 01:18 PM

To bill.wycko@sfgov.org  
cc rick.cooper@sfgov.org  
bcc

Subject Treasure Island & Yerba Buena Island Redevelopment DEIR  
(2007.0903E)

Dear Mr. Wycko:

Thank you for the opportunity to submit comments regarding the Treasure Island and Yerba Buena Island Redevelopment Plan draft EIR. I am submitting my comments by e-mail pursuant to California Public Resources Code section 21090(d)(3). In the future, you should let people know that they have the option of submitting comments on CEQA documents via e-mail.

5.1

I strongly support the basic concept of the Treasure Island Redevelopment Plan: creating a relatively high-density mixed-use community that has the critical mass necessary to support neighborhood services and high-quality transit. The Plan's provision for 1:1 residential parking, however, weakens the Plan's strategy for minimizing automobile use and is inconsistent with the approach the City has taken in other recently adopted neighborhood plans. (See, e.g., the Market & Octavia Better Neighborhoods Plan, the Eastern Neighborhoods plans, and downtown residential parking limits.)

5.2

The DEIR notes that members of the public had requested that the EIR consider a reduced-parking alternative, but summarily rejects it as an infeasible alternative. The DEIR's explanation for why the reduced-parking alternative is infeasible, however, is inadequate and internally inconsistent.

5.3

At page IV.E.139, the DEIR states that providing less than 1:1 parking would affect the project's livability, financeability, and marketability and would make the project economically infeasible. It goes on to point out that parking fees would pay a substantial portion of the funding for transit facilities and other aspects of the TDM Plan. It concludes by asserting that with "no" offstreet parking, the transit service, the TDM Plan, and the project as a whole would be infeasible.

5.4

There are multiple problems with these statements. First, they suggest that residential parking fees would help pay for transit service and other TDM programs. Page VII.76, however, states that only commercial parking fees would fund transit service and the TDM Plan. If the statement on page VII.76 is accurate, then the statement on page IV.E.139 should be corrected. In addition, if residential parking fees will not fund transit services, then a reduction in residential parking supply would not have a direct effect on transit funding.

Second, according to the DEIR, 30 percent of the housing units will be below market rate. The DEIR fails to explain how reducing residential parking for affordable units would harm their marketability or the financial viability of the project. To the contrary, by reducing construction expenses, reducing parking supply for affordable units would make those units less of a financial drag on the overall project.

Third, page IV.E.139 relies on a strawman argument when it states that with "no" offstreet parking, there would be insufficient funding for transit service and the TDM Plan. If page VII.75 is accurate, proponents of a reduced-parking alternative were not asking for a prohibition on all offstreet parking. They instead requested consideration of parking maximums similar to

5.5



maximums that the City has established in other neighborhoods where the City has adopted a strategy of minimizing automobile use. The EIR should evaluate how various reduced-parking scenarios would affect the TDM program. As pointed out previously in this letter, reduced residential parking would apparently not have any direct effect on revenues. Reduced supply of commercial parking conceivably might reduce revenue, or it might increase revenue by increasing the prices that could be charged for parking, or it might be a wash. It's impossible to tell given the lack of analysis in the DEIR.

5.5, cont'd

Fourth, given that the City has in recent years approved residential parking maximums of less than 1:1, it is surprising to see the statement in the DEIR that the City concluded that anything less than 1:1 residential parking would render the project entirely infeasible. Given the recent plans where the City reached very different conclusions, the EIR should at a minimum explain this seeming inconsistency.

5.6

Finally, page VII.76 of the DEIR asserts that reducing parking supply would result in less transit use, more automobile use, and greater impacts to air quality. These conclusions, however, rest on the unexplained and unexamined assumption that less parking means less revenue for the TDM program. Elsewhere (page IV.E.140), the DEIR points out that reduced parking supply will tend to increase transit ridership, so, using the DEIR's own assumptions, a reduced-parking alternative that is structured to minimize loss of revenue for the TDM Plan would actually reduce traffic and air quality impacts.

5.7

The DEIR fails to adequately explain its refusal to evaluate a reduced-parking alternative. There appear to be ways to reduce parking supply (e.g., for affordable units) that would be both environmentally beneficial and do no harm to the financial viability of the project. The final EIR should therefore include analysis of a reduced-parking alternative or provide a reasonable, accurate, and internally consistent explanation for its refusal to do so.

Thank you.

Christopher Pederson  
201 Laguna St. # 9  
San Francisco, CA 94102  
(No need to add my name to the mailing list.)



August 25, 2010

Bill Wycko, Environmental Review Officer  
 City and County of San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

Re: Notice of Availability of a Draft Environmental Impact Report - Treasure Island and Yerba Buena Island Redevelopment Project (Case No 2007.0903E)

Dear Mr. Wycko:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Treasure Island and Yerba Buena Island (TI/YBI) Redevelopment Project. EBMUD has the following comments.

## GENERAL

On September 16, 1965, EBMUD and the U.S. Navy entered into an agreement to provide an intermittent and interruptible water supply for the sole use of the Navy station at Treasure Island. EBMUD is not the primary supplier for the area and any use of water is for emergency use when full water service is not readily available from San Francisco Public Utilities Commission (SFPUC). Given the changes in land use that are envisioned in the project described in the Draft EIR, EBMUD requests that the 1965 agreement be updated. It is recommended that a new agreement be negotiated upon the termination of the San Francisco - Navy Cooperative agreement.

6.1

## WATER SUPPLY

1. On page II.11, under EXISTING INFRASTRUCTURE, first paragraph, revise the fourth sentence to read "*A water supply pipeline (used only in emergencies) extends under the east span of the Bay Bridge and is supplied by the East Bay Municipal Utilities Utility District (EBMUD).*"
2. On page II.52, under Proposed Water Supply, second paragraph, delete the word "supplemental" in the first and third sentences. The water supply from EBMUD to TI/YBI is strictly an emergency supply, and the only permissible use of EBMUD water other than emergency is the quantity of water needed to assure water quality in the pipeline. Any and all additional references throughout the Draft EIR utilizing "supplemental" in regard to EBMUD should also be deleted and replaced with emergency.

6.2

6.3

- |    |   |     |
|----|---|-----|
| 3. | On page II.52, under Proposed Water Supply, second paragraph, revise the second sentence to read: <i>“Capacity of the new 12-inch water main will be equivalent to the in place 12-inch main on the existing east span of the Bay Bridge.”</i>  | 6.4 |
| 4. | On page IV.K.52, first paragraph, the first sentence should be deleted; service from EBMUD should not be considered a redundant water source which provides a back-up water source. As stated above, EBMUD currently provides <b>emergency</b> water supply to TI/YBI through a special agreement with the Navy. EBMUD does not guarantee that it can provide a 1,800 gpm supply as stated in the same paragraph.   | 6.5 |
|    | Footnote 97 is not relevant and should be deleted as EBMUD is not the water purveyor for this project:<br><del>“<sup>97</sup>EBMUD currently provides 220 mgd of water to approximately 1.3 million people as well as industrial, commercial, and institutional customers in its 331-sqaure mile service area. The existing and proposed water demand for the Redevelopment Plan Project Area is small in relation to EBMUD’s total delivery.”</del>  | 6.6 |
| 5. | On page 283 of the Appendix I of the Acrobat document, Final Water Supply Assessment, 7.1.1 Existing Water Supply, second paragraph, first line, “back up supply” should be changed to <b>emergency supply</b> as is correctly used later in the same paragraph.  | 6.7 |
| 6. | On page 283 of the Appendix I of the Acrobat document, Final Water Supply Assessment, 7.1.1 Existing Water Supply, second paragraph, sixth sentence states “There is currently an agreement in place between EBMUD and the Navy that limits the average annual flow to 61 gallons per minute to maintain water quality in the line on the bridge.” This statement is not correct and should be deleted. The agreement between EBMUD and the Navy includes an estimated annual consumption for the purposes of providing a water supply for emergency purposes. Historically, the amount of flow used by the Navy to maintain water quality in the pipeline is significantly lower than the 61 gallons per minute. | 6.8 |

## WATER RECYCLING

The Draft EIR does not consider the feasibility of supplying recycled water to TI/YBI from the East Bay. As a feature of the new Bay Bridge east span reconstruction project, Cal Trans installed a 6-inch recycled water line on the bridge for potential future supply. This pipeline, along with the proximity of the East Bayshore Recycled Water Project at EBMUD’s Main Wastewater Treatment Plant may provide an opportunity to supply recycled water to the proposed project should institutional arrangements be made between EBMUD, SFPUC, and TI/YBI. EBMUD recommends that the City of San Francisco and Treasure Island Development Agency require developers of new or redevelopment projects within TI/YBI to coordinate and consult with EBMUD regarding the feasibility of providing recycled water for appropriate non-potable purposes such as	6.9
---	-----

Bill Wycko, Environmental Review Officer  
August 25, 2010  
Page 3

landscape irrigation, commercial applications, industrial processes, and other applications  
as identified in the Draft EIR.

↑ 6.9,  
cont'd

If you have any questions concerning this response, please contact David J. Rehnstrom,  
Senior Civil Engineer, Water Service Planning at (510) 287-1365.

Sincerely,



William R. Kirkpatrick  
Manager of Water Distribution Planning

WRK:AMW:sb  
sb10\_165.doc



**RON MIGUEL**

**President, San Francisco Planning Commission**  
 600 De Haro St., San Francisco, CA 94107  
 C-415-601-0708 F-415-641-8621 E-rm@well.com

RECEIVED

 AUG 11 2010  
 CITY & COUNTY OF S.F.  
 PLANNING DEPARTMENT  
 MEA

27 August 2010

Environmental Review Officer

San Francisco Planning Department

1650 Mission St., Suite 400

San Francisco, CA 94103

RE: Treasure Island / Yerba Buena Island Redevelopment Project DEIR – Case No. 2007.0903E

The following comments on the TI/YBI DEIR are submitted as an extension of my remarks during the 8/12/10 Public Hearing. They are primarily based on the *Project Objectives* [II.4, 5] – specifically those noted under *Land Use, Housing, Sustainability* and *Transportation*.

I am both concerned and confused, because the project assumptions, particularly those regarding parking, traffic, and auto use, depict a backward mindset modeled on 1950-1990 parameters and fail to properly address the second Land Use Objective, “*Provide a model of 21<sup>st</sup> century sustainable urban development...*” [II.4]; nor do they “*Demonstrate leadership in sustainable design and provide new benchmarks for sustainable development practices...*” [II.5].

7.1

Simple application of population to housing units (either present or 2030 ABAG projected) would place the islands’ residents at around 18,500. In addition there would be the normal daytime influx of workers, tourists and recreational users, less those residents who go off-island. A usable comparison statistic might be the 2030 San Francisco Supervisorial District average of about 72,700 residents. The TI/YBI plan should consider what amount of retail, office, services, etc. is commensurate with a mere quarter of such a District. Obviously transit, both inter- and intra-island creates a unique situation due to the geography – and it must also account for the anticipated recreational and tourist use.

7.2

Unfortunately, the concept as articulated in the DEIR, presumably by the developer, is not that of an additional San Francisco neighborhood as was originally envisioned, promulgated, and sold to San Francisco citizens in 1994 when the Citizen’s Reuse Committee (CRC) was formed, or as noted in early discussions of the TI Citizens Advisory Board, but a re-conceived vision of a stand-alone community - a major tourist attraction assessable by automobile. Unaccountably, there is specific reference to *Regional-serving retail uses which could include specialty foods, specialty gift or crafts, and entertainment uses.*”; as well as “*...regional-serving retail uses.*” [II.33]. These proposals demand a totally different transportation system than would a standard San Francisco residential neighborhood with a mix of Neighborhood Serving Retail (NCD) facilities which might include some entertainment and recreational opportunities. The DEIR thus has a very basic flaw – it is confused as to what is actually meant to be analyzed. One must

7.3

wonder if the vision is that of San Francisco citizens or the developer. No logic is given for so small a community, 18,500 residents, to become "regional-serving". It is as if the intent of the developer is to emulate the former World's Fair in modern terms.

The provision of 1:1 residential parking is completely in opposition to San Francisco's currently approved areas plans (Market-Octavia, etc.), and no reasoning is supplied. Nor is there logical explanation for 1,035 spaces of on-street parking being projected [II.50]. These provisions are totally unsupportable in view of the stated *Walking and Biking Objectives* [II.45]. No explanation for the stated amount of hotel parking – 400 spaces for 500 hotel rooms is given – the amount is ludicrous and totally unsupportable. An enhanced shuttle system [II.39] should provide for all visitor/tourist and recreational uses – including teams arriving from off-island by transit; tourist and museum visitors, as well as island residents. The TMD measures noted under *Encouraging Use of Transit & Other Modes, and Discouraging Automobile Use* [II.51] are useful, however they must be applied to a much lower parking allowance following the principles articulated by the *Transportation Demand Management Plan* [IV.E.45-47], i.e. "...designed to reduce use of single-occupant vehicles and to increase the use of rideshare, transit, bicycle, and walk modes for trips to and from, as well as within the Proposed Project." A maximum ratio of .5:1 residential parking; wide sidewalks in all areas; bike lanes with the possibility of bike-share; car-share; and enhanced shuttle service would be far more in keeping with the stated objectives. Analysis must proceed directly from Objectives!

In addition, retention and preservation of the Base Chapel must be thoroughly explored. This should be done in light of its historic standing: serving the Navy, active duty, reserve and retired – as a site for regular services in addition to thousands of weddings and funerals. As a retired florist I personally serviced innumerable weddings and funerals in the Chapel during the later half of the 1900's – there is a long tradition here. Certainly, if the concept is one of 'community' for 18,500 people, providing a place of worship should be equal to providing an educational institution.

The *Project Variants* [VI.1-54] are relatively well stated – however they must be considered conceptual and are naturally subject to that methodology and innovation which is concurrent with actual development. Technology will undoubtedly change by the time implementation moves forward, and a great deal of leeway must be built into the basic infrastructure to allow for at least 50 years of environmental progress.

Of the *Alternatives* [VII.1-78], the only one deserving any consideration would be the *Reduced Development Alternative* [VII.3]. However even this scenario is subject to the same comments above regarding the over-emphasis of auto use.

Sincerely,



Ron Miguel

**Comments from the  
Treasure Island/Yerba Buena Island Citizens' Advisory Board  
on the  
Treasure Island/Yerba Buena Island Redevelopment Project  
Draft Environmental Impact Report  
DRAFT EIR PUBLICATION DATE: JULY 12, 2010  
STATE CLEARINGHOUSE NO. 2008012105**

1. The massing reflected in Volume I, Pg. IV.B.2, in **no way** reflects the massing that has been presented to the CAB over the past 10 years, far exceeding previous programmatic parameters that have been presented to us. To say that the CAB is disappointed by these massing images is an understatement. To be brutally honest, the CAB was rather "horrified" by the images in the DEIR. We would like it clarified to reflect more clearly the images that the CAB has previously seen. (Although we fully understand that this massing picture is used in all DEIRs, it is no less disturbing to see buildings pictured in this massing simulation manner.) 8.1
2. Pg. S.53 (Summary of Project Alternatives), Section C (*No Ferry Service Alternative*). The CAB adamantly disagrees with this as an "alternative", and we cannot stress strongly enough that neither the city nor TIDA consider a "no ferry" option. We feel the DEIR should be changed with all *No Ferry Alternative* references removed. 8.2
3. Throughout the DEIR, there is reference to diesel ferries. With our constant goal of this becoming a *sustainable* and *green* development, we feel and recommend very strongly that all parties involved explore alternate types of ferries that do not rely solely on diesel fuel and that all parties strongly consider and include wind and/or solar-powered ferries. These alternate ferry types are currently under development and should be ready for use by the time the Island redevelopment is underway. (For more information on alternative power, please reference the August 19, 2010, article in the New York Times, titled Beyond Fossil Fuels: *Finding New Ways to Fill the Tank*, by Matthew L. Wald, which I have attached to my email.) 8.3
4. Pg. S.39, Impact BI-4 of the DEIR posits the slowing down and reducing number of ferries due to the water fowl around the island in December and January. While we understand and concur that slowing ferries may be necessary, we feel a reduction in the number of ferries is unreasonable and should be removed. It is our opinion that a reduction in ferry service would not be in keeping with a transit first and alternative modes of transportation policy that have been a major plan element for this community throughout our years of planning on this project. 8.4
5. Pg. S.39, Impact BI-4, *Educating Residents and Occupants*: This statement says ... *permit applicant agrees to provide educational materials to tenants and occupants* ... and ... *closing window coverings at night*. The CAB feels that artificial light can be minimized (both outside and reflective) by **design** rather than by **training**, and we question that training would be either a viable or effective mitigation tool. 8.5
6. There are no hours of construction reflected in the DEIR. The CAB urges the DEIR reflect that construction's operation hours to be clearly defined – and limited – to weekday "normal" working hours (8:00a – 5:00p), **and** that there be will be no construction occurring on weekends. This would include elements of construction such as pile driving, etc. 8.6
7. The CAB strongly encourages the inclusion of the study of wind technology as a sustainable energy source, in addition to solar and other alternatives, again remembering that throughout all the years of planning, the goal has been for the creation of a **green, sustainable** neighborhood. Much of the DEIR does not appear to reflect that goal. 8.7
8. Concurring with TIDA Director Elberling, who made his feelings clear at the joint TIDA/Planning Commission meeting on August 12, 2010, the CAB considers the Navy Chapel an historic resource worthy of preservation. The DEIR doesn't address this resource and needs to be amended. The CAB strongly supports a preservation alternative which maintains the Chapel and keeps it on the island. 8.8



## Finding New Ways to Fill the Tank

### Beyond Fossil Fuels

Published: August 18, 2010

CAMBRIDGE, Mass. — Most research on renewable energy has focused on replacing the electricity that now comes from burning coal and natural gas. But the spill in the Gulf of Mexico, the reliance on Middle East imports and the threat of [global warming](#) are reminders that [oil](#) is also a pressing worry. A lot of problems could be solved with a renewable replacement for oil-based gasoline and diesel in the fuel tank — either a new liquid fuel or a much better battery.

A graduate student at the Massachusetts Institute of Technology holds a battery prototype.

Yet, success in this field is so hard to reliably predict that research has been limited, and even venture capitalists tread lightly. Now the federal government is plunging in, in what the energy secretary, [Steven Chu](#), calls the hunt for miracles.

The work is part of the mission of the new Advanced Research Projects Agency - Energy, which is intended to finance high-risk, high-reward projects. It can be compared to the [Defense Advanced Research Projects Agency](#), part of the Pentagon, which spread seed money for projects and incubated a variety of useful technologies, including the Internet.

The goal of this agency, whose budget is \$400 million for two years, is to realize profound results — such as tens of millions of motor vehicles that would run 300 miles a day on electricity from clean sources or on liquid fuels from trees and garbage.

One miracle would be a better battery. A pound of gasoline holds about 35 times more energy than a pound of lead-acid batteries and about six times more than [lithium](#)-ion batteries. Cars must carry their energy and expend energy to carry it, so the less weight per unit of energy, the better.

David Danielson, an Energy Department official, oversees a program to invest in start-up companies with new approaches to batteries, which is a new strategy; in the early 1990s, the department decided to concentrate all its efforts in lithium-ion research and gave up on other chemistries.

One new technology would allow every car, at modest extra cost, to shut down automatically at each stop sign or red light; when the driver tapped the accelerator, the battery would instantly get it going again. (Hybrids like the Prius do that, but at a substantial cost premium.)

A team at an infant company is using tiny carbon structures called nanotubes to store electricity. The goal is to create something the size of a flashlight battery, holding only about 30 percent as much energy, but able to charge or discharge in two seconds, almost forever.

The technology could form part of the battery pack for a car, cheaply delivering the energy for a jackrabbit start, without damaging conventional chemical batteries, which can store vastly more energy but can only accept or deliver it slowly.

It could also provide a cellphone battery that would charge in five minutes. That kind of battery is called a capacitor.

Joel E. Schindall, a professor at the [Massachusetts Institute of Technology](#) and a scientist on the project, pointed out that a capacitor was the original battery. [Benjamin Franklin](#) built a set of glass bottles that stored electricity and released it all at once; he called it a battery because, like guns, the bottles fired simultaneously.

But the nanotubes are modern. The walls of the tubes are about 12 atoms thick, and they grow, like leaves of grass, with just enough space between them to provide docking stations for charged particles. So a lot of charged particles can fit into a small space, with very light structures. He compares the device to a book shelf with very thin shelves placed exactly far enough apart to accommodate the books. Because the connection is physical, not chemical, the charged particles can attach and detach almost instantly. The result is a small, light, powerful package.

The project started out with a Ph.D candidate, Riccardo Signorelli, using tweezers to put tiny squares of aluminum into a vacuum chamber and then pumping in a hydrocarbon gas. When heated, the hydrogen burns away and the carbon atoms arrange themselves into tubes. The breakthrough was doing that on a surface that would conduct electricity.

Dr. Signorelli, now with his Ph.D, is chief executive of FastCap Systems, which, with government help, is converting an industrial loft into a factory.

In another M.I.T. lab, Gerbrand Ceder is developing a “materials genome,” using computers to predict the qualities of materials that could be used in batteries, and then fabricating the ones that the computer finds promising. A materials genome would speed the distribution of knowledge about materials and make development of new materials faster, he said, an idea that impresses officials at the Energy Department.

ARPA-E invested \$3.2 million in a battery developed with a materials genome in a start-up company, run by Professor Ceder, that is exploring magnesium. In batteries today, whether they are lithium-ion or old-fashioned lead-acid, an atom shuttles between the positive and negative terminal, carrying a single electron, as the battery charges and discharges. But a magnesium atom would carry two electrons, so a battery storing a given amount of energy could be nearly halved in size and weight.

Another approach being financed by ARPA-E is to convert the tremendous amount of energy stored by plants and trees to a car fuel.

Scientists are tantalized by plants and trees because they store far more energy than is consumed by cars, trucks, trains and planes, and they do it by taking carbon out of the atmosphere. But they do not give that energy back in an easy-to-use form, at least not without taking millions of years to turn into oil. Instead, they make energy-bearing sugars in a form called cellulose, which forms the sinew or skeleton of the plant.

Cellulose is hard to break down. “Cotton is pure cellulose,” said Eric Toone, who is Mr. Danielson’s counterpart for [biofuels](#) at the Energy Department. “When you take your cotton shirt and put it in a washing machine, it still comes out as a cotton shirt.”

Engineers have tried using steam, acids and enzymes to break cellulose into useful sugars. The enzymes are usually made by gene-modified bacteria or fungi and resemble the saliva of termites, which is notoriously good at dissolving cellulose. So far, none are commercial, but with Energy Department help, some researchers are trying new methods.

Take Michael Raab, whose start-up, Agrivida, in Medford, Mass., is tinkering with the genes of grass and sorghum to develop plants that make the enzymes internally and digest their own cellulose on cue, leaving behind a murky brown concoction of sugars that can be converted into gasoline, diesel or jet fuel.

Deep inside their cells, his plants produce a smooth, nonreactive molecule, but when the plant is exposed to heat and a change in acidity, the molecule breaks open, like a beer bottle smashed against the bar. The jagged edges are enzymes. They rip apart cell walls and leave fragments that are useful sugars.

Sugars — both the common kind that comes in paper packets for coffee and some more exotic types — can be converted by yeast into ethanol, a technology known since ancient times. Or they can be fed to gene-altered bacteria that will excrete diesel or gasoline components. Or they can be converted chemically, with catalysts.

All these steps, including the tricky one of recovering sugar from cellulose, can be done already, but not cheaply enough to produce tens of billions of gallons a year.

The Energy Department is putting \$4.6 million into Agrivida, and similar sums into other start-up firms, many of them intent on finding gasoline substitutes. It is, said one department official, “real science fiction stuff,” ideas promising enough to attract a few million dollars for research but not quite promising enough to draw the private capital required for small-scale production.

RECEIVED

August 30, 2010

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENTGOLDEN GATE BRIDGE  
HIGHWAY & TRANSPORTATION DISTRICT

Mr. Bill Wycko, Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

**Re: Draft Environmental Impact Report for the Treasure Island and Yerba Buena Island  
 Redevelopment Project**

Dear Mr. Wycko:

Golden Gate Bridge, Highway and Transportation District (District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island Redevelopment Project (Case No. 2007.0903E) and offers the following comments:

- The District requests that Page IV.E.19 be modified to state that Golden Gate Transit (GGT) Routes 2, 38, 56, 58, 74, and 97 also operate on surface streets in the vicinity of the Transbay Terminal. Routes 92 and 93 serve San Francisco but do not operate within the study area. While the route listing is correct at the time of publication of the DEIR, please note that Routes 26 and 73 will be discontinued effective September 12.

9.1
- Impacts TR-6, TR-7, TR-44, and TR-45 indicate that significant and unavoidable queuing will occur on freeway approaches to the Bay Bridge, at the Bay Bridge Toll Plaza (TR-6 and TR-44) and on San Francisco city streets (TR-7 and TR-45). It is unclear if the queuing impacts will affect bus operations to the Bay Bridge. Although GGT does not operate in revenue service across this bridge, it is used by GGT buses operating in non-revenue service between the District's main bus garage in San Rafael and San Francisco. Excess congestion on the approaches to the Bay Bridge, especially in the vicinity of the entrance to the bus lane at the Toll Plaza, can adversely impact GGT operations and ultimately increase operating costs.

9.2
- Impacts TR-32 (existing conditions plus project) and TR-62 (cumulative conditions plus project) indicate that the proposed project will have a less-than-significant impact on GGT operations even though buses travel through intersections that will see degradation in traffic operations. The District agrees with this assessment because GGT buses operate in lanes that appear to be mostly unaffected by project-generated traffic.

9.3
- Impact TR-36 indicates that the proposed project will have a less-than-significant impact to pedestrian access to the Ferry Building. Golden Gate Ferry operates two ferry lines originating at this location, and it is the District appreciates that the impact remains less than significant if ferry service to Treasure Island is operated at 15- or 50-minute headways.

Thank you for providing the District with the opportunity to submit comments on the Treasure Island/Yerba Buena DEIR. You may contact David Davenport, Associate Planner, at 415.257.4546 if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ron Downing".

Ron Downing  
 Director of Planning

c: David Davenport  
 Maurice Palumbo



U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
Shore Infrastructure  
Logistics Center

Product Line Division  
Portfolio Management Branch  
1301 Clay Street, Suite 700N  
Oakland, CA 94612-5203  
Staff Symbol: (pmb/eb)  
Phone: (510) 637-5542  
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Email: erik.s.balsley@uscg.mil

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SEP 03 2010

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Mr. Wycko:

Thank you for inviting the U. S. Coast Guard (USCG) to review the Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island (YBI) Redevelopment Project. The USCG presence on YBI dates to 1872, when the Lighthouse Board constructed the first lighthouse on the Island. Over time the USCG has constructed many facilities of various types on 47.9 acres of USCG-controlled YBI land, immediately adjacent to the proposed development. These USCG facilities are essential to supporting the Maritime Homeland Security (MHLS) mission of the United States, and will be negatively impacted by the Redevelopment Project.

10.1

In particular the Vessel Traffic Service (VTS) maintains facilities on YBI that provide direct radar, radio, and visual contact with all vessels in the major shipping channels to the Ports of Oakland and Richmond. These facilities may be negatively impacted by the proposed project. Buildings over 300 feet in height on Treasure Island may eliminate the direct contact currently provided by the existing VTS facilities, creating an unacceptable maritime risk to both the vessels and the public without mitigation. The operation of the VTS equipment may also create electronic and radio interference, which may negatively impact Treasure Island residents on higher floors of the proposed buildings. To resolve these issues, the USCG is prepared to work with the developers to identify appropriate locations on Treasure Island for additional USCG facilities to maintain direct radio and radar contact with vessels in the navigable waters of the Bay. Any new facilities required by the USCG would be owned by the USCG, though their construction costs should be paid for by the developer.

Personnel and equipment assigned to support USCG operations based at YBI also require unfettered, uninterrupted (24/7/365) access to and egress from USCG facilities on YBI. The increase in traffic volumes, construction equipment, and changes of traffic patterns during construction could negatively impact the USCG's mission response posture. Based on the USCG's experience in accommodating the construction of the San Francisco Oakland Bay Bridge Eastern Span Replacement Project, the USCG strongly advocates that the City designate a liaison with whom the USCG can work to ensure that access to USCG facilities is not compromised during construction.

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Once the project is completed, the USCG believes the increase in traffic volumes and the proposed congestion pricing described in the DEIR may continue to impinge on USCG access to our facilities. Traffic may restrict the ability of our personnel to enter facilities and congestion pricing will place a cost on access to USCG facilities. It seems the traffic study did not explicitly consider USCG operations in its evaluation, or study USCG operations in depth. The full impacts to the USCG from the project cannot be clearly discerned or mitigated. The project liaison proposed for project construction should therefore be maintained after project completion to ensure that no access to USCG facilities is compromised.

10.3

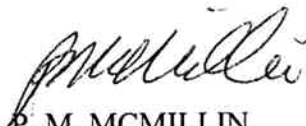
Additionally, the discussion of utilities does not appear to consider USCG demands for water, electricity, and telecommunication services that reflect our actual YBI operations. Future USCG demands for these services cannot be accurately estimated based on current use patterns reflected in the DEIR. As the USCG continues to modernize and improve its equipment and operations, the utilities requirements at this site may significantly change. As the utility improvements mentioned in the DEIR are constructed, the USCG should be consulted to ensure that USCG ties to the utility systems continue to provide uninterrupted and adequate service to support USCG operations on YBI.

10.4

As a major stakeholder in this project, the USCG remains prepared to work with your developers to ensure our operations can be accommodated with minimal impacts to the project. The Redevelopment Project is a worthwhile effort to shape future development in San Francisco, California. The USCG will work with you in a cooperative and informed manner to ensure it is completed in a timely and successful manner.

A detailed listing of our specific concerns is enclosed. Please contact Mr. Erik Balsley, my lead on this project, at (510) 637-5542, if you have questions.

Sincerely,



P. M. MCMILLIN  
Captain, U. S. Coast Guard  
Chief, Product Line Division  
By direction of the Commander

Enclosure: (1) USCG Consolidated Comments

Enclosure (1)

# USCG CONSOLIDATED COMMENTS

## Treasure Island / Yerba Buena Island Redevelopment

### DRAFT ENVIRONMENTAL IMPACT REPORT, July 12, 2010

Comment	Section	Page	Comment
1	Summary	S.1	<p>Please reformat first paragraph to make it clear you are describing the former NSTI in the discussion of historic resources. Right now reference is to the Island and there are historic resources on property owned by the US Coast Guard (USCG). These are:</p> <ul style="list-style-type: none"> <li>• Quarters A - Listed on the Historic Register in 1980.</li> <li>• Quarters B and C - Determined to be eligible for listing on the Historic Register in 1997.</li> <li>• Quarters 8 and 9 - Potentially eligible for listing on Historic Register. (This determination was made by Navy).</li> </ul> <p>Please place a paragraph before the sentence starting, "The Islands also include..." and then reference USCG historical buildings. Or just make it clear you are focusing solely on the NSTI side of YBI for the discussion of historical resources.</p>
2	Summary	S.7	Need to list "Impact to CG operations on YBI" as a stand-alone summary in this table.
3	II	II.1	Add a sentence such as, "The areas of the Islands occupied by these entities are not included in this document" – make it clear the USCG Sector, Station, and residential facilities are not in this project.
4	II	II.10	Please include the USCG in the first sentence in the Yerba Buena Island section as follows: "Yerba Buena Island is a natural island that has been used by private parties and by the U.S. Army, Navy and Coast Guard since the 1840s."
5	II	II.17	The land use map shows that no high intensity development will occur on the project's boundary with USCG property. This is desirable to ensure residential and mixed use redevelopment of the historic USN Officers Quarters is buffered from USCG operations.
6	IV	IV.A.6	The lighthouse was built by the Lighthouse Board which later became the Lighthouse Service and finally the US Coast Guard. The Army did not build the lighthouse. Please refer to page II.11 of this DEIR for The Cultural Resources Survey for Group San Francisco can be provided for reference.
7	IV	IV.A.10	Same as comment 4 above.
8	IV	IV.D.6	There is no mention of the USCG's history on the Island during the Army period. Please include at a minimum discussion of the 1872 lighthouse.
9	IV	IV.D.6	The Lighthouse Board, not the US Army, built the lighthouse keeper's residence.

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## Enclosure (1)

Comment	Section	Page	Comment	
10	IV	IV.D.27	The US Coast Guard should be listed in the following sentence, "Yerba Buena Island is a natural island that has been used by private parties and by the Army and Navy since the 1840s" The USCG's presence on the Island dates back to 1872. We have a long history on YBI which should be acknowledged.	10.10
11	IV	IV.D.28	Lighthouse was built by the Lighthouse Board after receiving a permit for the construction by the War Department. Please see comment 9 and rectify this ownership issue <b>throughout</b> the document.	10.11
12	IV	IV.D.30	The USCG Historic Districts should probably be mentioned in this portion of the document. Although not in the project area, the boundaries of at least one run to Hillcrest Road and may be impacted by any development of a bike path. Again these sites are not within the Project Area but adjacent to it.	10.12
13	IV	IV.D.61	Although the USCG's historic districts are outside the project boundary – any additional work down to City of SF roads may require incursion onto USCG property. In that case, the project may have some impacts on adjacent USCG properties – so a brief mention of these impacts might be warranted in this document. It is believed that any impact to these resources will be slight and wholly able to be mitigated.	
14	IV	IV.E.23	Did the temporary Transbay Terminal just open recently? If so, please change the reference of a "spring 2010" opening to "summer 2010"	10.13
15	IV	IV.E.31	Figure IV.E.8 does not classify nor improve Northgate Rd in the Proposed Street System, yet its function needs to be reflected and studied as a "major artery" in the TIR definition as it provides sole USCG access to TI and the SFOBB for majority of our operations. Because our access is not improved, this DEIR should document how the project will impact USCG existing access.	10.14
16	IV	IV.E.39	Southgate Rd at Hillcrest Rd bicycle enhancement detail states flow through uncontrolled Hillcrest Southgate intersection and direct entry onto the SFOBB bike landing area. An opening into the bike landing area at north side of this intersection was requested but eliminated due to safety concerns. The project as designed has significant impact to USCG QTRS 9 driveway access as it will remove the existing Hillside Rd stop sign controlling vehicle and bike right turn movement onto Southgate Rd. Thus safe use of the driveway can no longer be assured as cyclists make in essence a blind turn into traffic movements in/out of the driveway. USCG personnel may collide with cyclists.	
17	IV	IV.E.40	This relates to the comment above. On Figure IV.E.12 please address the impacts of the Southgate & Hillcrest Rd configuration to CG QTRS 9 driveway access without mitigation. As shown, either this or the ramp project will remove existing Hillside Rd stop sign controlling vehicle and bike right turn movement onto Southgate Rd. We have noted through previous discussions that possible acceptable mitigation measures include:	

## Enclosure (1)

Comment	Section	Page	Comment	
			<ul style="list-style-type: none"> <li>• A traffic control trigger activated by exiting driveway vehicles.</li> <li>• A relocation of the driveway.</li> <li>• New stop signs and signage to alert drivers on Southgate to the presence of the bike path in the intersection and cyclists to the driveway when making the right turn.</li> </ul> <p>We hope to minimize cyclist and traffic conflicts at the intersection and at the driveway.</p>	10.14, cont'd
18	IV	IV.E.45	Would USCG personnel be subject to any "congestion fees" to be imposed by TITMA? Please clarify. Based on previous discussions the USCG believes it will not be subject to these fees and would like the exclusion to be mentioned in the DEIR text.	10.15
19	IV	IV.E.81	<p>Thank you for this thorough discussion of ramp traffic impacts at the Hillcrest/Southgate intersection. While the USCG will experience a shorter ramp queueing distance as personnel will not be required to circle the Island to access the eastbound on-ramps, there are still impacts. These should be elevated to an actual "TR" impact section in the document – such as <b>Impact TR-5</b> while the remaining impacts are renumbered. Access to the eastbound on-ramps and westbound off-ramps are of vital importance as USCG requires access to its units in the East Bay.</p> <p>While most have impacts been addressed, there are residual concerns about those in the Hillcrest queue allowing USCG vehicles to make a right hand turn from Southgate onto the ramps. Also we have concerns about truck access to Macalla Road down to the CG facilities as at least twice a week deliveries are made to Sector San Francisco Buildings on the east side of YBI. Many USCG vehicles do not have sirens or signals. The USCG would recommend that ongoing monitoring of the intersection by USCG and SFMTA be included as a recommendation to ensure that dialogue commences early and often regarding traffic impacts to USCG operations.</p>	10.16
20	IV	IV.E.81	<p>The sentence: "Coast Guard vehicles are equipped with lights and sirens, and during emergency conditions, would be able to bypass queued vehicles." is factually incorrect. The assumption that <u>all</u> USCG vehicles are equipped with lights and sirens is incorrect and reliance on this strategy to mitigate traffic impacts is invalid and not acceptable to the USCG.</p> <p>The longest potential queue the Coast Guard vehicles would have to face would be about one-tenth of a mile, based on the distance between access points on the main YBI circulation route and the Bay Bridge. The TIS did not quantify any CG facility trip generators in its data, nor study all potential CG delays and queues. The primary USCG access concerns are the Macalla/Southgate/Northgateroad intersection which was not studied. USCG trip generators <b>MUST</b> be included in the assessment of transportation impacts.</p>	10.17
21	IV	IV.E.104	"At the intersection of Hillcrest Road at South Gate Road, bicycle	10.18

## Enclosure (1)

Comment	Section	Page	Comment	
			treatments would allow for an uncontrolled crossing of South Gate Road for bicyclists destined to the Bay Bridge bicycle path.” – The USCG has concerns with this proposal in light of USCG personnel turning right from Southgate onto the eastbound on-ramp. Signage should be provided to both drivers on Southgate and to cyclists on Hillcrest to proceed with caution through this intersection.	10.18, cont'd
22	IV	IV.F.21	Impact NO-3 recognizes noise impacts to the USCG from traffic. Is increased insulation of USCG residential structures, or other interior sound dampening viable to mitigate these impacts? Is there going to be long term monitoring of noise impacts to CG property?	10.19
23	IV	IV.F.31	Impact NO-8 should mention the cumulative sound impacts on USCG residential properties along Hillcrest Road.	
24	IV	IV.G.31	Although the USCG properties are not in the Study Area, air quality impacts have been mentioned earlier in the Air Quality section of the DEIR – due to increased traffic on Hillcrest. Are the USCG residences covered in the Yerba Buena Island Receptors listed on this page?	10.20
25	IV	IV.J.8	<i>Bay Plan Map No. 4 Policy 23</i> that encourages “redevelopment of the portion of Yerba Buena Island south of the San Francisco-Oakland Bay Bridge (“Bay Bridge”) for recreational use when it is no longer owned or controlled by the U.S. Coast Guard,” is mentioned. To be clear the USCG does not have any current or long-term plan to vacate its interests in this area of YBI.	10.21
26	IV	IV.K.9	The USCG wastewater is currently processed by the existing facility on Treasure Island. The USCG’s wastewater processing needs should be discussed as they are for the Job Corps on this page. If we are included on the eastern side of YBI, please make this state so in the text. The USCG will work with the project to provide the information necessary for system design.	10.22
27	IV	IV.K.47	Please make reference to the fact that the USCG and Job Corps obtain their water from the SFPUC in the discussion of the current water conveyance and distribution system.	10.23
28	IV	IV.K.52	Please include a paragraph similar to the one provided for the Job Corps site concerning water service for the USCG. While our site is technically outside the project area, the system supplying our site is within the project area.	
29	IV	IV.K.57	On table IV.K.3 the USCG water demands were provided by SFPUC (via the water supply report, Appendix I, page 4-3). However does this figure consider future USCG facility operations on YBI? The USCG must maintain several vessels and runs a buoy maintenance facilities whose water needs are reflected in current SFPUC billings. However, the USCG should verify this figure and can provide an estimate of future water use based on planned operations and planned water conservation measures. A footnote in an appendix referencing a person working at the SFPUC is probably insufficient means by which to project USCG water demand. We can work with the City and developers to more accurately determine USCG water demands.	
30	IV	IV.K.71	The USCG obtains its power via the submarine cable from Oakland.	10.24

## Enclosure (1)

Comment	Section	Page	Comment	
			The text should mention the USCG tie-in point into this system in the "Distribution on the Islands" text on this page.	10.24, cont'd
31	IV	IV.K.72	There is no mention of tie-in points to the natural gas and telecommunications infrastructure by the USCG. The USCG obtains these utilities via the same connections to the mainland so that any improvements will impact the USCG.	10.25
32	IV	IV.K.78	Utility service to the job corps is addressed at the top of this page. A similar discussion on electrical distribution to the USCG should be provided as we rely on the system up to our property line. Additionally the USCG can assist the developer as the project is completed by providing more accurate estimates of USCG energy demands as we continue to modernize our vessels. As such, current electrical demands by the USCG cannot be assumed to remain at their current levels. Thus we can assist in developing	10.26
33	IV	IV.K.80	In the discussion of telecommunications no mention is made of the USCG. As the USCG continues to update its telecommunication and computer systems additional capacity may be required. We are in the process on constructing a new harbor command center and wonder if it has been considered by this DEIR. As we obtain our telecommunication services through the same supply lines from the mainland as the project does, we should be assured that all improvements up to the USCG property line and tie-in points can accommodate USCG needs.	10.27
34	Appendix C	2	The text refers to the size of USCG facilities as 47 acres. The main DEIR text often says the USCG owns 39 acres. The Appendix is correct. The USCG owns 47.9 acres of land on YBI – please correct the acreage number throughout the document and in all appendices. Please see comment 36 for further detail...	10.28
35	General	General	Please note that it is not just a USCG Station located on the Island. It is a combined Station and Sector Facility. The Station is under the direction of the Sector Command indicating that the Sector is at a higher level in the USCG hierarchy. The Sector's Area of Responsibility (AoR) includes most of Northern California from the Oregon border to just south of Monterey Bay. Therefore the facility near the water's edge in total <b>MUST</b> be referred to Sector San Francisco (although the Station is collocated with the Sector).	10.29
36	General	General	The exact history of the USCG's real property interests is included on record of survey #2010I960234 filed 04/28/2010 with the San Francisco Assessor Recorder's office. You may obtain this from the Assessor's office or we may provide you a copy. A brief history is provided below:  The USCG's presence on YBI predated the establishment of Naval Station Treasure Island (NSTI). Initially the lighthouse built by the Lighthouse Board in 1872 was located on land leased from the War Department. However, the USCG obtained full real property interests on these 26.51 acres of YBI on July 27, 1939 via an Act of Congress.	

## Enclosure (1)

Comment	Section	Page	Comment
			<p>This area included the lighthouse and portions north of it up to Hillcrest/Treasure Island Road including the oldest buildings of Sector San Francisco.</p> <p>The next major expansion of the USCG's property occurred on 6/14/1967 via the acquisition of 8.207 acres from the USN, via a form 1354 transfer, just north of the property acquired in 1939. The new buildings of the Sector Command were built in this area. An adjoining 2.71 acres were acquired through a direct transfer of land from the USN dated 8/20/1974.</p> <p>On 4/17/1998, the USCG acquired 5 additional parcels of land, totaling 10.4831 acres from the USN through the transfer process. The parcels included Quarters 8 &amp; 9, and the uphill site currently occupied by the Vessel Traffic Service (VTS).</p> <p>Finally on 11/26/2002 the USN transferred ownership of 11.8 acres of submerged lands to the USCG.</p> <p>Thus, in total, the USCG owns 47.9101 acres of land on YBI and another 11.8 acres of submerged lands.</p>

↑ 10.29,  
cont'd

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SEP 08 2010

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A2139 Durant St. #1  
Berkeley, CA 94703  
September 3, 2010Bill Wycko, Environmental Review Officer  
San Francisco Planning Dept.1650 Mission St. #400  
San Francisco, CA 94102

The DEIR for the TI/YBI Redevelopment Project is legally and practically insufficient because it does not include study of a true environmentally superior alternative. Such an alternative would include enough density to support realistically cost-effective public transit and neighborhood-serving retail businesses. It would also minimize parking.

I urge the Department to include a full and impartial analysis of such an alternative in the FEIR,

Sincerely,  
Donald Fyman



To: The Environmental Review Officer  
 S.F. Planning Department  
 1650 Mission St, Suite 400  
 San Francisco, CA 94103

Re: Treasure Island/ Yerba Buena Island Redevelopment Project - Case# 2007.0903E/CA 2008012105

Specific reference – Section IV.E (Transportation)

- 1) The current westbound ramp (upper deck) would become transit & emergency vehicles only
- 2) Macalla Road would become a 1-Way Street
- 3) The requirement for all residence/hotel guests to purchase transit passes (IV.E.46 Sect #4)

I am writing on behalf of myself as a resident of Yerba Buena Island and as a board member of the Yerba Buena Island Residence Association and the Yerba Buena Island Residence Mutual Benefit Corporation.

In reading the EIR statement I have become aware Impact TR-24 & Mitigation Measure M-TR-2 as they relate to item (1) in the list. I don't know how else to state the obvious limitation that this ill-conceived idea represents. Historically that having all "your eggs in one basket" has never been a good idea and making the current west-side westbound ramp into a transit & emergency vehicle lane will create severe overcrowding on Treasure Island Road and Hillcrest as there would be only one single westbound entrance for general traffic on the east side of the island where the bridge connects to the island tunnel fixture. That area has always been significantly crowded with slower traffic as vehicles prepare to enter the tunnel. Study of the traffic flow prior to the current bridge configuration showed this speed decrease and resulting congestion as mostly a psychological event as there were no significant increases in accidents in the tunnel, people just are generally claustrophobic and hesitate when entering enclosed spaces. With that in mind, you are proposing that all the general traffic be made to proceed around the island on a small two way it will share with traffic coming from the eastbound off ramp from San Francisco & the west-bound off ramp from Oakland. The traffic flow study needs to be done part of a realistic view of how vehicles move and how this "one ramp fits all" can be even proposed. The safety danger is not addressed and the event of any need for large numbers of people to be moved off the island, one westbound onramp towards San Francisco on the other side of the island is not practical, it is dangerous and invites significant loss of life in the event of an emergency. I point to the SFPD's & California Highway Patrol's own event management currently and before the Macalla onramp was closed as part of the new spans construction. Their logistics were not included in this EIR and just the lack of study of the pollution from the cars being forced to wait on Treasure Island Road & Hillcrest Road for the bridge onramps must render this section insufficient for review and will need to be re-done. There is no reason to change the current configuration on the west-side top-deck onramp. Including a timed transit lane would meet all the requirements as emergency vehicles will have plenty of opportunity to enter the westbound traffic. Currently few emergency vehicles enter the bridge from Ti/YBI to affect emergency services or transports as CHP and Caltrans operate constantly on the bridge and dispatch vehicles for either the Oakland meter-station or the San Francisco CHP station on 8<sup>th</sup>/Howard. SFPD do not operate in significant numbers to impact this need a reconfiguration on the west-side, westbound top-deck on-ramp.

Now let's look a Figure IV.E.13 and the questionable decision to use the bridge underpass as the sole route to the westbound onramp for the entire island. Requiring all traffic to go through such a bottle-

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neck is inherently dangerous. The underpass can be subject to closure from many things that are readily foreseeable. The lanes are close together and there is no room for emergency vehicles on the side. Trucks coming off the eastbound top-deck may be too tall for the underpass and damage or in a worst case instance destroy the outer segment weakening the decking. A accident in the tunnel east or west bound would not allow traffic to exit and re-enter the freeway in a thoughtful and timely manner as they would have to come back around the island and the use the west-side Emergency /Transit only lane. Most motorists would not know if they would be allowed to use it and emergency responders would have other more pressing issue to take care of ... the gridlocked traffic would lead to critical delays that have negatively impact emergency operations.

12.5,  
cont'd

In item (2), I want to address the EIR consideration of turning Macalla road into a one-way leading from the Hillcrest Road/I-80 underpass to Treasure Island Road. This was being done to facilitate bicyclist coming off the east bridge span. This idea again put all the traffic flow "eggs in one basket" as the only way to the bridge (east or west bound onramps) is on Treasure Island road to Hillcrest Road. Having only one way off an island with upwards of 6500 units and hotels is just nuts. Add to that the incline on Macalla road coming down to Treasure Island road is too dangerous. The EIR study does not have a single authority on bicycle safety cited on this study. The danger in allowing bicyclist to come down Macalla at full speed is evident in figure IV.E.14, there is simply no way bicyclist can stop or turn at speeds of over 30 mph .. Which is the minimum speed a bicyclist will reach if they fail to realize there is a sudden stop or their brakes fail, which is a very real issue as bicycle brakes lose stopping power as they heat since the rubber composite becomes soft. There also needs to be a rethink of the design of figure IV.E.15 - No one who has seen that design feels it is in anyway safe or even rational. Please look at making the bicycle lane follow the hill. This design will get people injured or killed.

12.6

In item (3), please advise us of your thought on IV.E.46 Sect #4, the Pre-Paid Transit Passes. You have written in the report "where-by residence and hotel guests would be REQUIRED to purchase transit passes. The pre-paid transit voucher will provide a subsidy to transit operator's ...". Please cite specific legal statute that allows you to force resident and guest to purchase an item that will subsidize a private or public agency. This is not a valid section and the conclusions based on an illegal requirement cannot be allowed to be included in the EIR as is.

12.7

I look forward to your actions and reviews of the items I have mentioned.

Sincerely

*Todd Brennan*, 06 SEPT 2010

Todd Brennan

Secretary YBI-Residence Association Inc, YBI Residence Mutual Benefit Corporation

115 A Forest Road, SF CA 94130

(415) 225-0195

**ANTHONY F. GANTNER**  
ATTORNEY-AT-LAW

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(415) 421-2694  
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**RECEIVED**

September 8, 2010

SEP . 8 2010

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Dept.  
1650 Mission St., Suite 400  
San Francisco, CA 94103

Re:Treasure Island/Yerba Buena Island Redevelopment Project Case:  
#2007.0903E---Questions/Inquiries on the DEIR

Dear Mr. Wycko:

As a resident of Telegraph Hill, and as a citizen of the San Francisco Bay Region, I have major concern and reservations about the proposed Treasure Island/Yerba Buena Redevelopment Proposal ("the project") in its present form as presented in the DEIR. In particular, the density, massing and height of the proposed project---allowing up to nineteen high-rise towers----would unacceptably impact one of the most iconic settings on San Francisco Bay. In this respect, the project has devolved into the most irresponsible, short-sighted, out-of-control development proposal that I have seen in my lifetime. This proposal has mutated from under 3000 units in the 2003 EIS, to approximately 8000 units today, including a 650 foot high-rise tower, as well as a score of other buildings up to 450 feet in height---testament to unbridled development piling on an originally modest proposal---in the process setting back an environmental ethos which decades ago strove to put an end to this kind of thoughtless over-development, particularly on such a unique scenic resource which we all enjoy. How a proposal of this sort could have gotten as far as it has without significant public outcry is testament to the soothing, greenwashing, "sustainable" manner in which this incrementally engorging project has been presented, to the point that, through bait-and-switch tactics, it has now fattened itself, with multiple highrises, offices, hotels, a cornucopia of parking---all ostensibly justified by a weak economy and transfer costs, and to be paid for through shaky financial schemes.

With the foregoing in mind, I have questions/inquiries/requests for information about Environmental Setting and Impacts set forth in Chapter IV of the DEIR, particularly Aesthetics. I trust each of the below items will be answered in detail and with specificity:

1. Please state why views of the Bay, including the project area, are of particularly high visual quality.
2. Please state why, the dramatic topographic features of the central portion of the Bay contribute to "highly recognizable, even iconic, scenic vistas."
3. Please state why, the distinctive built environmental features of the central portion of the Bay contribute to "highly recognizable, even iconic, scenic vistas."
4. Please describe the impact, and nature and extent thereof, of a series of high-rise towers in the project area on the panoramic vistas across the wide, flat expanse of open water from the perspective of three publicly accessible shoreline locations in each of (a) San Francisco; (b) East Bay; and (c) North Bay.
5. Same as Question # 4, except approximately one mile from the shoreline in the subject locations.
6. Same as Question # 4, except approximately two miles from the shoreline in the subject locations.
7. Same as Question # 4, except approximately five miles from the shoreline in the subject locations.
8. As to Questions # 4-7, please provide similar information relevant to **nighttime** vistas.
9. Please explain whether the project will impact, reorient or affect the views that are currently bounded and directed by the Golden Gate Bridge and the Bay Bridge from the perspective of three publicly accessible shoreline locations in each of (a) San Francisco; (b) East Bay; and, (c) North Bay.
10. Same as Question # 9, except approximately one mile from the shoreline in the subject locations.
11. Same as Question # 9, except approximately two miles from the shoreline in the subject locations.
12. Same as Question # 9, except approximately five miles from the shoreline in the subject locations.

13.1

13.2

13. Why are the selected photographic views from the eight locations of the project only during the daytime?

13.2, cont'd

14. Were nighttime photographic views of the project also considered or taken? If not, why not? If such nighttime photos were taken, describe each and every location from which said photographs were taken.

13.3

15. As to the San Francisco Bay Conservation and Development Commission ("BCDC") and its "Bay Plan" policies relating to "Appearance, Design, and Scenic Views", please explain how:

13.4

(a) the project will enhance the pleasure of the user or viewer of the Bay;

(b) the project will **not** impact visually on the Bay and shoreline;

(c) the project will assure continued visual dominance of the Hills around the Bay from the shoreline perspective of (1) San Francisco; (2) East Bay; and, (3) North Bay;

(d) the project's proposed high-rise towers are in accordance with the Bay Plan; and

(e) the nature, type and extent of BCDC advice, input, comments, and observations to date, on appearance and design of the project, particularly with regard to the proposed high-rise towers.

13.5

16. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers would not have a substantial affect on scenic vistas from each of the following locations: (a) Rincon Park on the Embarcadero; (b) Telegraph Hill at Pioneer Park; (c) Twin Peaks; (d) Nob Hill; and, (e) Russian Hill.

13.6

17. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers would or would not degrade the existing character or quality of Treasure Island.

18. Under the San Francisco Planning Dept. Initial Study Checklist form, please explain how the proposed project's high-rise towers:

(a) would or would not create a new source of substantial light or glare;

(b) the amount of light or glare that would be produced by **each** of the project's proposed high-rise towers;

(c) whether and to what extent, such light or glare would adversely affect daytime views;

(d) whether and to what extent, such light would adversely affect nighttime views.

13.7

13.8

19. Please provide the name, address, telephone number, email of the "independent photographer who photographed the Redevelopment Plan Project Area from a range of publicly accessible vantage points."

13.9

20. Please list each and every location from which the photographer identified in response to Question #19, photographed the project area.

13.10

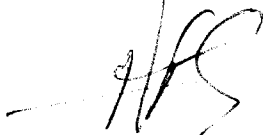
21. Please describe the methodology used by the Planning Department to select from all the locations listed in response to Question # 20, to choose the eight representative views shown in the DEIR. 13.10, cont'd
22. Did the photographer identified in response to Question # 19 take any nighttime photos of the project? 13.11
23. If the answer to Question # 22 is in the affirmative, from what locations were the photographs taken? 13.12
24. Why does the "construction program" referred to at Page IV.B.19 only allow for some limited flexibility in the siting of tower volumes? 13.12
25. Please describe the nature and extent of how, "Proposed new construction on Treasure Island would adversely alter scenic vistas of San Francisco Bay" from **each** of the following vistas:(a) San Francisco waterfront; (b)The Embarcadero at Rincon Park; (c) Telegraph Hill; (d) Russian Hill; and, (e) Nob Hill. 13.13
26. Please describe the nature and extent of how "East Bay shoreline views would be significantly altered by the project from **each** of the following vistas:(a) Albany; (b) Berkeley; (c) Emeryville; (d) Oakland; and, (e) Alameda.
27. Please describe in detail how views of the project's proposed new buildings from each of the five East Bay Shoreline locations listed in Question #26, "would eclipse the San Francisco skyline in visual importance."
28. Please describe the basis and methodology by which it was determined that from the East Bay shoreline, "the new cluster of high-rise buildings on Treasure Island...would create visual ambiguity as to what the viewer is actually observing---the San Francisco skyline or the Treasure Island skyline."
29. Please describe in detail why, "the effect of the Proposed Project on scenic vistas of the Bay when viewed from the eastern waterfront of San Francisco, Telegraph Hill, the East Bay shoreline, and from the Bay Bridge east span would be considered significant."
30. Please state each and every reason why there is "no effective mitigation measure available that would avoid or substantially reduce a significant impact on scenic Bay vistas resulting from construction of a new, high-density urban community on Treasure Island."
31. Given that the project's "nighttime skyline of Treasure Island would become a prominent new visual presence within nighttime views of the Bay", why weren't existing and proposed nighttime photographic views provided in the DEIR as were daytime photographic views? 13.14

32. If the project's "nighttime skyline of Treasure Island would become a prominent new visual presence within nighttime views of the Bay", how could lighting standards and guidelines established by the *Design for Development* ensure "that project light would **not** adversely affect nighttime views from the mainland"?

13.14, cont'd

I look forward to receiving detailed, informative answers to the above questions and inquiries.

Very truly yours,

A handwritten signature in black ink, appearing to read 'A. F. Gantner', with a horizontal line extending to the left.

Anthony F. Gantner





Bill Wycko  
 Environmental Review Officer  
 San Francisco Planning Dept.  
 1650 Mission St., Suite 400  
 San Francisco, CA 94103

September 8, 2010

Re:Treasure Island/Yerba Buena Island Redevelopment Project Case:  
 #2007.0903E — Questions on the DEIR

Dear Mr. Wycko:

As the producer of the documentary, *The Wild Parrots of Telegraph Hill*, and my current project, *Pelican Dreams*, I am deeply concerned about the proposed TI/YBI redevelopment project ("the project") on which comments are being solicited for the DEIR. In that regard, I have a number of questions for which I would hope to receive informed and detailed responses:

- |   |      |
|---|------|
| 1. As I understand it, numerous high-rise towers (multi-story commercial and residential), may be planned for Treasure Island. In that regard, DEIR Impact B1-4 deals with avian collisions with buildings. What studies, if any, not including the subject DEIR, have been done to determine whether the Pacific Flyway for migratory birds could be significantly impacted or affected by high-rise towers built on or proximate to such Flyway path? | 14.1 |
| 2. The DEIR cites at p. 1V.M.50, Stenzel, et.al., <i>Abundance and Distribution of Shorebirds in the San Francisco Area</i> , however, does the DEIR rely on any more specific studies than this? If so, please give the author and title of such materials.  | 14.2 |
| 3. Please provide a description of each and every species of (a)migrating bird, (b) resident bird, for which the project could have potential impact or affect, and for each and every species the nature and scope of such impact or affect.   |      |
| 4. Please describe in detail as to each local and regional bird species, how glass surfaces on the project's high-rise towers would "affect the viability of local and regional bird populations."  | 14.3 |
| 5. Please describe which species of migratory birds would be vulnerable to illuminated buildings at night.  |      |
| 6. Please state why there are no illuminated night renderings of the proposed project's high-rise towers.   | 14.4 |



- |   |       |
|---|-------|
| 7. Please describe in detail, as to each species of migratory bird, why "avian collisions are a potentially significant impact."  | 14.5  |
| 8. Please describe at least five locations in the United States where patterned and fritted glass has been used in high-rise towers, and what has been the result of such use in each such location in diminishing avian collisions.        |       |
| 9. Please set forth in detail why, with Mitigation Measure M-B1-4a, "the impacts on birds from the Proposed Project would be less than significant."  |       |
| 10. Why do the "ground floor and first few stories of buildings present the greatest hazards to birds"?   |       |
| 11. Which "breeding birds" within the project area may be at risk of colliding with the project's possible high-rise towers?  | 14.6  |
| 12. Specifically to the peregrine falcon, please describe the nature and extent of the project's potential impacts on this endangered species.  |       |
| 13. Specifically to the California brown pelican, please describe the nature and extent of the project's potential impacts.   | 14.7  |
| 14. What species of birds listed under the Federal Endangered Species Act, or proposed to be listed, may be subject to impact from or affected by the proposed project's buildings, including high-rise towers?                             | 14.8  |
| 15. As to Question # 14, would such impacts or affects be considered significant? If so how? If not, why not?   |       |
| 16. What species of birds listed under the California Endangered Species Act, including candidate species, and any species of special concern, may be impacted or affected by the proposed project's buildings, including high-rise towers? | 14.9  |
| 17. As to Question # 16, would such impacts be considered significant? If so, how? If not, why not?   |       |
| 18. Which bird species would be considered to have a known or high potential to nest on any of the project's proposed high-rise towers?   | 14.10 |
| 19. What measures would be taken to minimize avian collision with antennae, monopole and rooftop elements on any of the project's buildings, including high-rise towers?  |       |
| 20. As to breeding birds on Treasure Island, what steps will be taken during each stage of project development to mitigate impacts?   | 14.11 |

Thank you for your kind attention to the above questions.

Best regards,

*Judy Irving*

Judy Irving  
Executive Director



September 9, 2010

Bill Wycko,  
Environmental Review Officer,  
San Francisco Planning Department,  
1650 Mission Street, Suite 400,  
San Francisco, CA 94103.

Subject: **DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE TREASURE ISLAND  
AND YERBA BUENA ISLAND REDEVELOPMENT PROJECT  
PLANNING DEPARTMENT CASE NO. 2007.0903E  
STATE CLEARINGHOUSE NO. 2008012105**

Dear Mr. Wycko:

The National Office of Job Corps has completed our review of the Draft Environmental Impact Report for the Treasure Island Redevelopment Project. Our questions and comments are attached.

We look forward to working with the City of San Francisco and the Treasure Island Development Authority to make the redevelopment a success for all parties.

If you have any questions, I can be contacted at 202-693-8012 or [hoffman.johannes@dol.gov](mailto:hoffman.johannes@dol.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Hoffman", with a horizontal line extending to the right.

Johannes Hoffman, AIA  
Contracting Officer's Technical Representative

Attachments

cc: William Dakshaw, OJC DFAM

Questions and comments for the Treasure Island Development Authority (TIDA) from National Office of Job Corps on the Draft Environmental Impact Report For The Treasure Island And Yerba Buena Island Redevelopment Project

- |   |      |
|---|------|
| 1. Truck traffic, with noise and pollution, to fill in the island is not discussed. Does truck traffic projections include trucks needed to add fill as well as those for building construction?  | 15.1 |
| 2. Where will the construction truck routes be located on the island?   | 15.2 |
| 3. Will the proposed/anticipated locations of the truck routes result in potential pedestrian hazards? If so, how is the developer proposing to deal with the hazards?  | 15.3 |
| 4. As an affected agency, Job Corps would like an opportunity to review and comment on the Construction Traffic Management Plan.  | 15.4 |
| 5. Will the Treasure Island Job Corps Center have an opportunity to review the General Contractor's proposed hours of operation and noise mitigation plan, particularly for deep dynamic compaction and pile driving activities?  |      |
| 6. Copies of the pre-construction assessment and subsequent monitoring results on the subsurface conditions and nearby building structural conditions (p. 25 of Summary) should be provided to potentially affected parties (e.g., TI JCC, current residents, etc.).  |      |
| 7. Dormitories at Treasure Island Job Corps Center are identified in the Air Quality report as "sensitive receptors." Diesel Particulate Matter concentrations/health risks were estimated for residents living in the northwestern part of the island but not the southern part where a significant portion of the construction will occur. Can TIDA complete additional studies to include potential impacts on Job Corps residents and staff? Incremental cancer risk for Phase 2 for residents is right at the threshold for "significant and unavoidable."                                       | 15.5 |
| 8. Would construction of a solid fence around the center add a measure of safety as well as help mitigate the air quality impacts on the center? Would the redevelopment be willing to construct such a permanent structure around the campus?  | 15.6 |
| 9. Where will stockpiles of contaminated/unsuitable soils be located?   | 15.7 |
| 10. The wind studies indicate that the only location on the island where there will be an increase in winds exceeding prescribed comfort levels will be at the southeast corner of Education Building 367. An exterior stairwell and parking lot are located here. Would there be a wind tunnel effect in the exterior corridor of Building 367 from 45 mph winds? What measures will be taken to protect staff and students who park in the lot? This area is a busy pedestrian area on the campus; what measures will be taken to protect staff and students as they walk to and from the building? | 15.8 |
| 11. Job Corps is going to get runoff from neighboring properties with the addition of fill. How will this runoff be drained off Job Corps property?   | 15.9 |
| 12. Stormwater pumping systems and modifications to the stormwater drainage system are proposed for the Job Corps property. Will the construction,  |      |

- |   |   |              |
|---|---|--------------|
| operations, and future maintenance of these systems be the responsibility of the developer?   | ↑ | 15.9, cont'd |
| 13. Additional discharge to sewer system will occur during construction – any problems with system backups now?   |   | 15.10        |
| 14. Our property agreement reserves utility distribution to the Navy including water, wastewater, stormwater, gas and electrical systems. Will the transfer to TIDA include these distribution systems?   |   | 15.11        |
| 15. Will the replacement of the fire hydrant system affect Job Corps? Will the new piping be extended to fire hydrants on Job Corps property? Will the hydrants located on the Job Corps property be modernized by the developer? Who will own and who will maintain the water lines and hydrants that are located on Job Corps property. |   | 15.12        |
| 16. Job Corps would like to explore receiving consideration for a Voluntary Clean-Up Agreement similar to that which will be afforded the school site (p. 46 of the Summary).   |   | 15.13        |
| 17. Has a decision been made if the Automated Waste Collection System will be constructed? If it will be built, will it still be located in the vicinity of the planned urban agricultural park?  |   | 15.14        |
| 18. City regulations state that construction cannot occur between 8 p.m. and 7 a.m. seven days a week. Currently are construction activities for the Treasure Island development anticipated to occur during weekends?  |   | 15.15        |
|   |   | 15.16        |



**DEPARTMENT OF TRANSPORTATION**

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TTY 711

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**CITY & COUNTY OF S.F.**  
PLANNING DEPARTMENT  
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Be energy efficient!*

September 9, 2010

SF080060  
SF-80-7.72  
SCH2008012105

Mr. Rick Cooper  
Planning Department  
City and County of San Francisco  
1650 Mission, Suite 400  
San Francisco, CA 94103

Dear Mr. Cooper:

**Treasure Island and Yerba Buena Island Redevelopment Plan – Draft Environmental Impact Report**

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Treasure Island and Yerba Buena Island Redevelopment Plan. The following comments are based on the Draft Environmental Impact Report (DEIR).

***Highway Operations***

1. The Traffic Impact Study (TIS) assumes that the ramp meter would be operated at a fixed rate of 550 vehicles per hour (vph). This is not a realistic assumption. The ramp meter would operate in a traffic responsive mode such that the sum of the upstream mainline flow rate and the ramp metering rate would not exceed the downstream mainline capacity. In the westbound direction, the existing mainline meter at the San Francisco Oakland Bay Bridge (SFOBB) Toll Plaza operates to maintain capacity flow on the bridge. We understand that the analysis assumed that the mainline meter would be operated such that the flow on the bridge would be less than capacity to the extent that a 550 vph metering rate at the Yerba Buena Island (YBI) on-ramp could be absorbed by the mainline traffic stream on the SFOBB. Due to current levels of congestion, the Department cannot commit to operate the mainline meter in this manner. It is also questionable whether this level of coordination between the mainline meter and the ramp meter would even be possible. Accordingly, it would be prudent to assume that the current mainline meter operating strategy would be maintained. The analysis should also assume that maximum metering rate at the westbound YBI on-ramp would be set such that the downstream mainline capacity would not be exceeded. Practically speaking, this would mean that the metering rate would be approximately equal to the flow rate for the westbound YBI off-ramp. That being the case, the ramp metering rate would be significantly lower than the 550 vph used in the analysis. Therefore, to fully and accurately evaluate the impacts from the proposed redevelopment project, please revise your traffic analysis to use a metering rate that does not exceed the off-ramp flow rate (projected to be 219 vph in the AM peak). Should the expected delays be significant, consideration should be given to restricting on-ramps to high occupancy vehicles (HOV) only in the morning and afternoon peak periods.

16.1

16.2

- |   |             |
|---|-------------|
| <p>2. In Table 8 on page 45 of the TIS, the maximum observed AM queues for the Interstate (I) 80 approach on Tuesday, May 6, 2008 and Wednesday, May 7, 2008, of 5.45 miles and 1.69 miles, respectively, do not look typical. These queues were possibly due to incidents on the SFOBB. Based on the Department's observations, the maximum AM queue for the I-80 approach typically extends approximately 0.8 mile to 1.1 miles upstream of the Toll Plaza. If the queues on these days were indeed the result of incidents, the average maximum observed queues would overestimate bridge demand. In addition, if there were incidents on these days, the longer queue would be caused by reduced bridge output (i.e., less demand served) rather than higher demand, and using a "normal" bridge output for those days would not be appropriate to estimate demand.</p> | <p>16.3</p> |
| <p>3. As the queue from the Toll Plaza extends greater than 1.5 miles upstream from the Toll Plaza, it begins to combine other bottlenecks that are not associated with the Toll Plaza queuing. While some of the vehicles in queue at I-80 upstream of the Powell Street interchange are certainly headed to the Toll Plaza, it is not possible to use this part of the queue to estimate Toll Plaza demand because the destinations of this traffic cannot be determined.</p>   |             |
| <p>4. The maximum observed queues are only shown for the local street approaches to the SFOBB in San Francisco. However, the eastbound I-80 mainline also experiences queuing during both weekday AM and PM peak periods. The analysis does not include the eastbound I-80 mainline approach to the SFOBB. This would underestimate the eastbound demand for the SFOBB.</p>   | <p>16.4</p> |
| <p>5. In Section 4.2 of the TIS, freeway mainline and ramp metering impacts analysis appears to only evaluate peak hours. The report should note that the peak hour impacts would be greater if the demand for the preceding time periods is higher than the capacity, which is likely to occur in the westbound direction for the AM period and the eastbound direction for the PM period.</p>   | <p>16.5</p> |
| <p>6. The analysis of ramp metering impacts appears to assume that HOVs originating on Treasure Island would reach the HOV ramp meter bypass when in the mixed-flow queue. This is not a realistic assumption due to the physical constraints on the roads approaching the on-ramp. If the HOVs remain in the mixed-flow ramp meter queue before reaching the HOV bypass, the ramp meter delays, queue lengths, and number of unserved ramp vehicles should be included in the HOV volumes.</p>   | <p>16.6</p> |
| <p>7. In Section 4.2.1.1 of the TIS, it indicates that VISSIM was used to evaluate the impacts of ramp metering. There is no discussion of model calibration in the report or appendices. Was the model properly calibrated before the analysis? What were the procedures and criteria used for the calibration?</p>  | <p>16.7</p> |
| <p>8. In Table 38 on page 108 of the TIS, the ramp meter queue lengths are shown for the westbound on-ramp during the AM and PM peak hours. What average vehicle length was used to estimate the queue length? The average vehicle length in ramp meter queues is typically 29 to 30 feet per vehicle. This is slightly greater than the vehicle length used at controlled intersections because vehicles in ramp meter queues are moving rather than stopped. In addition, as noted in a previous comment, the number of unserved ramp vehicles in the peak hour would be higher if ramp demands for the preceding time periods are higher than the metering rates.</p>  | <p>16.8</p> |

Mr. Rick Cooper/City and County of San Francisco  
 September 9, 2010  
 Page 3

9. Using the 550 vph ramp metering rate assumed in the analysis, the ramp meter delays shown in Table 38 do not correspond with our calculation of delays for unserved ramp demands shown in Figures 21, 25, and 30. Please discuss how the unserved ramp demands are calculated. 16.9
10. In Appendix D3 of the TIS, "Congestion Pricing and Ramp Metering Analysis", the information does not include an analysis of the effect of ramp metering on eastbound vehicle trips from Treasure Island during the PM peak hour. The meter on the on-ramp to eastbound I-80 would likely operate during the PM peak period. Was this analysis performed? 16.10

***Transportation Demand Management Mitigation Measures***

1. As stated on page 23 of the TIS, the Treasure Island Transportation Management Agency (TITMA) will oversee the collection of revenue from parking, transit passes and congestion pricing, and the disbursement of funds to transit operators. Would these funds go toward improving and maintaining the Muni Route 108 service? Due to annual fluctuation of the San Francisco Municipal Transportation Agency (SFMTA) budget and numerous competing priorities for General Fund revenues, the TITMA should contribute directly to SFMTA to ensure that the headways for Route 108 are maintained or improved. 16.11
2. On page 73 of the TIS, it indicates that the ferry will have a capacity of 699 passengers. In Table 26 (page 89), the DEIR projects 817 PM peak hour ferry trips under the Base Transit Scenario. With ferries operating at 50 minute headways, will there be enough capacity to accommodate all these trips? ~~A~~ 699 passenger vessel will be one of the largest ferries operating on the Bay. Has the City already verified the availability of this size boat and an operator to provide the service? Is there available capacity at the Port of San Francisco to accommodate the larger ferry? 16.12  
16.13
3. The DEIR states that Mitigation Measure M-TR-2 will reduce the headways for Muni Route 108 from 15 minutes to as low as seven minutes in the AM peak and as low as five minutes in the PM peak. By implementing M-TR-2, an additional four to eight buses would be added to the westbound on-ramp. Due to the projected congestion on the Treasure Island westbound on-ramp to the SFOBB and the SFOBB itself, will an additional four to eight buses be sufficient to maintain lower headways? Since transit schedule reliability is critical to attracting transit riders, please discuss how to mitigate the potential affects on transit headways. ~~In~~ addition, in the DEIR, numerous downtown intersections in San Francisco experience 'significant and unavoidable' impacts. Please discuss how SFMTA plans to maintain the proposed seven minute bus headways between the Transbay Terminal and Treasure Island if there are significant delays within San Francisco and on-ramps onto I-80 and the SFOBB. 16.14  
16.15
4. The expanded transit scenario for Mitigation Measure M-TR-2 has not yet been funded but is considered as a mitigation measure for transportation impacts. Please discuss how these transit improvements will be funded and explain development phasing in relation to expanded transit services. 16.16
5. As stated in the DEIR, Mitigation Measure M-TR-24 would create a Transit Only Lane between First Street on Treasure Island and the Transit/Emergency vehicle-only westbound SFOBB on-ramp by eliminating the proposed southbound bicycle lane on Treasure Island 16.17



Road and a segment of Hillcrest Road. Although bicyclists will still have access to the bicycle path on the new east span of the SFOBB by the bicycle lanes proposed on Macalla Road, eliminating the southbound bicycle lane will result in a significant disconnect to the proposed multi-use path on the west span of the SFOBB between Treasure Island and the rest of San Francisco. On page 17 of the TIS, the report states the Department and the Bay Area Toll Authority are currently considering alternatives for the proposed path. The proposed redevelopment project should proactively plan for connectivity between Treasure Island and San Francisco. Eliminating the southbound bicycle lane would severely limit future options to provide bicycle access to the proposed multi-use path.

16.17,  
cont'd

6. In the DEIR, Impact TR-27 states that AC Transit will experience significant and unavoidable impacts after implementing Mitigation Measures M-TR-2 and M-TR-24. Although AC Transit buses can use the Transit/Emergency Vehicle-only lane proposed for westbound transit, AC Transit buses would need to merge back into the mixed-flow lane towards the eastbound on-ramp. Due to the size and significant queuing on Treasure Island Road, buses merging could potentially block both travel lanes and delay Muni buses accessing the westbound on-ramp.

16.18

#### ***Americans with Disabilities Act***

All improvements both on and off island, including the on-island shuttle, should meet the Americans with Disabilities Act standards. This includes providing adequate connections to the east span pedestrian/bicycle path currently under construction and the proposed west span multi-use path on the SFOBB.

16.19

#### ***Goods Movement***

In Table 49, page 207 of the TIS, the proposed project would generate 583 daily truck trips (approximately 24 per hour). The I-80 eastbound and westbound off-ramps for Treasure Island and YBI are designed with small radius curves. As a result, there is a potential for serious operational and safety issues on the mainline as a result of the queuing caused by vehicles waiting to exit behind larger vehicles negotiating these small radius curves at slow speeds. As the owner and operator of State highway facilities, the Department is obligated to ensure public safety on all highways under its jurisdiction, and monitors factors such as accident rates, traffic and truck volumes, speed and level of service. Please include proposed improvements and mitigation measures to address these potential safety issues.

16.20

#### ***Fair-Share Fees***

The proposed project would generate numerous significant and unavoidable transportation impacts but only three mitigation measures were proposed to reduce the number of vehicle trips on the SFOBB. Since only the 'base transit' is fully funded, the Department cannot assume the 'expanded transit' will be in place after project completion. In the DEIR, under the "Proposed project – base transit" scenario, the project would generate 1,613 AM, 2,462 PM, and 2,861 Saturday vehicle trips. As a result, the proposed project will have significant impacts to the already congested State highway system.

16.21

Per California Environmental Quality Act (CEQA) law precedence, the City has a legal duty to require mitigation of all the significant impacts identified. In the case of City of Marina et. al. v. Board of Trustees of the California State University (2006) 39 Cal 4<sup>th</sup> 341. The California Supreme Court determined that,

"CEQA requires a public agency to mitigate or avoid its projects' significant effects not just on the agency's own property but *"on the environment"* (Pub. Resources Code, Section 21002.1, subd. (b)), with "environment" defined for these purposes as "the physical conditions which exist *within the area which will be affected by a proposed project*" (id., Section 21060.5). Thus, if the [Board of Trustees of the California State University] cannot adequately mitigate or avoid [California State University Monterey Bay]'s off-campus environmental effects by performing acts on campus (as by reducing sufficiently the use of automobiles or the volume of sewage), then to pay a third party such as [Fort Ord Reuse Authority] to perform the necessary acts off campus may well represent a feasible alternative. A payment made under these circumstances can properly be described neither as compulsory nor, for that reason, as an assessment." (City of Marina at p.704)

16.21,  
cont'd

In April 2010, the Department identified three projects which have the potential to reduce trips on the SFOBB and its approaches. Since then, the Department has refined these cost estimates as referenced below.

- i. Traffic Operation System (TOS) projects in San Francisco and Alameda Counties for ramp meters and fiber optics installation – Estimated cost \$25.9 million
- ii. Projects near Toll Plaza approach in Alameda County for TOS and fiber optics installation – Estimated cost \$13.1 million
- iii. Proposed Multi-use bicycle and pedestrian path on the west span of the SFOBB – Estimated cost - \$500 million

These TOS projects will improve operations on the State highway system by improving response time to incidents and providing more reliable travel times for all users of the system. Any operational improvements to the approaches to the SFOBB have the potential to add capacity that would mitigate the impacts of the proposed redevelopment project. The proposed multi-use path on the west span of the SFOBB has the potential to reduce vehicle trips by providing an attractive alternative to driving. The Department strongly urges the City and County of San Francisco to contribute fair-share fees to these projects that would improve the efficiency of the transportation system and reduce delays while maintaining reliability on the major approaches to the SFOBB.

### ***Mitigation Monitoring***

Public Resources Code Section 21081.7, requires that, after a Lead Agency approves a project, Agency must submit transportation information generated from the reporting or monitoring program that the Lead Agency adopted at the time of approval. Please see the Department's *"Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the Department of Transportation"* at the following website for more information: [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa.html](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html)

16.22

The Mitigation Monitoring Submittal Guidelines discuss the scope, purpose and legal requirements for mitigation monitoring reporting and submittal, specify the generic content for reports, and explain procedures for timing, certification and submittal of reports. Please complete and sign a Certification Checklist form for each approved development project that includes transportation related mitigation measures and return it to this office once the mitigation measures are approved, and again when they are completed.

Mr. Rick Cooper/City and County of San Francisco  
September 9, 2010  
Page 6

The City needs to consider measuring mitigation effectiveness and periodically evaluate transit utilization rate, headway reliability and quality of service to ensure transit is the most attractive mode of travel.

↑ 16.22,  
cont'd

Please send signed Certification Checklist forms and supporting attachments to the address at the top of this letterhead, marked ATTN: Yatman Kwan, Mail Stop #10D. For supporting attachments, the CEQA lead agency, at its discretion, may also submit the entire mitigation monitoring program report for each project with the required transportation information highlighted. When the District has approved the submittal and signed the Certification Checklist form, a copy of the form will be supplied to your agency.

We look forward to continuing our coordination with the City and County of San Francisco and appreciate the opportunity to comment on this project. Should you have any questions regarding this letter, please call Yatman Kwan or my staff at (510) 622-1670.

Sincerely,



LISA CARBONI  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse



Making San Francisco Bay Better

September 9, 2010

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, California 94103

**SUBJECT:** Treasure Island and Yerba Buena Island Redevelopment Project (SCH No.: 2008012105)  
(BCDC Inquiry File No. MC.MC.0703.1)

Dear Mr. Wycko:

On July 13, 2010, the San Francisco Bay Conservation and Development Commission (Commission) staff received the Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island Redevelopment Project located in the center of the San Francisco Bay within the City and County of San Francisco. The proposed Redevelopment Plan Area includes approximately 400 acres of land on Treasure Island (TI), approximately 150 acres of land on Yerba Buena Island (YBI) and about 550 acres of tidal and submerged lands adjacent to the islands. The U.S. Navy currently owns the land and is in the process of conveying most of these areas to the Treasure Island Development Authority (TIDA).

The proposed redevelopment of Treasure Island and Yerba Buena Island includes: 6,000 to 8,000 residential units; 450,000 square feet of retail space; up to 500-hotel rooms; a cultural center; a new ferry terminal and transit program; approximately 300 acres of new public park and open space; and an approximately 3.5-mile public shoreline trail around TI and various trails on YBI. The proposed project would redevelop both Treasure Island and Yerba Buena Island over four phases spanning 10 to 15 years.

The Commission itself has not yet reviewed the DEIR. The staff comments below focus primarily on the above-described Project and are based on the McAteer-Petris Act (Cal. Gov't Code § 66600 *et seq.*), the Commission's *San Francisco Bay Plan* (Bay Plan), the Commission's federally-approved management plan for the San Francisco Bay, and the federal Coastal Zone Management Act (16 U.S.C. § 1451 *et seq.*; "CZMA").

#### Commission Jurisdiction Under State and Federal Law

The Commission's jurisdiction under state law as it applies to the Project includes all tidal areas of the Bay up to the line of mean high tide (MHT) or to the inland edge of wetland vegetation in marshlands, and all areas formerly subject to tidal action that have been filled since September 17, 1965, and a shoreline band extending 100 feet inland from and parallel to the Bay. The Commission also has jurisdiction over priority use areas designated in the Bay Plan on Yerba Buena Island. Within the Commission's jurisdiction, authorization is required for construction, dredging, fill placement, land subdivisions, and substantial changes in use.

The Project would be subject to the Commission's permit application review and authority under state law.

17.1

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The DEIR states that the Treasure Island shoreline is approximately 3.35 miles long and the Yerba Buena Island shoreline is approximately 1.8 miles long, resulting in approximately 57 acres located within the Commission's 100-foot shoreline band jurisdiction, approximately 36 acres on TI and 21 acres on YBI.

### Commission Policy Issues

**Priority Use Areas.** Yerba Buena Island is listed under the San Francisco Bay Plan Map No. Four as a Waterfront Park Priority Use Area. Section III (pg. 9-12) and Section IV.J (pg. 8-9) of the DEIR lists the appropriate Bay Plan Map policies that relate to the development of both Yerba Buena Island and Treasure Island, which state the following:

- **Yerba Buena Island South of Bay Bridge** - "[W]hen no longer owned or controlled by the federal government, redevelop for recreational use."
- **Yerba Buena Island North of Bay Bridge** - Provide "(1) a large public open space at the center of Yerba Buena Island; (2) a large public open space on the plateau on the eastern peninsula, adjacent to and beneath the eastern span of the San Francisco-Oakland Bay Bridge; and (3) a linked system of trails near the shoreline and at the upper elevations that connect vista points and open spaces. Vista Points should provide views of the Bay Bridge, San Francisco Skyline and other important Central Bay features. The remainder of the island upland of the shoreline band may be developed for other uses consistent with the Bay Plan recreation policy 4-b, and with the applicable public trust provisions and statutes."
- **Yerba Buena Island and Treasure Island- Clipper Cove** - "[E]xpand marina and other water-oriented recreation uses, provide water access for small water craft, such as kayaks, and for swimming. Preserve beaches and eelgrass beds."
- **Treasure Island** - "When no longer owned or controlled by the federal government, redevelop for public use. Provide continuous public access to Bay in a manner protective of sensitive wildlife. Provide parking and water access for users of non-motorized small boats, including at north end of the Island. Develop a system of linked open spaces, including a large open space at the northern end of the island."

**Sea Level Rise.** The Bay Plan policies regarding safety of fills state, in part, that, "[t]o prevent damage from flooding, structures on fill or near the shoreline should have adequate flood protection including consideration of future relative sea level rise as determined by competent engineers." Additionally, the policies state that, "[t]o minimize the potential hazard to Bay fill projects and bayside development from subsidence, all proposed development should be sufficiently high above the highest estimated tide level for the expected life of the project or sufficiently protected by levees..." The policies also recommend: "[l]ocal governments...with responsibilities for flood protection should assure that their requirements and criteria reflect future relative sea level rise and should assure that new structures and uses attracting people are not approved in flood prone areas or in areas that will become flood prone in the future, and that structures and uses that are approvable will be built at stable elevations to assure long-term protection from flood hazards." Lastly, the Bay Plan policies regarding recreation state, in part, "[t]o enhance the appearance of shoreline areas, and to permit maximum public use of the shores and waters of the Bay, flood control projects should be carefully designed and landscaped and, whenever possible, should provide for recreational uses of channels and banks."

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According to the DEIR, proposed building structures located away from the immediate shoreline will be raised between 36 to 42 inches above the current 100-year high tide elevation, which means that all new development footprints would be able to accommodate up to 36 inches of sea level rise. The perimeter berm would be raised, where necessary, to prevent significant overtopping during storm events for up to 16 inches of sea level rise from present day standards. The storm drainage system would also be built to gravity drain up to 16-inches of sea level rise, and the design includes provisions for additional storm drain pump stations at outfall locations in the future if necessary.

The proposed adaptive management strategy also includes monitoring and a decision-making framework to initiate the adaptive strategy measures. As proposed, the Project includes over 5-miles of trails and a variety of other public amenities directly adjacent to the shoreline. The Commission's Bay Plan policies regarding public access state, in part, that all fill projects "should increase public access to the Bay to the maximum extent feasible" and, further, that public access areas should be maintained over time. While the public access along the shoreline has been designed with a development setback to allow any future increases in elevation to accommodate higher sea level rise elevations, Section IV.O states that during large rain events occurring simultaneously with 100-year tides the adaptive strategies approach would allowing ponding to occur for 1 to 3 hours next to the levees. Due to the location of the public access along the entire shoreline around Treasure Island, we are concerned about the impact of the ponding on the usability of the public access.

17.2

Further, if sea level rises beyond 36 inches, it can be assumed that over time the levees would need to be raised and, likely, widened at the base, thereby partly or entirely obstructing the public's view of the Bay from inland areas, encroaching upon and reducing the area devoted for public use, and impacting the overall public access experience. In light of these potential impacts on the access area, the adaptive management approach should address these issues before the overtopping of the levees occurs without compromising the views of the Bay from the shoreline public access areas. While we are aware of the existing site constraints, seawalls are not the preferred adaptive management tool. Therefore, we are also concerned about the use and location of sea walls as an adaptation approach along the shoreline and how these sea walls would be modified in the future for a sea level rise greater than 36-inches.

**Bay Fill.** Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize filling of the Bay and certain waterways. According to Section 66605, fill in the Bay can be authorized by the Commission only when: (a) the fill would constitute the minimum necessary to achieve the project purpose; (b) no alternative upland location exists; (c) the public benefits of the fill exceed the public detriment from the loss of water areas; (d) the fill would occur on land to which the project proponent has adequate title; (e) the activity would minimize harmful effects to the Bay's natural resources; and (f) the fill would be constructed according to sound safety standards. The project sponsor should consider these issues for any element of the project that constitutes Bay fill. Additionally, any portion of the project that would occur adjacent to or within a wetland or marsh area should consider any potential impacts of the proposed project on fish and wildlife, including any special-status species, and any measures to avoid such impacts.

The Commission defines fill as solid, pile supported and cantilevered fill in the Bay and marsh. Section II.36 states that a boarding float and gangway, transfer spans and breakwaters would result in approximately 0.94 acres of new Bay fill for the proposed ferry terminal, including approximately 0.73 acres of solid fill, approximately 0.01 acres of pile-supported fill and about 0.2 acres of floating fill. Section II.38 states that an additional 1.12 acres of solid riprap fill would be placed in the Bay along the shoreline. In order to permit the approximately 2.06



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acres of proposed fill, the project would need to meet the Bay Fill policies laid out in the McAteer-Petris Act. In addition, Section IV.M mentions new docks at the proposed sailing center, including new pilings, a boat launch and new pier. In the FEIR, please further describe the proposed work at the sailing center, including the area and volume of fill in the Bay and how the proposed work meets the McAteer-Petris Act's Bay Fill policies.

17.3

Further, the project description for the Ferry Terminal Site Plan lays out three Breakwater Variants under consideration: (1) symmetrical breakwaters with a 200-foot west-facing opening; (2) two symmetrical breakwaters plus a third, separate, detached breakwater, and a 300-foot opening facing southwest; and (3) phased construction of breakwaters, with the northern, longer breakwater constructed first, along with the ferry slips and passenger facilities. Based on a cursory review, the third proposal or preferred breakwater plan involves the least amount of fill in the Bay to achieve the project purpose; therefore, this proposal may provide the greatest consistency with the McAteer-Petris Act's Bay Fill policies. In the FEIR, please further explain how the proposed project is the minimum fill necessary and why public access may not be provided along the southern breakwater in the preferred variance.

17.4

**Transportation.** Section III.D of the DEIR correctly states that the San Francisco Bay Plan is a guiding transportation and planning document for the Bay Area. Relevant transportation policies include Bay Plan Transportation Policy No. 4, which states, "[t]ransportation projects on the Bay shoreline and bridges over the Bay or certain waterways should include pedestrian and bicycle paths that will either be a part of the Bay Trail or connect the Bay Trail with other regional and community trails. Transportation projects should be designed to maintain and enhance visual and physical access to the Bay and along the Bay shoreline." Further, Bay Plan Transportation Policy No. 5 states, "[f]erry terminals should be sited at locations that are near navigable channels, would not rapidly fill with sediment and would not significantly impact tidal marshes, tidal flats or other valuable wildlife habitat. Wherever possible, terminals should be located near higher density, mixed-use development served by public transit."

Based on Transportation Policy No. 4, the bicycle and pedestrian access along Treasure Island and Yerba Buena Island should all be designated to San Francisco Bay Trail standards. In addition, the San Francisco Bay Plan Map No. 4 states that in regards to the open spaces on Yerba Buena Island (YBI), and from the Bay Bridge, the project should provide, "a linkage system of trails near the shoreline and at the upper elevations that connect vista points and open spaces." As further discussed in this letter under Public Access and Recreation, we are concerned about the linkage of the trails for bicycles and pedestrians from the east span of the Bay Bridge through Yerba Buena Island to Treasure Island.

17.5

Pursuant to Transportation Policy No. 5, the FEIR should state whether the proposed design would provide adequate clearance for vessels and how the Ferry terminal breakwaters would affect visual access of the Bay from the ferry terminal and Building One.

17.6

**Appearance, Design and Scenic Views.** Sections IV.B pages 16-17 of the DEIR cites Bay Plan policies regarding appearance, design and scenic views applicable to the Project. While the DEIR shows eight locations as representative of proposed visual conditions of the Redevelopment Plan Project Area, the FEIR should include visual impacts from the downtown financial core near the Ferry Building toward Treasure Island and the visual impacts from the City of Oakland near the Bay Bridge, and the City of Emeryville at the Emeryville Marina.

17.7

**Biological Resources.** Section IV.M discusses the possible biological resource impacts related to the proposed project. While this section correctly outlines the Commission's jurisdiction, the FEIR should include a discussion about the Commission's regulatory requirements governing the

17.8

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protection of the Bay's natural resources. In evaluating Bay projects for authorization, the Commission must find that marshes, mudflats, and subtidal habitat would be "conserved, restored and increased." Further, pursuant to the Bay Plan policies on Fish, Other Aquatic Organisms and Wildlife, "[t]he Commission should: (a) Consult with the California Department of Fish and Game and the U.S. Fish and Wildlife Service or the National Marine Fisheries Service whenever a proposed project may adversely affect an endangered or threatened plant, fish, other aquatic organism or wildlife." Thus, this project may trigger consultation with these various resource agencies, which would be a filing requirement before the Commission can take action on this proposed project.

17.8,  
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While Section IV.M.43 of the DEIR outlines potential impacts to endangered or threatened plant, fish other aquatic organisms or wildlife, it should also address the work windows established to protect the aquatic special status species, such as Chinook Salmon, Coho salmon, steelhead trout, green sturgeon, and longfin smelt, and any work windows established to address the upland special-status animals, such as the American peregrine falcon, double-crested cormorant, and the California brown pelican.

17.9

17.10

Section IV.M Impact BI-2 recognizes potential impacts to eelgrass beds, which are sensitive habitat for Pacific herring, invertebrates and assorted fish species. In order for the Commission to permit the proposed project, the proposed eelgrass survey under Mitigation Measure M-BI-2c, should depict the eelgrass bed locations and which beds could be impacted from the proposed ferry, the sailing center, and other recreational activities that could impact eelgrass. The FEIR should further discuss the Best Management Practices to be utilized during and after construction, such as the use of barges and sediment curtains, as well as the approximate number, location and size of the proposed storm water outfalls in relation to how the project would impact the onsite biological resources.

17.11

**Recreation and Public Access.** Section IV.J.8 correctly refers to the Bay Plan policies regarding recreation and public access and Section III.10 refers to Bay Plan Map No 4. Bay Plan policies regarding public access—in addition to those mentioned above—state, in part, that access should "be provided in and through every new development in the Bay or on the shoreline," be designed using the Commission's *Public Access Design Guidelines* and pursuant to the advice of the Commission's Design Review Board, "encourage diverse Bay-related activities and movement to and along the shoreline," be conveniently located near parking and public transit, "permit barrier free access for the physically handicapped...and include an ongoing maintenance program," and "prevent significant adverse effects on wildlife."

At completion, the Project would include approximately 300 acres of park and open space areas. On Treasure Island the parks and open space include: an approximately 56-acre Northern Shoreline park adjacent to another approximately 59-acre habitat area and 15-acre wetland; an approximately 40-acre sports park connecting to the Eastside Commons and the Eastern Shoreline Park and Pier One; and an approximately 20-acre Cityside Waterfront Park adjacent to a cultural park, waterfront plaza and the Clipper Cove Promenade and Marina Plaza on the Southern end of the island. The parks and open space on Yerba Buena Island include: a 6-acre hilltop park, historic buildings and open space; approximately 74-acres of natural areas; and a small beach park. These sites are intended to serve 18,640 residents and 2,930 employees that are projected for the Project. The FEIR should clarify whether the area dedicated for parks and open space takes into account the demands of visitors besides residents and employees, e.g., those using the bicycle and pedestrian trails, hotel guests, and retail customers, as well as visitors to the open spaces.

17.12



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On November 9, 2009, the Commission's Design Review Board (DRB) reviewed the Project and provided preliminary feedback regarding the design and layout of proposed public access and recreational facilities. The DRB also considered whether the Project would provide adequate and attractive public access with adequate connections to and along the shoreline, maintain and preserve the visual quality of the Bay and shoreline, and be adequately designed to address sea level rise effects on access areas.

At the first DRB review of this project, the Board raised a concern regarding the potential impact on the 0.5-acre beach adjacent to Clipper Cove on YBI. Section IV.J Impact RE-2 states that there will be a less than significant impact on existing recreational facilities on the whole. However, an additional 18,640 residences, plus employee and visitors, may have a significant impact on the 0.5-acre beach and surrounding areas, including access and parking to the beach. The FEIR should address specific impacts to the 0.5-acre beach, as well as any improvements in the area to create safe access to and from the beach.

17.13

Further, the FEIR should clarify if all neighborhood parks at the Project site would remain open to the general public or would be restricted for use in any manner.

17.14

The DEIR states that the residential and non-residential parking demand associated with the Project would be for 21,233 vehicles and that 18,917 spaces would be provided as a part of the Project resulting in about 2,300 fewer spaces than what is actually needed. The DEIR does not identify parking areas or spaces dedicated to users of the public access areas at the project site. Because the demand for off-street parking would likely be high, the FEIR should clarify whether parking for shoreline public access areas would be provided, how parking restrictions would be enforced to assure parking availability for shoreline users and, if no designated parking is proposed, where users of these areas would be expected to park.

17.15

The Bay Plan recreation policies state partly that marina development "should include public amenities, such as viewing areas, restrooms, public mooring docks or floats and moorages for transient recreational boaters, non-motorized small boat launching facilities, public parking, [and] substantial physical and visual access...." While the marina is not apart of this DEIR, the FEIR should further clarify the proposed upland marina facilities amenities along the Clipper Cove Promenade, and how the amenities would be utilized if the marina expansion project were not built.

17.16

Regarding bicycle and pedestrian access on Yerba Buena Island (YBI) Figures II.12 and IV.E.10 show the proposed conceptual bicycle and pedestrian plans. While we are aware of existing site constraints, as mentioned in the Transportation section of this letter, we are concerned about the safety, usability, and lack of a separated, Class One trail on YBI. Visiting bicyclists and pedestrians coming from the east span of the Bay Bridge will likely be a mix of advanced and novice riders both youth and adult. Without a Class I trail, the novice riders would likely interfere with the advanced riders going down hill and up hill on Macalla Road. The FEIR should address providing a Class I trail, in both directions on Macalla Road, including curb separation and guardrails along the outside edge of Macalla Road, which could allow for bicycles to safely use the four-foot-wide shoulder. In addition, we are concerned over Mitigation Measure M-TR-24, which could allow for the removal of the proposed bicycle lane on Treasure Island Road if bicycle access interferes with bus access off the island. Without this proposed bicycle access, a bicycle would be forced to use the steep incline up Macalla Road. In addition, the FEIR should address incorporating signals along

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Treasure Island Road at the Bay Bridge Westbound On-Ramp Intersection, as shown on Figure IV.E.15, which could create a safer bicycle access lane across the on-ramp. We are also concerned that the project lacks a view overlook on Treasure Island Road for bicycles and pedestrians to take advantage of the views toward the City from YBI. The FEIR should also address this public access opportunity.

**Water Quality.** The DEIR identifies various activities, including remediation, dredging, construction (earth moving, grading, and excavation), and operational work at the project site that could result in impacts, including erosion, turbidity, etc. The DEIR lists strategies to mitigate potential water quality impacts, including the application of Best Management Practices (BMPs) and certification by the San Francisco Bay Regional Water Quality Control Board (RWQCB). The DEIR does not include the San Francisco Bay Plan's policies on Water Quality. The Bay Plan Water Quality Policy No. 1 states, "[b]ay water pollution should be prevented to the greatest extent feasible. The Bay's tidal marshes, tidal flats, and water surface area and volume should be conserved and, whenever possible, restored and increased to protect and improve water quality. The Bay Plan's Water Quality Policy No. 2 states, in part, that "[w]ater quality in all parts of the Bay should be maintained... and...protected from all harmful or potentially harmful pollutants," and, further, that the RWQCB's recommendations provide "the basis for carrying out the Commission's water quality responsibilities." Pursuant to this policy, the RWQCB certification would need to be obtained in order for the Commission to file a permit application or federal consistency determination.

**Dredging.** While a proposed dredging plan is not included in the DEIR, the option to dredge at the project site is discussed in Section IV.O page 18 and 37. The Commission's dredging policies state, in part that dredging should be authorized with the Commission can find that "dredging is needed to serve a water-oriented use or other important public purpose, such as navigational safety" and "the siting and design of the project will result in the minimum dredging volume necessary for the project." The FEIR should clearly outline the proposed dredging at the project site, and how the goals of the project can be achieved while minimizing the volume of dredged material. The FEIR should also address dredging and disposal issues recognizing that (1) the Dredged Material Management Office has not taken action on any proposed dredging on site, and (2) the Commission's policy preference is for beneficial reuse of dredged material, where feasible.

Thank you for providing the Commission staff with the opportunity to comment on the Project. We realize that the project is in the early design stage and would be happy to meet with the Project proponents to discuss potential changes that may come about through the DEIR process, the Commission's policies, permit or federal consistency procedures, etc. Please contact me with any questions at (415) 352-3669 or karenw@bcdca.gov.

Sincerely,

KAREN WEISS  
 Coastal Program Analyst

KW/mm

cc: State Clearinghouse  
 Maureen Gaffney, San Francisco Bay Trail

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*Executive Director*

September 9, 2010

**Submitted by email**

Bill Wycko

Environmental Review Officer

San Francisco Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Email: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)

**Re: 2007.0903E: Redevelopment Plan for the Treasure Island / Yerba Buena Island Redevelopment Project – Draft EIR**

Dear Mr. Wycko:

Thank you for the opportunity to comment on the Treasure Island Draft Environmental Impact Report ("DEIR"). Founded in 1971, San Francisco Architectural Heritage ("Heritage") is a non-profit 501(c)(3) membership organization whose mission is to preserve and enhance San Francisco's unique architectural and cultural identity. Although Heritage concurs with the DEIR's identification of potential historic resources and evaluation of project impacts, we request that the Final EIR further explore creative alternatives and mitigation measures that would reduce or avoid the project's limited range of significant adverse impacts on cultural resources.

18.1a

**I. Historic Resources Within the Project Area**

The DEIR includes a comprehensive list of buildings and structures on Yerba Buena Island and Treasure Island that are considered historical resources for purposes of CEQA.<sup>1</sup> Those already listed in the National Register of Historic Places include Building 1 (the Administration Building), Building 2 (the Hall of Transportation), Building 3 (the former Palace of Fine and Decorative Arts), the Senior Officers' Quarters Historic District (also known as the "Great Whites"), Quarters 10 and its contributing garage (Building 267), and the Torpedo Assembly Building (Building 262).

18.1b

<sup>1</sup> Although not included in the DEIR, three previous historic resource surveys of Yerba Buena Island and Treasure Island are referenced in support of its findings. These surveys should be made available for public review in conjunction with the release of the Final EIR. In particular, Heritage would like to see if they contain information about the chapel, completed in 1943, which may potentially be a contributing resource, and which has been the subject of some public comment.

The DEIR also evaluates thirteen individual extant buildings and structures that have reached 50 years in age. Of those thirteen, two were found to meet the criteria for inclusion in the California Register of Historic Resources (CRHR). The Damage Control Trainer *USS Buttercup* (housed in Building 341) is determined eligible under Criterion 3 - Design Construction, and the landscape elements that surround Buildings 1, 2, and 3 were found to contribute to the significance of the buildings under California Criterion 1 - Events, for their association with the Golden Gate International Exposition of 1939. Based on the information provided in the DEIR, Heritage concurs with these findings.

18.1b,  
cont'd

With regard to potential impacts on the above-mentioned historic resources, we agree that the proposed rehabilitation of Buildings 1, 2, and 3 will not result in a significant adverse impact, as the project's Design for Development guidelines require that all work be consistent with the Secretary of the Interior's Standards for Rehabilitation. Likewise, the proposed project would not alter the contributing landscape areas of Buildings 2 and 3 in a manner that would significantly diminish their ability to contribute to the significance of the resource as it exists now. However, as acknowledged in the DEIR, the proposed project will have a significant and unavoidable adverse impact on the *USS Buttercup* battleship simulator.

## **II. The FEIR Should Evaluate Less Harmful Alternatives to Complete Removal of the *USS Buttercup* Battleship Simulator**

18.2

The proposed project calls for the demolition of the *USS Buttercup*; as such, its character-defining materials and features would be removed entirely and it would no longer convey historic significance. Although Mitigation Measure M-CP-9 calls for documentation and interpretation of the Damage Control Trainer, it would not lessen the impact of demolition to a less-than-significant level.

The DEIR finds that moving the *USS Buttercup* is not feasible because the Damage Control Trainer includes a large concrete sump, much like a swimming pool, which is partially built into the grade. Heritage requests that the Final EIR include more detailed analysis of partial preservation alternatives, such as relocation of the simulator onto a reconstructed sump and/or into a museum setting. As noted in the DEIR, the proposed Development Program reserves over 100,000 square feet for recreational, interpretive, cultural and museum uses.<sup>2</sup> If relocated, the *USS Buttercup* could be an interesting addition to one of these areas and would convey

<sup>2</sup> "The Development Program would provide space for a variety of community programs in the historic former Administration Building (Building 1), in some of the proposed residential buildings, and in a new 35,000-sq.-ft. building near Pier 1 expected to provide space for recreational or interpretive center activities. Space for public offices, such as TIDA, and child care also would be provided. Space for an up to 75,000-sq.-ft. museum or other cultural institution is planned in the Cultural Park north of Building 1." DEIR at II.33.

to the public information about the island's past use as a naval base. The FEIR should also assess the feasibility of transferring the *USS Buttercup* back to the Navy for active use. Any of these options is preferable to documentation and interpretation alone, and would potentially reduce impacts to a less-than-significant level.

18.2,  
cont'd

If preservation options prove infeasible after detailed evaluation, Heritage proposes enhanced and creative interpretation of the *USS Buttercup* as part of Mitigation Measure M-CP-9, such as a video installation or other interactive media in the Treasure Island museum illustrating the use and function of the battleship simulator.

Thank you again for the opportunity to comment on this complex project. If you have any questions or need additional information, please do not hesitate to contact Alex Bevk, Preservation Project Manager, at 415/441-3000 x11 or [abevk@sfheritage.org](mailto:abevk@sfheritage.org).

Sincerely,



Mike Buhler  
Executive Director





## LAW OFFICE OF NICK S. ROSSI, ESQ.

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September 9, 2010

Environmental Review Officer  
C/O Rick Cooper  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, California 94103

*Sent via email to [rick.cooper@sfgov.org](mailto:rick.cooper@sfgov.org)  
and First Class Mail*

Re: Treasure Island and Yerba Buena Island Draft Environmental Impact Report  
published July 12, 2010 (“**DEIR**”); Treasure Island/Yerba Buena Island  
 (“**TI/YBI**”) Redevelopment Project (“**Project**”)

To Whom This May Concern:

This firm represents Kenneth and Roseanna Masters (“**Clients**”) with regard to analyzing the DEIR for the proposed development of Treasure Island and Yerba Buena Island. Our Clients reside at 301-D Macalla Court (Treasure Island) SF, 94130. I respectfully request that should you choose to respond to this letter that such be addressed to my law office.

19.1

As you know the San Francisco Bay Conservation and Development Commission (“**BCDC**”), established pursuant to Title 7.2 (commencing with Section 66600) of the California Government Code, has jurisdiction over matters affecting the San Francisco Bay, which includes Treasure Island and Yerba Buena Island. The BCDC also acts as a “sister agency” to the California Coastal Commission; thus, often times many of its findings concerning land use and tidal lands, including sea levels, may be relevant. BCDC is guided in its decisions to a great deal by the McAteer-Petris Act, the San Francisco Bay Plan, and other plans for specific areas around the Bay. It is necessary to obtain a BCDC permit prior to undertaking most work in San Francisco Bay or within 100 feet of the shoreline, including filling, dredging, shoreline development and other work; thus the Project is subject to BCDC’s jurisdiction and such should have been thoroughly addressed in the DEIR. Although the DEIR does include BCDC within the regulatory section of the analysis, it does not include any reference to consultations or compliance with any permits or regulations.

19.2

BCDC released a series of maps showing areas vulnerable to 16 inches of sea level rise at mid-century and 55 inches by the end of the century. The map for Treasure Island is

19.3



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attached and shows areas subject to 55 inches of sea level rise, whereas the DEIR assumes sea level rise of 36 inches with 6 inches of freeboard (Hydrology and Water Quality page IV.O.29); therefore, it appears that the DEIR's analysis is inadequate. It is unknown if the attached map accounts for the perimeter berm in the modeling. The BCDC's and the DEIR's (again at Hydrology and Water Quality page IV.O.29) estimates only represent sea level rise in the next century; however, it is reasonable to assume that additional sea level rise will occur within the lifespan of the Project, which is expected to exceed a century. Therefore, it seems the DEIR did not adequately analyze a sea level rise of 55 inches or the risks to public safety for the lifetime of the Project (i.e. after 100 years).

19.3,  
cont'd

In fact, Impacts HY-11 and HY-12 find that these concerns regarding tsunamis and sea-level rise are "...less than significant." The "less than significant" determination is without any justification or scientific (basis) discussion; indeed, it flies in the face of the clear facts stated and delineated on the attached Treasure Island Map and the findings of the California Coastal Commission (Addendum to Commission Meeting for Friday, June 12, 2009 – North Coast District Item F4a, Local Coastal Program Amendment No. CRC MAJ-1-09; Costa Norte) – i.e., tsunami resilience design proposes a minimum sea level rise rate of three feet per century. These findings also mention that tsunami hazard maps should account for sea level rates of three to six feet per century.

Moreover, no definitive publication has been produced that addresses sea level rise, making it impossible to determine the appropriate height of the berm. It is conceivable that, during the lifetime of the Project, the sea level may increase more than the Project's contemplated berm designed height; again, the DEIR fails to address this probability.

Sea level rise is especially problematic for Treasure Island because of its low elevation; thus, as water levels rise around Treasure Island, the shallow ground water table would be affected. This obvious fact/consequence may alter the liquefaction potential, structural foundations, and the perimeter berm affecting the Project, its viability and the safety of its inhabitants. Indeed, the implications of placing a community behind an inadequately designed (i.e., insufficient width, height and structural materials) perimeter berm could create problems that will be deferred to the future and costly to the detriment of the Project's inhabitants and San Francisco's taxpayers of. Proper, detailed, worst-case scenario future planning for sea level rise is technically feasible from an engineering and geologic perspective; however, the maintenance/repair/improvement costs in the future may be excessive and unrealistic. As such, these potential significant impacts must be fully addressed and mitigated at the full cost and liability of the Project's developer.

Furthermore, it seems the Project provides no study of alternative berm systems. Key to this analysis is that, although a soil/rock based system will be much cheaper for the developer to construct at the beginning of the Project, the completed structure will be very expensive to maintain; in addition, it cannot be easily raised/expanded, except at great difficulty and cost – to someone or entity other than the Project's developer. A study for a superior alternative such as an "Amsterdam Dam" (*paraphrased*) [i.e., a core-

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tin, steel-plate, bulkwork system, anchored by foundation piles, as in Discovery Bay, California], and should have been included in the DEIR - it is a system that, although more costly to first install, can be easily expanded (i.e., its height raised) to address sea level rise if the foundation piles are of a sufficient diameter and driven to a bedrock depth. Normally and understandably, a developer does not want to pay for the very large, front-end costs, but rather seeks to have as little money in the system as possible and then “back-end load” the maintenance and future expansion onto the residents and public via a reclamation district; such a district will mostly likely fail if it does not conservatively estimate and collect very large future assessments.

19.3,  
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Moreover, notwithstanding the failure to define and regulate a perimeter berm as a levee, it is axiomatic that a perimeter berm serves the same function as a levee. The Federal Emergency Management Agency (“**FEMA**”) has defined a levee in the National Flood Insurance Program (NFIP) regulations at 44 *CFR* as “... a man-made structure, usually an earthen embankment, designed and constructed in accordance with sound engineering practices to contain, control, or divert the flow of water so as to provide protection from temporary flooding.” Its primary function is flood protection.

19.4

Here, the DEIR fails to properly evaluate the long term consequences of placing a community that is subject to sea level rise and flooding, with a limited ability to seek refuge from flooding events. In particular, FEMA manages the National Flood Insurance Program (“**NFIP**”), which is a cornerstone strategy for preparing communities for flood disasters. As part of that strategy, FEMA has developed certain certification criteria to confirm that levee systems are designed and constructed to an appropriate level for their needs and risk tolerance; moreover, these criteria ensure that these levees are adequately maintained and otherwise perform properly.

The levee owner is responsible for providing documentation to show that the levee meets these criteria. If a levee meets FEMA criteria, then the flood hazard map will show the area behind the levee as a moderate-risk zone. If it does not, then the map will show the area as a high-risk area, or Special Flood Hazard Area (“**SFHA**”). The SFHA is the area subject to inundation by the 1 percent annual-chance flood (FEMA, 2010).

The responsibility for seeking levee certification is that of the local agency with jurisdiction over the floodplain in question. The local agency may perform the certification analysis with staff or consultants, or may request such technical determination by others. FEMA does not certify levees; instead, FEMA is the recipient of levee certification determination documentation forwarded by the local agency. If levee certification documentation is found to be in order, then FEMA will accredit the levee and the associated flood insurance rate maps depicting flood hazard will show the floodplain areas as protected from the base (regulatory) flood (FEMA, 2010).

On February 24, 2006, following sustained heavy rainfall and runoff, Governor Arnold Schwarzenegger declared a State of Emergency for California's levee system, commissioning up to \$500 million of state funds to repair and evaluate state/federal

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project levees. This declaration was a necessary step in preventing possible catastrophic consequences of Hurricane Katrina-like proportions. Following the emergency declaration, Governor Schwarzenegger directed the California Department of Water Resources to secure the necessary means to fast-track repairs of critical erosion sites. *Levees or other flood prevention structures should not be used as a means to encourage the development in flood prone areas.* At the core of this debate should be determining what level of risk to public safety is acceptable. Levees require regular maintenance to retain their level of protection. The fact is that levees can and do decay over time, and maintenance can become a serious challenge. When levees do fail, or are overtopped, they fail catastrophically (FEMA, 2010). The aforesaid/above-discourse dramatically illustrates the DEIR's failure to properly evaluate the long-term consequences of the Project being subject to sea-level rise and flooding with a minimal ability to seek refuge from flooding events.

19.4,  
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Moreover, the Project's emergency response plan, as analyzed by the DEIR (at Hazards and Hazardous Materials IV. P.38 and IV.P.39), should have included analysis/mitigation measures of practice and drills to ensure proper education/preparation for flooding as well as the adequacy of safety routes in areas designated for emergency evacuation. These analysis/mitigation measures are crucial due to the fact that TI/YBI are located in an area with high seismic activity and limited access off of them (as discussed below), which could further contribute to berm failure. The DEIR should include an analysis of seismic failures that could impede access off the islands as evidenced by the Bay Bridge collapse during the 1989 Loma Prieta earthquake.

19.5

The DEIR (at IV. Environmental Setting and Impacts, O. Hydrology and Water Quality, Page IV.O.33) proposes an adaptive management strategy implemented by Treasure Island Development Authority ("TIDA"). By properly naming the perimeter berm as a levee, another level of accredited management structure would exist to ensure that necessary maintenance is conducted appropriately and timely. However, as noted above, failure to require that the berm be certified as a levee under and otherwise subject to FEMA jurisdiction creates an unnecessary risk of flooding in the future due to lack of maintenance; this risk will ultimately increase maintenance costs and safety risks to property owners/residents. In addition, it should be noted that most lenders will not provide any purchase or construction financing without proper FEMA certification and recognition. The developer's attempt to use sleight of hand to falsely label the berm as anything other than a levee should not go unaddressed – the obvious motivation is greed and not the best interests of the Project's future inhabitants.

19.6

Consistent with the above, there should be great consternation about the creation of a funding mechanism for the berm maintenance based on fees assessed by property owners/homeowners; the failure of the berm because of improper design or underfunded maintenance will have a significant impact. Considering the Project's significant affordable housing component/population, it seems unrealistic that the Treasure Island population alone would be able to afford the studies and/or any future repairs. Moreover, there has been no analysis of how the property owners would be able to afford the

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consequences of a catastrophic failure of any part of the perimeter berm, unless San Francisco's taxpayers are willing to share this burden. As currently proposed, in light of this inadequately proposed rock berm and undefined repair/maintenance obligation, it is obvious that the Project is susceptible to a "Katrina"-like disaster. If the awareness of climate change and other causes of profound environmental variances lead to additional pressures upon levees and flood control systems (and their failures), then courts will find themselves entangled in property owner claims asserted against government entities. If government flood control structures are not designated and built to accommodate the anticipated changes in the environment, and the inevitable results associated with them, then the government will face increasing liability burdens with the taxpayers will bear the full economic burden. The aforesaid significant impact was not addressed in the DEIR.

19.6,  
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Often times anything can be engineered to meet geotechnical standards, but the question should be at what cost to construct and maintain them in the future. The DEIR is completely silent on these issues (as noted, in part, above). The Project's developer is proposing expensive geotechnical methods that include population densification and the massive importation of clean fill. The indirect and very significant impact of removing Treasure Island's existing, seismically unstable, sand-based soil and replacing the same with massive amounts of imported fill should be fully evaluated in the DEIR. Just with addressing geotechnical issues, yet along with other Project concerns, the potential for this Project to become a problem in the future should be carefully evaluated. As noted above, future costs and safety risks to rest of the San Francisco taxpayers should be analyzed in the DEIR. As currently proposed, the Project relies on a specious premise of "build it and they will come" (i.e., someone will pay for it at any risk).

19.7

Although the DEIR seeks to analyze the effect and possible consequences of a large part of the Project being a man-made/artificial island with poor fill and compaction by proposing mitigation and improvement measures to rectify this inherent problem, including without limitation the possibility of liquefaction resulting in massive structural failures of the Project's improvements, it does not address the environmental impact on the surrounding tidal waters and the generation of greenhouse gases necessary to effectuate such measure's improvements.

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(comments  
overlap)

Moreover, although it is generally true that every engineering problem has an engineering solution, such as the complete replacement of the poor, sand-based fill that constitutes the majority of Treasure Island itself, it is not true that the cost and the damaging impact to the surrounding environment is justified. Not only will this mitigation burden and improvement cost have to be subsidized by a variety of public-financing mechanisms, but the enduring effect of building something where it should not be built will endure for generations to come. The DEIR wholly and completely fails to analyze and propose acceptable mitigation measures to address this problem, including how such is not to become a future environmental problem and a burden on the taxpayers of San Francisco.

19.10

Moreover, it is incredible that the DEIR proposes underground garages to reduce the parking footprint when logically such will have to be below sea-level and disruptive to the environment (not to mention the high probability of future failure due to hydrostatic

19.11

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water pressure and catastrophic seismic activity). Indeed, it appears a governmental employee may have raised concerns over seismic difficulties posed by high rises and new, man-made development on an artificial island; for her troubles, she was allegedly demoted.

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con'td

Of equal or more significance is the Project's traffic impact(s) and the DEIR's flawed conclusion that such is "unavoidable." In fact, the various Mitigation Impacts TR1 through TR63 as addressed by Mitigation Measures M-TR-2 and M-TR-24, are fatally flawed because of their vague and speculative/incomplete nature, including but not limited to a failure to consider/examine direct access to BART, an overdependence on an expensive, limited, bi-directional (only between TI/YBI and SF) ferry service, and an illogical reliance on a fundamentally inadequate congestion management "fee." Indeed, it is incredible that there can be sixty three identified Traffic Impacts, but only some basic, oversimplified Mitigation Measures proposed in M-TR-2 and M-TR-24.

19.12

For instance, the Project's proposed public transportation system does not adequately serve and/or account for intra-island transportation, including where visitors would like to travel (e.g. the northern shoreline, to the wetlands or historical admiral mansions); more study needs to be done concerning on-island transportation. Moreover, as noted above, it is difficult to conceive as to why ferry service is not extended to the East Bay cities.

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Furthermore, as part of implementing the Project, the Treasure Island Transportation Management Act ("TITMA") would administer a variable congestion fee to those accessing the Bay Bridge (at IV. Environmental Setting and Impacts E. Transportation, Page IV.E.45.) In other words, fees would be charged for auto access between the Bay Bridge and TI/YBI during periods of peak congestion. This "congestion pricing" program is designed to discourage residents from making auto trips during peak travel periods and encourage other modes of travel to and from TI/YBI. The amounts and hours that fees would be charged would be controlled by the TITMA. However, individuals can simply circumvent the higher price for this fee by leaving or entering the islands at different time periods. Therefore, the revenue is uncertain as well as its effect on car ownership/traffic. Consequently, the primary purpose of TITMA will be significantly underfunded and/or frustrated to the point of being ineffectual – all of which is a significant impact that should be addressed in the DEIR.

19.15

The Draft Transportation Plan for Treasure and Yerba Buena Islands ("DTP"), which plan is part of the DEIR states, "[T]otal peak period vehicle trips should be similar to the number of trips generated when Treasure Island was operating as a Naval Base." There has been no analysis by the DEIR (or elsewhere) that the previous naval traffic was an acceptable burden then or would now be an acceptable burden; such is especially true in light of the fact that no one would seriously argue that traffic on the Bay Bridge has decreased since the closure of the Naval Base. The DEIR's baseline traffic data should be compared to current conditions and not outdated and inaccurate data. Historical traffic data should not be considered part of the current environmental setting.

19.16

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Moreover, based on the accepted current understanding of global warming, green house gases and the economic effects (not to mentioned the distorting demographic effects on the surrounding cities/communities) caused by increased traffic, the proposed mitigation measures and alternatives fail miserably to address those issues. In addition, the DTP

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does not adequately evaluate the needs of families with children (e.g. creating either a walkable and/or bikeable transit-oriented community), and lacks focus on those individuals that cannot afford cars (e.g. encouraging electronic transportation such a golf carts). It is notable that at the August 12, 2010 Planning Commission hearing, one commissioner took issue with the Project's demolition of the existing place of worship, and failure to replace such; he asked the question (but did not receive an answer) as to what effect/burden such demolition/lack of replacement would have on the residents and increased trip generation. The DEIR completely fails to take this fact into consideration when analyzing the traffic impacts.

19.18

In particular, the proposed ferry service relies on another agency to approve and conduct that service, while Alternative C includes no ferry service and provides fewer residential units and less neighborhood-serving retail space than in the Project. The DEIR should include an analysis of impacts of the preferred Project (such as traffic, air quality, evacuation plans) if no ferry service is provided. (See - VII. Alternatives, pages VII.48 through VII.60). A project with a thirty percent affordability demographic may mean

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that (as to at least those residents) they probably cannot afford an expensive ferry service; as such, there will be many more vehicular trips than estimated by the DEIR - a mitigation by way of a transportation subsidy paid for by the Project should be studied.

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The traffic mitigation analysis focuses on transit options, not on providing the services on TI/YBI that would reduce transportation. Additionally, since public transportation is voluntary, it is difficult to quantify the amount of reduced traffic; therefore, the aforesaid traffic mitigation analysis is inadequate and fatally flawed.

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Notwithstanding these alternatives and obvious analysis failures, the DEIR improperly concludes that the majority of the Traffic Impacts are "unavoidable," which obviously is a false conclusion. In addition, it should be noted that TI/YBI is passed the toll plaza heading towards San Francisco. Therefore, it is likely commuters would drive instead of taking alternative transportation. Even if alternative transportation is provided, such does

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guarantee it will be utilized.

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The Project's alternatives, including but not limited "Reduced Development Alternative" (as identified therein), include a review of reduced densities, but not at a level that would actually reduce impacts to traffic. The primary difference between the Project and the Reduced Development Alternative is that residential development would be reduced from up to 8,000 dwelling units (which proposes a population density equal to that of the City of San Francisco's most populous areas and likely to cause many issues beyond traffic) to 6,000 units (see VII. Alternatives, page VII.15). The Reduced Development Alternative was included to determine if a reduced number of residential units on TI/YBI would avoid or substantially lessen traffic (and related air quality and noise) impacts, as well as an aesthetic impact on scenic vistas of the Project (VII. Alternatives, page VII.18). Pages VII.31 and VII.32 describe cumulative impacts of

19.25

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traffic under a reduced development alternative. In addition, no financial information was located to determine if a further reduction in dwelling units could still produce enough user fees to support wastewater and water services (this topic is further discussed below).

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It is obvious that there would still be significant cumulative traffic impacts, and such should be addressed; however, it is also clear that even at 6,000 units, the Project is much too dense considering the traffic impacts it will generate. The DEIR should have studied a much lower density, including the creation of more open-space as a way to reduce the significant traffic impacts.

It should also be noted that beginning January 1, 2011, when a circulation element may be subject to a substantive revision, there must be a plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads and highways for safe and convenient travel that is suitable to rural, suburban and/or urban contexts of San Francisco's General Plan. [See Government Code Section 65302, et seq]. The compliance with that requirement may create significant new impacts and otherwise identify additional alternatives that require analysis. However, the DEIR and the DTP fail to analyze and otherwise project the consequences of complying with this requirement.

19.26

Another potential traffic impact not adequately analyzed is the contribution of such impact to greenhouse gases and the degradation of air quality. The DEIR applies BAAQMD's second, optional quantitative efficiency threshold of 4.6 MT of CO<sub>2</sub>e per service population per year to the Project. Both the Project and the Project with Expanded Transit Service are analyzed quantitatively (H. Greenhouse Gas Emissions, page IV.H.27). Moreover, the Waste Management Act of 1989 requires local governments to reduce solid waste by fifty percent. There is an inadequate, cross-analysis correlation between the traffic impact sections and the greenhouse gas/air quality sections.

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In particular, the analysis of greenhouse contributions falsely assumes that they are reduced because certain (vague) programs and the Project's design will reduce solid waste and transportation contributions to greenhouse gas generation. Indeed, there is no demonstrative science in the DEIR that quintupling the population of TI/YBI would produce a "less than significant" impact on greenhouse gas creation. In addition to the aforesaid items, the DEIR analysis should include a worse-case, greenhouse gas scenario in order to determine the Project's full impacts because solid waste and transportation are fickle habits subject to change by the consumer.

Tangentially related to air quality is the fact that the Dust Control Ordinance requires additional dust control measures when winds exceed 15 miles per hour; mitigation measure M-AQ-4, contemplates that there may be winds that exceed twenty miles per hour, and impacts W-S3 and W-S4 recognize the possibility of a Section 148 wind disaster, possibly in different areas of the Project. Local history can be telling; Lennar Homes's poor efforts regarding the asbestos, manganese and other toxic elements that went into the air during the development at the Bayview Hunters Point project, led to

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three violation notices and over \$515,000 in civil penalties for violations of California Health and Safety Code Section 424. A regulatory commission should be established to monitor this development as old naval bases may similarly contain these toxic elements. Despite this recent experience, neither the Wind and Shadow Mitigation Measures (IV., I., S-73 through S-74) nor other proposed mitigation measures such as the Hazardous and Hazardous Materials DEIR analysis, including the Human Health Risk Assessment, adequately address this concern or otherwise propose sufficient mitigation/improvement measures.

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With further regard to the DEIR and potentially toxic issues affecting the Project, it should be noted that there are several active and closed hazardous sites located on Treasure Island. Incredibly, the DEIR appears to assume that no risk surrounds the hazardous sites that have been closed, unless it is related to construction or the school. It should be noted that closed hazardous sites can be reopened in the future if other contaminants are identified. Planning efforts should disclose the facts to future residents and analyze the risks. Additionally, the DEIR states continuing hazardous material cleanup will meet the requirements of applicable agencies. No specific information about the type of hazardous cleanup is mentioned in the DEIR. In addition, the DEIR fails to analyze and/or otherwise propose improvement/mitigation measures concerning the potential cost of any such future hazardous clean up. (See P. Hazards and Hazardous Materials, pages IV.p.9 and IV.P.17).

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Furthermore, although the DEIR/Project proposes two methods to treat wastewater, only conceptual plans have been developed. The impacts of different wastewater treatment should be defined so that proven mitigation measures can be properly evaluated. Additionally, neither the developer nor the City/County of San Francisco can ensure that the Regional Water Quality Control Board will permit a new facility. (See II. Project Description, pages II.56 to II.60).

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Finally, although economic impacts are generally not evaluated in an environmental impact report (as here), this Project should include a thorough analysis of funding sources to determine if the Project can remain revenue neutral. The analysis should review the relocation of residents if they would not be able to afford the rental rates. Prior to the decision-making process, it is important to know: 1) if San Francisco residents will be burdened by the costs and 2) if affordable rates can be guaranteed for TI/YBI residents. The rate structure may limit the ability of middle- to low-income residents to remain on TI/YBI. Once the rates are established, an analysis could be conducted for the Population and Housing sections, respectively. Until then, it is unknown if the rental rates are acceptable to support middle- to low-income residents.

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The financial burden on qualified, affordable income residents, and the distorting demographic effect (such as on the Project's and surrounding communities' traffic, water supplies, habitats and wastewater systems) was not studied in the DEIR - i.e., it is unlikely they can afford to be burdened with any of the anticipated items, such as: (a) reclamation district assessments, (b) street and lighting district assessments, (c) parks



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district assessments, (d) sewer district assessments, (e) water district assessments, and (f) public transportation fees such as the ferry service (unless such is heavily subsidized). A project with thirty percent affordability may mean that (as to at least those residents) they probably cannot afford an expensive ferry service; as such, there will be many more trips than estimated - mitigation by way of a transportation subsidy paid for by the project should be studied. Moreover, the Project further attempts to raise revenue from parking. However, in the City of San Francisco, it seems parking fees go to public bus service, while commercial parking fees are split between its public bus service, the general fund and the elderly. It is unclear that the parking revenues generated here would go to TI/YBI's own transit funds. Therefore, this identified impact and resulting mitigation measure analyzing the need and source of a transportation subsidy should be studied.

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Qualified affordable renters benefiting from restricted affordable rents cannot (logically or lawfully), through the rent structure or any other assessment, be charged or otherwise burdened with the costs noted in subclauses (a) through (f), above. Thus, if the Project and its developer are not required to underwrite these costs at the time of implementation and for the life of the Project, then such costs and burdens will necessarily fall to the property owners and the San Francisco taxpayers; the Project's developers will have made the profit and left the burden to those who remain. They will make their money under the guise of creating a civic asset for the benefit of all San Franciscans, while leaving the future costs to those supposed taxpayer beneficiaries and property owners. Furthermore, the DEIR fails to study the job locations and effect on transportation and consequential trip generation for affordable housing residents. There has been a complete failure of the DEIR to study the project's social economic effects on the Project's demographics and surrounding communities. In particular, it is most likely that a non-profit affordable housing entity in partnership with the San Francisco Housing Authority will end up being the owners of the projected affordable housing units. As such, in anticipation of the future costs and burdens having to be sustained by that affordable housing partnership, there will be significantly less resources available to develop future affordable housing. This affordable housing would be in existing San Francisco housing locations that are more properly situated where such residents are likely to have access to local employment, readily-available, public transportation (i.e., transit villages), and retail/necessary services – all of which are not only major factors on the budgets of those individuals (and they are the ones that can least afford these budget burdens), but will also significantly reduce traffic greenhouse and air quality impacts. In fact, this very concept has been addressed by the passage of recent state laws, including but not limited to AB-32. Consequently, these matters constitute a significant impact that should be studied in the DEIR with viable proposed mitigation measures.

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Regrettably, it is apparent that the DEIR is fatally flawed, and if approved as written will result in a project in a too-dense, too-expensive, and too much of a burden for its affordable residents and San Francisco's taxpayers. The mere fact that so many political stakeholders want to see a project akin to the hype of this Project approved is not sufficient grounds to ignore the obvious flaws and burdens that will have lasting consequences after those responsible for its approval are gone. The developer has made

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great strides in proposing what could be an asset to the San Francisco community and the existing residents of TI/YBI; however, its march is not over until the above issues are addressed. My Clients believe that, once these issues are addressed and the Project is redesigned accordingly, then it will become the jewel of the Bay.

Respectfully Submitted,

Nick S. Rossi

CC: Client



September 10, 2010

e-mail text

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Dept.  
1650 Mission St., Suite 400  
San Francisco, CA 94103  
Re:Treasure Island/Yerba Buena Island Redevelopment Project Case:  
#2007.0903E  
Comments - DEIR

Dear Mr. Wycko:

As a San Francisco resident and a Planning Commissioner, I have major concerns about the accuracy and completeness of the Draft EIR for Treasure Island/Yerba Buena Redevelopment Project. The overly positive language of the description of proposed project (more appropriate for a promotional marketing brochure) together with the intentional vagueness and omission of important facts are of great concern to me. In particular, the density, massing and height of the proposed project would result in unacceptable impacts on one of the most iconic settings in San Francisco Bay.

20.1

While the Transfer & Reuse of Naval Station Treasure Island Final EIR in June 2006 describes a project that is primarily focused on public oriented development, open spaces, recreation and residential uses, the 2010 DEIR describes a major private real estate development that seems to maximize investment at the expense of public interest values.

20.2

While over the course of 10 years, well-intentioned planning efforts have tried creating the first green, sustainable neighborhood in San Francisco, the project today has morphed into an irresponsible, out-of-control development proposal, with obvious irreversible and immitigable impacts that this EIR fails to objectively evaluate.

My DEIR comments are attached.

Sincerely,

Kathrin Moore

(See attached file: Treasure Island\_Draft EIR Comments\_KM\_09\_08-\_10.pdf)  
(See attached file: Prominent Vlsual Features\_1996.jpg)(See attached file:  
Marina Project\_TI max dev.jpg)

## Comments

## Draft Environmental Impact Report

Treasure Island/Yerba Buena Island Redevelopment Project Case: #2007.0903E

September 10, 2010

Kathrin Moore

Planning Commission

PAGE	TOPIC	COMMENT	
Vol. 3 App. B	Scoping	Why are relevant Scoping Comments by J.Blumenfeld _SF Environment, Letter dated Feb 25, 2008, not listed in their entirety?	20 . 3
Vol. 1 S-2	Summary	What does reference to "immediately surrounding waters" actually mean? Please explain in the context of what is described.	20 . 4
Vol. 1 S-2	Summary	Why is the Development Program described in vague ranges, using approximations like: up to 8,000 residential units? The Treasure Island Development Plan, its Transportation Plan, its Sustainability Plan, its Habit Management Plan, describe the project with 5,800 dwelling units on TI and 200 units on YBI - why is the DEIR deviating from this program?	20 . 5
Vol. 1 S-3	Summary	What regional entertainment uses are being described? In II.33 Commercial: there is reference to uses that were never described in the actual plan	
Vol.1 II.33			
Vol. 1 S-3	Summary	The description of proposed buildings, and their respective heights is written for promotional purposes, it doesn't objectively describe the project. We request revising all references to low-, medium-, and high-rise buildings to what is typically used in building codes, and construction/ industry lingo. <b>Low-Rise:</b> 40'0" or less from grade at the entry level to the roof line (either flat or average height of sloped roof) <b>Mid-Rise:</b> less than 75'0" from grade at the entry level to the top-most floor of occupancy <b>High-Rise:</b> 75'0" or more from grade at the entry level to the top most floor of occupancy Why is this EIR consistently using misleading language to describe the project? We expect language to be corrected.	20 . 6
Vol. 1 S-5	Summary	Why are the goals of the Sustainability Plan described in such tentative language when the main objective of the Plan has been to design the first fully sustainable neighborhood for San Francisco? <u>that would enable installation of photovoltaic panels on most roof tops....</u>	20 . 7
Vol. 1 II.24	Project Description	Residential: Program Ranges are overstated for both TI and YBI. At Plan release, documents show TI with 5800 units and YBI had a maximum of 200 units, but never a range of 150 - 300 units	20 . 8
	Prominent Visual Features	The 2006 Transfer & Reuse of Navan Station TI Final EIR clearly describes visual features Fig 3-2 attached. Why does this EIR fail to describe prominent visual features and resources? We ask this to be added.	
Vol 1. IV.B.2	Aesthetics	The impacts of the development of TI/YBI are clearly regional in scope, has the Region been asked to comment on this DEIR, like communities in the East Bay, the North Bay, th South Bay?	20 . 9
Vol 1. IV.B.2	Aesthetics	The reference to the simulation of the maximum allowable massing (height and bulk) needs to be consistent with the 'slender' building simulations shown in all published plan documents, over the past year or two.	20 . 10

	We request that all simulations are being redone to fit the project as described in this DEIR.	↑	20.10, cont'd
Vol 1. IV.B.3 Aesthetics	Figure IV.B.1: View Point Locations needs to be corrected to show Alcatraz. Why is Alcatraz not being shown?	↑	20.11
Vol 1. IV.B.3 Aesthetics	View Locations need to include views from the Embarcadero Promenade starting at the Ferry Building to Pier 39, an iconic sequence of eye level views.	↑	20.12
Vol 1. IV.B.3 Aesthetics	Figure IV.B.1: View Point Locations needs to show View Point D as Fort Baker, not Vista Point	↑	20.13
Vol 1. IV.B.5 Aesthetics	View Point A: Existing and Proposed, needs to simulate views on a clear day, where the impact on long views to the East Bay Hills can be clearly evaluated. Using Photoshop to hide the hills is not a way to avoid showing impacts. We request that the view simulation is being redone.	↑	20.14
Vol 1. IV.B.6 Aesthetics	Figure IV.B.3: View Point B: Proposed, doesn't include the simulation of the proposed Ferry Terminal. Why is the ferry terminal not shown?	↑	20.15
Vol 1. IV.B.7 Aesthetics	Why do View Simulations only simulate day-time views? We request that the EIR simulates Night Time Views from all view points and with additional views added as being suggested in other DEIR comments.	↑	20.16
Vol 1. IV.B.1(Aesthetics	Why is the Berkeley Marina the only East Bay location for simulating impacts on the East Bay? The DEIR needs to add East Bay View Simulation to address impacts as seen from other prominent vantage points like views from the Flat Lands as well as views from the Hills.	↑	
Vol 1. IV.B.13 Aesthetics	View Points G & H show over-bulky massing simulations, not in keeping with the overall plan intent of 'slender' towers. New buildings as simulated dwarf and minimize the iconic view of historic buildings. Why does View Point G omit simulating the new Ferry Terminal?	↑	20.17
Vol 1. IV.B.1(Aesthetics	Why is the 80 ft building proposed for YBI not shown in 3D anywhere in the DEIR? There needs to be a view simulation.	↑	20.18
Vol 1.IV. B.2(Aesthetics	Figure IV.B.10: Proposed Representative Massing Diagram - what is shown here is vague, and suggestive. If there is uncertainty in the proposed plan where buildings actually will be sited, then the Visual Analysis needs to evaluate the range of impacts, simulate all possible variants and analyze the full range of possible impacts.	↑	20.19
Vol 1. IV.B.2(Aesthetics	Impact AE-1: Disagree with statement about impact on Views from Twin Peaks - views from Twin Peaks with the proposed development would be substantially altered, effecting views of the City's icon skyline, with hills and valleys as its trademark. Proposed development would flatten out this distinct view of the skyline and of downtown, visually merging the two skylines and creating visual ambiguity.	↑	20.20
Vol 1.IV.B.23 Aesthetics	Impact AE-2: Fails to identify the Naval Chapel as a Historic Resource. Nowhere in the DEIR is there a mention of the Chapel. Why isn't the chapel shown under: Existing Buildings?	↑	20.21
Vol 1.IV.B.23 Aesthetics	Impact AE-2: the statement that new infill construction impacts in the vicinity of Buildings 1,2, and 3 would be less than significant is wrong; the most prominent historic buildings appear dwarfed, diminished and overpowered by the excessive height and massing of the proposed buildings.	↑	20.22

Vol 1.IV.B.24 Aesthetics	There is no sufficient description of the historic importance of the Avenue of Palms, so the conclusion that is not considered a Historic Resource for the purpose of this analysis, is an insufficient conclusion. The 2006 EIR Transfer& Reuse of Station TI 3-40 clearly states it to be a resource, why does this EIR fail to identify it?	20 . 23
Vol 1.IV.B.24 Aesthetics	YBI - Impacts of New Construction: the DEIR fails to provide visual analysis to substantiate the findings. Why is there no view simulation?	20 . 24
Vol 1.IV.B.25 Aesthetics	The DEIR text uses subjective interpretations to describe the visual character of the island as follows: <i>the island is not characterized by a strong sense of spatial or design cohesiveness</i> . The landform of the island is uniformly strong, a distinct green form punctuated by the view of the iconic form and massing of Building 1. We consider the impact of new construction to be Significant and request the findings to be revised.	20 . 25
Vol 1.IV.B.26 Aesthetics	The assumption that the Implementation of Approved Design Guidelines will ensure that the Proposed Project would not cause a significant impact on the visual quality of the project area and therefore no mitigation measures are required, is false, unsubstantiated and not anchored in applicable codes. Guidelines, by definition, are there to guide, there are a statement of intent, not a guarantee. Guidelines don't substitute for a CODE.	
Vol1.IV.B.27 Aesthetics	Why are Night Light impacts not analyzed? The visual impact assessment is incomplete. Night Light impacts need to address ALL planned uses, including the regional sports facilities. Comparable sports facilities in the region can provide data for prototypical nuisance levels of spill-over light to use for a complete assessment of night light impacts. We request an EIR revision to include this study.	20 . 26
Vol 1.IV.B.28 Aesthetics	Where is the visual simulation of nighttime lighting? Night light impacts potentially are greater than impacts during the day. Standards established in the D4D do not create guarantees, they are merely guiding ideas. The statement that the intensity of project light when viewed from mainland locations would be diffused by distance is grossly incorrect - the main land is only 1.6 miles away from TI as the crow flies.	20 . 27
Vol 1.IV.B.29 Aesthetics	Cumulative Impacts under AW-5 fail to analyze the cumulative visual impacts of TI Development with the new TransBay Tower, the tallest building planned in Downtown, close to the Bay. Why doesn't the analysis take into consideration the cumulative visual impact of the new TransBay and the bridge tower of East Span currently under construction?	20 . 28
Vol 1.IV.C.7 Population- Housing	Where is an analysis of impact on the existing resident population on TI and YBI? When are they impacted, how often, and how long will they be impacted -when and where?	20 . 29
Vol 1.IV.E.33 Transportation	Footnote 11: What are the Planned Improvements referred to in the footnote ? What population assumptions are they based on? What car ratios are they based on? The fact that full funding for improvements is currently not available doesn't justify a complete change in project intent.	20 . 30
Vol 1.IV.E.46 Transportation	The Transportation Demand Management Plan among other measures describes a Travel Coordinator and a Guaranteed Ride Home Program, both unrealistic mitigation suggestions. Can the DEIR identify other projects	20 . 31

		of comparable size which have successfully implemented a similar TDM Plan?	↑ 20.31, cont'd
Vol. 1.IV.E.4	Transportation	Does the statement that "Actual phasing of development would be market-driven" make this project de-facto unsustainable? Can stop-start construction that is market-driven over 20+ years, ever be sustainable ?	20.32
Vol 1.IV.E.1 f	Transportation	Why does the DEIR fail to provide a cumulative impact analysis that looks at this and other large projects in the pipeline, i.e. Eastern Neighborhoods, Market Octavia, TransBay, Rincon Hill, Bay View Hunters Point?	20.33
Vol.1.IV.G.42	Air Quality	Why is the DEIR assuming ferries operated by diesel fuel ? An alternative energy fueled ferry alternative needs to be studied., with minimum or zero impact on air quality.	20.34
Vol.2.VII.1	Alternatives	The 2006 Term Sheet and Transportation Plan, Land Use -, Sustainability and Infrastructure Plan work with a different set of program assumptions than what is used for the Proposed Project in this DEIR. Why were the numbers so drastically changed and why the were the many Plan documents that are being referenced never amended? There is a 25% increase in dwelling units and a 22% increase in parking .	20.35
Vol.2.VII.3	Alternatives	Why is "Reduced Development Alternative" not studied as the Proposed Project? The program summarized for this alternative is the basis for all studies that have been supported and formed the basis for numerous approvals by different public bodies, including the Board of Supervisors, the TI Board, the TI CAB, the Planning Commissions, etc.	
Vol.2.IV.J.4	Recreation	Why is the Treasure Island Sailing Center not listed under TI Rec Facilities? As a non-profit, volunteer-operated multi-use community sailing center, TISC offers sailing and boating safety to under-privileged adults and youth in the region. 1200 + inner-city youths, referred by Glide Memorial, Boys & Girls Club and inner-city agencies partake in the program each year. Why does the EIR fail to evaluate project impact on this social services resource? How is this Community Sailing Center impacted during construction, where is relocated? Please explain why the 2006 EIR for Transfer & Reuse of TI clearly identifies TISC and identifies its continued use in future reuse? Why does the current EIR fail to mention that it exists and also fails to identify its continued use in the future? (see attachment)	20.36
Vol.2.IV.J.8	Recreation	In keeping with SF Bay Plan Recreation Policies IV.1 and IV.3 why does the EIR fail to evaluate diverse and accessible water-oriented recreational facilities, such as marinas, launch ramps, beaches and fishing piers? Why is the existing Clipper Cove Marina (100+ slips) not evaluated as an integral part of the recreational facilities? What are development impacts on this widely-popular marina which is a regional resource?	
Vol 1.S.86	Summary	Why does the DEIR fail to evaluate an Environmentally Superior Alternative? An environmentally superior alternative is a Smart Growth alternative that balances sufficient density with the minimum number of cars, supporting ferry service and other modes of mass transit.	20.37
Other	General	Why does the January 2008 Notice of Preparation of an EIR describe the project as a sustainable redevelopment project with 6000 Residential Units, to be built in four phases between 2009 and 2018?	20.38
Other	General	Why then, on July 12, 2010, has the description of the project studied in the DEIR become a DEVELOPMENT PROJECT ( note the word sustainable has been dropped) ? Why has the residential number of units increased	↓



to 8000 units? Why have other program elements like regional retail and office been increased? Why now is the project no longer being analyzed as distinctly phased (4 Phases)? Why has the time frame for construction been increased from originally ten years to fifteen (15) to twenty (20) years? Clarify how the increase in years of project realization - construction increases cumulative impacts of noise, construction disruption, air pollution, etc.?

20.38, cont'd

20.39

## TI/YBI Redevelopment Plan DEIR – Comments

1. Impact CP-8. The reasoning that “Building 111 does not significantly contribute to the historic character of Building 3” and “Building 111 was included in the NRHP nomination because of its age, not because it was considered an integral feature of Building 3” and “Constructed with less-refined materials, this feature was an addition intended to serve a temporary function as a firehouse during the GGIE” are all flawed.

21.1

Why does 111 have to contribute to the historic character of Building 3 in order to have historic significance? Since it was constructed separately as a firehouse, was “completed by the time GGIE opened,” served as the firehouse during the exposition and is still extant today argues for its historic significance separate and apart from it being attached to Building 3. The two buildings functioned separately. It isn’t as though 111 was an addition to Building 3 intending to serve some use supporting those in the larger building. 111 was built as a firehouse and it only happens to be attached to Building 3.

You must evaluate Building 111 as its own entity, not as an “integral feature of Building 3.” Of course, it is not such a feature. It was never intended to be that; it is a separate building.

Whether it was constructed “with less-refined materials” is irrelevant. It was a utilitarian building not intended to be of the scale of Building 3 let alone be an addition with architectural details and materials of the Building 3.

Whether Building 3 was to “serve a temporary function as a firehouse during the GGIE” really doesn’t matter. It survived and currently stands. One would think a building, temporary or not, that served as a firehouse for the exposition and which still remains would be considered a historic resource. Using this line of thinking, the remaining earthquake shacks in San Francisco would not have historic significance since they were temporary housing (and also not well constructed).

2. Please include an evaluation of the Job Corps site. In numerous EIRs historic resource evaluations include adjacent parcels and even neighborhoods. The evaluation may not find any historic resources, but we don’t know that now and indirect impacts to historic resources could result from construction activities.

21.2

3. Mitigation measures referencing TIDA review seem inadequate. Shouldn’t the process of review and what it should consider be stated in the mitigation? At a minimum, review for compliance with the Secretary’s Standards should be referred to the city’s Historic Preservation Commission for its recommendations. The consultation process would be formalized by an agreement between TIDA and the City of San Francisco.

21.3

Submitted by:

Hisashi Sugaya

[hbsugs@sbcglobal.net](mailto:hbsugs@sbcglobal.net)



#2007.0903E

By John Elberling, TIDA Board Member  
9/10/10

via e-mail to MEA

1. To mitigate the significant transportation impacts of the project, an overall program level mitigation/principle measure is necessary: "As much as feasible, minimize the practical necessity for residents of the Project to leave the Island for routine (non-work) activities and purposes." This will include not just essential services such as childcare, but also at build out occasional services such as dental care and popular activities like a neighborhood bar with entertainment.. Price levels must be taken into account too, given that 30% of the population will be households eligible for affordable housing. Of course the larger population of 20,000+ at build-out will support a wider variety of uses than earlier phases can.

22 . 1

But as a guiding principle this will be very important throughout the life of the Project.

2. As I understand it, no public assembly facility, which might include a church at any location, is included in the development program that the EIR is evaluating. and so if some property owner proposed such a use in the future, it could not be allowed. This is a serious oversight. Per 1. above, such flexible multiuse facilities are potentially important to mitigate transportation impacts. Also, "zoning out" any kind of future religious facility for residents of faith would be ethically reprehensible. A cumulative total of 25,000 sq ft should be included in the Program for such non-commercial potential public assembly facilities, whoever may build them (not necessarily the Developer). Also, I see no potential location provided in the Plan and the DEIR for such a free standing building. An appropriate general area should at least be designated.

22 . 2

3. It may be that the Navy's survey of pre-1947 historic resources is sufficient for CEQA review. But it is not in compliance with the City's higher standards for review of architectural/historic resources. Either the EIR needs to incorporate such a review - as it does for post-1947 buildings

22 . 3

- or include as a condition that such a City-standard review will be conducted for pre-1947 buildings prior to their final disposition. Of course the Chapel is the key building at issue in this matter, which is located on the site of the proposed Culture Park and thus may not necessarily be demolished, although the Program does not include it even as a contingency, which it should, and which the Program addition of 50,000 sq ft to the Program per 2. above would include. The Chapel is currently located where the Plan proposes a "culture park," but apparently the Chapel is demolished in the process. If that is the Plan, then this needs to be stated clearly.

22 . 4

4. The transportation program does not include a fleet of small nonpolluting vehicles, such as very small electric cars, that residents might use individually for on-island travel on a shared basis, like car share (or I could not find this in the text). This would be very helpful for shopping and other local trips that they would otherwise use a car for.

22 . 5

It will also be very helpful for households that own no cars, and for persons with disabilities. The on-island shuttle buses alone do not meet all foreseeable practical needs. There are various possible mechanisms to fund and implement such a program, and short term parking for them with battery charging access will be need at destination points.

5. The transportation program does not include (or I can could not find it in the text) a required mitigation that large scale residential property managers provide shuttle van/bus services for their residents to mainland locations, such as shopping trips to major supermarkets etc. There are various possible mechanisms to fund and implement such services, which are routine in many master planned developments. This would be very helpful for shopping and other trips that they would otherwise use a car for. It will also be very helpful for households that own no cars, and for persons with disabilities.

22 . 6





September 10, 2010

Bill Wycko  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission St., Suite 400  
 San Francisco, Ca. 94103

Dear Mr. Wycko:

Thank you for the opportunity to comment on the draft Environmental Impact Report (EIR) for the Treasure Island and Yerba Buena Island Redevelopment Project. AC Transit has been working with San Francisco and Treasure Island agencies to assure that redevelopment of the island occurs in the most transit-friendly manner possible. We believe Treasure Island provides a unique and exciting opportunity for transit oriented development. We look forward to continuing this effort and making the project a reality.

#### **Bay Bridge Congestion Study**

As the process goes forward, it is important that all relevant agencies coordinate their efforts. In order to make the best use of their new facility the Transbay Joint Powers Authority (along with the San Francisco County Transportation Authority) is currently conducting a study of projected Bay Bridge congestion. This study, now in draft, makes a preliminary recommendation for a "contraflow" westbound transit lane on the lower deck of the Bay Bridge. The Treasure Island EIR should review and incorporate (as needed) the findings of the Bay Bridge Congestion Study, particularly the proposal for the contra-flow lane.

23.1

#### **Transit Funding**

The EIR assumes that AC Transit will operate the robust transit service from Downtown Oakland to Treasure Island that is contemplated in the 2006 Treasure Island Transportation Plan (a document which should be specifically incorporated by reference into the EIR). AC Transit's ability to provide this service is completely based on the ability of the development project to provide an adequate and sustainable source of funds for transit operations. This should be noted in the EIR. The specific cost estimates in the 2006 Plan are now obsolete, and will need to be updated to costs at the time service is initiated (with ongoing inflation adjustments). If it is not possible to fully fund this transit, then levels of service would have to be reduced, either in frequency and/or in hours of operation (span of service). We would be happy to work with the newly formed Treasure Island Transportation Management Agency (TITMA) to analyze various potential funding sources.

23.2

**Roadway Assumptions**

AC Transit's ability to provide service rests on certain roadway assumptions, as well as funding assumptions. It is assumed that Hillcrest Road will not suffer Impact TR-25 (p. IV.E.101), backups due to the Ramps Project not being implemented. It is also assumed that the development project will not cause congestion on the Bridge mainline. We are particularly concerned because the Bay Bridge Congestion Study has made a preliminary finding that without mitigation congestion in the area of the Toll Plaza will block bus access to HOV lanes by 2035.

23.3

If either Hillcrest Rd. or the Bay Bridge mainline experience delays, then bus service quality will degrade, and operating time and costs would increase. That would in turn require additional funding to maintain the every ten minutes level of service planned in the Treasure Island Transportation Plan. Alternatively, appreciably increased travel times with no additional resources would result in levels of service to be reduced.

**Facility Design Guidelines**

The EIR discusses the creation of a Treasure Island Transit Hub, on pages II.35 and following. The hub would be served by ferries, on-island buses, and off-island buses, and would be a focal point for bicycle activity. It is important that this facility be designed well to both support transit operations and to provide passenger amenities. It would be appropriate at this time to develop design guidelines for facilities such as bus loading bays, bus layover locations, bus shelters and benches, restroom facilities, wayfinding and real time passenger information.

23.4

Design guidelines are also now needed for bus-served roadways and bus stops along them. Particular attention should be paid to how buses and bicycles will interact safely and efficiently along these roads and at these stops.

AC Transit's design manual—**Designing With Transit**—provides some guidance on these issue.

Thank you for your consideration of these comments.

Yours Sincerely,



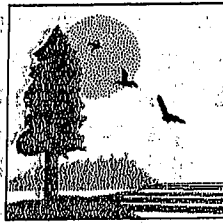
Cory LaVigne

Director of Service Development and Planning

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, Governor

**CALIFORNIA STATE LANDS COMMISSION**  
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September 10, 2010

File Ref: W25115

Rick Cooper  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Mr. Cooper:

RE: Draft Environmental Impact Report for the Treasure Island/Yerba Buena  
Island Redevelopment Project (SCH#2008012105)

Staff of the California State Lands Commission (CSLC or the Commission) has reviewed the Draft Environmental Impact Report (DEIR) for the Treasure Island/Yerba Buena Island Redevelopment Project. Under the California Environmental Quality Act (CEQA), the Treasure Island Development Authority (TIDA) is the lead agency and the CSLC is a Responsible and/ or Trustee Agency for any and all projects that could directly or indirectly affect sovereign lands, their accompanying public trust resources or uses, and the public easement in navigable waters.

The Treasure Island/Yerba Buena Island Redevelopment Project proposes to develop up to 8,000 residential units; up to 140,000 square feet of new commercial and retail space; up to 100,000 square feet of new office space; adaptive reuse of approximately 311,000 square feet for commercial, retail, and/or flex space uses in the historic buildings on Treasure Island; up to approximately 500 hotel rooms; rehabilitation of the historic buildings on Yerba Buena Island; new and/or upgraded public facilities and public utilities; about 300 acres of public open space including shoreline access and cultural uses such as a museum; new and upgraded streets and public ways; bicycle, transit, and pedestrian facilities; landside and waterside facilities for the existing Treasure Island Sailing Center; landside services for an expanded marina; and a new Ferry Terminal and intermodal Transit Hub. Construction and build out of the proposed Development Plan would be phased and is anticipated to occur over an approximately 15 to 20 year period.



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Page 2

As general background, the State of California acquired sovereign ownership of all tide and submerged lands and beds of navigable waterways upon its admission to the United States in 1850. The CSLC also retains residual and review authority for tide and submerged lands legislatively granted in trust to local jurisdictions (Public Resources Code §6301 and §6306). All tide and submerged lands, granted or ungranted, as well as navigable rivers, sloughs, etc., are impressed with the common law Public Trust Doctrine. The public trust is a sovereign public property right held by the State or its delegated trustee for the benefit of all the people. This right limits the uses of these lands to waterborne commerce, navigation, fisheries, open space, water-oriented recreation, and other recognized public trust uses.

At Treasure Island, the Legislature has granted all tide and submerged lands, whether filled or unfilled, to TIDA pursuant to Chapter 898, Statutes of 1997, as amended (Conversion Act). Pursuant to Section 3(b)(2) of the Conversion Act, all filled and unfilled tide and submerged lands on Naval Station Treasure Island will be subject to the public trust upon their release from federal ownership. The Conversion Act further recognizes that public trust lands at Treasure Island are to be used for public trust purposes. However, there are two exceptions. First, pursuant to Section 8(b), short-term leases may be issued for property for which there is no immediate trust-related need. Second, pursuant to Section 9, buildings that were built for a non-trust use and which are now incapable of being put to a public trust use may be used for non-trust purposes consistent with the reuse plan for their remaining useful lives, to be set by agreement at between 25 to 40 years.

In 2004, pursuant to Chapter 543, as amended, the Legislature authorized the CSLC to carry out an exchange of public trust lands at Treasure Island for certain lands at Yerba Buena Island. Lands exchanged into the public trust on Yerba Buena Island would be held by TIDA subject to the public trust pursuant to the Conversion Act. Additionally, pursuant to such an exchange, if approved by the CSLC, the lands exchanged out of the trust at Treasure Island could then be developed for non-trust consistent uses.

As the DEIR states, residential development is not a use consistent with the public trust doctrine, as residential development causes the privatization of public property resulting in a loss of its special character as public lands. General commercial, recreational, mixed-use office, and retail uses are also uses inconsistent with the Public Trust Doctrine, as such uses generally serve the local citizenry and are not water-related or visitor serving. Alternatively, commercial recreational, office, and retail uses, which are visitor-serving, cater to the regional or statewide general public, and are water-related, may be considered incidental and necessary in promoting the public's use of public trust lands and hence would be considered consistent with the Public Trust Doctrine. Also, general civic/cultural uses that are not water-related and are not visitor-serving in nature are not appropriate public trust uses as such uses cater to the local community and do not serve the regional or statewide general public.

Rick Cooper  
Page 3

CSLC Staff's specific comments on the DEIR are as follows:

1. Energy Variant A1 Renewable Electricity Generation – Increased Solar Photovoltaic: According to the DEIR this variant would provide up to 20 acres of ground-mounted photovoltaic panels in open space areas on the eastern or northern shorelines of Treasure Island and/or in the center of the Island near the urban Agricultural Park. A total of 28 acres has been tentatively identified as potentially available for this use. Generally, energy generation that is not water-dependent and does not further or benefit the public trust is not consistent with TIDA's statutory trust grant or the Public Trust Doctrine. 24.2
2. Open Space and Recreation: Permanent athletic fields or sports fields, off-leash dog areas, and the 20-acre demonstration organic urban farm, are not uses consistent with TIDA's statutory trust grant or the Public Trust Doctrine, as such uses purely provide a municipal benefit for the local community and are not water-related or visitor serving. 24.3
3. Commercial: According to the DEIR, the proposed project includes a grocery store or market to serve local residents on the Island (about 30,000 square feet), along with approximately 22,000 square feet of food production uses. Building 2 is proposed for the location of the grocery store/market. Pursuant to Chapter 543, as amended, Building 2 and Building 3 are proposed to be within the area impressed with the public trust. Both Building 2 and Building 3 are considered to be structures of historic significance. Generally, a grocery store is not consistent with TIDA's statutory trust grant or the Public Trust Doctrine, as it benefits the local residents without any nexus or connection to the water. Additionally, according to the DEIR, Building 3 is proposed to be used for approximately 150,000 square feet of entertainment/recreation uses, such as a movie theater and/or indoor sports/recreational facilities that would also be regional-serving retail uses. Generally, a movie theater and indoor sports/recreational facilities are not consistent with the Public Trust Doctrine. It is important to keep in mind that the overarching principle of the Public Trust Doctrine is that trust lands and trust assets belong to the statewide public and are to be used for water-related purposes and must benefit the statewide public rather than primarily serve local community or municipal purposes. 24.4
4. Institutional and Public Services: Space for a 75,000 square foot museum or other cultural institution is planned in the Cultural Park north of Building 1. Generally, a museum or cultural institution without any connection to the water is not consistent with the Public Trust Doctrine. 24.5
5. Transportation and Parking: Staff supports the City's Transit First Policy for Treasure Island and Yerba Buena Island. The proposal for a fleet of alternative fuel shuttle-buses that circulate throughout the Islands, with timed transfers at the Transit Hub offering fare-free rides to residents and visitors of the Islands is consistent with TIDA's statutory trust grant and the public trust. Visitor serving 24.6

Rick Cooper  
Page 4

parking and signage regarding the availability of the free shuttle-bus are encouraged throughout both islands.

↑ 24.6,  
cont'd

Staff has commented on the Design for Development for Treasure and Yerba Buena Islands and it is our understanding that the document will be adopted in connection with the Redevelopment Plan. We appreciate the opportunity to comment. If you have any questions, please contact me at (916) 574-1227.

Sincerely,



Grace Kato  
Public Land Management Specialist

cc: Jennifer Lucchesi



September 10, 2010

Mr. Bill Wyco  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

**Subject: Draft Environmental Impact Report for the Treasure Island and Yerba Buena Island Redevelopment Project**

Dear Mr. Wyco:

The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes and advocates for the implementation of a continuous 500-mile bicycling and hiking path around San Francisco Bay. When complete, the trail will pass through 47 cities, all nine Bay Area counties, and cross seven toll bridges. To date, slightly more than half the length of the Bay Trail alignment has been developed.

Thank you for the opportunity to comment on the above referenced DEIR. As described in detail below, the Bay Trail project has serious concerns regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the San Francisco-Oakland Bay Bridge to the Islands. As stated on several previous occasions, a fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island with connections to Treasure Island and to the future path on the West span of the Bay Bridge must be included in the project description.

**Background**

The underlying mission of the Bay Trail is a Class I, multi-use pathway along the shoreline. While there are times it is not feasible to accommodate a Class I facility due to existing conflicting land uses (San Francisco International Airport, Port of Oakland, etc.), the development of Treasure and Yerba Buena Islands represents an unprecedented opportunity to build not only 'gold-standard' Bay Trail, but a green transportation infrastructure that can become a model for cities worldwide.

25.1a

The new eastern span of the San Francisco-Oakland Bay Bridge will feature a multi-use path connecting Oakland to Yerba Buena Island. Treasure Island will feature a stunning multi-use shoreline path around its perimeter. Both of these facilities are proposed to become part of the region-wide Bay Trail system, and will be a welcome addition. While many progressive statements are made encouraging environmentally sound transportation choices and a true "transit first" approach on the Islands, unfortunately, the current plans as depicted in the DEIR fail to deliver for bicycles and pedestrians on several important fronts.

25.1a,  
cont'd

Bay Trail staff have been requesting information, then expressing concern, and then commenting on the serious design flaws represented by the current plan for the past eight years (since 2002) in the following ways:

**June 17, 2002 Letter to US Navy, Southwest Division re: DEIS for the Disposal and Reuse of Naval Station Treasure Island**

"...We are aware of the fact that the City and County of San Francisco and Caltrans are involved in a continuing discussion regarding the design of the Bay Bridge touchdown on Yerba Buena Island (Figure 5-2, page 5-6). It is unclear, however, how the connection between the bicycle and pedestrian pathway on the east span will be planned for and implemented. The DEIS should identify a process for planning a continuous connection between the planned pathway on the new Bay Bridge east span and Yerba Buena and Treasure Islands, including all potential stakeholders and their role in the planning process."

**October 21, 2003 Letter to Paul Maltzer, Environmental Review Officer re: DEIR for the Transfer and Reuse of Naval Station Treasure Island**

"...There is no discussion in the DEIR about how this bicycle and pedestrian connection will be made. The DEIR should address this issue and indicate how the bridge pathway will be connected to Treasure Island. Regardless of whether portions of Yerba Buena Island fall outside the transfer area (Figure ES-2), this connection has a direct impact on the access to and circulation around the islands and should be included in this DEIR."

**May 12, 2005 Letter to Mr. Jack Sylvan, Project Manager, Base Reuse and Development re: Treasure Island Draft Infrastructure Plan, January 2005:**

"...while we understand that the exact alignment of the offramps from the new eastern span of the Bay Bridge are not finalized at this time—a factor that may impact the final alignment of a trail in this area—we believe that denoting even a draft alignment for the trail on YBI will encourage the myriad planners, engineers, landscape architects, and regulatory agencies who are involved to think of the trail as an important part of this exciting redevelopment opportunity"

25.1b

**March 27, 2008 Letter to Mr. Bill Wycko, Acting Environmental Review Officer, re: Case No. 2007.0903E—Treasure Island and Yerba Buena Island Redevelopment Plan Notice of Preparation of EIR**

"...While plans for the perimeter path around Treasure Island are relatively clear, connections from the new east span of the San Francisco/Oakland Bay Bridge are less so. Please provide detailed descriptions and drawings regarding how connections will be made from the new bridge onto and off of both islands for bicyclists and pedestrians. It will be important to remember that in the absence of a pathway on the west span of the bridge connecting the islands to San Francisco, cyclists and pedestrians coming to the Islands will be largely recreational users as opposed to commuters. Tourists, families with children, wheelchair users and skaters are likely to be the prime user group until such time as the west span path is built. As such, please give careful consideration to the width and slope of the pathways leading from the bridge to the respective Islands."

**January 9, 2010:** Commented regarding concerns with the proposed contra-flow bike lane on Macalla and overall lack of appropriate bicycle/pedestrian facilities on YBI at **Bay Conservation and Development Commission (BCDC) Design Review Board (DRB) meeting.**

**May 11, 2010 Letter to Michael Tymoff, Office of Economic and Workforce Development re: Design for Development Document—Treasure and Yerba Buena Islands**

"...Unfortunately, the current Design for Development Plan fails to deliver for bicycles and pedestrians on several important fronts. The proposal for a contra-flow bike lane on Macalla Road is not in keeping with the "Bicycle Facilities Framework" goals on page 21 of the Public Review Draft which state that "Island planning began with a focus on pedestrians and bicyclists, resulting in a transportation network that provides convenient non-motorized access to all areas of the islands." The framework further states that "Bicycles are a key transportation option on the islands. Routes are designed to invite riders of all ages and capabilities for trips that range from a daily commute, to a school trip, to convenient shopping and casual recreation." These goals are followed by the statement on Page 231 Y2 Streets that "Macalla Road is a one way road that is the primary road for traffic between the Bay Bridge, Yerba Buena Island, and Treasure Island" (emphasis added).

The new world class pathway on the Bay Bridge combined with the planned world class pathway on Treasure Island will undoubtedly draw families, tourists, and cyclists of all abilities. It is difficult to envision that if Macalla is the primary road for traffic from the Bay Bridge, that a bike lane running in the opposite direction of a constant flow of traffic with no discernable separation will "invite riders of all ages and capabilities".

**June 7, 2010:** Commented regarding concerns with the proposed contra-flow bike lane on Macalla and overall lack of appropriate bicycle/pedestrian facilities on YBI at **Bay Conservation and Development Commission (BCDC) Design Review Board (DRB) meeting.**

**June 11, 2010: Met with representatives from the City of San Francisco and the Treasure Island Redevelopment Team** regarding concerns with the proposed contra-flow bike lane on Macalla and overall lack of appropriate bicycle/pedestrian facilities on YBI.

No changes to address the safety and functionality of bicycle/pedestrian facilities on YBI were incorporated into the Draft EIR after 8 years of focused comments, participation, and attention. The Final EIR must address issues related to new infrastructure facilities for bicycles and pedestrians that must be proposed in the FEIR.

## Section II. Project Description

The Project Description and numerous other areas of the document present overall goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with what is actually proposed for the Islands.

25.2

To address these discrepancies, the FEIR must show contiguous sidewalks fully encircling the islands in addition to the trails and pathways currently proposed. The Bay Trail Project's comment letter regarding the Design for Development Document suggested a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the 80 west onramp from Treasure Island Road. We suggested that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. This public access amenity would be a brilliant addition to the project, and would afford new and unique views of the San Francisco shoreline. Please include discussion of such an overlook in the FEIR, and include complete Class I multi-use paths to this location from both sides of the Island.

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## Section III. Plans and Policies

We appreciate reference to the Bay Trail Plan. Please note that the Bay Trail is a planned 500-mile path encircling the Bay, and to date 300 miles have been completed. This section states that the Proposed Project includes extensions to the Bay Trail "and was evaluated against Bay Trail Plan policies for...expanding proposed trail links, and no conflicts were identified." The Bay Trail Plan, policies, and our project comments have continually stated that a Class I multi-use pathway is needed to connect the East Span of the Bay Bridge to Treasure Island. A contra-flow bike lane on a steep narrow winding road (Macalla) is in conflict with Bay Trail Plans and policies.

25.5

**Bay Trail Plan Policy #12:** Provide access wherever feasible to the greatest range of trail users on each segment: It is the goal of the Bay Trail Plan that the full range of trail users be able to enjoy the trail, regardless of physical limitations due to age or disability.

**Bay Trail Plan Policy #13:** Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users: The possibility of conflict between automobiles and trail users is a serious safety concern.

A 6' wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a well known phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve—this is human nature.

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 18,640 residents and 2,930 employees of the proposed new hotels, restaurants, entertainment and other uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco's "Better Streets" Plan, the Bay Trail Plan, BCDC's Public Access Design Guidelines, or the Transportation Objectives Shared by TIDA and TIDC.

The Macalla Road cross section shown in Figure IV.E.13 shows a 32' ROW with an 11' vehicle lane. In order to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island—a Class I facility or its functional equivalent is needed on both sides of the road. Given the steepness of this route, design within bike/pedestrian facilities must be carefully planned as many cyclists— young and old—will surely be walking the steepest pitches.

During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the above referenced Class I facilities will be incorporated on Macalla Road. The Bay Trail Project is confident that the TI/YBI design team can find an innovative solution to the challenging terrain presented by YBI, and we are open to any solution that provides a safe and enjoyable connection between the Bay Bridge and Treasure Island. However, it is important to note that from our perspective, a singular Class I path in the uphill direction and a bike lane in the downhill direction are *baseline starting points* from which to begin designing this facility.

## Section IV E: Transportation

Under "Pedestrian Circulation Improvements", the document states that the pedestrian circulation network "would encourage walking as the primary mode within the Development Plan Area." However, this is followed with "Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed."



*Treasure Island Road*

Page IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a "...one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they must share the roadway at this location (see Figure IV.E.15)."

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a "bicycle circulation improvement". The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge. Please provide detailed design information and drawings of a proposed solution in the FEIR.

25.7

*Macalla Road*

See comments above in "Plans and Policies" section.

**Mitigation Measure M-TR-24**

"The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road".

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road "would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists." The impact is deemed "Less than Significant". Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project's lack of commitment to non-motorized transportation. Please remove Mitigation Measure M-TR-24 from the proposed project as it will have a significant impact on bicycle circulation on the Islands.

25.8

**Connections to Future Path on the West Span**

It is of the utmost importance that the planners, developers, engineers and landscape architects of TI/YBI plan for future bicycle and pedestrian connections to the west span of the Bay Bridge. Once this facility is in place, the TI and YBI developments will be

25.9

able to fully realize their promise of green transportation on and off the islands. To this end, the Class I path on Treasure Island should be continued to the 80 westbound onramp, and alongside the remainder of Treasure Island Road to complete a full loop of both Islands. A vista point near the westbound onramp to I-80 off of Treasure Island Road would not only be a desirable amenity, but could potentially serve to secure right-of way until an alignment onto and across the bridge is secured. R.O.W in the area between the vista point and the bridge structure should be secured so that interim plans or construction do not preclude this important connection in the future.

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## Conclusion

The Bay Trail Project has been an avid supporter of the new development on Treasure and Yerba Buena Islands. The Bay Trail project has submitted no less than six letters of support for various actions regarding the proposed project—from tidelands trust transfer to ramp legislation. The underlying goal and mission of the Bay Trail is a Class I, fully separated multi-use pathway along the shoreline. When this is absolutely infeasible, the Bay Trail Steering Committee may choose to adopt Class II bike lanes and sidewalks in particular situations. Class III bike lanes or the type of facility proposed on Macalla Road do not constitute "complete" Bay Trail, and the Bay Trail Steering Committee is unlikely to adopt them into the regional system, thus precluding the City from pursuing grant funding from the Bay Trail Regional Development Program.

In order to deliver on the promise of progressive green transportation and a new paradigm of urban living in the middle of the San Francisco Bay, please start with the most basic elements of sustainability—a solid and robust bicycle and pedestrian infrastructure—and build from there. With 20 traffic impacts that are significant and unavoidable with or without mitigation, the need for a completely revised bicycle and pedestrian infrastructure on Yerba Buena Island is abundantly clear. If you have any questions regarding the Bay Trail Project, plans or policies, please do not hesitate to contact me at (510) 464-7909 or by e-mail at [maureeng@abag.ca.gov](mailto:maureeng@abag.ca.gov).

Sincerely,



Maureen Gaffney  
Bay Trail Planner





BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

September 10, 2010

**Bill Wycko**

Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Subject: Treasure Island and Yerba Buena Island Redevelopment Project Draft  
Environmental Impact Report

Dear Mr. Wycko:

**ALAMEDA COUNTY**

Tom Bates  
(Vice-Chairperson)  
Scott Haggerty  
Jennifer Hosterman  
Nate Mile

**CONTRA COSTA COUNTY**

John Gioia  
(Secretary)  
David E. Hudson  
Mark Ross  
Gayle B. Uilkema

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht  
(Chairperson)

**SAN FRANCISCO COUNTY**

Chris Daly  
Eric Mar  
Gavin Newsom

**SAN MATEO COUNTY**

Carol Klatt  
Carole Groom

**SANTA CLARA COUNTY**

Susan Garner  
Ash Kalra  
Liz Kniss  
Ken Yeager

**SOLANO COUNTY**

James Spering

**SONOMA COUNTY**

Shirlee Zane  
Pamela Torliatt

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the Treasure Island and Yerba Buena Island Redevelopment Project (Project). The proposed Project would include development on Treasure Island and Yerba Buena Island, including up to 8,000 residential units; up to 140,000 square feet (sq. ft.) of new commercial and retail space; up to 100,000 sq. ft. of new office space; adaptive reuse of three historic buildings with up to 311,000 sq. ft. of commercial, retail and/or flex space; about 500 hotel rooms; rehabilitation of historic buildings; new and/or upgraded public and community facilities and utilities; 300 acres of open space; an expanded marina; and a new ferry terminal and intermodal transit hub. Construction and build out of the proposed Project would be phased and would be anticipated to occur over a 15- to 20-year period.

District staff is impressed with and strongly supports the Project's commitment to building an energy efficient, compact mixed-use development that encourages residents and employees to use transit, walking and bicycling facilities for transportation needs, and actively discourages reliance on private automobiles through congestion pricing for residents and parking pricing for residents and visitors. The Project's commitment to unbundling parking spaces from housing units is just one example of the forward-thinking aspects of this Project. Projects like this not only will help the Bay Area move towards reaching the State's AB32 greenhouse gas (GHG) reduction goals, but also will serve as a model for other jurisdictions seeking to reduce GHG emissions and build energy efficient communities.

While staff supports the above referenced attributes that will serve to reduce air pollutants from this Project, staff is concerned about the significant and unavoidable air quality impacts identified in the DEIR that are associated with Project construction and operation emissions. The San Francisco Bay Area region is currently in non-attainment for state and federal ozone standards and fine particulate matter (PM2.5) standards, and for state PM10 standards. The emissions associated with this Project need to be mitigated to the maximum extent feasible to ensure the Project does not adversely affect the region's ability to attain health-based ambient air quality standards.

26.1

*Spare the Air*

The Air District is a Certified Green Business

Printed using soy-based inks on 100% post-consumer recycled content paper Page 1 of 2



## Letter 26

Mr. Bill Wycko

September 10, 2010

Air Quality Mitigation Measure-2

The DEIR states that Air Quality Mitigation Measure-2 (M-AQ-2) requires the project sponsor to commit to converting all construction diesel equipment to EPA Tier 3 engine standards or better, or utilize diesel oxidation catalysts, diesel particulate filters or similar technology *to the extent feasible* at the start of construction, and utilize EPA Tier 4 engine standards for 50 percent of the fleet at the start of construction, increasing to 75 percent by 2015, and 100 percent by 2020, *to the extent feasible*.

26.1,  
cont'd

District staff recommends "to the extent feasible" be stricken from this clause and M-AQ-2 changed to state that the all construction diesel equipment utilized *shall be* as clean as Tier 3 engine standards, and that Tier 4 engine standards *shall be* 100 percent utilized by 2018. In addition, staff also recommends that diesel generators for construction activity be prohibited as a condition of Project approval.

M-AQ-2 also states that *to the extent feasible*, year 2007 or newer model year haul trucks shall be utilized. District staff recommends that "to the extent feasible" be stricken from this clause, and that the City require use of year 2010 or newer model year haul trucks.

Air Quality Mitigation Measure-5

Mitigation Measure AQ-5 (M-AQ-5) requires all ferries providing service between Treasure Island and San Francisco to be equipped with diesel particulate filters or an alternative equivalent technology to reduce diesel particulate emissions.

26.2

District staff recommends that the EIR state that all ferries that serve Treasure Island meet the most stringent California Air Resources Board regulations for new vessels. In addition, the project sponsors should take additional steps to ensure maximum ferry ridership, for example by subsidizing ferry tickets, or further adjusting pricing mechanisms to discourage vehicle trips to and from the Project to San Francisco.

26.3

In addition to the specific measures above, the City could establish an offsite mitigation program that project sponsor(s) could pay into if on-site construction and/or operation emission reductions cannot lower emissions to the less-than-significant level.

26.4

District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,

  
Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Chris Daly  
BAAQMD Director Eric Mar  
BAAQMD Director Gavin Newsom



**SAN FRANCISCO BOARDSAILING ASSOCIATION**  
 1592 UNION STREET, BOX 301 • SAN FRANCISCO, CALIFORNIA 94123

September 10, 2010

Mr. Bill Wycko  
 Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission St., Suite 400  
 San Francisco, CA 94103

Re: Draft Environmental Impact Report (DEIR) for the Treasure Island / Yerba Buena Island  
 Redevelopment Project – Case No. 2007.0903E - Comments and Questions on the DEIR

Dear Mr. Wycko:

After many years of public meetings and verbal assurances regarding both the interim and future uses of Treasure Island, the San Francisco Boardsailing Association (Boardsailing = Windsurfing + Kiteboarding) hereby submits comments and questions that we would like to see addressed regarding the “Environmentally Superior Alternative” chosen as the preferred alternative in the DEIR referenced above.

We appreciate the time and cooperation extended over the years by City officials and other stakeholders in incorporating our long-term vision for boardsailing into the Treasure Island Redevelopment Plan. However, because the northern end of Treasure Island is one of the premier, world-class boardsailing locations in the United States, the complete omission of any specific reference to interim and future boardsailing access and facilities in the DEIR raise cause for concern.

One of the premises upon which we have based our access discussions has been the “Proposed Actions and Alternatives” as stated in the “Transfer and Reuse Naval Station Treasure Island Final EIR 2006”, which states in Chapter 2-8:

*Recreation Facilities*

*Several recreation facilities continue to be used on Treasure Island as a venue for regional sports activities. These include the baseball field which serves as the home field for the San Francisco Little League, including regional competitions; the soccer field located in the middle of the Island, which is used by soccer and rugby teams from around the Bay Area; the Great Lawn; and various other open space recreational facilities such as parks, trails and ball-fields. **Boardsailors and users of other water oriented recreational crafts use the shoreline of Treasure Island, launching from the boat ramp at the northern corner and landing regularly along the northern shoreline of the island.***

27.1



## SAN FRANCISCO BOARDSAILING ASSOCIATION

1592 UNION STREET, BOX 301 • SAN FRANCISCO, CALIFORNIA 94123

Based upon previous experiences with EIR decision documents we believe it necessary that the public components of the *Plan* be clearly summarized and articulated in the Final EIR for them to carry any weight during the development process. The objective of an EIR is that it look for adequacy and completeness and a good faith effort of full disclosure. Our impression of the project scope presented in this DEIR is one of a “market driven” development, with little priority placed upon the implementation of public improvements so frequently presented during planning discussions.

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cont'd

While our expectation is that the draft “*Design for Development for Treasure and Yerba Buena Islands*” (“*Design for Development*”) will be formally adopted in connection with the *Redevelopment Plan*, it is also our understanding that the *Design for Development (D4D)* document will exist as a guideline for future “*Island*” development, more or less in place of building and zoning codes as applied in non-redevelopment. As such, the *D4D* is more of a guideline for Island development and should not be misconstrued as law. To be more specific, “Section 2:: T1 Public Open Space” of the *D4D* states in the Standards Column that “T1.6.5.9 – Two loading areas and amenities for boardsailing shall be provided in two locations near parking areas.” While we applaud this description, either this type of specificity needs to be included in the final EIR, or the *D4D* needs to be adopted as is, and as an appendix to the EIR such that it carries the same force of law. In no section of the DEIR do you find mention of Public Open Space and/or its environmental impact, positive or negative.

27.2

While we understand that the substantial downturn in the housing market complicates the City’s and the project applicant’s ability to provide improved access during the initial stages of construction, we believe that the DEIR should specifically describe incremental access and phasing of Public Open Space and Facilities.

In addition, mandates of the Mac-Ateer Petris Act provide “maximum feasible public access consistent with the project” to apply to all and interim stages of construction as well. Presently, windsurfers, fishermen, walkers, and kayaks use the levee road and launch from the Island. We think that those users should be able to have improved use of the existing facilities, which can be accomplished without any construction, but merely by reopening the parking lot adjacent to the launching ramp. Such options should also be address in the DEIR.

27.3

In Summary, please address the following questions:

- 1) Why is there complete omission of any specific reference to interim and future boardsailing access and facilities in the DEIR?
- 2) Why is there no reference to the “Proposed Actions and Alternatives” as stated in the “Transfer and Reuse Naval Station Treasure Island Final EIR 2006”, Chapter 2-8?

27.4



**SAN FRANCISCO BOARDSAILING ASSOCIATION**  
**1592 UNION STREET, BOX 301 • SAN FRANCISCO, CALIFORNIA 94123**

3) Why does the DEIR not provide specific project scope for Public Open Space and/or its environmental impact, positive or negative?

27.5

4) Why does the DEIR not specifically describe "maximum feasible public access consistent with the project" to apply to all and interim stages of construction, including incremental access and phasing of all Public Open Space and Facilities during project development?

27.6

In closing, the DEIR does not include the specific depiction of public access that had been agreed upon in earlier versions of the plan. While that detail is included in the *D4D*, plans and graphics should be part of the Final EIR. The Final EIR should make it clear that part of the long term plan for the 300 acres of parkland is the specific provision for continued and improved access to the water.

Sincerely,

*signed*

William Robberson, President  
 San Francisco Boardsailing Association





# Arc Ecology

*Environment, Economy, Society, & Security*

Friday, September 10, 2010

Mr. Bill Wycko  
 Environmental Review Officer  
 San Francisco Planning Dept.  
 1650 Mission St., Suite 400  
 San Francisco, CA 94103  
 By Fax: 415 558 6409  
 By e-mail: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
[rick.cooper@sfgov.org](mailto:rick.cooper@sfgov.org)

Re:Treasure Island/Yerba Buena Island Redevelopment Project Case: #2007.0903E

Mr. Wycko:

Thank you for the opportunity to comment on the the Draft Environmental Impact Report for the Treasure Island/ Yerba Buena Island Redevelopment Project Project Case: #2007.0903E. Attached please find Arc Ecology's comments on the Treasure Island/ Yerba Buena Island Redevelopment Project DEIR. Our comments are presented in three parts. The first found immediately below is based on a review conducted of the Transportation & Traffic components of the DEIR by LSA Associates on behalf of Arc Ecology. The second included later in these pages represents our short commentary on the sustainability concerns we have with regard to the project. Finally attached is a copy of Eve Bach's comments on the DEIR Notice of Preparation dated February 26, 2008. As you Eve Bach was Arc Ecology's Economist Planner and she spent many years working on the Treasure/ Yerba Buena Redevelopment Project. Many of her questions were not fully vetted in the DEIR and so we are resubmitting her commentary in full.

1.

## Traffic & Transportation

- A. The EIR reveals plans to implement congestion pricing. During both the a.m. and p.m. peak hours, in both the eastbound and westbound directions, residents entering or exiting the islands would be subject to a \$5.00 toll. However, the EIR reveals that visitors are not subject to this fee, nor carpools of at least three people. What is the rationale for not charging visitors a fee as properly priced parking fees for visitors could dramatically reduce congestion?
- B. The EIR estimated parking demand based on the San Francisco Planning Department's 2002 Transportation Impact Analysis Guidelines for Environmental Review. The parking analysis also considered that different land uses reach their peak parking demand at different times of day. As a result of utilizing these guidelines, a peak demand of 10,162 residential spaces (including residential visitors) and 2,138 nonresidential spaces was identified. This equates to a shortfall of 2,162 residential parking spaces and a surplus of 1,015 nonresidential spaces. Residential visitors could seek parking in on- or off-street nonresidential parking spaces, but an ultimate shortfall of 1,147 parking spaces is anticipated. In other words, the proposed project allows a maximum parking supply of 91 percent of anticipated demand based on parking utilization rates in the City of San Francisco. Because no

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28 . 2

minimum parking requirements are being established, the shortfall when construction is completed could be greater.

28.2,  
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Mandating further reductions of nonresidential parking may not be productive. Residents who are provided with transit alternatives and required to pay each time they exit and enter the islands would be incentivized to use public transit instead of driving. However, visitors to the islands have chosen their mode of travel without knowing whether a space is available to them. If insufficient parking is available when a vehicle arrives on the island, vehicles would have to continue circling the islands' streets searching for a space, which would increase local traffic congestion. Appropriately priced parking could limit a visitor's desire to drive on subsequent visits. Please elaborate on the strategy?

## 2. Identification of a Reduced Parking Alternative

The proposed project states that a maximum of 1.0 parking spaces will be provided per residential dwelling unit. The Alternatives Section in the Treasure Island and Yerba Buena Island Redevelopment Plan EIR revealed that a public comment received during the Notice of Preparation phase suggested that an alternative be analyzed providing 0.75 parking spaces per residential unit. Additional commenters suggested 0.50 or 0.25 parking spaces per residential unit. A brief discussion of reduced parking alternatives is contained in the "Alternatives Considered but Rejected" section. Two reasons are given for rejecting the Reduced Parking Alternative. The first is that parking fees are planned to generate revenue for transit improvements such as the on-island shuttles and off-island ferry and bus service. The second is the belief that providing less than 1 parking space per residential unit will hurt the marketability of the units and would adversely affect the financial feasibility of the project.

LSA queried data for vehicles per household in the City of San Francisco from the 2006–2008 American Community Survey conducted by the United States Census Bureau. The latest data available reveal that 29 percent of households in the City have no car, 43 percent have one car, and 28 percent have two or more cars. The average number of vehicles per household in the City of San Francisco is approximately 0.65. Because the average number of vehicles per San Francisco household is 0.65, an alternative providing 0.75 parking spaces per residential unit likely deserves more analysis than is currently provided in the "Alternatives Considered but Rejected" section.

28.3

## 3. Public Transit Required in Lieu of Private Automobiles

The fully funded base transit scenario includes one ferry making round trips to the Ferry Building requiring 50 minutes for a roundtrip, 15-minute headways on Muni-108 during both peak hours (40-foot [ft] buses), and a new bus route to downtown Oakland with 10-minute headways during both peak hours (40 ft buses). In this scenario, total transit capacity is 1,415 passengers per hour. The expanded transit scenario includes three ferries making roundtrips to the Ferry Building with 15 minute headways, 7-minute headways on Muni-108 in the a.m. peak hour, 5-minute headways on Muni-108 in the p.m. peak hour (with larger, 60 ft buses), a new bus route to downtown Oakland with 10-minute headways during both peak hours (40 ft buses), and a new bus line with 12-minute headways to Civic Center San Francisco during both peak hours (40 ft buses). In this scenario, total transit capacity is 4,241 passengers in the a.m. peak hour and 4,563 passengers in the p.m. peak hour. Total travel demand off the island is estimated at 5,376 in the a.m. peak hour and 7,559 in the p.m. peak hour. In the absence of private automobiles, travel demand could be accommodated in the a.m. peak hour with the expanded transit scenario with the addition of two ferries for a total of five ferries

28.4

and 10-minute headways. Travel demand in the p.m. peak hour would require five ferries with 10-minute headways, 5-minute headways on Muni-108 with 60 ft buses, 5-minute headways to downtown Oakland with 60 ft buses, and 5-minute headways to Civic Center San Francisco with 60 ft buses. Please identify how the project will address and mitigate this discrepancy.

28.4,  
cont'd

#### 4. Residential

We find the following statement in the DEIR disturbing. *"18 Family-sized units are those with two or more bedrooms. While 20 percent of the units is the minimum proposed number of family-sized units, a larger number was used for the purpose of analyzing transportation impacts, since the Proposed Project is likely to include more than the minimum number of family-sized units. As described in more detail in Section IV.E, Transportation, trip generation rates for units of two bedrooms or more are higher than those for one bedroom or less. This EIR assumes that the proposed 8,000 residences would include about 2,005 studio and one-bedroom units, and about 5,995 units with two or more bedrooms, resulting in a larger travel demand than would result with the minimum number of family-sized units."*

28.5

We understand the rationale provided later in the document however there is still the fact that a certain dwelling unit may not be occupied by people of the same demographic throughout its lifetime. A young couple could buy a 1-bedroom condo and live there even after having a baby (at least for a little while). They might sell it to some empty nesters, but later it might get sold to another young couple who wind up starting a family there. The assumption that family oriented housing would generate more or less trips just seems too precise given the variables involved. Given that it is equally likely that with the amenities proposed and in place work force housing, Treasure Island and Yerba Buena Islands could do much more with regard to addressing the City's need for dramatically increasing its stock of family oriented housing. Please provide further evidence that family housing will negatively impact the transit/ traffic issues.

#### 5. Emergency Evacuation

One transportation-related element does appear to be missing from the analysis and the EIR. No mention is made in the Transportation section of an emergency evacuation plan. Page 29 of the Hydrology and Water Quality section states that engineered fill would be used to raise the ground level before constructing new buildings. After raising the ground level, the "finished floor elevations would likely range from 12.6 feet to 14.5 feet NAVD88 [North American Vertical Datum of 1988]." Also in the Hydrology and Water Quality section, it is revealed that the "maximum run-up conditions for combined astronomical tides, storm surge, waves, and tsunami would be 10.0 to 16.3 feet NAVD88."

28.6

Despite the fact that the floor area is lower than the maximum run-up conditions, page 48 of the Hydrology and Water Quality section states that the proposed project would not be susceptible to inundation because the proposed project includes strengthening and raising the protective berms around the perimeter of Treasure Island. However, perimeter protective berms are not mentioned under Proposed Flood Improvements on pages 29 and 30 of the Hydrology and Water Quality section. When the berm is mentioned in the Executive Summary, the proposed height is not included. The Project Description does, however, reveal that the existing 10–14 ft berm would need to be strengthened and raised to heights of "about 14 to 16 feet."

Regardless of berm height, evacuation of Treasure Island is likely following a seismic event. Some

28.7

discussion should be provided in the EIR describing the methods to be used to evacuate the 8,000 residential units and 550,000 sf of retail and commercial space. Analysis should include with and without Bay Bridge scenarios and should provide quantitative statements of time required to evacuate.

↑ 28.7  
cont'd

## 6. Sustainability Plan

General comment. We are concerned that what is called a sustainability plan is in actuality an environmental impact mitigation strategy. The two are quite different approaches. Sustainability approaches a development from the ground or in this case Bay up. A mitigation plan is layered on top of a proposed land use to reduce its effects. We believe the latter is a more reasonable way to describe this plan which does have numerous important and beneficial attributes but is nevertheless largely mitigation.

28.8a

- A. Energy variants: To the maximum extent practicable the use of fossil fuel powered Heating, Cooling, & Electricity Central District strategy should be avoided. Even densely packed developments loose heating, cooling and electrical capacity through transport from the generation point to the end user. For solutions to be sustainable they need to be to the maximum extent practicable building specific so as to minimize transmission loss. Strategies that maximize building surface areas for heat control and energy production should be implemented. To the extent that supplemental power generation is required the project should explore the use of tidal generation using the eastern pier-side as a possible staging area. Navy studies of the tidal forces for planned berthed ships done in the early and mid 1980's indicate that the movement of bay water past that location might provide sufficient energy to warrant the study of an in-bay power generating station for Island service.

28.8b

28.9

- B. We support Supplemental Firefighting Water Variant C2

- C. We support a combination of Wastewater Wetlands Variants D1 and D2 as these two uses are not mutually exclusive, would provide additional treatment capacity while enriching the wetlands access and experience for residents, students and potential visitors.

28.10

- D. We support open space plan

## 7. Building heights & Density.

General Comment: While all of the environmental commentary on the NOP focused on supporting density, there is density and then there is this plan. The project is overly tall, overly dense and dramatically changes the nature of Bay and its view sheds.

28.11

## Conclusion

We agree with Ruth Gravanis and disagree with MEA's rejection of the low-parking alternatives. The DEIR does not adequately support the contention that providing fewer parking spaces will make the project economically infeasible. Given that the project's purpose is to create a world-class model of sustainable, carbon-neutral development the sponsors should not create an economic pro forma that depends on parking revenues, thereby creating an incentive for them to encourage driving.

28.12

February 26, 2008

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SUBJECT: **COMMENTS ON NOTICE OF PREPARATION**  
**2007.0903E – Treasure Island and Yerba Buena Island Redevelopment Plan**

Dear Mr. Wycko:

Thank you for providing the opportunity to comment on the Notice of Preparation for this ambitious Project. We appreciate that you have arranged for two scoping meetings and have in addition discussed environmental review of the Project with the Citizens Advisory Board.

As you may know, Arc Ecology has actively participated in the planning process for the reuse and redevelopment of Treasure and Yerba Buena Islands (TI). We have supported efforts by the Treasure Island Development Authority (TIDA) and Treasure Island Community Development (TICD) to create a project that exemplifies environmental sustainability by responding creatively to both the requirements and opportunities that this challenging site presents. Environmental sustainability is a necessity in part because TI depends for land access on the bridge that is a main source of traffic congestion extending for 7-8 mile along the regional highway system and beyond to feeder streets in San Francisco and Oakland. TI also presents unique opportunities for sustainable development because the site is publicly owned land (much of it in the Public Trust) and will be almost completely rebuilt at a time, and in a political setting, where environmental values are high priority.

As active participants in TI planning, we have observed the many ways that environmental sensibilities have informed design of the Proposed Project. We look forward to an EIR that tests and improves upon environmentally sensitive features of the Project. In particular, we want to ensure that the many innovative programmatic responses to TI challenges will operate over the life of the Project as its sponsors hope.

## 1 OVERVIEW OF THE PROJECT'S ISLAND CONTEXT

Before providing page by page comments on the NOP text, we would like to address important environmental implications of TI's special geographic context. The location of this Project on a very small island with land access that depends on the Bay Bridge presents unusual considerations that must inform its environmental review:

- Traffic impacts are not proportional to Project size;

- Adequate funding of the Development Plan and Term Sheet<sup>1</sup>, including exhibits must be ensured to reach the outcomes projected over the life of the Proposed Project;
- Traffic impacts do not diminish over distance from the Project.

These issues will be addressed specifically in the discussion of relevant impacts, but a short discussion of the general implications follows.

### 1.1 Traffic impacts are not proportional to Project size.

Since the version of TI redevelopment described in the 2004 EIR, we have witnessed the evolution of a project that has grown substantially in order to become financially feasible; in the process its potential to be a model of environmental sustainability has grown. The 6,000 housing units currently proposed would utilize less acreage than the 3,800 previously proposed. The number and density of the additional units can enable residents to meet their needs for many goods and services without leaving the island. Most importantly, a densely populated neighborhood can support frequent, convenient, and inexpensive transit service that fosters accessibility independent of the private automobile.

The same logic dictates that reducing development intensity would not necessarily mitigate environmental impacts. Nor would a less intensively developed project be a suitable EIR alternative, which must feasibly achieve Project objectives with reduced environmental impacts.<sup>2</sup> For example, moderate reductions in Project size would probably create a project below thresholds needed to support neighborhood retail services, public services, and public transportation, potentially increasing rather than decreasing off-island (primarily auto) trips. An alternative small enough to significantly reduce less off-island traffic would be financially infeasible due to the high fixed infrastructure costs at Treasure Island. A project limited to existing units at Treasure Island and a few hundred residential units at Yerba Buena Island would abandon Project objectives “to provide extensive public benefits to the City such as significant amounts of new affordable housing, increased public access and open space, transportation improvements and recreational and entertainment opportunities, while creating jobs and a vibrant, sustainable community.”<sup>3</sup>

The need for threshold population levels to support transit and other services also suggests that failure to achieve full buildout could generate unanticipated environmental impacts. EIRs typically treat the “project” as an envelope of impacts, such that partial implementation, like a smaller project, is assumed to generate less impact. The TI Project description appears to share this assumption since it states that the Project will have “up to 3800 units,” even though the impacts of a smaller project might be greater.

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<sup>1</sup> TICD, LLC. *Treasure Island Development Plan and Term Sheet*, September 2006, as adopted by the San Francisco Board of Supervisors, file number 06498 12/12/06

<sup>2</sup> PRC§ 21002. Approval of projects; feasible alternative or mitigation measures. The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.

<sup>3</sup> TICD *op cit* page 7

Partial implementation would also be problematic since the Proposed Project is intended to be self-mitigating. Partial implementation of the sustainability plan, the transportation plan, or the infrastructure plan, for examples, would unleash a wide spectrum of environmental impacts that full realization of those plans would be more likely to avoid.

## 1.2 Adequate funding of the Development Plan and Term Sheet including exhibits must be ensured to reach the outcomes projected over the life of the Proposed Project;

The Proposed Project includes a rich array of services (e.g., transit, public safety, schools, shopping) intended to support a pedestrian- and transit-oriented community life style intended to reduce traffic that the Project would otherwise generate. However, the never-ending expense of operating these services at the levels required by a small island community will be higher than elsewhere in the city. TI's small size (even as enlarged) and geographic isolation imposes diseconomies of scale and precludes sharing service areas with other neighborhoods for the provision of public safety, schools, health, library and other public services, as well as limiting the variety of neighborhood commercial enterprises. The ferry slip cut into the Treasure Island landfill will require periodic dredging and disposal of the spoils. The Project's lack of dedicated sources of funding to fully cover such operating expenses and its reliance on public and private agencies that are beyond the City's control foreshadows ongoing risk of funding shortfalls, with the threat that projected levels of service will not be sustained over the life of the Project.

## 1.3 Traffic impacts do not dissipate over distance.

Although traffic congestion resulting may occur on the TI site itself (particularly backup at bridge on-ramps) and the bridge, more serious disruptions will occur on the regional highway system (US 101 and I-80, 580, and 880), on and off-ramps, and the city streets that in effect function together to meter traffic on the bridge itself. Under most traffic conditions, traffic on the bridge itself ordinarily flows freely where there are no merging lanes. Currently traffic merging onto the bridge from TI does not usually interrupt the free flow since the short merging lane regulates the volume of traffic joining traffic on the bridge. However even when traffic during the p.m. peak is flowing, there are typically backups five to ten miles to the south and the east. Therefore the EIR must analyze a region of impact (ROI) for the Project's traffic effects that captures the far flung effects of adding Project traffic volumes, both the metered traffic adding to the a.m. peak and unmetered traffic to the p.m. peak.

## 2 PAGE-BY-PAGE REVIEW AND COMMENTS OF THE NOP

The comments that follow trace the general issues above as they inform specific potential impacts, mitigations, and alternative projects.

### 2.1 Introduction

#### 2.1.1 "The EIR will be a project-level EIR on the Redevelopment Plan and the Development Program"

[page 1]

Given the wide scope of this Project, the long build-out period, possibilities for incorporating portions of the Job Corps site into the Project, explorations currently under way for ramp redesign, and market and other uncertainties, a Master Environmental Impact Report (MEIR)<sup>4</sup> would

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<sup>4</sup> CEQA Guidelines: PRC §15175 - §15179.5



be more appropriate than a project level document. The current intention to prepare an independent EIR for bridge ramp improvements once agreement is reached on their configuration segments what is essentially a single project since there would be no compelling reason to rebuild the ramps absent redevelopment of TI. Substantial changes to the ramps will create changes to this Project's environmental impacts even absent pursuit of modifications of and additions to the Proposed Project. The MEIR provides a streamlined way to track these interdependent changes but provides the City and developer with flexibility.

- 2.1.2 "An Initial Study will not be prepared as part of the environmental review process for the Proposed Project, instead all topics will be addressed in the EIR."

[page 1]

At a meeting of the TI Citizens Advisory Board, I requested that the NOP include an Initial Study, not because it was required but because it would provide early information about the Project's sponsors' thinking about environmental issues. Although we appreciate the discussion of potential impacts included in this NOP, it lacks the comprehensiveness of an Initial Study; in particular it lacks a summary of mitigations that San Francisco requires an Initial Study to include.<sup>5</sup> In addition the specific question posed by the Initial Study Checklist is a very useful tool to prevent inadvertently overlooking potential impacts.

## 2.2 Project Location – Access and Transit

- 2.2.1 "Improvement and/or replacement of the other ramps is currently under study by the San Francisco County Transportation Authority and the California Department of Transportation ('Caltrans'); improvement or replacement of these ramps, if undertaken, would be a separate project from both the Bay Bridge eastern span currently under construction and the Proposed Project. Impact analysis in the EIR on the Proposed Project will take into account conditions resulting from both the existing ramps and the potential improved or replaced ramps."

[Access and Transit, page 4]

As mentioned above, future ramp improvements could be a critical feature of the final design of the Proposed Project, since the outcome of current negotiations could lead to major modifications. A MEIR would avoid segmenting environmental analysis of these strongly linked approvals while still providing flexibility in dealing with the present level of uncertainty

## 2.3 Project Description –Conceptual Land Use Plan

- 2.3.1 "The Proposed Project includes...up to approximately 6,000 residential units...up to approximately 270,000 square feet (sq ft.) of new commercial and retail space;"

[page 5]

This appears to reflect the invalid assumption that a smaller project will have less impact on the environment. "The Redevelopment Plan includes exhibits that address project design concepts (Exhibit E), transportation (Exhibits J and L), infrastructure (Exhibit I), community services (Exhibit Q), affordable housing (Exhibits L and O), jobs (Exhibit M), sustainability (Exhibit K), and other aspect of the development."<sup>6</sup> These studies, plus the Financing Plan and Transaction Structure (Exhibit R) and the Fiscal Impacts Analysis (Exhibit S) are based on the

<sup>5</sup> "Mitigation measures and improvement measures identified in the discussion for the applicable topic areas will be summarized here." [page 13, "San Francisco Initial Study Form, Annotated Final Version" (July 26, 2006)]

<sup>6</sup> San Francisco Planning Department, NOP cover sheet, January 26, 2008

assumption that the full 3800 units would be developed. It is not clear whether these plans could be implemented at an equivalent level for a smaller plan. Concerns that the developer may want to reduce the size of the Project are highlighted by the current crisis and long term uncertainties of the real estate market.

2.3.2 "The Proposed Project includes...bicycle, transit, and pedestrian facilities; and An Intermodal Ferry Quay/Transit Hub."

[page 5]

This description, plus the description on page 9 of the Transportation Plan's encouragement of transit suggests that the Project does not include the levels of transit service that are included in the Transportation Plan. **Which features of the Development Plan are included and which are excluded from the Proposed Project?**

Failure of the project to commit to providing transit services at least at the level projected in the Transportation Plan raises concerns about the relevance of the trip analysis in the Transportation Plan. The EIR must base its independent trip analysis on levels of transit service that the City can rely upon the Redevelopment Plan to deliver.

2.3.3 "Approximately 50 percent of all housing units would be in low-rise buildings (building height 65 feet and lower)"

[Land Uses-Residential page 5]

In specifying a maximum, this characterization of the height of half the housing units assumes that a shorter building will have less impact than a taller one. Like the assumption that less development equals less impact, categorizing multi-family housing in six-storey buildings (with off-site parking) together with single family housing that will be furthest from the transit hub obscures the greater traffic impact of the single family units. The EIR needs to make a clear distinction between multi-family units with shared parking and single family units with attached or specifically designated parking in order to capture the much higher rates of automobile trips by residents in the latter.

2.3.4 "Approximately thirty percent of all units would be affordably priced at a range of below-market rates, including an expansion from 250 to 435 residential units for the existing Treasure Island Homeless Development Initiative (TIHDI) program."

[Land Uses-Residential page 5]

The plans presented to the public have consistently spoken of 30% affordable housing as a *minimum*. There are traffic implications to the mix of affordable and market rate units since car ownership rates – hence trip rates –are lower for the affordable units

2.3.5 "The recreational and open space uses would include ...a stormwater treatment wetland..."

[Land Uses Residential – Open Space and Recreation page 7]

We are pleased that the stormwater treatment wetland is now included in the Redevelopment Project Area Plan.

- 2.3.6 "The Development Program would provide space for...community programs... [and] child care. The existing, closed public grammar school on Treasure Island would be improved and reopened for use by the San Francisco Unified School District."

*[Land Uses Residential – Institutional and Public Services page 7]*

Ensuring that an improved school and space for community programs will be available is a necessary first step in providing TI with a school and operating programs at TI. However, for a school to materialize, the San Francisco Unified School District will have to reopen a school that they closed along with others as a cost-saving measure. The economic inefficiency of operating an elementary school on an island with 3,800 dwelling units – many of which will not house families with children – raises questions whether there will actually be a school and what grades it will include. The answer to those questions has obvious implications for the projection of off-island automobile trips and car ownership rates.

To some extent, the same questions arise concerning community programs and child care. The variety of community programs that will be available on-island will depend on the prices charged for the space and, in many cases, the availability of public funding. The necessity to travel off the island for services ranging from religious worship to health care to library will generate automobile trips.

The likelihood that a school, child care facility, community programs, and services required by residents will be financially feasible on TI over the long term will depend to some extent on TI population size.

## 2.4 Project Description – Proposed Transportation Plan

- 2.4.1 "The roadway system would consist of three levels of public roadways: arterial streets, collector streets, and neighborhood streets."

*[Proposed Street System – page 7]*

Except to link the multi-modal transportation node to the bridge, arterial streets should not be needed since TI is essentially a single neighborhood. The EIR should analyze the proposed street hierarchy at TI to prevent the construction of excess capacity, which would encourage vehicular traffic and reduce pedestrian and bicycle safety.

- 2.4.2 "All of the proposed residential units on Treasure Island would be within a 15-minute walk of the proposed Intermodal Transit Hub."

*[Proposed Street System – page 7]*

Walking time should be calculated for housing on Yerba Buena Island and measures proposed to ensure safe walking and bicycle connections.

- 2.4.3 "The Development Program would include the construction of a new ferry quay and terminal..."

*[Transit Facilities and Service – page 8]*

Since the new quay will require excavating landfill that created Treasure Island, the spoils will need to be tested for contaminants prior to disposal. In addition the design of the ferry landing will require on-going dredging of the excavated channel branching off of the Bay. The Project needs to ensure that adequate funding will be available on a continuing basis for proper upland disposal of the dredge spoils.

2.4.4 “Proposed funding for ferry vessels would provide the opportunity for an operator to initiate ferry service to the Islands between San Francisco and Treasure Island, and the proposed bus transit facility would provide stops for Muni service to San Francisco and East Bay transit service.”

[Transit Facilities and Service – page 8]

Since the Proposed Project includes only an “opportunity” for ferry service, and bus stops rather than bus service, the modal split used to calculate auto trips must not assume that ferry service will be available or that bus service will be at the levels projected in the Transportation Plan. This statement is confusing since all presentations to the public of this Project have stressed transit linkages.

2.4.5 “Should funding be identified to replace or improve the existing ramps, Caltrans and the City would conduct a separate environment analysis of the selected design(s).”

[Bay Bridge Access – page 9]

As mentioned above, ramp improvements necessitated (and probably paid for in part) by TI redevelopment should be considered part of the Proposed Project and analyzed in a MEIR.

2.4.6 “The Development Program includes the provision of approximately 8,250 parking spaces...”

[Parking – page 9]

Since parking is an important determinant of modal choice, the EIR needs to analyze whether supplying the 8,250 parking spaces negotiated as part of the Term Sheet would exceed parking demand.<sup>7</sup> The EIR must not assume that ITE or San Francisco neighborhood parking standards are relevant since both the need and demand for parking will be reduced by features of the Proposed Project that do not rely on non-City funding and that would reduce rates of car ownership and use by residents, and car travel by employees and visitors:

- **Land use plan** – a high level of on-island trips by residents will be made on foot or by bicycle compared to a typical San Francisco residential neighborhood, and the concentration of employment and visitor attractions at the transit node will reduce the need for parking through Treasure Island;
- **Transportation Demand Management Program** - the shuttle service and bicycle library will further reduce on-island car trips by residents and also visitors;
- **Parking fees** – plans to charge for parking will reduce demand, depending on charges;
- **Shared parking** – allows a smaller supply of parking spaces to serve a given level of demand by means of a higher average occupancy rate;
- **Mandatory transit passes** – depending on the level of pre-paid service, increases the likelihood of transit use for off-island travel;
- **Car share program** – will reduce car ownership, with corresponding reduction in need for parking;

Since parking supply, location, and price are factors that strongly influence modal choice, calculations that assume generous parking ratios (based on occupancy rates lower than 85%, for example), have the potential to generate significant environmental impacts. The demand for parking is elastic, enabling parking management tools for the design of traffic mitigations.<sup>8</sup> (See Attachment 1 for additional references on this subject.)

<sup>7</sup> San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002.

<sup>8</sup> Litman, Todd. “Transportation Elasticities: How Prices and Other Factors Affect Travel Behavior” Victoria Transport Policy Institute, 11 April, 2007 <http://www.vtpi.org/tranelas.pdf>

- 2.4.7 "Automobile use would be discouraged through parking pricing, parking management, and congestion pricing...The mechanisms proposed include...implementation of a congestion pricing program...The congestion pricing fees could be set and adjusted to reflect traffic patterns, congestion levels, time of day, and other conditions that affect the roadway system."

*[Encouraging Use of Transit and Discouraging Automobile Use – page 9]*

Given the Governor's unfortunate veto of enabling legislation for the congestion pricing program, alternative mitigations to accomplish these ends should be proposed in the EIR. Features included in the "car independence mobility alternative" (described below) are examples of such measures.

## 2.5 Project Description – Wastewater

- 2.5.1 "In addition, a new wastewater treatment facility would be constructed..."

*[page 10]*

The Financing Plan and the Fiscal Analysis in the TI Term Sheet do not provide for funds to construct the wastewater treatment facility. Construction of the Proposed Project must not begin until *full* funding for the new system is secure, even though replacement of the existing system will be phased in.

- 2.5.2 "The replacement wastewater treatment facility...would be designed to handle projected wastewater flows at buildout of the Proposed Project."

*[page 10]*

Since there is a possibility that the site of the Job Corps may become available in the future, design of wastewater system should anticipate expansion.

## 3 PROJECT PHASING AND CONSTRUCTION

- 3.1.1 "However, the actual timing of construction would depend on market conditions and other factors."

*[page 12]*

Since the timing of full buildout of the Proposed Project is uncertain, the EIR must analyze the potential for impacts to be generated ahead of mitigations, and to propose measures to ensure that mitigations (including self-mitigating features of the Project) are synchronized to potential impacts.

## 4 REQUIRED APPROVALS

- 4.1.1 Additional approval will be necessary to fully implement the Proposed Project.

The list of required approvals omits those by public agencies that the Proposed Project relies upon to implement some of its most important features: San Francisco Unified School District, Alameda Contra Costa Transit District, San Francisco Bay Area Water Emergency Transportation Authority, and the California Legislature and Governor (enabling legislation for congestion management fees). Approvals of an early transfer will require approval by the Governor and the California Department of Toxic Substances Control in addition to the Regional Water Quality Control Board. Approval of the TI Redevelopment Plan will need approval from taxing agencies that share San Francisco property tax receipts.

## 5 POTENTIAL ENVIRONMENTAL ISSUES

### 5.1 Alternatives

#### 5.1.1 "The EIR will identify and evaluate alternatives to the Proposed Project. It will analyze a No Project alternative, as well as a plan for a less-intensive development program."

[page 14]

As we have discussed earlier in these comments, unlike the typical project, a "less-intensive development program" cannot be assumed to meet the requirements that an EIR alternative generate less environmental impact.

*"Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. ...The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives."*<sup>9</sup>

We request a "car independence mobility alternative." It would include the same or greater intensity of development as the Proposed Project plus additional features to enable most residents, employees, and visitors to forego routine private automobile travel without sacrificing mobility. Features of this alternative would include all of the following:

- Time limits for all on-street parking ranging from 30 minutes to 2 hours;
- Parking fees that fully amortize construction and land costs (including pro-rated infrastructure costs, such as Treasure Island stabilization, based on square footage) and full operating costs, including enforcement;
- Leasing (rather than sale) of all residential off-street parking, with a system prioritizing need based on factors such as disability and employment location;
- Mandatory transit passes for residents, employees, and hotel guests covering the full cost of all bus and ferry travel;
- TIDA contracts with San Francisco and East Bay bus and ferry service providers specifying 24-hour, 7-day service with short daytime headways;
- Community-wide membership in a car share organization;
- Establishment of an island-focused taxi or jitney service;
- Dedicated or queue-jumping access to the bridge for buses, taxis; van pools, emergency vehicles;
- Maximum 15 mph speed limit for all TI roads;
- TDM services that include car pool and van pool match making;
- Purchases delivery;
- Supervised pathways enabling children living on Treasure Island to walk or bicycle to school without crossing major roadways.

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<sup>9</sup> PRC 15126.6 ((a

5.1.2 "An alternative that does not include an exchange of Tidelands Trust properties between Treasure Island and Yerba Buena Island will also be described and analyzed."

[page 14]

Such an alternative that presumably would limit all new residential and most commercial construction to Yerba Buena Island could avoid the high fixed costs of soil stabilization that make a smaller project infeasible on Treasure Island. However, such an alternative would sacrifice the nine objectives of the Proposed Project that are bulleted on pages 7 and 8 of the Development Plan. Unless such an alternative is being seriously entertained by the City and the developer, it would not contribute insights to a public dialog about ways that environmental impacts of the Proposed Project could be mitigated. If such an alternative is under consideration, there needs to be an extensive public discussion since it is in conflict with all previous concepts.

## 5.2 Employment, Population and Housing

5.2.1 "The EIR will describe existing conditions related to employment, population, housing, and business activity..."

[– page 15]

The baseline for the evaluation of these and all potential impacts by this EIR should be conditions on the date of this NOP (January 26, 2008), and not "the physical conditions which were present at the time that the federal decision for the closure or realignment of the base or reservation became final."<sup>10</sup>

## 5.3 Transportation

5.3.1 "In a transportation report for the Proposed Project, the travel demand will be estimated by using population, square footage, and other relevant information."

[page 16]

As we have discussed earlier in these comments, additional critical variables include features of the Proposed Project that are designed to shift travel mode choices to transit to the extent that implementation of projected services and programs will occur. In the design of mitigations, emphasis should be placed on factors such as parking that affect the competitive attractiveness of transit.

The scoping for the Transportation Report should be available for public review prior to its finalization.

5.3.2 "Traffic impacts will be analyzed for the AM and PM peak periods."

[page 17]

Daily and weekend traffic impacts should also be analyzed. Since a possible result of the congestion management program would be to shift trips to off-peak hours, it will be important to track the ripple effects and to understand how much roadway capacity is available at other times of the day to absorb the spillover. Bridge-related traffic congestion extends from early morning until late evening on both weekdays and weekends.

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<sup>10</sup> PRC §15229

- 5.3.3 "Traffic impacts will be analyzed in relation to existing conditions and in a future context that accounts for cumulative growth in volume of traffic on the Bay Bridge."

[page 17]

The concern is not traffic volume *on the Bay Bridge*; it is congestion on the *roads and highways that serve the bridge*. The issue is delay rather than volume since a congested typically serves a smaller number of vehicles than one with flowing traffic.

#### 5.3.4 Truck traffic

The EIR needs to analyze truck traffic impacts, including those related to demolition, construction, and on-going deliveries.

### 5.4 Air Quality

- 5.4.1 "Increased traffic could lead to local 'hot spots' with higher concentrations of carbon monoxide."

[page 17]

As for transportation impacts, the Region of Influence for air quality needs to extend to the full area (both highways and city streets) that will be impacted by additional bridge traffic.

### 5.5 Community Services and Utilities

- 5.5.1 "The EIR will also discuss emergency access to the Islands and potential issues related to emergency evacuation, as part of the analysis of police and fire services."

[page 19]

Dedicated access to the bridge is needed to ensure that ambulances can get to a hospital quickly when there is a backup due to metering.

### 5.6 Cumulative Impacts

- 5.6.1 "The EIR will address the potentially significant cumulative impacts of the Proposed Project when considered with other planned development in San Francisco and the East Bay."

[page 22]

The discussion of cumulative traffic impacts must include all projects that will contribute to the congestion of city streets and highway sections that are impacted by bridge traffic.



## ATTACHMENT 1

## REFERENCES ON PARKING MANAGEMENT AS A FACTOR IN MODAL CHOICE

Hensher, David A. and Jenny King (2001), "Parking Demand and Responsiveness to Supply, Price and Location in Sydney Central Business District," *Transportation Research A*, Vol. 35, No. 3 (www.elsevier.com/locate/tra), March 2001, pp. 177-196.

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Mildner, Gerard, James Strathman and Martha Bianco, "Parking Policies and Commuting Behavior," *Transportation Quarterly*, Vol. 51, No. 1, Winter 1997, pp. 111-125.

Morrall, John and Dan Bolger (1996), "The Relationship Between Downtown Parking Supply and Transit Use," *ITE Journal*, February 1996, pp. 32-36.

Shiftan, Yoram (1999), "Responses to Parking Restrictions: Lessons from a Stated Preference Survey in Haifa and Their Policy Implications," *World Transport Policy And Practice*, Vol. 5, No. 4 (www.ecologica.co.uk/wtpp05.4.pdf), pp. 30-35.

# Arc Ecology

*Environment, Economy, Society, & Peace*

## FAX TRANSMISSION SHEET

**RECEIVED**

Date: 9/10/10

To: **Mr. Bill Wycko**  
**Environmental Review Officer**  
**San Francisco Planning Dept.**

SEP 10 2010  
CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
MPS

FAX #: 415.558.6409

From: **Michael F. McGowan, Ph. D.**

# of pages, incl. cover sheet: 3

Comments: TreasureIsland DEIR comments

Friday, September 10, 2010

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Dept.  
1650 Mission St., Suite 400  
San Francisco, CA 94103  
By Fax: 415 558 6409

By e-mail: [bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org)  
[rick.cooper@sfgov.org](mailto:rick.cooper@sfgov.org)

Re: Treasure Island/Yerba Buena Island Redevelopment Project Case: #2007.0903E  
Mr. Wycko:

Treasure Island DEIR comments from Michael F. McGowan, Ph.D., Arc Ecology, 9/3/2010

These comments are limited to marine, intertidal, and subtidal impacts.

p. IV M 10. The clam species that dominate the benthic community, *Rochefortia coani* and *Musculista senhousi* are somewhat unusual. The 2007 Light's Manual lists the first as being uncommon and primarily offshore. Please expand on what it means to have these species so prevalent. For example, is the area already impacted or dominated by non-native species?

p. IV M 11 used the species name for bay shrimp *Crangon franciscorum* instead of *Lissocrangon* that was used previously. *Crangon* is the most familiar name. Please explain usage and make consistent throughout the document.

same page Please explain why *eulachon*, a Pacific northwest species was reported as a dominant species in this part of SF Bay.

Names of fishes *shokihaze* and *plainfin* and *henlei* are misspelled.

Table IV M 1 prickly sculpin one of the most abundant species? This is a freshwater species unlikely to be found in trawls in Central SF Bay. Please explain how this could be or correct the section.

brown bullhead and green sunfish at these stations? These are entirely freshwater species and unlikely to be found in trawl samples of Central SF Bay. Please check to see if there are errors in the CDFG data analyzed, or if the wrong station data were mistakenly analyzed, or otherwise explain the unlikely occurrence of freshwater species in marine waters around TI and YBI.

Heavy reliance on NOAA 2007, not the peer-reviewed literature for marine habitats and species. Please support statements with original sources, not summary overviews.

29 . 1

p. IV M 15 *nigricauda* should not be capitalized. *Crangon franciscorum* is misspelled and not consistent with prior use of the name *Lissocrangon*.

CDFG 2000-20008 is not a citation that can be looked up and checked. Please give a more complete reference or link to retrieving these data.

p. 19 I am not aware of squid being common in the bay. What is the documentation for the statement that squid are eaten by marine mammals in SF Bay around the island?

p. 23 a bird citation was used to footnote Chinook salmon presence in the bay. Is this the correct citation? Please use a fish citation to support statements about fish distribution and abundance.

Table 4. The status of longfin smelt is now State threatened, not Special concern. Please update and consider this change in status with regard to impacts and mitigation measures.

The green sturgeon is on the federal Endangered Species list as threatened, not Special Concern. Please check and correct current state and federal endangered status of this and other species.

p. 30 the statement that the green sturgeon are not significant inhabitants of the waters around TI and YBI miss the point that the waters around the islands, having been declared critical habitat for the green sturgeon by the federal government , are important to this listed species. Impacts to the critical habitat need to be addressed.

p. 31 incidental take of anadromous fish cannot be authorized by the USACE but must come from NOAA/NMFS or USFWS.

p. 33 the date for declaring SF Bay critical habitat for green sturgeon was 2009 not 2008.

p. 43 Temporary impacts to marine organisms of activities are listed but not the permanent impacts to their habitat of shoreline modifications and chronic disturbance (waves and incidental oil spills) of ferry traffic.

pp. 43-44 There was no mention of impacts to the herring fishery. Herring would be expected to spawn on the eelgrass adjacent to TI and YBI.

p. 48 The native oyster is not typically known as the California oyster. It is known as the Olympia oyster. This needs to be corrected in the Habitat Management Plan for YBI too.

p. 57 The effects of chronic oil pollution from ferries and other marina operations are not addressed. These are thought to equal or exceed oil pollution from the highly publicized spill events.

p. 59 *Crago franciscorum* is not a polychaete. It is a shrimp and this is the third different name used for the same shrimp in the DEIR. Please correct and use the same name throughout.

p. 60-61 The vertical bulkhead habitat is not equivalent to the rocky intertidal that would be replaced. Some of the organisms that would colonize the bulkhead would be the same as some of those found in the rocky intertidal but; in general, they would more likely be non-native fouling organisms typically

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found on docks and in marinas around the bay. The less complex flat surface of the bulkheads does not provide the same habitat complexity as rocky intertidal and therefore does not support the same species diversity. Please correct this section and add a mitigation measure to compensate for the loss of habitat and implied species diversity by constructing rocky intertidal and subtidal habitat along with monitoring to confirm that what was lost has been replaced.

29.6,  
cont'd

p. 63 The measures to address accidental fuel and oil spills do not address the impacts of chronic leakage of fuel and oil in marinas and at ferry terminals that are thought to equal or exceed the total volume of spills on an annual basis.

p. 64 The statement that the habitat management plan (HMP) for YBI would provide biological improvements and additional protection for sensitive resources does not apply to marine and intertidal resources because intertidal and offshore resources are specifically excluded from coverage by the HMP (p. 25) which refers back to the DEIR for coverage of intertidal and marine species. Please correct in the DEIR that the HMP does not provide protection or enhancement for these particular species and their habitats. Please amend the HMP so that it does protect and enhance intertidal and offshore resources.

29.7

e-mail comment

Eric Brooks  
<[brookse@igc.org](mailto:brookse@igc.org)>

09/10/2010 03:47 PM To  
[bill.wycko@sfgov.org](mailto:bill.wycko@sfgov.org) cc

[Jim.McCormick@sfgov.org](mailto:Jim.McCormick@sfgov.org)

Subject  
Public Comments: Planning Dept.  
Item 2007.0903E Treasure Island and  
Yerba Buena Island Redevelopment  
Plan DEIR

9/10/2010

Public Comments On:

CITY AND COUNTY OF SAN FRANCISCO PLANNING DEPARTMENT File No.  
2007.0903E

"Treasure Island and Yerba Buena Island Redevelopment Plan"

TO:

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400, San Francisco, CA 94103

FROM:

Eric Brooks  
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288 Onondaga Ave # 4  
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415-756-8844

Mr Wycko, and other environmental review officers and staff,

I am submitting these comments to point out, and insist upon correction  
of, serious inadequacies, in the the Draft Environmental Impact Report

(DEIR) for the Treasure Island and Yerba Buena Island Redevelopment Plan, and in the project plans to which the DEIR refers.

I will focus my comments in three categories -

1) SERIOUS INADEQUACIES IN ADDRESSING, AND FAILURES TO ACCOUNT FOR, PROJECTED SEA LEVEL RISE

2) FAILURE TO ACCOUNT FOR AND AVOID HEALTH AND ENVIRONMENTAL HAZARDS OF TOXIC MATERIALS, INCLUDING BUT NOT LIMITED TO IONIZING RADIATION; AND, FAILURE TO MEET THE LEGAL PRECAUTIONARY PRINCIPLE ESTABLISHED BY ORDINANCE IN THE SAN FRANCISCO, CALIFORNIA, ENVIRONMENT CODE CHAPTER 1:

- PRECAUTIONARY PRINCIPLE POLICY STATEMENT - SECTIONS 100-104 (see <http://library.municode.com/HTML/14134/level1/CH1PRPRPOST.html> )

3) SERIOUS INADEQUACIES IN ADDRESSING GREENHOUSE GAS EMISSIONS

Comments:

1) SERIOUS INADEQUACIES IN ADDRESSING, AND FAILURES TO ACCOUNT FOR, PROJECTED SEA LEVEL RISE

As is now commonly understood and established by widespread and overwhelming scientific consensus, the Earth's oceans and the San Francisco Bay are now undergoing sea level rise due to planetary climate warming.

Until very recently, science policy groups, including and especially the Intergovernmental Panel on Climate Change (IPCC) had been projecting that the worst case scenario for global sea level rise would be no higher than 1.5 meters by the year 2100.

However new data and reports released in November 2009 indicate that the worst case scenario for global sea level rise is now projected to be at least 2 meters by the year 2100. More importantly, NASA's James Hansen, widely recognized as the preeminent climate change expert on Earth, argued credibly as early as 2007 that worst case scenario sea level rise will instead be 5 meters by the year 2100. In light of the fact that the IPCC's predictions of sea level rise from just two years ago have been found to be inadequate by an entire one half meter, and that James Hansen had previously argued in 2007 that the IPCC's projections were indeed inadequate, Hansen's projection of a worst case scenario of 5 meters sea level rise by the year 2100, must now be assumed as the guide for all plans for the Treasure Island and Yerba Buena Island Redevelopment Plan.

30.1

The following reports, with referenced data, prove this case:

- On Nov 22, 2009 NASA released new satellite gravimetric data from a 7 year study of Antarctica showing that the massive East Antarctic Ice Sheet, which scientists previously thought was gaining in volume, is suddenly (as of 2006) undergoing rapid and widespread melting. See <http://www.guardian.co.uk/environment/2009/nov/22/east-antarctic-ice-sheet-nasa>

The NASA study report itself can be ordered from Nature Geoscience at <http://www.nature.com/ngeo/journal/v2/n12/full/ngeo694.html>  
This research also shows massive new and more rapid melting in West Antarctica and Greenland. Quantified analysis of how this dramatic increase in melting will measurably impact sea level rise is shown in the next item.

- As of November 24, 2009, in a report entitled 'The Copenhagen Diagnosis', even historically overly equivocal IPCC scientists revised their sea level rise projections to a possible 2 meters (6.5 feet) by the year 2100. This report can be accessed at <http://www.copenhagendiagnosis.org/download/default.html>

The section of the report which describes the new sea level rise projections is on page 37 and 38 of the document.

- In a March 2007 report, NASA's James Hansen, who first alerted the general public and policy makers to the global climate crisis, discusses the probability of a 5 meter (16.25 feet) sea level rise. See Hansen's report at:

[http://www.iop.org/EJ/article/1748-9326/2/2/024002/erl7\\_2\\_024002.html](http://www.iop.org/EJ/article/1748-9326/2/2/024002/erl7_2_024002.html)

Note that Hansen's report is speculative by nature, simply because ice sheet melting and other data will not exist to prove the case that he argues, until that level of melting is already happening. However, given that the NASA gravimetric data noted above shows that Antarctic and Greenland ice sheets are currently undergoing rapidly accelerating melting at previously unforeseen rates (and at rates which continue to accelerate even further) there is absolutely no reason whatsoever to doubt Hansen's predictions; especially in light of the fact that Hansen's past predictions have consistently proved to be correct.

## CONCLUSIONS - SEA RISE:

Since James Hansen's prediction of a worst case 5 meter sea level rise by the year 2100 is highly credible, it is, at the very least, the standard of a predicted 5 meter rise which must be used as the worst case guideline for all plans for the Treasure Island and Yerba Buena Island Redevelopment Plan.

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cont'd



More importantly, good engineering practice (especially when dealing with a factor with such high unpredictability and potentially severe and costly outcomes as climate induced sea level rise) would call for at least an additional 100% margin of safety over worst case projections to be adopted for the Treasure Island and Yerba Buena Island Redevelopment Plan. This means that the safest standard for assumed worst case sea level rise in the project would be at least 10 meters (32.5 feet) of sea level rise by the year 2100. Even if planners were to use the likely far too equivocal 2 meter worst case sea rise projection in The Copenhagen Diagnosis, an additional 100% margin of safety would still demand a minimum 4 meter rise assumption.

Since the project plans and DEIR for the Treasure Island and Yerba Buena Island Redevelopment Plan have not taken into account the November 2009 reports noted above, and since planners and drafters were apparently unaware of Hansen's earlier and even more serious 5 meter rise projection, the project plans and DEIR are therefore utterly inadequate in addressing and including sufficiently high sea level rise projections.

The DEIR cites findings of agencies such as the San Francisco Bay Conservation and Development Commission (these agencies themselves relying on data that is not sufficiently current) as a justification of its own findings. Clearly, citing any given agency's findings which are not sufficiently current, regardless of the recognized authority of that agency, is not in any way adequate for a proper DEIR.

#### Specific Inadequacies

The section of the DEIR which deals most comprehensively with sea level rise; IV.O. 'Hydrology and Water Quality', has numerous entries on sea level rise. In every instance, the core predictions and plans referenced in the DEIR are dramatically overwhelmed by even the new minimum worst case scenario described above of 2 meters (78 inches) rise by the year 2100. Most of the DEIR and project plan sections mentioning sea level rise assume a maximum of 36 inches sea level rise, and the highest specific potential rise addressed in the plan is 55 inches.

Furthermore, while the DEIR claims that the project plans allow for sea rise higher than 55 inches to be addressed through 'adaptive management' none of the references to this 'adaptive management' plan engage in any concrete scoping whatsoever of specifically enumerated hypothetical heights of rise, exactly how such rise would be mitigated, and exactly how specifically quantified funding would be assured in order to guarantee that such mitigation would in fact take place. The so-called 'elements' and 'activities' of the 'adaptive management' plan are

described in the DEIR beginning on page IV.O.33. under the heading 'Adaptive Management Strategy' and ending on page IV.O.35. under the heading 'Reporting Requirements'. The total lack of specificity in this section is absolutely unacceptable.

30.1, cont'd

The DEIR must be revised to describe a clear response strategy for specific higher sea rise levels of at least each progressive 6 inch increment above 36 inches, progressing all the way up to, at least, James Hansen's hypothetical 5 meter rise. Specific cost projections must be provided for each of these scenarios. And clear, detailed, and fully plausible funding mechanisms which will finance necessary mitigations must be described and quantified.

Most importantly, it is conceivable that some given level of sea rise above two meters might make any sufficient, safe and affordable mitigation effectively impossible to achieve while still proceeding with the Treasure Island and Yerba Buena Island Redevelopment Plan. The revised section must give a clear projection of the specific threshold sea level rise at which such effective impossibility of mitigation will occur. This revised section must clearly detail sufficient ongoing assessment strategies to identify promptly when this threshold appears likely to in fact be reached, and accordingly, must provide a clear exit strategy for ceasing operations under the Treasure Island and Yerba Buena Island Redevelopment Plan, to instead adopt the 'No Project Alternative' as described in the DEIR.

#### Total Failure Of DEIR To Address Sea Level Rise Interactions With Liquefaction & Hazardous Materials

30.2

The most important inadequacies of the DEIR and project plan lie in their failure to account adequately for the potential of sea level rise to severely exacerbate both liquefaction and the leaching and harmful interactions of hazardous materials in the project area.

#### Liquefaction

In the report entitled 'Vulnerability assessment to liquefaction hazard induced by rising sea-levels due to global warming' (see <http://www.thefreelibrary.com/ /print/PrintArticle.aspx?id=155784183> - or purchase the full article with graphics at [http://eproceedings.worldscinet.com/9789812701602/preserved-docs/9789812701602\\_0069.pdf](http://eproceedings.worldscinet.com/9789812701602/preserved-docs/9789812701602_0069.pdf)

) the report authors establish clearly that liquefaction dangers increase as sea levels rise, and increase rapidly after sea level rise exceeds 1 meter.

Shockingly, of the pertinent DEIR sections, neither IV.N. 'Geology'; IV.O. 'Hydrology and Water Quality'; nor IV. P. 'Hazards', mention in any substantial way whatsoever the dangers of potential interactions between sea level rise and liquefaction.

It is absolutely imperative that the DEIR and the project plan, outline a detailed analysis of these potentially extremely hazardous interactions, and outline plans for how they would be prevented; all with the full range from 2 to 5 meters worst case sea level rise assumed.

This analysis must be provided for all project areas, both those in which liquefaction mitigations are planned, and those in which such mitigations are not planned.

#### Hazardous Materials

Another highly troubling aspect of the DEIR and project plan's neglect of sea level rise assessments is in their failure to sufficiently address potential sea level rise interaction with hazardous materials in and on the project site.

In 'Implications of Sea Level Rise for Hazardous Waste Sites in Coastal Floodplains' (see [http://www.epa.gov/climatechange/effects/downloads/Challenge\\_chapter9.pdf](http://www.epa.gov/climatechange/effects/downloads/Challenge_chapter9.pdf) )

the authors establish clearly the extensive dangerous interactions that can occur as sea level rise exacerbates flooding and triggers other negative impacts in hazardous waste sites, such as those in the Treasure Island and Yerba Buena Island Redevelopment Plan.

Yet astoundingly, of the pertinent DEIR sections, neither IV.N. 'Geology'; IV.O. 'Hydrology and Water Quality'; nor IV. P. 'Hazards' assess in any comprehensive or substantial way the very serious dangers of potential interactions between sea level rise and the numerous hazardous materials and residues in the project plan area.

It is crucial that comprehensive detailed assessments of such potential interactions be included in the DEIR and project plan; assessments which assume the full spectrum of 2 to 5 meters sea level rise projected above.

And regardless of the findings of such new assessments, the dramatic sea level rise scenarios projected above, especially if also exacerbated by earthquake liquefaction, could so overwhelm the project area that unforeseen and unavoidable extremely dangerous leaching, flushing,

30.2, cont'd

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mixing, out-gassing and dispersion of a veritable toxic soup of hazardous materials could take place in the project area. It is therefore imperative that all hazardous materials be completely removed from the entire project area before any development is permitted to proceed. Under a scenario of sea level rise between 2 and 5 meters, no capping, other on-site containment, or 'Institutional Controls' for any hazardous wastes can be adequate to ensure the prevention of unacceptably dangerous leaching, flushing, mixing, out-gassing and dispersion of hazardous materials; all which in turn would lead to the inevitable poisoning of the environment, animals, and people, living in, working in, and visiting the area.

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cont'd

All Other Sections Of DEIR Are Dramatically Impacted By New Sea Rise Projections And Must Therefore Be Revised

30.4

Every -other- section of the DEIR and the project plan referenced, is fundamentally impacted by sea level rise; and in light of the much higher worst case 2 to 5 meter sea level rise projections now shown to be warranted, the -entire- DEIR, its appendices, and the project plan that it references, must likewise be carefully reexamined and revised to account for the much higher potential sea level rise impacts indicated by these new projections.

To get a sense of why such a detailed and comprehensive reassessment is necessary, see the following online interactive sea level rise projection maps:

The Project Area At 2 Meters Sea Level Rise:

<http://flood.firetree.net/?ll=37.8240,-122.3724&z=2&m=2>

The Project Area At 5 Meters Sea Level Rise:

<http://flood.firetree.net/?ll=37.8240,-122.3724&z=2&m=5>

Even at the minimum 2 meter rise worst case assumption, the sea inundations into the project area clearly and profoundly impact the entire project in fundamental ways that are not adequately addressed in the DEIR and the referenced project plan. The 5 meter projection map is undeniably astounding in its implications. Such sea rise would likely mandate that a 'No Project Alternative' be adopted.

2) FAILURE TO ACCOUNT FOR AND AVOID HEALTH AND ENVIRONMENTAL HAZARDS OF TOXIC MATERIALS, INCLUDING BUT NOT LIMITED TO IONIZING RADIATION; AND, FAILURE TO MEET THE LEGAL PRECAUTIONARY PRINCIPLE ESTABLISHED BY ORDINANCE IN THE SAN FRANCISCO, CALIFORNIA, ENVIRONMENT CODE CHAPTER 1:

- PRECAUTIONARY PRINCIPLE POLICY STATEMENT - SECTIONS 100-104 (see

30.5

<http://library.municode.com/HTML/14134/level1/CH1PRPRPOST.html> )

## Ionizing Radiation

In June 2005 the National Academies of Science reported that there is no safe dose of ionizing radiation (see <http://www8.nationalacademies.org/onpinews/newsitem.aspx?RecordID=11340> )

Proceeding with any development while such wastes remain anywhere in the project area, presents unnecessary and unacceptable risks to human health and wildlife. Therefore the DEIR must be revised to direct that all radiological waste materials be removed from the Treasure Island and Yerba Buena Island Redevelopment Plan before any development may proceed.

## The Precautionary Principle And All Hazardous Materials

Furthermore, because San Francisco's own legally established Precautionary Principle also requires that no person be unnecessarily exposed to ionizing radiation or any other hazardous materials, it is doubly mandated that all radiological and other hazardous materials must be completely removed from the Treasure Island and Yerba Buena Island Redevelopment Plan area before any development is allowed to proceed.

Finally, because it is possible for human error and/or natural disaster to trigger their failure, none of the 'Institutional Controls' referred to in the DEIR and in the Treasure Island and Yerba Buena Island Redevelopment Plan itself are consistent with San Francisco's Precautionary Principle and therefore no such Institutional Controls are acceptable in the DEIR or project. Therefore the DEIR must be revised to direct that all reliance on 'Institutional Controls' be removed from the Treasure Island and Yerba Buena Island Redevelopment Plan.

## 3) SERIOUS INADEQUACIES IN ADDRESSING GREENHOUSE GAS EMISSIONS

The Treasure Island and Yerba Buena Island Redevelopment Plan DEIR makes fundamentally false and deeply flawed assumptions about the severity of greenhouse gas emission impacts and relies on reports and data that are far too old, in establishing those assumptions.

Section IV.H. begins its first paragraph with statements including the following:

"While worldwide contributions of GHGs are expected to have widespread consequences, it is not possible to link particular changes to the environment of California to GHGs emitted from a particular source or location. Thus, when considering a project's contribution to impacts

30.5,  
cont'd

30.6

from climate change, it is possible to examine the quantity of GHGs that would be emitted either directly from project sources or indirectly from other sources, such as production of electricity. However, that quantity cannot be tied to a particular adverse effect on the environment of California associated with climate change."

30.6,  
cont'd

This statement is completely false. It is now well established science that global greenhouse gas emissions are accelerating, and are currently so high, that the Earth's atmosphere already contains sufficient excess parts per million (PPM) of CO<sub>2</sub> to create adverse climate impacts (along with connected adverse social, agricultural and economic impacts) in every state on the planet. No state is, or will be, unaffected. This is especially true when it is recognized that since some impacts of climate change, no matter where they are happening on the Earth, will be sufficiently powerful to negatively impact the global economy, and food production and distribution systems, that it is impossible for California to completely avoid such impacts.

This can be said with certainty, because recent peer reviewed science has clearly established that the planetary atmospheric CO<sub>2</sub> load is causing and will continue to cause adverse impacts unless that load is brought -down- from its current level at around 392 PPM, to be stabilized at or below 350 PPM. Because of this fundamental reality, -all- net increases in greenhouse gas emissions (GHGs) will have adverse impacts on California. This is particularly clear in the case of sea level rise which obviously does not recognize state boundaries in its impacts, and which is even clearly recognized as an immediate problem to the Treasure Island and Yerba Buena Island Redevelopment Plan itself.

This science on CO<sub>2</sub> PPM load is most clearly established by Hansen, et al. 2008, in 'Target Atmospheric CO<sub>2</sub>: Where Should Humanity Aim?' a 20 page document which can be easily read at <http://arxiv.org/ftp/arxiv/papers/0804/0804.1126.pdf>

This report is also further verified, shown to be accurate, and amplified in its importance, through the even more current reporting and data in the previously mentioned 'Copenhagen Diagnosis', which again can be read at <http://www.copenhagendiagnosis.org/download/default.html>

To understand its full, very serious, and immediate implications, the 64 page 'Copenhagen Diagnosis' should be read in its entirety. Particularly important in this report is the section 'Abrupt Change And Tipping Points' which can be found on pages 40-42 of the report. (Note that page 40 of the report itself, begins at page 42 of the full PDF document found at the link noted above.)

Since it cannot be determined at precisely which point CO2 overload in the atmosphere will result in triggering the serious tipping points noted in both of these reports, only a project which results in actually -reducing- greenhouse gas emissions can be claimed to have 'less than significant impacts'.

Therefore the DEIR's claims on pages IV.H.44. and IV.H.45 that project greenhouse gas emissions will be 'Less than Significant' are clearly and dangerously false.

Consequently, the entire DEIR section IV.H. 'Greenhouse Gas Emissions' must be extensively and dramatically revised to properly reflect the realities established in these reports.

Furthermore the entire DEIR, as well as the Treasure Island and Yerba Buena Island Redevelopment Plan itself must be extensively and dramatically revised so that they will set forward clear mandates by which the project will begin achieving quantifiable net -reductions- in greenhouse gas emissions by at least 2050 (and beginning to achieve such reductions by 2030 or even earlier is far more prudent and should be an aggressive goal of the project).

Such net greenhouse gas reductions are possible, and can be achieved through;

1) Establishing a long term transportation plan which will transition virtually all transportation in the project area to mass transit and care sharing (and perhaps taxis) which are all powered by renewable electricity sources by 2030 (2050 at the latest). DEIR section IV.E. 'Transportation' does not reference such an aggressive plan, and so it, and the project plan itself, should be extensively revised to mandate and adopt such a plan.

and;

2) Establishing that all open space, wildlife habitat, gardening and farming areas in the project area must be carefully designed to achieve aggressive and rapid soil building which will progressively and permanently sequester large amounts carbon from the atmosphere. The actual methods by which such soil carbon sequestration can be achieved are extensive and too numerous to specify in these remarks, however a web search for the combined terms 'permaculture' and 'carbon farming' will produce a plethora of examples by which to model a successful plan. A similar search for the term "keyline agriculture" will produce similar results which detail one of the most promising methods for such success.

30.6, cont'd

(comments overlap)

30.7

30.8

The 'Land Use', 'Transportation', 'Greenhouse Gas Emissions', 'Recreation', 'Biological Resources', 'Hydrology and Water Quality', and 'Agricultural Resources' sections of the DEIR must each be revised to mandate such changes in the Treasure Island and Yerba Buena Island Redevelopment Plan, so that the project will be able to effectively achieve the establishment of 'Less than Significant' impacts on greenhouse gas emissions.



30.8, cont'd

-end of comments-

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74 Mizpah Street  
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September 10, 2010

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission St., Suite 400  
San Francisco, CA 94103

Re: TI/YBI Redevelopment Project, Case: #2007.0903E

Dear Mr. Wycko:

Here are some of my comments on the Draft EIR:

**Need for a truly “environmentally superior alternative”**

The subject DEIR fails to identify, describe and analyze the CEQA-required “environmentally superior” alternative. What the DEIR calls the environmentally superior alternative – the no-ferry service alternative – clearly is not. As pointed out by many participants in the scoping process, the way to achieve fewer negative environmental impacts would be with a project with enough density for the residents to meet their basic retail and service needs on the islands, a maximum of transit options, a minimum of car trips, and a reduced level of car ownership. The “no ferry service” alternative, on the other hand, includes less density, fewer transit options, a 1:1 residential parking ratio and far too much commercial and visitor parking. A 1:1 residential ratio is no longer considered anywhere near the cutting edge of sustainability or carbon neutrality.

31.1a

The reasons offered for not analyzing an alternative with reduced parking and reduced automobile ownership are flimsy at best. It cannot be said that such an alternative would “not meet most of the Proposed Project's basic objectives.” (page S.86) It has been demonstrated that reducing parking reduces driving, and reducing the number of automobile trips on the islands as well as to and from the islands would meet several of the project objectives (pages II.4 and II.5) significantly better than the Proposed Project does:

31.1b

- Implement a land use program with high-density, compact residential and commercial development located within walking distance of an intermodal Transit Hub to maximize walking, bicycling, and use of public transportation and to minimize the use and impacts of private automobiles.
- Provide a high-quality public realm, including a pedestrian and bicycle-friendly environment with high design standards for public open spaces, parks, and streetscape elements.
- Include enough residential density to create a sustainable community that supports neighborhood-serving retail, community facilities, and transit infrastructure and service.
- Demonstrate leadership in sustainable design and provide new benchmarks for sustainable development practices in accordance with the *Treasure Island Sustainability Plan*.

- \* Create a circulation and transportation system that emphasizes transit-oriented development, discourages automobile use, and supports and promotes the use of public transportation and car-sharing, through a comprehensive transportation demand management program.

31.1b,  
cont'd

The way to reduce the vehicle miles traveled that are generated by the development is to **reduce the availability of parking** on the islands. Merely increasing the cost of parking is not sufficient. As SPUR wisely points out in its October 2004 report, *Parking and Livability in Downtown San Francisco; Policies to reduce congestion*:

**The more parking you build, the more cars you attract and the worse congestion gets.**

31.2

It makes sense, therefore, to analyze a "truly environmentally superior alternative" whose major difference from the Proposed Project is its decreased reliance on the private auto and its significantly less impact on traffic and transit currently assessed as "Significant and Unavoidable with Mitigation" in numerous locations. For the sake of convenience, this comment letter will use the term "Reduced Driving Alternative," though other labels would work as well. It is similar to, but not the same as, the "Reduced Parking Alternative" that is described and rejected in the DEIR.

31.3

Another possible reason for MEA's refusal to even study reduced parking or reduced automobile ownership is that those options might be considered infeasible. If infeasible means unrealistic, a reduced parking alternative could not possibly be less realistic than the no-project, reduced development, or no ferry service alternatives.

31.4

The DEIR states, on p. VII.76, that the Reduced Parking Alternative was not considered for further study because **TIDA and the City "concluded** that it could exacerbate significant traffic impacts and would be financially infeasible." Is it appropriate for the Office of Environmental Review to accept the conclusions of the Project Sponsor without independent analysis?

Please provide detailed documentation of factors that led to MEA's conclusion that it would be economically infeasible to reduce parking spaces to numbers that would avoid the many instances of significant and unavoidable impacts cited in the Transportation section.

The Proposed Project is to be commended for specifying that parking spaces will be unbundled from residential units. In the Reduced Driving Alternative, a dedicated parking space could only be rented and not purchased, even if the dwelling unit is purchased.

31.5

The DEIR states (page VII.76) that "less than one parking space per residential unit **could** adversely affect the marketability of the units . . ."

Please consider that what may be marketable today may change in a few years. Consider advances in education, attitudes and circumstances that will lead to greater acceptance of and even the embracing of a car-free lifestyle. Consider, for example, the observations in this article:

31.6

It's a rarely acknowledged transformational shift that's been going on under the noses of marketers for as long as 15 years: The automobile, once a rite of passage for American

youth, is becoming less relevant to a growing number of people under 30. And that could have broad implications for marketers in industries far beyond insurance, gasoline and retail. . . .

The share of automobile miles driven by people aged 21 to 30 in the U.S. fell to 13.7% in 2009 from 18.3% in 2001 and 20.8% in 1995, according to data from the Federal Highway Administration's National Household Travel Survey released earlier this year.

Meanwhile, Census data show the proportion of people aged 21-30 increased from 13.3% to 13.9%, so 20-somethings actually went from driving a disproportionate amount of the nation's highway miles in 1995 to under-indexing for driving in 2009.

William Draves blames (sic) the internet. Mr. Draves, president of Lern, a consulting firm which focuses mainly on higher education, and co-author of "Nine Shift," maintains that the digital age is reshaping the U.S. and world early in this century, much like the automobile reshaped American life early in the last century.

His theory is that almost everything about digital media and technology makes cars less desirable or useful and public transportation a lot more relevant. Texting while driving is dangerous and increasingly illegal, as is watching mobile TV or working on your laptop. All, at least under favorable wireless circumstances, work fine on the train. The internet and mobile devices also have made telecommuting increasingly common, displacing both cars and public transit.

The environment is the reason Gen Y-ers most often give for wanting to drive less, Mr. Draves said. But he sees the fundamental economic transformation wrought by the internet (and, apparently on the internet; research firm J.D. Power & Associates found that Gen Y-ers don't talk about cars nearly as much as their elders in social media). This demographic will be working on "intangibles" in professional jobs, not on tangible things that require physical presence, Mr. Draves said. "Time becomes really valuable to them," he said. "You can work on a train. You can't work in a car. And the difference is two to three hours a day, or about 25% of one's productive time."

Ford Motor Co. sees the trend as well . . . "I don't think the car symbolizes freedom to Gen Y to the extent it did baby boomers, or to a lesser extent, Gen X-ers," said Sheryl Connelly, global trends and futuring manager. "Part of it is that there are a lot more toys out there competing for the hard-earned dollars of older teens and young adults."

Digital technology "allows teens to transcend time and place," she said, "so they can feel connected to their friends virtually." New options like Zipcar also make it easier to do without permanent car ownership, she said.

. . . "This new generation, their first thought is not 'let's drive to the store to get these things,'" [Draves] said, "but 'let's get them the easiest, fastest, cheapest way.' We call them internet-first people. We think that's an important segment for us . . ."

Of course, the trend is mainly bad news for an auto industry struggling to recover from its steepest downturn since the Great Depression. The combination of Millennials driving less and boomers retiring led Carlos Gomes, economist with ScotiaBank in Toronto, to issue a downbeat forecast for long-term vehicle sales in North America in February. He projects growth in U.S. new vehicle sales of only around 0.6% annually over the next decade, cutting nearly by half the 1.1% growth rate of the prior decade. While the need to replace a fleet that averages 9.4 years old in the U.S. favors the auto industry short-term, demographics and driving trends argue against a robust recovery, he said. Citing his own teenage children and their friends in Toronto, Mr. Gomes said, "they just prefer taking the train."

--"Is Digital Revolution Driving Decline in US Car Culture?  
Shift Toward Fewer Young Drivers Could have Repercussions for all Marketers"  
[http://adage.com/digital/article?article\\_id=144155](http://adage.com/digital/article?article_id=144155)

31.6,  
cont'd

Please provide a thorough assessment of parking-related marketability of residential units as well as commercial space, taking into account future trends.

↑ 31.6,  
cont'd

Please also address the illogical circuitousness of the argument on the same page that says that the only way to achieve the project objective of "discouraging automobile use and promoting the use of public transportation" is to encourage more driving and parking as the way to generate enough revenue to make it possible for people to take transit. This argument suggests that the Project Sponsor believes that it is economically infeasible for the Proposed Project to meet its own objectives. The implication that we should not try to encourage non-car owners to move to the islands because of the potential negative impacts on the 108 defies understanding of the development's claims to be environmentally sustainable. How can greater use of public transit be considered a negative? Consider the City's Transit First Policy objectives:

31.7

Objective 8 -- New transportation investment should be allocated to meet the demand for public transit generated by new public and private commercial and residential developments.

Objective 14 -- Develop and implement a plan for operational changes and land use policies that will maintain mobility and safety, despite a rise in travel demand that could otherwise result in system capacity deficiencies.

These objectives seem to be at odds with the statement on page IV.E.141 that a parking shortfall on the islands could result in a shift from auto to transit modes, resulting in an increase in transit travel and therefore in a negative impact on the 108. How can a mode shift from private autos to transit not be a good thing for the environment? If there's an increase in transit demand, it is the City's policy to meet that demand.

Whether or not deemed economically infeasible by the Project Sponsor, the DEIR should include an analysis of a Reduced Driving Alternative in which the provision of adequate transit service is not dependent on car-generated revenues. The analysis should take into account that the more people taking transit, the cheaper per passenger mile to provide that transit. And the fewer cars on the road, the more reliable and efficient the bus transit will be.

31.8

As stated on page VII.1:

**The analysis of alternatives is of benefit to decision-makers because it provides more complete information about the potential impacts of land use decisions, and consequently a better understanding of the inter-relationships among all of the environmental topics under evaluation.**

31.9

The importance of having a basis of comparison to truly understand the Proposed Project's enormous auto-related impacts and the effectiveness of various possible mitigation measures outweighs the unproven possibility that reducing driving might make the project less profitable.

The analysis should also include the increased desirability of living on and visiting the islands due to greater safety, especially for families, and reduced noise and pollution. Also include the increase in bicycle use that is likely to result from having fewer cars on the roads, especially on Macalla and Treasure Island Roads.

31.10

Please also note the following, from AB 981 (Leno), Treasure Island Transportation Management Act:

↓ 31.11



## CHAPTER 9. TREASURE ISLAND TRANSPORTATION MANAGEMENT

1967. This act shall be known and may be cited as the Treasure Island Transportation Management Act.

1967.1. The Legislature finds and declares all of the following:

(a) It is essential for the economic well-being of the state and the maintenance of a high quality of life that the people of California have efficient transportation systems that will reduce traffic congestion, vehicle miles traveled, and greenhouse gas emissions, and improve travel times and air quality.

(b) In 2006, the Legislature passed Assembly Bill 32 (Ch. 488, Stats. 2006), which enacted the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code), a landmark act that establishes a first-in-the-world comprehensive program of regulatory and market mechanisms to achieve real, quantifiable, cost-effective reductions of greenhouse gases.

(c) Implementation of the California Global Warming Solutions Act of 2006 will require creative and innovative solutions, including strategies designed to integrate land use and transportation measures to reduce vehicle miles traveled and traffic congestion, improve travel times, and encourage transit use.

(d) The proposed development of Treasure Island includes an innovative and comprehensive land use and transportation program designed to discourage motor vehicle usage, reduce vehicle miles traveled, encourage public transit, and serve as a model of sustainable neighborhood development. An element of the transportation program is the use of congestion pricing.

...

(h) The purpose of the Treasure Island transportation program is to accomplish all of the following:

(1) To facilitate the implementation of an innovative, sustainable transportation program for Treasure Island that will encourage public transit, bicycle, pedestrian, and waterborne modes of transportation, reduce vehicle miles traveled, and minimize the impact of Treasure Island development on the system of state and local roadways affected by the San Francisco-Oakland Bay Bridge, as well as on the bridge itself, in furtherance of the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code).

How can we say that the development will reduce vehicle miles traveled and minimize the impact on the bridge when the DEIR states that the Proposed Project will have significant and unavoidable impacts on the bridge?

It is essential to identify and fully analyze an alternative that complies with AB 32, AB 981, and the Proposed Project's own objectives. That has not been done.

### Other transportation topics

The shuttle route shown on page II.40 varies considerably from the route shown on page IV.E.34. How is the reader to know which one applies? The one on page II.40 does not serve the historic buildings called the "Great Whites." If that's the one that applies, then what will be the environmental impacts of people having to take private cars there? How many fewer cars would be brought to the islands if people knew they would be able to take a shuttle between the transit hub and the Great Whites?

31.11,  
cont'd

31.12

The Walking Times map (page II.47) is inaccurate for YBI. People take longer to walk uphill (and up stairs), and since most of us can't walk on water it will take longer to get from the transit hub to the east housing area on YBI than to a site that is the same distance away (as the crow flies) on TI. Please revise the walking times diagram to make it realistic. It is necessary to have this information to be sure that YBI residents and visitors are equitably served.

31.13

The ferries should provide areas for bikes where they will be protected from salt spray. How many more people will bring their bikes on the ferries if they know that their bikes and accessories will not be sprayed with salt water?

31.14

The "Transportation Improvements" (page IV.E.31) need to be shown in comparison with existing transportation infrastructure, superimposed on topographic maps, as recommended in the CEQA Guidelines. The existing and proposed roads should be given names so that it is possible for the public and decision makers to discuss them, and the names should be consistent on all maps. The map on page IV.F.5, for example, calls Northgate Macalla Ct., among other confusions.

31.15

The proposed road segment that would connect Macalla Road with the Yerba Buena loop road appears to go straight uphill. What is the grade of this segment? Also, the new segment that would link Nimitz Drive with the real Macalla Court looks impossibly steep. What is the grade of the proposed new section?

There are serious problems with the proposed ped/bike connection (p. IV.E.38) to the planned new path on the East Span of the bridge. Please provide an analysis of realistic ways to get people between TI and the bridge. Consider the needs and abilities of families with children. Consider shuttles with racks for multiple bicycles. Consider a significant widening of Macalla Road to accommodate a Class I bike path. Please also do a comparative analysis of the impacts on the bike/ped connection of retaining or removing eucalyptus trees in the area, both with regard to safety and maintenance needs.

31.16

Under "Pedestrian Circulation Improvements" (p. IV.E.36) the document states that the pedestrian circulation network "would encourage walking as the primary mode within the Development Plan Area." However, this is followed with "Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed." It is difficult to evaluate this approach when the diagram on E.37 fails to show the streets and erases the contour lines in the housing areas.

31.17

Please rethink the "Secondary Pedestrian Route" that appears to traverse the rip-rap along the causeway to bring people down onto Clipper Cove Beach and along a sensitive habitat area. Please analyze the impacts on native plants and animals that would result from the construction and use of such a route.

## Biological Resources

Many of the proposed mitigations to assure the protection of indigenous plants and animals are very good, but the enforcement mechanisms are not made clear. For example, who is responsible for removing feral cat feeding stations? Who will issue

31.18

citations to boaters seen within eelgrass zones? Please review the mitigation measures and add information about accountability and the resources needed to assure implementation.

↑ 31.18,  
cont'd

On page VII.13, it states that the impacts of the No Project Alternative on the biological resources would be insignificant. While the resources have indeed been "ecologically compromised" the health of the remnant ecosystems could still deteriorate drastically over time if nothing is done. The same significant negative impacts would occur under the Proposed Project and other alternatives if funding does not become available to implement the Habitat Management Plan. Please provide a more thorough discussion of the impacts on YBI's biodiversity that will result if the invasive introduced species are allowed to continue to out-compete, smother and displace the naturally occurring biotic communities.

31.19

### Water Conservation

On page II.61 it states that the use of grey water is currently not allowed. Please update this section to reflect the changes in state and local law that are currently in the works.

31.20

### Regulatory Framework

This section (page IV.E.25) appears to be incomplete. Consider adding AB 32, AB 981, the Bay Trail legislation, etc.

31.21

### Yerba Buena Island View Corridors

The diagrams on page II.23 are not useful for understanding what the views will be from YBI. Please extend the view cones all the way out to whatever the viewer would actually be looking at. Would any of these view corridors include views of the Bay? Please show renderings and or photographs of the actual views from these locations, looking in the directions specified. Also, please describe and illustrate the impacts on these view corridors of the island's trees, as they continue to grow over time.

31.22

I hope that these comments and requests for additional information and the responses to them will be useful to the public and decision makers in gaining a better understanding of what is proposed and how the redevelopment project can be improved.

Sincerely,

Ruth Gravanis







*inspiring people to protect  
Bay Area birds since 1917*

September 10, 2010

Via US Mail and electronic mail

Bill Wycko, Environmental Review Officer,  
San Francisco Planning  
Department, 1650 Mission Street, Suite 400,  
San Francisco, CA 94103.  
Bill.Wycko@sfgov.org

**Re: Draft EIR Treasure Island and Yerba Buena Island Redevelopment Project Planning  
Department Case No. 2007.0903E (State Clearinghouse No. 2008012105)**

Dear Mr. Wycko;

I am writing on behalf of the Golden Gate Audubon Society and its members and supporters in the San Francisco Bay Area to provide comments on the Treasure Island and Yerba Buena Island Redevelopment Draft Environmental Impact Report (DEIR). Golden Gate Audubon's mission is to protect Bay Area Birds and other wildlife as well as conserve and restore native wildlife habitat. Golden Gate Audubon serves to connect people of all ages and backgrounds with the natural world, and educates and engages Bay Area residents in the protection of our shared local environment.

Treasure Island and Yerba Buena Island are located in San Francisco Bay which is an important part of the Pacific Flyway. The Pacific Flyway is a migratory route for birds travelling from as far away as Alaska and Canada in the north to South America. Millions of birds come to San Francisco Bay and rely on it to forage and rest from the fall through the spring. Other birds are residents and breed and raise their young on the island. Some birds like the Orange-crowned Warbler and Cliff Swallow come to Yerba Buena Island to breed and then migrate away during the fall and return in the spring. Many shorebirds and waterbirds depend on the waters surrounding Yerba Buena Island and Treasure Island particularly from fall through the spring each year. This project provides many opportunities for people to learn more about and improve this area for the native plants, marine mammals, fish, birds and other wildlife that depend on Treasure Island and Yerba Buena Island.

32.1

Birding is one of the fastest-growing outdoor recreational activities in North America, generating billions of dollars for businesses adjacent to bird watching destinations. *See, e.g.,* US Fish & Wildlife Service, *Birding in the United States: A Demographic and Economic Analysis*, Report No. 2006-4 (available at [http://library.fws.gov/Pubs/birding\\_natsurvey06.pdf](http://library.fws.gov/Pubs/birding_natsurvey06.pdf)) (finding that birders spent approximately \$36 billion in 2006 on equipment and birding-related trip expenditures, including travel, transportation, food, lodging, and user fees). Protecting the birds and bird watching opportunities at Treasure Island and Yerba Buena Island will ultimately contribute to the overall success of the project and benefit the Bay Area economy.

**GOLDEN GATE AUDUBON SOCIETY**

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Below please find Golden Gate Audubon's comments regarding the Yerba Buena Habitat Management Plan.

## I. SETTING

Section IV.M ("Biological Resources") begins with an assessment of the current setting of the Treasure Island-Yerba Buena Island (TI-YBI) setting. While accurate that TI was heavily used for decades when the base was functioning, the Biological Resources section does not appear to account for the decrease in use after the closure of the base. The suitability of TI-YBI and its adjacent waters for wildlife may depend on overall resident and transient (especially work-related) human population on the island.

32.2

It is not appropriate to consider the "baseline" as the conditions at the base during its peak operations. Rather, the environmental assessment should be based on the use and population exists today. The proposed development will increase use and population on the island much more significantly over current use than it might have over the historical use of the island.

## II. REGIONAL SETTING

The TI-YBI development must be considered within the context of cumulative impacts throughout the Bay Area (or, at a minimum, the Central Bay). In order to best understand these cumulative impacts, readers must be provided with a more complete assessment of the regional setting.

32.3

As a first step, the Regional Setting section would be improved with a statement regarding the current state of baylands (as defined in the section) and open water habitats in the Bay Area. The Bay Area has lost more than 90% of its historic wetlands and 40% of its open water habitat. (See Bay Conservation and Development Commission, *San Francisco Bay Plan* (2008), at 15) Similarly, the Bay Area has suffered the loss of considerably amounts of coastal prairie, coastal riparian, mixed woodland, coastal scrub, intertidal, and subtidal habitats. These declines in available habitat have resulted in increased pressure on resident and migratory birds and other wildlife that depend on the Bay.

This section would also be improved by including citations to appropriate scientific and technical sources. For example, there is no citation provided for the following:

32.4

The dominant marine birds regularly inhabiting or utilizing the Central Bay include cormorants (*Phalacrocorax* spp.), pigeon guillemot (*Cepphus columba*), herring gull (*Larus argentatus*), mew gull (*L. canus*) and California brown pelican (*Pelecanus occidentalis californicus*). Among the diving benthivores guild, canvasback (*Aythya valisineria*), greater scaup (*A. marila*), lesser scaup (*A. affinis*), and surf scooter (*Melanitta perspicillata*) are the most common.

(DEIR at § IV.M.3).

Moreover, the apparent reliance on only a few of the available scientific and technical resources available about the Central Bay is worrisome. There are only four publications cited in this section and one, *Baylands Ecosystem Habitat Goals*, is used only to define endemism (despite providing very useful information about the regional setting for this project). We are concerned because the DEIR's assessment of biological impacts will be incomplete unless a thorough review of available information is conducted and the relevant information is incorporated into the EIR. If additional documents were reviewed in the preparation of this section, we ask that an appendix or reference list be provided to verify the information presented in the DEIR.

### III. PROJECT SETTING

#### A. Treasure Island

The DEIR states that the non-native plants incorporated into landscaping result in a habitat type that is “of low value” to wildlife. (DEIR at IV.M.4). The DEIR provides no means to assess the scale of the habitat’s value; in other words, how are “high value” and “low value” habitats measured, respectively—by species diversity, density, breeding success, population demographics, individual lifespan? Moreover, the only citation provided for this assessment is the San Francisco Planning Department (presumably the 2005 EIR). This is not an adequate citation for such a broad characterization, especially given that it does not even cite to a specific page or other reference in the 2005 EIR (or some other verifiable document).

32.5

While the human-altered landscape of TI could be greatly improved for wildlife, it is likely that it currently provides better habitat for wildlife than it will after the completion of the project. If the DEIR downplays the importance now, it is easier to show no significant impact to wildlife, and therefore avoid minimization or mitigation measures required by law. Therefore, if such assessments are to be made in the DEIR, they must be supported by a quantifiable and verifiable metric of “habitat value”. We also note that while the DEIR emphasizes that TI is of “low value” for habitat for wildlife, it offers no such blanket assessment for YBI.

Finally, Christmas Bird Count (CBC) data since 1984 indicate that at least 112 species have been observed using the island during the CBC counts in December of those years. (Attached hereto as Attachment A; available from the National Audubon Society at <http://www.audubon.org>) Other species are present during the fall and spring migrations and the spring-summer bird breeding season. These birds use different parts of the landscape—including non-native ornamental plants—for a variety of purposes.

32.6

#### B. Yerba Buena Island

Golden Gate Audubon joins in the comments provided by the Yerba Buena Chapter of the California Native Plant Society and the San Francisco Bay Chapter, especially with regard to their assessments of the vegetation communities on YBI.

##### 1. Birds at YBI

As an initial matter, we are confused as to why the section on birds is identified as “Breeding Birds” when it is clear from the text that it is intended to cover all bird that use YBI. (See DEIR at IV.M.17-18) If this section is intended to cover only breeding birds, then the inclusion of a bird list from January is probably inappropriate, as few (if any) birds are breeding on the island at that time.

32.7

The DEIR never expressly states that increasing the human population will inevitably result in significant impacts to the birds and other wildlife that live on and around TI-YBI. Humans introduce direct disturbances, trash (which attracts predators and subsidizes non-native pests), light, and pollution; all these increase by the mere presence of more people near wildlife. The DEIR should more specifically discuss the impacts that will arise from a larger human population on the islands and identify mitigation, avoidance and minimization measures.

The DEIR assumes that only non-native birds breed in non-native habitat in Treasure Island but that is untrue. Native bird species will nest in non-native habitat when native habitat choices. Golden Gate Audubon requested that the project include surveys throughout the year to census all of the birds and other wildlife that depend on the island including the resident, migrant and possible vagrant species.

The DEIR does not specifically address the effect of increased illumination on wildlife, especially birds. It is widely known that artificial light affects the foraging, migrating, hunting, and breeding habits of

32.8

birds and other wildlife. By increasing residential capacity so significantly on the island, the Project will undoubtedly increase overall illumination. Even with some measures in place (e.g., dimmer lights, shielded fixtures), increase in light pollution is inevitable. The DEIR does not appear to consider this a significant impact and offers no real solutions to offset it.

32.8,  
cont'd

In any event, it appears that the research conducted in building the bird list on page IV.M.18 is inadequate. First, it is unfortunate that the DEIR's authors would rely on a single bird list from a walk in January 2007 as a source for birds using YBI and adjacent waters in the winter. San Francisco Bay is extremely important to over-wintering birds and an assessment of their diversity and abundance merits more than checking a list from a single bird walk. This is particularly disturbing given that there is over 25 years of Christmas Bird Count data conducted by knowledgeable birders for YBI and TI that is freely available online. We also invite the DEIR's authors to review results posted on the SFBirds group on Yahoo.com, on which birders post sightings and lists from walks on YBI. A simple search would have greatly expanded the list provided in the DEIR. Consultation with experienced biologists and birders in the area would probably also be extremely productive for understanding the biodiversity of YBI and its adjacent waters.

32.9

In any event, the Christmas Bird Count data and SFBirds lists indicate that the following species in addition to those listed in the DEIR that use YBI and TI:

Snow goose	American coot	Mourning dove
American wigeon	Black-bellied plover	Barn owl
Greater scaup	Black oystercatcher	Belted kingfisher
Lesser Scaup	Greater Yellow-legs	Acorn woodpecker
White-winged scoter	Willet	Downy woodpecker
Long-tailed duck	Wandering tattler	Northern (Red-shafted)
Common goldeneye	Ruddy turnstone	Flicker
Barrow's goldeneye	Sanderling	Say's Phoebe
Red-breasted merganser	Western sandpiper	Hutton's Vireo
Red-throated loon	Least sandpiper	American crow
Pacific loon	Bonaparte's gull	Red-breasted nuthatch
Pied-billed grebe	Heermann's gull	House wren
Great-blue heron	Mew gull	Golden-crowned kinglet
Green heron	Herring gull	Varied thrush
Sharp-shinned hawk	Western x Glaucous-winged	Wrentit
Red-shouldered hawk	gull	Palm warbler
American kestrel	Glaucous-winged gull	Brown-headed cowbird
Peregrine Falcon	Pigeon Guillemot	

Golden Gate Audubon finds it extremely worrisome that the DEIR's authors would produce a bird list for the island that falls so short of the truth, especially given the ease with which such information is available.

## 2. Wetlands

The description of the wetlands on YBI is minimal, at best. (See DEIR at IV.M.30). It would be appropriate to at least quantify the amount of wetlands on YBI, rather than referring it to a "small band" of indeterminate size.

32.10

## 3. Eelgrass Beds

The island has eelgrass beds which are important for many native fish and bird species. (See [http://www.dfg.ca.gov/marine/status/submerged\\_aquatic\\_plant.pdf](http://www.dfg.ca.gov/marine/status/submerged_aquatic_plant.pdf)) Eelgrass was also a source of food

32.11

for Native Americans and has value as a cultural resource. From its review of Section IV.M.12-13, Golden Gate Audubon cannot determine what protections, if any, are in place as part of the transportation plans to ensure the integrity of the eelgrass beds and other important parts of the subtidal ecosystem. The mitigation measure (discussed further below) offers to identify eelgrass beds, but offers no measurable, enforceable means of protecting the eelgrass beds. The DEIR should be revised to ensure adequate protections are included as mitigation and avoidance measures.

32.11,  
cont'd

#### IV. REGULATORY SETTING

The description of the applicability of the Migratory Bird Treaty Act is not adequate because it fails to state whether the killing of migratory birds or the destruction of their nests would be considered “significant” within the scope of the EIR (compare to the subsequent section on the Fish & Game Code). This is particular importance for this project, given that it includes plans to construct very tall, lighted structures on the island, which are known to cause collisions and birds with migratory birds.

32.12

It is our understanding that the description of the applicability of the McAteer-Petris Act (DEIR at IV.M.37) is inaccurate because it states that the Bay Conservation & Development Commission (BCDC) does not have a role to play on federal lands. However, according to the BCDC website and other sources, BCDC must make a federal consistency determination with the Bay Plan and any other applicable plans where federal action may affect a specially designated area. (See <http://www.coastal.ca.gov/fedcd/faq-fc.html>).

32.13

#### V. IMPACTS ANALYSIS

##### A. Significance Criteria

It is inconsistent with the City General Plan Objective 8 (*Ensure the protection of plant and animal life in the City*) to hold significance of impacts to wildlife at a threshold of whether there is a “substantial impact” on a listed or specially-designated species. (DEIR at IV.M.38-39) Given that most native bird populations in the San Francisco Bay Area are suffering continuing declines, the impacts from the project on birds (and other wildlife and flora) should be considered in the context of cumulative impacts from projects throughout the Central Bay (at a minimum). Otherwise, the TI-YBI project is just another in the “death by a thousand cuts” that is pushing native bird and other wildlife populations toward extirpation or extinction.

32.14

If the Project is to be in compliance with Objective 8 (as well as the MBTA and the Fish & Game codes), then it must consider significant impacts as something more than just “substantial” impacts to specially-designated species. For example, if the project will have a significant impact on white-crowned sparrows (a once-common species in decline throughout San Francisco), then avoidance, minimization and mitigation measures must be developed to ensure the continued viability of the sparrow on YBI. Moreover, if the tall structures (housing units, towers, etc.) result in collisions harming migratory birds, there should be a mechanism in the DEIR that establishes the threshold for significance of this impact (which heretofore did not exist on TI-YBI).

##### B. Specific Impacts & Mitigation Measures

##### 1. Impacts to Plant Communities

Golden Gate Audubon joins in the comments provided by the California Native Plant Society, Yerba Buena Chapter, and the Bay Chapter of the Sierra Club regarding impacts to native plant communities. The coastal scrub, riparian, coastal oak woodland, and native mixed woodland sites in on YBI should be fully protected and, where possible, enhanced by the Project. Doing so would provide benefits for the plants, wildlife, and human community on TI-YBI.

32.15

**2. Impacts to Birds**

**a. Breeding Birds**

Golden Gate Audubon agrees that the breeding bird season is generally considered to run from February 1 to August 15 of each year. (See DEIR at IV.M.45) While the DEIR states that a “qualified biologist” will conduct surveys near construction sites during this time, the DEIR does not provide a basis for the adequacy of the 100 foot buffer between construction sites and nesting birds. Golden Gate Audubon reminds the agency that forcing a migratory bird to abandon its nest is a violation of the Migratory Bird Treaty Act, for which there is no take permit provided. Therefore, the DEIR should either document the adequacy of the proposed 100-foot buffer or establish additional steps to ensure that breeding birds are not disturbed to the point of abandoning nests or young. Moreover, the DEIR makes no effort to determine whether there will be significant disturbances to birds during the non-breeding season and what, if any, impacts that will have on local populations.

32.16

Moreover, Mitigation Measure M-BI-1b: Pre-project Surveys for Nesting Birds provides no mitigation measures for other impacts (other than direct disturbances to nesting birds). For example, the construction of additional outdoor lighting fixtures, tall buildings, and other structures is likely to increase ambient light and noise levels, perches and other sources for predators, and collisions risks. The DEIR must address these additional potential impacts and provide mitigation measures for them.

**b. Impact BI-4: The project may adversely affect the movement of migratory birds, rafting waterfowl, and/or fish passage. (*Less than Significant with Mitigation for migratory birds and fish passage; Significant and Unavoidable for rafting waterfowl*)**

Golden Gate Audubon appreciates the fairly thorough explanation of the bird-building collision issues presented by the new development on TI. (See DEIR at IV.M.50) While Mitigation Measure M-BI-4a: Minimizing Bird Strikes is an excellent start, and should be applauded as one of the first of its kind in a Bay Area major development EIR, we remain concerned about the DEIR’s determination that the measure will reduce the impacts to a “less than significant” level. The DEIR provides no basis for how it reached this estimation. For example, how many birds are expected to be affected, even assuming the Mitigation Measures are successful? How do the DEIR authors know that the proposed measures are effective? Is there a scientific or technical basis for making these assumptions? Without this information, we cannot determine the veracity of the claim that the impacts will be “less than significant.”

32.17

The DEIR should be specific about what will be done to protect birds on the island. For example, with development of the ferry terminal, what will be done to protect the black-crowned night herons and shorebirds at the site?

32.18

Mitigation Measure M-BI-4b: Changes in Ferry Service to Protect Rafting Waterbirds appears to provide few, if any, real protections for rafting birds. At a minimum, the DEIR should identify mitigation to offset this impact. The Bay Area has already lost more than 40% of its open water habitat. The Project will likely reduce the available suitable habitat even further. Mitigation must be identified and included in the DEIR.

**3. Impacts to Mammals**

Golden Gate Audubon reiterates its concern about the basis and adequacy of the safety buffer as identified as a mitigation for disturbance to bats. (See DEIR IV.M.46). The DEIR provides no basis for determining the adequacy of this mitigation measure.

32.19

The DEIR does not document raccoons on Treasure Island. Raccoons inhabit both islands. Given the problems in assessing bird life on the islands, Golden Gate Audubon is similarly concerned that the DEIR’s authors failed to conduct an adequate assessment of mammals. If an animal as obvious as the

32.20

raccoon were missed, what else was missed in the biological survey? Additional studies conducted and the section should be revised to ensure its completeness.

32.20,  
cont'd

**4. Mitigation Measure M-BI-1d: Control of Domestic and Feral Animals**

Golden Gate Audubon strongly endorses the creation of enclosed off-leash dog areas that provide ample room for dogs and their owners to enjoy outdoor recreation. We also strongly endorse ensuring that all other areas of the public space on TI-YBI are leash-only or, where necessary to protect biological resources, off-limits for pet-related recreation. As we have seen in other parts of San Francisco, enforcement of leash requirements is absolutely necessary to ensure that this kind of mitigation is actually effective. The Mitigation Measure should include requirements for active education of pet owners on the island about leash requirements and a statement that leash requirements will be enforced through citations, if necessary.

32.21

Golden Gate Audubon also endorses efforts to reduce feral cat populations. At a minimum, the Mitigation Measure should include a ban on feral cat feeding stations. Feral cat feeding stations promote “dumping” of cats, leading to larger feral cat populations. Contrary to the belief of some, the feeding stations do not provide an alternative for cats to hunting local birds and other wildlife; there are no studies that indicate that they result in lower predation rates on local wildlife. Instead, the feeding stations subsidize feral cat and other populations and prolong their deleterious impacts on local native wildlife populations. (See [http://www.ceru.up.ac.za/downloads/Demographic\\_parameters\\_cat.pdf](http://www.ceru.up.ac.za/downloads/Demographic_parameters_cat.pdf) <http://www3.interscience.wiley.com/journal/122216162/abstract?CRETRY=1&SRETRY=0> <http://www.abcbirds.org/abcprograms/policy/cats/materials/predation.pdf>)

**5. Mitigation Measure M-BI-2b: Seasonal Limitations on Construction Work**

Golden Gate Audubon supports seasonal limitations on construction work to protect native fish populations and other wildlife. We remind the lead agency that the bird breeding season is from February 1 through August 15 of each year and that some species of shorebirds may breed along the shoreline of TI-YBI.

32.22

**6. Mitigation Measure M-BI-2c: Eelgrass Bed Survey and Avoidance**

This mitigation measure does not provide any specific or enforceable measure for avoiding impacts to eelgrass beds. For example, how will the pilots of the barges or other watercraft that move through the area be made aware of the presence of the eelgrass beds and the applicable restrictions? How will these restrictions be enforced? Without adequate outreach, education and enforcement, this mitigation will not result in the minimization or avoidance required.

32.23

**7. Impact BI-6: The Proposed Project may result in adverse effects on intertidal and subtidal marine habitat and biota located along Treasure Island’s shoreline and nearshore regions of the Bay as well as Bay waters. (Less than Significant with Mitigation)**

Impact BI-6 correctly identifies many impacts to the intertidal or subtidal marine habitat and biota, but it fails to identify (or point to) adequate mitigation and avoidance measures to reduce the impact to less than significant. In many places, the DEIR appears to state that the impacts are unavoidable; however, no mitigation measures are identified (perhaps because there are none available). Given the loss and degradation of the Bay’s open water and nearshore habitats, Golden Gate Audubon is concerned about the additional impacts this project will inflict on the Bay and its marine life.

32.24

Mitigation Measures M-BI-2a through M-BI-2c, as written, are not sufficient to reduce the impacts from the Proposed Project to a “less than significant” level. Notably, the DEIR is not at all specific in how those mitigations will achieve the less than significant level. At a minimum, the DEIR must be revised to



provide more information about how the many, apparently unavoidable impacts, will be so substantially reduced.

32.24,  
cont'd

The DEIR appears to offer Mitigation Measure M-BI-4a as the only mitigation measure for dealing with light. It does not appear to address or minimize impacts to fish (especially as written now). The mitigation measure should be revised, or another measure should be drafted, to address the impacts of lights on fish and other marine organisms (which can affect many other species on the food chain).

32.25

We do not understand the DEIR's conclusion that shading and other factors (turbidity, etc.) reducing phytoplankton activity are "less than significant" without requiring mitigation. (See DEIR IV.M.61) It appears to assume that because the ferry will cause increase turbidity, phytoplankton activity will not be very high; however, it would seem that the introduction of the ferry itself is an impact that must be minimized, avoided or mitigated.

32.26

**8. Impact BI-7: The development planned as part of the Proposed Project, when combined with past, present, and other reasonably foreseeable development in the vicinity, could result in significant cumulative impacts to biological resources. (Cumulative Impact: Significant and Unavoidable for rafting waterfowl; Less than Significant for other sensitive plants, animals and habitats)**

Impact BI-7's claim that the cumulative impacts resulting from the project are less than significant is not credible. The DEIR notably focuses on impacts a very localized manner, without providing context to current state of the Bay subtidal or intertidal ecosystem or broader impacts from existing and concurrently planned projects. For example, the ferry system alone will result in the addition of lights, shoreline changes, benthic community alterations, mercury in the water column, oil spills and other contaminants, and other factors that will undoubtedly reduce the biological integrity of the system. Moreover, while the DEIR addresses current fish populations with some specificity, it offers no such specificity for birds or other wildlife (especially benthic organisms) that will be affected by the project; how can the reader assess these cumulative impacts if the DEIR provides no information or context with which to do so?

32.27

The DEIR's reliance on identifying only special status plants and animals as the possible means of identifying "significant impacts" violates Objective 8 of the SF General Plan and waters down the purpose of CEQA.

32.28

Clearly, the project will inject a multitude of impacts into the TI-YBI system: it will increase housing by more than 10-fold (and, presumably, do the same with the human population; it will create a significantly larger business and tourist industry to draw visitors and workers to the island; and it will induce expanded recreational uses throughout the area. All of this will occur while additional developments (such as the Hunters Point-Candlestick redevelopment project) are occurring and the general Bay Area population is expected to expand. Yet, this extremely limited cumulative impacts analysis does not appear to take any of those factors into consideration.

32.29

This section must be improved so that the reader and decision-makers truly understand the cumulative impacts to wildlife, plants, air and water quality, social and cultural resources, and other values. Unless it does so, the final EIR will be inadequate.

Finally, unless improved, the DEIR will fail to provide adequate minimization, avoidance, and mitigation measures that are needed to contribute to the cessation of the decline in bird, fish and other wildlife populations in the San Francisco Bay Area. It will be another of the "thousand cuts" that is contributing to the loss of our natural history. The DEIR's authors must know this, but have decided to ignore these facts to expedite the finding of no significance and move the project forward. At what point will the City of San Francisco take responsibility for introducing these cumulative environmental impacts?

**9. Other Impacts**

Golden Gate Audubon has focuses its comments on impacts to wildlife and natural habitats. However, we are also greatly concerned about the transportation plan as presented in the DEIR and join in the comments provided by the Bay Chapter of the Sierra Club. Increased population on TI-YBI will undoubtedly contribute to additional traffic on the Bay Bridge and to increased air pollution in the region. The TI-YBI plan does not include adequate measures to reduce dependence on cars (and in fact seems to encourage the use of automobiles as a primary form of transportation) and does little or nothing to offset the impacts that will inevitably arise. The increase in air pollution (primarily from cars) and water pollution (from construction and storm water discharge) are downplayed in the DEIR and not adequately considered in the cumulative impacts analysis. We ask that these sections be revised and released for additional review and comment by the public.

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(two  
topics)

**VI. CONCLUSION**

Treasure Island and Yerba Buena Island Redevelopment presents a chance to improve wildlife habitat in San Francisco for residents and visitors. We urge the lead agency to incorporate the information from this letter and others, and other available scientific and technical information, to improve the project and protect the diminishing legacy of the Bay's natural abundance.

Thank you for this opportunity to comment on these plans. Please feel free to contact me to discuss any of these recommendations further.

Best regards,



Mike Lynes  
Conservation Director

## **Attachment A**

### **Golden Gate Audubon Christmas Bird Count Data for Treasure Island and Yerba Buena Island 1984 through 2009**

Christmas Bird Count Data  
Treasure Island - Yerba Buena Island (1984- 2009)

	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	II	YRS	Name
3370				1	1	2	2		1													3					3	7	Bonaparte's Gull
3380	1																										1	2	Heermann's Gull
3390	37	110	36	31	112	420	21	19	46	10	34	16	51	5	6	5	4		6	5		47	5	1	7	120	24	Mew Gull	
3400					14		6			6	26		10	1		10	1			45	1	20	3		10	45	14	Ring-billed Gull	
3410	4	1	10	12		3						7	30	15	6	1		2		6	1	574	47	6	27	574	18	California Gull	
3420		4											21	1	2							2	1	1		21	8	Herring Gull	
3480	47	175	33	142	120	121	99	73	120	35	72	19	45	69	99	55	92	156	150	44	23	75	91	36	67	50	175	26	Western Gull
3485									2																		2	2	Western X Glaucous-winged Gull
3490	21	2	15	39	12	1	5			4	2	2	3	5		25	1	3	1	1	6	12	3	4	2	39	23	Glaucous-winged Gull	
3565												15										30	24			30	4	gull, sp	
3650					1		5						1					1	1								5	6	Forster's Tern
3960		1				1	2																			1	2	5	Rock Pigeon
4040	4	2	2	15	11	12	28	54	3	13	15	1	1	10	1	2	4	11	10	26	10		8	2	1	54	25	Mourning Dove	
4330	1																										1	2	Barn Owl
4880	47	19	4	6	14	10	11	4	4	8	12	22	9	15	4	20	10	5	15	18	21	4	11	10	12	12	47	26	Anna's Hummingbird
5000	2			1	1	1	1	1	1		1	1	2	1		1				1	1	1	1		1	2	18	Belted Kingfisher	
5160																			1								1	2	Downy Woodpecker
5240	6	3			6	1	3		1			6	1	2	3		2		3								6	13	Northern (Red-shafted) Flicker
5250																			1			1					1	3	Northern Flicker
5610	10	4		2		1	2	2		2	1	1	3	1	2	1	3	1	2	4	3	1	7	4	2	10	10	23	Black Phoebe
5630																			1	1							1	3	Say's Phoebe
6010	1																										1	3	Hutton's Vireo
6080													1														1	2	Steller's Jay
6210								2	1			2	3	2			10	14	45	12	6	20	22	30	14	40	45	15	American Crow
6260			2									2	5				2				1		8	46	2	2	46	9	Common Raven
6440	29	21				1	6	2									5	1	9	9	2	6		12	6	29	14	Chestnut-backed Chickadee	
6540	16	16		6	10					4					6	10			4	10	50		6	18	5	50	14	Bushtit	
6550	4					2	2						1		1						2				2		4	8	Red-breasted Nuthatch
6590	1	4										4					1		1								4	6	Brown Creeper
6740	4	4				1																					4	4	Golden-crowned Kinglet
6750	30	6			3	6	6	2		1	1	3	7	4	7	3	1	4	2		3	2	6	3	1	6	30	22	Ruby-crowned Kinglet
6970	2	5			1		2		3	2	3	1	1		1	1	1		1	1		2	1		1	2	5	18	Hermit Thrush
7050	55	30	21	75	17	19	28	11	68	6	8	3	48	26	10	25	7	6	30	26		6	16	5	6	10	75	25	American Robin
7060	4	3						2			3	1	1		2			1									4	9	Varied Thrush
7080		2																									2	2	Wrentit
7100	1																							1		2	2	3	Northern Mockingbird
7210	118	50	53		201	127	100	60	159	16	112	71	45	19	109	30	44	57	52	120	175	82	14	32	37	6	201	25	European Starling
7350	2							1							1												2	4	Cedar Waxwing
7550	76	3		38																							76	4	Yellow-rumped (Myrtle) Warbler
7560	94	80																						18			94	4	Yellow-rumped (Audubon's) Warbler
7570	9		18		26	29	23	24	26	25	60	30	55	29	29	36	17	36	25	330	66	195	38		36	48	330	23	Yellow-rumped Warbler
7610	7															2	1		1	3			2		1		7	8	Townsend's Warbler
7690																						1					1	2	Palm Warbler
8170	3																						1				3	3	Spotted Towhee
8200	1			3								1										2				1	3	6	California Towhee
8390							1																				1	2	Savannah Sparrow
8515																									1	1	1	2	Fox Sparrow (Sooty)
8530	5	4			2		3	1	3						1	1		5	15	3		1	3			15	14	Fox Sparrow	
8540	6	6	1				1										1	2					1			1	6	8	Song Sparrow
8570															1					1							1	3	White-throated Sparrow
8590	70	30	3	45	1	107	13	27	116	13	76	21	26	43	69	80	13	53	55	85	5	43	38	36	12	40	116	26	White-crowned Sparrow
8600	36	15		18	8	2	17	34	15	2	29	4	3	12	6	50	24	7	32	90	1	30	14	18	12	20	90	25	Golden-crowned Sparrow

## Christmas Bird Count Data

## Treasure Island - Yerba Buena Island (1984- 2009)

	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	HI	YRS	Name
8630	19	15	4	2		8	46	2	18	5	18	6		10	16		1	16	10	40	3					6	46	19	Dark-eyed (Oregon) Junco
8660																10						2	8		6		10	5	Dark-eyed Junco
8930									18				2	8	1					2				30			30	7	Red-winged Blackbird
8970	15			4			7				5	24				8			1		20						24	9	Western Meadowlark
9000	24	1	75	68	80	93	18	48	108	38	178	50	72	132	25	48	6	70	55	25	20	59	30	18	36		178	26	Brewer's Blackbird
9060																	1										1	2	Brown-headed Cowbird
9065														2000													2000	2	blackbird, sp
9290	113	9		12	9	17	24	26	11	4	3	4	5		1	10	18	6	15	30	20	6	5	8	6	24	113	24	House Finch
9340	20																										20	2	Pine Siskin
9370						6	1											3									6	4	American Goldfinch
9460	4	20							16		2		1		5				5				1		1		20	10	House Sparrow
9500	1088	948	514	865	1389	1213	1082	569	1194	301	962	464	754	2566	514	662	431	659	909	1155	598	1387	540	540	557	412	2566		Individuals
9510																										34			Species
9560								2	3	3	2	3	6	3	3	3	3	5	3	4	5	2	2	3	2	2	6	19	Observers in the field
9580								1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	19	Parties
9590								2	1	0.75	0.5	0.5	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.5	0.5	0.5	0.5	0.5	2	19	Hours on foot
9600								0.5	1	1.5	2.5	2.5	1.75	1.75	2	1.75	1.75	1.75	1.75	1.75	1.75	1.75	1.75	2	2	2	2.5	19	Hours by car
9660								0.5	0.25	0.5			0.5	0.25	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	17	Miles on foot
9670								3.5	2	2	3.75	3.75	4.5	4.5	4.75	4	4	4	4	4	4	5	5.1	4.5	7.2	7.2	19	Miles by car	
9760								700	700	700	700	700	715	700	715	700	700	700	715	715	715	730	715	700	715	730	730	19	Starting Time
9770								930	900	915	1000	1000	945	930	945	945	930	930	945	945	945	945	930	930	945	1000	19	Ending Time	



## Good Neighbors of Treasure Island and Yerba Buena Island

[www.TreasureIslandSF.org](http://www.TreasureIslandSF.org)

[Good\\_Neighbors@comcast.net](mailto:Good_Neighbors@comcast.net)

September 10, 2010

TO: San Francisco City Planning Department  
Treasure Island Development Authority  
Historic Preservation Commission

RE: EIR for Naval Station Treasure Island - Save Our Chapel

Please find attached our petition of 316 signatures to grant the chapel on Treasure Island the same status as the Great White Mansions on Yerba Buena Island and to preserve the building in a manner consistent with the other historic buildings on the base.

For decades the chapel served the millions of navy personnel that were stationed at or departed from Naval Station Treasure Island. For many it was the spiritual heart of the base and provided a non-denominational place for worship and comfort.

In addition, the chapel was one of the first buildings constructed utilizing materials from the deconstructed GGIE exhibits. It is an early expression of sustainable construction practices and reuse.

We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personnel, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building.

33.1

Sincerely,

Mark R. Connors  
President  
Good Neighbors of Treasure Island and Yerba Buena Island



We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personnel, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building.

Aug 24 2010	Louise M. Felsher	San Carlos	
Aug 24 2010	Mary Franklin	Treasure Island	It's a shame what greed can bring.....
Aug 24 2010	Christopher Montano	304 Nimitz Drive	
Aug 24 2010	SHANNON WISE	TREASURE ISLAND	
Aug 24 2010	Mark Connors	Treasure Island	I was married here!
Aug 24 2010	Douglas Owen Baker	Treasure Island	I'm an Army veteran and I'm pretty agnostic, but the value of that chapel is a visceral reminder of the hopes and fears of a million (?) or more Sailors that passed through this island.
Aug 24 2010	Miriam Padillapaz	Treasure Island	
Aug 24 2010	Diego Marcial Rios	Treasure Island	I feel the chapel on TI is a very important structure that should not be closed. Residents need a peaceful place to worship and build community!
Aug 24 2010	Jim Mirowski	Treasure Island	
Aug 24 2010	Peter Letourneau	TI	
Aug 25 2010	K.E. Knowles-Pearce	San Francisco	This is an important - and historic - building that should be included as part of the proposed development of T.I.
Aug 25 2010	Emory Maurice Wilson	1433 halibut ct	
Aug 25 2010	becky hogue	san francisco	
Aug 25 2010	lorraine damante	san francisco	
Aug 25 2010	sal damante	san francisco	
Aug 25 2010	Edwin M. Garcia	Treasure Island	I consider this to be a sanctuary for all and was married in the chapel two years ago. It was a special day!
Aug 25 2010	Arthur Banda	San Francisco	Chapel must be saved. It is a historical landmark. If necessary it could be moved to another location.
Aug 25 2010	esme marconi	san francisco, ca	



We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personal, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building.

Aug 25 2010	lashawndra breston	treasure island	Led By faith ministries has service and sunday school every sunday. my children were baptized there last week. I plan to renew my vows next year. this is our new church home, its unacceptable that plans would be made without consulting the community!!!!We are led by faith not by sight!!!
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Aug 25 2010	Iris Tseng	Treasure Island	
Aug 25 2010	Ernest Dadis	Bay Point, CA	
Aug 25 2010	Herb Mesler	San Carlos, CA	The TI museum should also be preserved.
Aug 25 2010	Germaine Valenti	Vacaville	I will remember the church because when my cousin passed away we had a huge ceremony there for him. I think a church is needed on the island. It will give the opportunity for people to attend church without having to travel across the bridge in any direction.
Aug 25 2010	Kathleen Angel-Ortiz	Vacaville	
Aug 25 2010	Chris Green	Millbrae, CA	
Aug 25 2010	Michael Hutchins	Louisville, Kentucky	I spent most of my adult life in supportive ministry with the Navy Chaplaincy. It is sad, very sad when places of worship removed. I do hope that this sacred house of worship will preserved.
Aug 25 2010	S. Corpuz	California	
Aug 25 2010	Colleen Medeiros	Sunnyvale, CA	
Aug 25 2010	Frankie Harrington	Los Altos, CA	
Aug 25 2010	Ida Duffy	New Port Richey, FL	
Aug 25 2010	James William Smith	Sacramento, CA	America needs to start working on saving our Chistianity.....
Aug 26 2010	Steven Wolf	San Francisco, CA	
Aug 26 2010	Lee Carter	San Francisco, CA	it is part of the history of the island and of the naval presence. The presidio has both chapels; why can TI?





We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personal, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building.

Aug 26 2010	Mitchell Cruz	Suisun City, Ca	my father was stationed on TI with the Coast Guard back in 1976...I was actually born on Treasure Island at my familie's home on Bayside Dr(long story, but basically I couldn't wait to make my debut and the ambulance didn't come fast enough)..I was also baptized at the TI Chapel and to see it torn down would be a shame.
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Aug 26 2010	Kristin Clark	San Francisco	
Aug 26 2010	Mark Hathaway	Point Richmond, CA	
Aug 26 2010	Andy Asp	Oakland	Save the chapel! Build Around
Aug 26 2010	Cris Advincula Jr	Foster City, CA	
Aug 26 2010	John S. Lloyd	Pleasant Hill, CA	Much like the Mare Island Chapel, the site has significant historical and cultural value. Short term gains at the expense of posterity will only make our current choice to save this landmark more important.
Aug 26 2010	John Assalian	San Francisco	I was married there - it is an amazing structure and ought to be preserved.
Aug 26 2010	Mark Swabey	Sacramento	My mom was a WAVE, stationed at the chapel.
Aug 26 2010	stephanie limon	san francisco	
Aug 26 2010	Judith Benjamin	Millbrae, California	It would be tragic to destroy this sweet building--the source of so many wonderful memories!
Aug 26 2010	Brandon Solem	San Francisco	my parents got married at the church
Aug 26 2010	Irene Fong	San Francisco	My husband and I got married here in 2008. Please preserve this meaningful chapel.
Aug 26 2010	Alicia Preston	San Francisco	It's a beautiful place where friends have been married, I'd love to see it relocated somewhere.
Aug 26 2010	Pia Nepomuceno	Vallejo, Ca	
Aug 26 2010	Romme Ramirez	Vallejo	
Aug 26 2010	Jeanne King	Northern California	
Aug 26 2010	Anna Abbott	Napa, CA	
Aug 26 2010	Nelson Sparks	Dixon, CA	
Aug 26 2010	John V. Ray	hayward, ca	grew up & went to church there
Aug 26 2010	Arnel Bautista	San Francisco	

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Aug 26 2010	Dabetswe Natasha	Berkeley	My husband and I got married here. It is a wonderful place for people of different spiritual backgrounds to come together to get married as it's not affiliated with any denomination. Otherwise, it'll be hard for us to find a chapel to have a chapel wedding. So many memories (not just ours but others too) are made here...it can't be taken down or destroyed!
Aug 26 2010	Paul Wermer	San Francisco	
Aug 26 2010	Joelle Rosander	Oakland	My parents were married at the chapel in 1958. Please save it.
Aug 26 2010	Adler	Amy	My best friend was married in that chapel. I would hate to see it go.
Aug 26 2010	eleanor m telefoni	san francisco	My husband and I got married here and my daughter was baptised here as well.
Aug 26 2010	Kara Lander	Treasure Island	
Aug 26 2010	William Lopez	San Francisco	
Aug 26 2010	Erin Gardiner	Ukiah, CA	
Aug 26 2010	Jennifer Nolen	San Francisco	I was married at the chapel 2 years ago and would be so sad to lose it. I think it holds a lot of significance for many individuals and should remain on the island.
Aug 26 2010	Lindsay Mazotti	San francisco	We were married here and love this historic chapel. Please help us keep it on treasure island.
Aug 26 2010	Jason Zimmerman	San francisco	
Aug 26 2010	Robert J. Holst	Vacaville, CA	
Aug 26 2010	Amber J. Mondina	Fairfield, CA	
Aug 26 2010	Erin Loscocco	Treasure Island	Save the building!
Aug 26 2010	Elaine Vastine	San Francisco	Treasure Island Chapel should be saved! It's a beautiful structure and holds a special place in my heart. It's where my husband and I were married!



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Aug 26 2010	Marianne Mazotti	Danville, CA	The chapel is lovely and so meaningful to the history of the island when is belonged to the Navy. Most recently it has played a meaningful role in the marriages of so many couples. It is in beautiful condition and deserves the chance to take it's place in SF history. It would truly be a shame to lose this beautiful building. Please preserve it beauty, even it means moving it to another location on the island. It is a part of Treasure Island and SF history.
Aug 26 2010	Karin Rosander	Rancho Palos Verdes	My parents got married there.
Aug 26 2010	Neil Chafetz	Rancho Palos Verdes	My inlaws were married there.
Aug 26 2010	Jordan Chafetz	Rancho Palos verdes	My grandparents were married there.
Aug 26 2010	Austin Chafetz	Rancho palos Verdes	My grandparents were married there.
Aug 26 2010	Cameron Chafetz	Rancho Palos Verdes	My grandparents were married there.
Aug 26 2010	Elizabeth Pidgeon-On	Vallejo CA	If so much as one federal dollar is involved in any part of the development, the chapel removal is subject to Section 106 review... Which requires no adverse impact. The chapel is by definition historic unless it's been radically altered. The Mare Island Chapel is a National landmark. Recommend you contact Susan Brandt-Hawley, preservation law attorney
Aug 26 2010	sandy gong	oakland, ca	
Aug 26 2010	Robert Nutter	Oakland, CA	My wife and I were married in this chapel 26 yrs. ago and I think it deserves to be preserved and remain a part of the community.
Aug 26 2010	Dana Forks	Hayward	
Aug 26 2010	Alice Lee	San Francisco	
Aug 26 2010	Chloe Fong	San Francisco	My parents were married here.



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Aug 26 2010	Nancy Foreman	San Bruno CA	I love that chapel. It is my understanding that there are no recorded divorces for couples who were married there during the military rein. Save the Chapel. Why are we a disposable society. Its PERFECT.
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Aug 26 2010	Christopher Proctor	Emeryville, Ca	
Aug 26 2010	Chris Cesano	Palo Alto	
Aug 26 2010	Yln Maung	Kelowna, BC	My sister got married here - beautiful chapel, please preserve.
Aug 26 2010	Juana Thomas	Treasure Island	
Aug 26 2010	Barbara A Erion	So. San Francisco	This beautiful chapel should be saved.
Aug 26 2010	DIANA MC CNEIL	SANTA ROSA, CA	
Aug 26 2010	Rommel Ramirez	Vallejo	
Aug 26 2010	Jan Hunter	Daly City	
Aug 26 2010	Hongxia Li Tsai	So. San Francisco	
Aug 26 2010	Bill Jenkins	Treas Island	
Aug 26 2010	alison cheung	san jose	
Aug 26 2010	Paul Naples	Fresno, California	
Aug 26 2010	Amy Schoew	San Francisco CA	
Aug 26 2010	Ronald Jenkins	San Jose, CA	Save it!
Aug 26 2010	Mary Coyne	Pennsylvania	
Aug 26 2010	Jim Petrovitz	South San Francisco	The Treasure Island Chapel is a landmark that must be preserved.
Aug 26 2010	Liz Petrovitz	South San Francisco	Save the Chapel!
Aug 26 2010	Jimmy Petrovitz	South San Francisco	
Aug 26 2010	John Petrovitz	South San Francisco	
Aug 27 2010	Maria A wolfram	San Francisco	
Aug 27 2010	Cathleen L. Edwards	San Francisco	



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Aug 27 2010	Gary G. Pollek	San Bruno, CA	I attended a wedding @the Chapel which was officiated by Cheech Marin during the time "Nash Bridges" was filming on Treasure Island. It is a beautiful structure and should be kept for all to see & use.
Aug 27 2010	Lee T. Hotchkin	Fresno, CA	
Aug 27 2010	Bob Fuss	San Jose, CA	
Aug 27 2010	Louise L. Hamre	San Francisco, CA	8,000 residents should have access to a church in their own community.
Aug 27 2010	Gregory L. Erion	South San Francisco	
Aug 27 2010	Valerie Stevenson	South San Francisco	We should save our history@
Aug 27 2010	Edna Hotchkin	Fresno	
Aug 27 2010	Jamie Whitaker	San Francisco	
Aug 27 2010	Phyllis Morison	Albany CA	
Aug 27 2010	Lisa Gotch	South San Francisco	
Aug 27 2010	Charlotte Dillon	Eureka CA	My husband and I celebrated our 25th wedding anniversary at the "TI" chapel. We were married for over 50 years. The chapel is beautiful and must be preserved.
Aug 27 2010	Amy Dillon Sewell	Eureka CA	I grew up in San Francisco and spent much time on Treasure Island. I can't believe the develeopeers are planning community development with no church! What are they thinking?
Aug 27 2010	Nate Payne	South Beach	We have to save our Treasure Island Chapel!
Aug 27 2010	Sophia Hanifah	San Francisco	We were married at Treasure Island Chapel and would like to see it preserved as it is so lovely as well as being open to nondenominational folks like us.
Aug 27 2010	Jane House	Walnut Creek, CA	My parents were married there & we used to spend their anniversary's at the TI officers club.
Aug 27 2010	Lynn	Asbury Park, NJ	The old buildings have charactor that enhance all things around it - new and old...
Aug 27 2010	Rochelle Metteer	Auburn, California	
Aug 27 2010	Thomas Krala	Morganville, NJ	

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Aug 27 2010	Kyoko Linda Baba	Richmond	My son and his wife got married at this chapel and have fond memories. Just the fact that our Navy personal, who protect and serve our country have heartfelt of memories should be enough reason to preserve the chapel.
Aug 27 2010	Carmalita Pangilinan	Rio Vista, Ca	So much history being lost to development. Let's not lose this one.
Aug 27 2010	Barbara Parker	Venice, FL	All that is said above is SO true. PLEASE save this part of history and memories for so many, and also for the future.
Aug 27 2010	Henry Tsan	San Francisco	
Aug 27 2010	Ankey Thomas	Richmond, CA	PLEASE preserve this historic site. My best friend & her husband had a beautiful marriage ceremony there, they would love to be able to revisit the memorable day on their many anniversaries. They also want their children be able to see the chapel where they made their vows.
Aug 27 2010	Christopher Thomas	Richmond, CA	
Aug 27 2010	Tracy Jue	San Francisco	
Aug 27 2010	Jannie Tong	San Francisco, CA	
Aug 27 2010	John J. Dillon	San Bruno Ca	Many happy memeories of the chapel-my mother and deceased father had their 25th re confirmation of marriage there. Hope you can save it.
Aug 27 2010	pat port	san francisco	worth saving
Aug 27 2010	Dean J. Stoker	Walnut Creek, CA	As a Marine, I was stationed on T.I. for 3+ years, and I was married in the chapel in 1958. A fellow Marine was also married there in the same time period. Great memories, crossed sabers and all that. Save the chapel!
Aug 27 2010	Jessica Tse-Riehl	belmont	
Aug 27 2010	marta camer	san francisco	it would be very so sad not to preserve this beautiful and historic chapel!



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Aug 27 2010	Linda Saunders	Quilcene WA	My father taught electronics on Treasure Island for many years in the 1950's while in the Navy. He wasn't a religious man, but this piece of history needs to be preserved!
Aug 27 2010	Wendy E. Abbott	Montara, CA 94037	
Aug 28 2010	Greg Wadsworth	San Francisco	
Aug 28 2010	amy m. post	vacaville	
Aug 28 2010	Miles G Eiswirth	Sacramento CA	
Aug 28 2010	maxine castro	vacaville, ca	
Aug 28 2010	Mary J. Barnhart	Vacaville	
Aug 28 2010	Thomas A. Watson	Port Angeles, WA.	my wife and I were married in this chapel in March 1981. We both do NOT want to see it destroyed.
Aug 28 2010	Terri Watson	Port Angeles, WA	My husband & I were married at the chapel. We would hate to see anything happen to it. My husband was in the Coast Guard when we got married. He was stationed on the Blackhaw which was stationed on the other side of Treasure Island. My husband & I were raised in the Bay Area. So when we got married it was wonderful because our family and friends could come to our wedding. Also all of my husband's friends who were on the ship could come to. Please do Not destroy it. I will always remember that church & I would like to see it again.
Aug 28 2010	Anne McMurrey	San Francisco	
Aug 28 2010	Modris Salzirnis	Treasure Island	Save the Chapel by all means!
Aug 28 2010	Avis Ochoa	Hemet CA	
Aug 28 2010	E Pulido	TI	"Most who served in the Pacific theater (WW II) passed through Treasure Island" - Jason Pipes, San Francisco's Treasure Island, 2007. How many structures helped sooth that many souls on their way to face mortal danger? It is our duty to remember...
Aug 28 2010	Timothy Birnschein	Pasadena, CA	Please save the chapel. Two of my friends were married there!

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Aug 28 2010	Eileen Nepomuceno Ma	Vallejo	
Aug 28 2010	Jed Madayag	Vallejo	
Aug 28 2010	Reahna Madayag	Vallejo	
Aug 28 2010	Jorge Garcia	San Francisco	
Aug 28 2010	David M Natcher	San Francisco, CA	My wife and I were married there on July 12, 1969. We still visit occasionally. The building is in fine shape and it would be a crime to destroy it.
Aug 29 2010	Jeannetta Mitchell	Treasure Island	
Aug 29 2010	johnny b tsan	fairfield, ca	
Aug 29 2010	Harry T. Parmley	Las Vegas, NV	A former Command Master Chief of Naval Station Treasure Island, this building holds a special place in my heart. I retired from 32 years of Naval Service in this chapel in 1997.
Aug 30 2010	Pamela Natcher	San Francisco	
Aug 30 2010	Kourtney Wagner	Oakland	I was married at the chapel in 2008, and would hate to see it go!
Aug 30 2010	Karen Conrad	Vacaville CA	
Aug 30 2010	Michael Goldman	San Francsco	
Aug 30 2010	Daniel Kemp	Novato	I have worked on Treasure Island for years (Nash Bridges & Trauma). The chapel is a real treasure.
Aug 30 2010	Lisa Rourke	Connecticut	
Aug 31 2010	Maria Ha	San Francisco	
Aug 31 2010	Martin Craft	Hoboken, NJ	I have attended several weddings at the chapel, and I know what a special place it is in the hearts of many.
Aug 31 2010	ewan lithgow	pacifica	
Aug 31 2010	Jeremy Kneessi	Treasure Island, SF	
Aug 31 2010	Sarah Veenstra	Lincoln, CA	
Aug 31 2010	Eugene A. Brodsky	San Francisco	
Aug 31 2010	Christine Adair	Oakland, CA	
Sep 1 2010	Anne Mueller	Oakland, CA	
Sep 1 2010	victoria blackmon	San Jose	

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Sep 1 2010	Larry Cupler	Rocklin, CA	
Sep 1 2010	Agnes M. Noriega	Citrus Heights, CA	
Sep 1 2010	Rev. Paul Chaffee	San Francisco	Please see the letter to the editor in the Monday Chronicle. Sorry it didn't have the petition link. But we do have the link on the newsletter that goes out to a couple thousand addresses today.
Sep 1 2010	Nicholas Naugle	Oakland, Ca	
Sep 1 2010	Kiel Anne Murray	Piedmont, CA	save the chapel!
Sep 1 2010	MC	Bennett	It's beautiful and historic. It should be preserved.  And it's on Treasure Island.
Sep 2 2010	Roger Moss	Berkeley	I have an undated 3 page essay on the history of the chapel written by Hugo W. Osterhaus, Read Admiral, USN (RET). Mentions SF coppersmith Dirk van Erp. Want to see it? Let me know.
Sep 2 2010	Patricia Singer	Piedmont, CA	I was married at this lovely Chapel in 1968 to my Vietnam-bound sailor husband. The Chapel deserves to be saved and treasured for future generations and out of respect to all the brave Sailors worldwide.
Sep 2 2010	Jennifer Sayenga	Pasadena, CA	
Sep 2 2010	Valerie Lambertson	South San Francisco	
Sep 2 2010	Tim Brauhn	San Jose	Thanks!
Sep 3 2010	Randy Fong	South San Francisco	
Sep 3 2010	Adrienne Lowe	Richmond, IN, USA	
Sep 3 2010	Jane B. Borg	San Francisco	The Treasure Island community needs a place for spiritual worship. This beautiful chapel should be preserved for use by future generations.
Sep 3 2010	Melissa Goan	San Francisco	
Sep 4 2010	Wendy McClure Shrum	Meridian, Idaho	
Sep 4 2010	Joseph Borg	San Francisco	
Sep 4 2010	Michael McGowan	Oakland, Ca	Chapels give a community history and roots.

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Sep 5 2010	Alice Wood	Oakland	I totally support saving the chapel. It's small enough to be moved.
Sep 5 2010	Doug Olsen	Rockridge, Oakland	
Sep 7 2010	Jeffrey Kline	1221-C Mariner Dr.	
Sep 9 2010	Don Downey	San Ramon	

Isis  
Breston

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Name	Location (TI/YBI, SF, etc)
1 Bryant A. Breston	Treasure Island
2 ANDREA MARCHON	HERCULES
3 Patrice Kirk	Treasure Island
4 MARY LEWIS	" "
5 Charles Watts	" "
6 Icon Figgins	" "
7 EDWIN TORRES	Treasure Island
8 Eric Jones	SF
9 SERGIO MUÑOZ	Treasure Island
10 SHAWN A. ROBERSON	S.F.
11 Julian	Treasure Island
12 Jamie Wilson	S.F.
13 Helene Brewer	1408 Sturgeon # D
14 Barbara Leahy	1226 Rapid off
15 Hector Ornel	Treasure Island/SF
16 Tiffany Thomas	1412 Flounder Ct unit F
17 Falechi Huan	Treasure Island
18 Esmeralda Michel	Treasure Island
19 Ruby Goldberg	810 Ave. D, Treasure Island
20 George Skinn	1539 PEBBLE
21 Jesse Skinn	
22 Cotton Skinn	✓
23 Cheryl Fields	
24 Deanna Crespo	Treasure Island



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415-520-6653



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Name	Location (TI/YBI, SF, etc)
1 James Montgomery	1410 Flounder Ct #C, SF 94130
2 Sharonda Johnson	1225 Northpoint Dr #A SF 94130
3 Laura Thorsson	1133 Mason #H 94130
4 LARRY W Lee	Mariner Treasure Island
5 Nora Calderon	1403 - unit #C Sturgeson St S.F. CA 94130
6 Linda Gossage	T.I.
7 Harry Gossage	T.I.
8 Naomi Gossage	T.I.
9 Seth	T.I.
10 Tina Correa	1241 A Northpoint Dr. SF CA 94130
11 ARMANDO B. HÖRPUERZ	+ I:
12 Marc Hennigues	151232 C Northpoint Dr
13 EILEEN Stockton	60 B Yerba Buena Rd.
14 DAVID ROYE	12470 Exposition
15 Gene Pilgram	302 Vinitz Dr. Unit B. S.F. 94130
16 Alta Pilgram	302 Vinitz Dr. Unit B S.F. 94130
17 Brad	301 E Maralla Ct SF 94130
18 Brandie L. Mann	106A Forest Road SF 94130
19 Mark Dunlop	66 F Yerba Buena Rd SF 94130
20 SANDA Ledington	1430A Halibut Ct "A"
21 MAYA Tippet	T.I.
22 Ari Ben-Avram	TI
23 GABRIEL DIKEL	TI
24 Leu Kilun	1080 A Dr



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Name	Location (TI/YBI, SF, etc)
1 Enishia Leebetter	1216 ACATAVIA 13th ST #A
2 Ethel Robb	1216 ACATAVIA 13th ST #A
3 Aquilla Tijerino	166 Kiska Rd SF CA 94134
4 Joley	363. Ave C 94130
5 Lamont Angelo	102 Toullome ST
6 Alexis Anderson	355 H. Ave
7 Desiree Walker	355 H. Ave.
8 Joyante Eaton	355 H. Ave
9 Docio Garcia	355 H. Ave.
10 Francisco Marcho	355 H. Ave
11 Carmina Whitmore	351 H Ave Building 442
12 Ayanna Hoskins	351 H AVE Building 442
13 Matthew Benjamin	351 H Ave Building 442
14 Chante Walker	351 H AVE Building 442
15 Marcel Simonson	351 H Ave Building 442
16 Chellie Johnson	351 H Ave Building 442
17 Estevan Ibarra	351 H Ave Building 442
18 Eber Quintanilla	351 H Ave. Building 442
19 Greg Young	351 H AVE Building 442
20 Anthony Villalobos	351 H AVE Building 442
21 ATKINS, Isaac	P.O. Box 15873 San Francisco CA 94115
22 KEM. HURST	442. H. AVE 94103
23 A. Saleh	2ND of the Palms 94130
24 Doug Merrett	1429 Norwalk EC 94530



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1 Kenneth Bonner	2 Ave of the Palm Bld 2 Suite 106 T.I
2 Margaret Bullborough	1206 #D Mariner DR T.I 94130
3 <del>Patricia Johnson</del>	1243 B Northpointe Court, YBI
4 Frank Sankar	1206 S. Mariner Dr. 94130
5 Ken Johnson	1290 Gateview
6 Jim Brown	840F Pacific Ave
7 Dwight King	1441 Chanoak San Francisco
8 Susan Bullborough	1441 Chanoak San Francisco
9 Elisha Hayes	1441 Chinoak SF
10 L122A Badlin	1441 Chinoak SF
11 Jerry Johnson	1441 Chinoak SF
12 Yolanda Lee	333 7th St SF 94103
13 Russ Beckles	333 7th St. S.F. CA. 94103
14 Maupha Pierson	518 S. 50th St Richmond CA
15 Cynthia Tupa	1020 Greenmont Valley
16 Fred Evans	1471 Newcomb
17 Kathleen Guidry	5348 Catanzaro Way
18 Sherri Pierson	
19 Tim Beckett	331 Yerba Buena RD
20 Renata Ewing	1313D Gaterian Ave 94130
21 Alex Lewis-Koshiner	1305A Gateview Ave 94130
22 Patricia Humfrey	1305A GATEVIEW AVE 94130
23 Theresa Sparks	725 VANNESS, #302, 94102
24 LOUISE FISHER	39 Bache SF CA 94110



This petition is sponsored by Good Neighbors of Treasure Island and Yerba Buena Island—This petition must be returned to Good Neighbors by Sept. 7th to be included in the petition drive.

[www.TreasureIslandSF.org](http://www.TreasureIslandSF.org)

[Good\\_Neighbors@comcast.net](mailto:Good_Neighbors@comcast.net)

415-520-6653



## Save Our Chapel

Are you interested in saving a part of Treasure Island history? For many former Navy personnel, residents, and friends of the Island the chapel stands out as a landmark and a part of our past worth saving. Please sign the petition below to show your support for the preservation of this historic building. Tell Your friends!



We, the below signed residents and friends of Naval Station Treasure Island, petition the San Francisco City Planning Department, the Treasure Island Development Authority, and the Historic Preservation Commission to preserve the historic Navy Chapel in a manner similar to the Great White Mansions on Yerba Buena Island. The chapel has been a spiritual home to countless Navy personal, and a site for weddings by current residents of the Island and San Francisco. It holds a special place in the hearts of many. Preserving the chapel will retain a part of the history of naval presence in the bay area and will insure generations to come will enjoy the building.

Name	Location (TI/YBI, SF, etc)
1 Angel Connady	Walden House
2 Lisa Sanchez	Walden House
3 Kou Chase	Walden House
4 Athena Pierce	San Francisco
5 Isabelle Clemen	San Francisco
6 Brian A Stockton	Y B I
7 Jack Stockton	Y B I
8 <del>John Thompson</del>	NORTHPOINT
9 Tim Lanza Hodge	Keppler Court
10 Katrina Rottler	Keppler Court
11 Marshall Cheesman	Treasure Island
12 Lily Liu	Treasure Island
13 Mandy Jung	Keppler Court
14 Love Maria	Reeves Court, Treasure Isle.
15	
16	
17	
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19	
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22	
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24	



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Name	Location (TI/YBI, SF, etc)
1 IRMA GUILLEN	San Francisco
2 Veronica Elvira	San Francisco
3 Kathryn Lundgren	TI
4 Mason Lundgren	"
5 Erik Lundgren	"
6 Quinn Lundgren	"
7 Praise Lundgren	"
8 Chris Ziegfeld	TI
9 Sophie Parish	SF
10 Drew Butler	TI
11 Jocelyn Peralta	Berkeley
12 Maya Peralta	"
13 Samantha Towne	Oakland
14 Isaiah King	"
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[Good\\_Neighbors@comcast.net](mailto:Good_Neighbors@comcast.net)

415-520-6653





e-mail message to Rick Cooper, 9-10-10

**TO:** SF City Planning Dept.

**RE:** Comment on the EIR for the Naval Station Treasure Island Redevelopment Project

Dear Planning Dept.,

I am writing as a resident on Treasure Island and ask that you consider the impact of redevelopment on current businesses on the Island.

For several years now businesses have added to our quality of life that have been unfulfilled by others. They have brought us services and in some cases, cultural opportunities.

Such companies as Treasure Island Wines, Jade Studio, the Gaelic Football League, the convenience store at the front gate, and others have brought services and a "flavor" to the island that has helped to build the sense of community.

I recognize that not all current business may be a good fit for the redevelopment, but certainly those listed above, and others, should receive consideration as they are contributing to the established community on Treasure Island.

Please help us find a place for these current business partners in future of Treasure Island.

Sincerely,

Mark Connors  
Resident, Treasure Island

34.1



**SIERRA CLUB**  
**SAN FRANCISCO GROUP**  
 85 Second Street, Box SFG, San Francisco, CA

September 10, 2010

Bill Wyko, Environmental Review Officer  
 Planning Department, FAX 558-6409  
 1650 Mission Street, Suite 400  
 San Francisco CA 94103-2414

Re: Treasure Island DEIR, Case No 2007.0903E, Transportation Comments

Dear Mr. Wycko,

Thank you for the opportunity to comment on the subject DEIR. The disc worked reasonably well and does save trees and shipping.

The Sierra Club's major comment is that a DEIR on a project of this magnitude should include an alternative with minimum transportation impacts. We are concerned that the project will be allowed to proceed and create profits on the island while causing delays to Muni and AC transit while both services are suffering with operating costs exceeding their available funding.

35.1

One problem is that this DEIR, like many others, uses a traditional method of determining transportation mode based on residential origin and attractions to a destination. This method doesn't work for automobile trips, which require a parking place near the residential origin and another parking place near the destination. If either end of the trip does not have parking the auto trip cannot take place. Congestion happens on roadways between areas of more than ample parking. City policy in San Francisco recognized this statement as true, when, over forty years ago, we limited the supply of parking in the central business district to low maximums when every other community was requiring high minimums. We also improved transit as the way to reduce increases in congestion. This truth of how well this worked is demonstrated by an observation: Throughout the Bay Area over 90% of people drive to work in their own car. However, in downtown San Francisco, where parking is limited and expensive over 50% get to work without their own car. The drivers and non-drivers are neighbors and similar people. The difference is the availability of parking. A deficiency in this EIR, and this project, is that the traditional method of analysis provides no incentive for the developer to consider an alternative with less parking and therefore fewer transportation impacts. The DEIR analysis should be corrected to reflect the availability of parking.

35.2

Another problem with usual method of environmental analysis is considering generally predicted population and land use cumulative impacts but only considering transportation improvements with completed designs, authorization and funding. Bus speeds and ridership should be reanalyzed based on predicted system improvements including: proof-of-payment; low floor buses; congestion pricing and other system changes which will reduce running time. This problem was demonstrated by the Central Subway FEIR which predicted surface transit running times through downtown that will be 50% greater in 2030 than today because of increased congestion, but did not consider transit improvements. This means that automobile drivers will

35.3

experience about a doubling of their driving time in the downtown because they don't spend time while passengers get on or off the bus or while the bus struggles to get back into a moving traffic lane. San Francisco knows that drivers will find this delay unacceptable and while congestion pricing is only a study, at this time, something will happen to reduce future driving, even if it is not expected. Further, in San Francisco when an EIR predicts increasing transit demand this is not an adverse impact but rather a public service prediction to warn Muni of future needs to allow them to plan for the additional transit capacity required.

35.3,  
cont'd

The traditional transportation portion of the CEQA process seems to be based on the out dated concept of "what's good for General Motors is good for America" and that the automobile needs enough highway capacity to minimize congestion and then ample parking at every destination to maximize driving convenience. Today in San Francisco we no longer consider the lack of desired parking as an impact and we will soon have to comply with State laws, AB32 and SB 375, to reduce driving not only to reduce congestion during peak hours but to reduce the emissions of global warming gases.

Based on the above, the Sierra Club requests that the EIR analyze an alternative project with minimum transportation impacts to include:

35.4

- 1) At least 8,000 units because this residential density seems to provide an adequate market size for most necessary continuous retail so that residents will not have to regularly drive off the island;
- 2) Fewer than 4,000 unbundled residential off street parking spaces, including car share because: a) The Planning Department produced a paper showing that 1:2 parking was adequate for SOMA, a short bus ride away; b) This project will have good transit like SOMA; c) This project will have a higher percentage of affordable units than SOMA and lower income people will own fewer cars; d) While fewer people will walk to work than in SOMA the necessity of less driving is even more clear today. e) Expanding on the analysis included in the Appendix, of the impacts of delay and cost on drivers, other reasons for less parking, on the island, include: probable congestion pricing fees to enter or leave San Francisco's downtown on top of the proposed TI/YB congestion pricing exit fees; no expectation that sufficient additional parking will be provided in the downtown for all of the additional drivers; improved transit to other San Francisco areas to meet the transit needs induced by congestion pricing; and reduced construction costs, on TI, for less parking, with less of the parking below sea level.
- 3) An expanded "prepaid transit voucher" requirement including all adults and reduced fare passes for all senior and high school age residents because a majority of trips are not to work sites.
- 4) Limiting the total area of commercial services to those that will actually reduce the need for residents to drive off the island for services, more than the services increase the desire for others to drive to the island for these services. Driving long distances from the mainland and paying Bay Bridge tolls and possible congestion fees to enter and leave the island does not seem probable anyway and we are concerned that additional commercial spaces, along with its parking spaces (see 5 below) will provide additional parking for residents. This commercial limit should not preclude essential services for visitors and if regional-serving shopping is provided it should not be perceived as requiring a car to take purchases home.
- 5) Reduced supply of off-street parking with market rate fees for commercial services for: a) Hotels at 0.1 parking spaces per room; b) Retail and "Flex" (commercial) Space at 0.2

spaces per 1,000 square feet, same as downtown San Francisco; and c) Marina at 0.3 parking spaces per berth; and reduced open space parking based on greater use of shuttles and transit. Any commercial off-street parking provided should incur parking fees that are at least as high as downtown San Francisco so that the availability of cheap parking will not induce people to drive.

- 6) Reduced curbside parking to provide pedestrian ambiance improvements (mini parks etc.); and 24/7 metering with market rate fees to induce drivers to park off-street rather than cruising around looking for cheaper parking along with night rates high enough such that residents will not chose curbside parking over residential off street parking.
- 7) Complete transit equity relative to: island residents, Muni and AC and their riders and TI ferry riders vs. bus riders. The EIR should show the total amount of subsidy over fare box revenue for the: ferry; the Muni 108 bus and AC buses serving TI. This should be broken down, in two ways, to show the subsidy contributed by TI and all other sources. We note that when this project was initially conceived the subsidy for each ferry ride from Marin was greater than the subsidy for each bus rider. It was not equitable, at that time, to provide a greater subsidy, from Golden Gate Bridge tolls, for those willing to pay more for a more luxurious ride than those who could only afford the bus. This inequity has since been corrected. In the same way it is not equitable for the subsidy for TI ferry riders to be greater than the subsidy for bus riders on essentially the same route. The EIR should be revised to analyze ridership for the bus and ferry when ferry fares are increased to over all ferry costs less the same amount of subsidy per ride as the 108 bus. It is good that the TI congestion charges will be used to fund transit. However the distribution of these funds should be equitable and also fund improvements for: pedestrians; bicyclists; sailors (see 16 below); additional recreational shuttles; bus transit and not used mostly for ferry subsidies. The EIR should analyze driving changes with this redistribution of funding.
- 8) Providing one ramp to the bridge in each direction that will allow buses and HOV vehicles to bypass all other traffic approaching the bridge and including a flashing warning light indicating an entering bus on the bridge right side lanes.
- 9) Adequate bus service because the EIR shows additional service increases use.
- 10) Stop-on-request Muni bus stops on Yerba Buena so that more YBI residents can use the bus without having to transfer from the shuttle.
- 11) Fareless shuttle service, as proposed, and nearly fareless Muni bus service on the island. The Muni bus could appear fareless for all island residents and visitors and fareless for those with a fast pass at the bus terminal, proof of payment boarding area. Those entering the POP area with a transfer will pay their return fare in advance. Those entering the POP area with neither a fast pass or transfer will purchase a two-way ticket as they enter the boarding area. This will speed up bus service and increase ridership.
- 12) A community service area including: library depot; minimum post office and UPS; food court and coffee shops; religious and community meetings areas etc. This will further reduce the need to drive off the island and increase the commercial viability of other services.

The Sierra Club suggests that the above alternative would create a more sustainable San Francisco neighborhood. The above project would be a walkable, livable community with less driving on the island and less auto congestion impacting transit on the bridge and mainland. We see the vehicles of choice for many residents will be: a shopping cart; the shuttles, transit buses, ferries, feet and bicycles.

35.4,  
cont'd

Sierra Club traditional comments are as follows:

- |  |       |
|--|-------|
| 13) The developer-provided shuttle will be useful for residents and visitors who cannot or desire not to walk long distances. However the history of developer-provided transit is that it doesn't last very long. The EIR should show future new guaranteed funding sources from the project and a method to determine funding needs for Muni when the shuttle service is discontinued; or show how the shuttle will go on in perpetuity.   | 35.5  |
| 14) Saturday traffic congestion indicates a need for inclusion of Saturday congestion pricing. and the EIR should analyze and compare Saturday congestion with and without Saturday congestion pricing.  | 35.6  |
| 15) We applaud the study of the no ferry alternative because other EIRs show that the average ferry service consumes more energy per passenger mile than a typical Bay Area automobile with 1.2 passengers, including the driver. However, this alternative should be re-analyzed with at least 8,000 units to provide the number of residents required to support a level of, on island, neighborhood services necessary for most residents. This alternative should also be reanalyzed with the components 1) to 12) above. The EIR for this alternative should show how all of the funds available from the congestion pricing will be used while complying with AB 981. One good use will be contributions to Muni because TI residents will use other lines besides the 108 and the typical mainland Muni funding sources of meters and parking taxes will not flow from TI to Muni. This alternative should eliminate most needs for the shuttles, because all of the shuttle passengers will be transferring to a bus. During peak hours about 25% of the Muni buses could cover each half of TI with 50% turning back at the transit center, where it will be easy for most riders to access this bus on foot. Off peak more of the buses will have to serve the outer island or shuttles can be used. The EIR should analyze the extent that reducing the need to transfer will increase transit use. Only AC passengers would have to transfer and they will have free transit on the island at all times. | 35.7  |
| 16) This project includes the use of Trust Lands to provide access to Bay waters. This access should be available for those of modest means as well as yacht owners who will rent berths in the TI marina. The EIR should analyze the reduction in driving that will be induced by providing storage facilities, made available at modest fees, for: wind surfing equipment and kayaks; small dinghies on racks and larger dinghies on trailers as well as rentable kayaks. The EIR should note that similar to how access promoted affection for and preservation of our wilderness and natural areas, the Bay will benefit by this increased access. These additional facilities for sailors should be considered as recreational transit and initial funding should be available from congestion pricing.   | 35.8  |
|  | 35.9  |
|  | 35.10 |

Very truly yours,

Howard Strassner, Emeritus Chair  
 Transportation Committee  
 419 Vicente, San Francisco CA 94116, 661-8786, (h,w)  
 email: ruthow@dslexreme.com

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 09/10/2010 05:08 PM -----

Tom Radulovich

[<tom@livablecity.org>](mailto:tom@livablecity.org)

To

Bill Wycko [<Bill.Wycko@sfgov.org>](mailto:Bill.Wycko@sfgov.org)

09/10/2010 05:07

cc

PM

Manish Champsee

[<manish@walksf.org>](mailto:manish@walksf.org), Andy Thornley

[<andy@sfbike.org>](mailto:andy@sfbike.org), Maureen Gaffney

[<MaureenG@abag.ca.gov>](mailto:MaureenG@abag.ca.gov)

Subject

Comments on the DEIR for Treasure

Island and Yerba Buena Island:

Bicycle facilities

Mr. Bill Wycko

Environmental Review Officer

San Francisco Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Subject: Draft Environmental Impact Report for the Treasure Island and Yerba Buena Island Redevelopment Project

Dear Mr. Wycko:

On behalf of Livable City and Walk San Francisco, we submit the following comments on the Treasure Island and Yerba Buena Island Redevelopment Project Draft EIR.

Livable City and Walk San Francisco share the concern of the Bay Trail Project and San Francisco Bicycle Coalition that the Bay Trail project regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the San Francisco-Oakland Bay Bridge to the Islands. A fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island and well connected to Treasure Island and to the future path on the West span of the Bay Bridge must be included in the project description.

The mission of the Bay Trail is to complete a Class I, multi-use pathway along the shoreline. The proposed development of Treasure and Yerba Buena Islands represents an unprecedented opportunity to connect both islands to the Bay Trail with Class I bicycle paths. Doing so will help the project

36.1





meet the CEQA requirements for an "environmentally superior" alternative, and which will better accomplish the Project Objectives, as adopted by TIDA and TICD (DEIR pp. II.4 - II.6), as well as the policies and objectives of San Francisco's General Plan.

36.1, cont'd

The new eastern span of the San Francisco-Oakland Bay Bridge will feature a multi-use path connecting Oakland to Yerba Buena Island. The proposed project for Treasure Island includes a multi-use shoreline path around its perimeter. Both of these facilities are proposed to become part of the region-wide Bay Trail system, and will improve the environmental performance of the project by providing sustainable transportation access to the island for residents and visitors, in keeping with the stated objectives of the project. Unfortunately, the current plans as depicted in the DEIR fail to deliver for bicycles and pedestrians on several important regards.

The Bay Bridge pathway and Treasure Island pathways are designed to accommodate residents, workers, visitors, and tourists of all cycling abilities. It is difficult to envision that if Macalla is the primary road for traffic from the Bay Bridge, that a bike lane running in the opposite direction of a constant flow of traffic with no discernable separation will "invite riders of all ages and capabilities".

## Section II. Project Description

The Project Description and numerous other areas of the document present overall goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with what is actually proposed for the Islands.

36.2

To address these discrepancies, the FEIR must show contiguous sidewalks fully encircling the islands in addition to the trails and pathways

36.3

currently proposed. The Bay Trail Project's comment letter regarding the Design for Development Document suggested a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the 80 west onramp from Treasure Island Road. We suggested that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. Please include discussion of such an overlook in the FEIR, and include complete Class I multi-use paths to this location from both sides of the Island.

36.4

## Section III. Plans and Policies

We appreciate reference to the Bay Trail Plan. Please note that the Bay Trail is a planned 500-mile path encircling the Bay, and to date 300 miles have been completed. This section states that the Proposed Project includes extensions to the Bay Trail “and was evaluated against Bay Trail Plan policies for...expanding proposed trail links, and no conflicts were identified.” The Bay Trail Plan, policies, and our commentary over the past 8 years have continually stated that a Class I multi-use pathway is needed to connect the East Span of the Bay Bridge to Treasure Island. A contra-flow bike lane on a steep narrow winding road (Macalla) is in conflict with Bay Trail Plans and policies.

36.5

Bay Trail Plan Policy #12: Provide access wherever feasible to the greatest range of trail users on each segment: It is the goal of the Bay Trail Plan that the full range of trail users be able to enjoy the trail, regardless of physical limitations due to age or disability.

Bay Trail Plan Policy #13: Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users: The possibility of conflict between automobiles and trail users is a serious safety concern.

A 6' wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a well known phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve—this is human nature.

36.6

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 16,000 new inhabitants, hotels, restaurants, entertainment and other new uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco's “Better Streets” Plan, the Bay Trail Plan, or the Transportation Objectives Shared by TIDA and TICD.

The Macalla Road cross section shown in Figure IV.E.13 shows a 32' R.O.W. with an 11' vehicle lane. Retaining a 5' bike lane in the downhill direction leaves 21' in which to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island. Given the steepness of this route, design within the 21' ROW for the bike/pedestrian facility must be carefully planned as many cyclists—young and old—will surely be walking the steepest pitches. During preliminary design discussions with the City and the development team, fire department emergency access to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the Class I facility that ABAG has been requesting for the past 8 years will be incorporated on Macalla Road.

36.7

#### Section IV E: Transportation

Under “Pedestrian Circulation Improvements”, the document states that the pedestrian circulation network “would encourage walking as the primary mode within the Development Plan Area.” However, this is followed with “Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed.”

36.8

#### Treasure Island Road

Page IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a “...one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they must share the roadway at this location (see Figure IV.E.15).”

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a

freeway on-ramp as a “bicycle circulation improvement”. The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge.



36.8, cont'd

Macalla Road

See comments above in “Plans and Policies” section.

#### Open Space and Recreation

A shoreline path for pedestrians and bicycles around the entire perimeter of Treasure Island; pedestrian and bicycle paths would continue on Yerba Buena Island to connect to the new pedestrian and bicycle path on the east span of the Bay Bridge and from there to the Bay Trail in the East Bay. The proposed alignment would also allow the Yerba Buena Island pedestrian and bicycle facilities to connect to any future pedestrian and/or bicycle path added to the west span of the Bay Bridge”

36.9

Throughout the document, reference is made to “bicycle paths” on Yerba Buena Island. The following are Caltrans definitions of bicycle facilities from Section 1001.4 of the Highway Design Manual:

“The Streets and Highway Code Section 890.4 defines a “Bikeway” as a facility that is provided primarily for bicycle travel.

(1) Class I Bikeway (Bike Path). Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.

(2) Class II Bikeway (Bike Lane). Provides a striped lane for one-way bike travel on a street or highway.

(3) Class III Bikeway (Bike Route). Provides for shared use with pedestrian or motor vehicle traffic.”

Despite eight years of commenting through various channels regarding the need for such paths, none are proposed. Until such time as a Class I path is proposed on Macalla, Treasure Island Road and Hillcrest, please make proper reference to the proposed facilities using the above definitions.

## Mitigation Measure M-TR-24

36.10

“The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road”.

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road “would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists.” The impact is deemed “Less than Significant”. Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project’s lack of commitment to non-motorized transportation. Please remove Mitigation Measure M-TR-24 from the proposed project as it will have a significant impact on bicycle circulation on the Islands.

## Connections to Future Path on the West Span

36.11

It is of the utmost importance that the planners, developers, engineers and landscape architects of TI/YBI plan for future bicycle and pedestrian connections to the west span of the Bay Bridge. Once this facility is in place, the TI and YBI developments will be able to fully realize their promise of green transportation on and off the islands. To this end, the Class I path on Treasure Island should be continued to the 80 westbound onramp, and alongside the remainder of Treasure Island Road to complete a full loop of both Islands. A vista point near the westbound onramp to I-80 off of Treasure Island Road would not only be a desirable amenity, but could potentially serve to secure right-of way until an alignment onto and across the bridge is secured. R.O.W in the area between the vista point and the bridge structure should be secured so that interim plans or construction do not preclude this important connection in the future.

## Conclusion

In order to meet the requirements of CEQA, the project must, to the extent feasible, accommodate the Class I, fully separated multi-use pathway along the shoreline, consistent with the mission and intent The Bay Trail Project. When this is absolutely infeasible, the Bay Trail Steering Committee may choose to adopt Class II bike lanes and sidewalks in particular situations. Class III bike lanes or the type of facility proposed on Macalla Road do not constitute “complete” Bay Trail, and the Bay Trail Steering Committee is unlikely to adopt them into the regional system, thus precluding the City from pursuing grant funding from the Bay Trail Regional Development Program. With 20 traffic impacts that are significant and unavoidable with or without mitigation, the need for a safe and continuous bicycle and pedestrian infrastructure on the island is clear.

36.12

Sincerely,

Tom Radulovich  
Executive Director  
Livable City  
995 Market Street, Suite 1450  
San Francisco CA 94103  
415 344-0489  
[tom@livablecity.org](mailto:tom@livablecity.org)  
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----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 09/10/2010 04:30 PM -----

Tom Radulovich

[<tom@livablecity.org>](mailto:tom@livablecity.org)

[org](mailto:tom@livablecity.org)

To

Bill Wycko <[Bill.Wycko@sfgov.org](mailto:Bill.Wycko@sfgov.org)>

09/10/2010 04:21

cc

PM

[michael.jacinto@sfgov.org](mailto:michael.jacinto@sfgov.org), Greg

Riessen <[greg.riessen@sfgov.org](mailto:greg.riessen@sfgov.org)>

Subject

DEIR for the Treasure Island and  
Yerba Buena Island Redevelopment  
Project: project alternatives

Bill Wycko, Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 9410

Re: DEIR for the Treasure Island and Yerba Buena Island Redevelopment  
Project

Planning Department Case No. 2007.0903E

Dear Mr. Wycko,

On behalf of Livable City, we submit the following comments on the TI/YBI  
Redevelopment project EIR.

We believe that the EIR is inadequate in several regards. Principally, it  
does not analyze an environmentally superior alternative or alternatives,  
as required by CEQA.

In order to comply with CEQA, the EIR should evaluate at least two  
alternatives which would meet the CEQA requirements for an "environmentally  
superior" alternative, and which will better accomplish the Project  
Objectives, as adopted by TIDA and TICD (DEIR pp. II.4 - II.6), as well as  
the policies and objectives of San Francisco's general plan.

37.1



Reduced Parking alternatives: One or more alternatives should include reduced parking. San Francisco has consistently used reduced parking as a strategy to meet its environmental, transportation, and housing affordability goals, as well as the objectives of the city's General Plan and area plans, in every neighborhood plan approved over the past decade and before, including the Downtown Plan (1985), Rincon Hill Plan (2005), Downtown Parking reform (2006), Market & Octavia Plan (2006), Mission Plan (2008), Eastern SoMa Plan (2008), Showplace Square/Potrero Hill Plan (2008), Central Waterfront Plan (2008), and Balboa Park Plan (2009) MEA's conclusion that a reduced parking alternative is "infeasible or did not meet most of the Proposed Project's basic objectives." (p. S.86) is laughable. If it is feasible in every single other neighborhood plan in San Francisco, why is it infeasible for TI? Also, this plan is the first to contain explicit sustainability goals, and is the first neighborhood plan to be undertaken since the Passage of AB 32 and SB 375, which make reducing greenhouse gas emissions a requirement of state law. A reduced parking alternative will better meet 'The proposed project's basic objectives' than the alternatives assessed in the DEIR.

Similarly, the document's rejection of "Measures to Reduce Automobile Ownership" as "infeasible or did not meet most of the Proposed Project's basic objectives." (p. II.7) is not supported by evidence, and renders the DEIR's evaluation of alternatives inadequate.

A reduced parking alternative should include:

- \* limiting residential parking to less than one parking space per residential unit. Residential parking ratios in recently adopted plans range from one space for every four units to three spaces for every four units.
- \* limited commercial and visitor parking.
- \* unbundled residential and commercial parking.
- \* limiting on-street and public parking, and pricing it in keeping with SFpark program standards.
- \* mandatory participation in transportation demand management programs, including transportation brokerage services, providing transit passes to all residents workers, etc.
- \* other transportation management strategies which further the project's land use, transportation, and sustainability goals, and reduce the environmental impacts of the project.

Planning Code alternatives: One or more alternatives should also study adopting amendments to San Francisco's Planning Code to establish the land use controls and design standards and guidelines for the project site, rather than use a redevelopment Design for Development Document (D4D) (p. II-3). There is no requirement that land use controls within redevelopment areas be governed by design for development documents, rather than planning code amendments. Several recent redevelopment plans and survey areas have proposed amendments to the Planning Code to establish land use controls, including Transbay Redevelopment Area (partial), and the Mid-Market Redevelopment survey area. SB 1268, approved in 2004, explicitly permits the inclusion of form-based and illustrative codes in municipal planning codes, permitting a planning code to accomplish all of what a D4D document can.

Based on San Francisco's experience of the past few decades, setting land use controls via the Planning Code, rather than Design for Development, is an environmentally superior alternative. The Planning Code has been continuously amended over the past decade to reduce environmental impacts of new development and improve their environmental performance, shift trips from autos to walking, cycling, and public transit, improve pedestrian-oriented street design, require projects and fees which improve streetscapes and sustainable transportation infrastructure, limit impacts of new development on walking and cycling and transit, promote car-sharing and expand bicycle parking, and adopt transportation demand management measures in new projects. The history of these legislative changes is summarized in Livable City's "A Brief History of Parking Requirements in San Francisco" (<http://www.livablecity.org/campaigns/parkinghistory.html>)

In stark contrast, no Redevelopment Plan or Redevelopment Design for Development adopted over the past several decades has been amended to improve the environmental performance of the project, or to reduce environmental impacts from transportation. Currently, Redevelopment Plan areas remain stubborn enclaves of antiquated, traffic-inducing transportation policies, requirements, and standards in a sea of incremental improvement. At present, every redevelopment plan area in San Francisco requires or permits more parking than comparable neighboring districts governed by the Planning Code do.

Based on decades of evidence, an alternative or alternatives which rely on amendments to San Francisco's Planning Code to establish land use controls will prove environmentally superior, and better able to meet the project objectives, than alternatives which rely on Design for Development, and will prove increasingly environmentally superior over time. Such alternatives are demonstrably feasible, and can demonstrably meet the proposed project's basic objectives, and must be included among the alternatives studied.

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Executive Director

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# ***San Francisco Tomorrow***

*Since 1970, Working to Protect the Urban Environment*

September 10, 2010

Environmental Review Officer  
Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: DEIR Case No. 2007.0903E  
Treasure Island / Yerba Buena Island Development Project

San Francisco Tomorrow submits the following comments to the DEIR:

**1. Project Description is inadequate and misleading.** So many options are given, with the heights expressed as “flex” zones, that it is impossible to tell what the preferred project is. Apparently, completely open-ended “**mix-and-match**” of **component parts** is what is desired by the project sponsor. However, the variants are so great and the impacts so different that the Project Description cannot be relied on to describe the so-called preferred project.

38.1

While one can appreciate that project sponsor wants flexibility, the proposed project must be more or less fixed so that it can be analyzed.

Sometimes the options are called “**flex**”, as in height “flex” zones; these vary, for example, from 70’ to 350’ or from 70’ to 450’ (see Vol 1, Fig. II.6a.) That is like having no height limits at all. But CEQA requires that the worst case be studied as the proposed project. Furthermore, the graphics in this figure are very difficult to read and require a magnifying glass; the overlay “flex” zones are hard to differentiate as they are rendered in hatch patterns and in colors that are hard to discriminate. Please revise Figure II.6a to make it easier to perceive the distinctions among the various height districts and flex zones.

38.2

Sometimes the options are called **variants** and they comprise options regarding energy, water, air, greenhouse gasses, etc (Vol II, VI. 1-54); Another example of options which are called variants are changes in the shape of the Ferry Terminal/Breakwater and size of the harbor and express a wide range in numbers of ferry boat berths and ferry service

38.3

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- *Recommendation: Provide a single project description that provides the most extreme example of the proposed project in order to allow for appropriately conservative review and mitigation of the project's environmental impact;*
- *Relabel Figure IV.B.10 "Proposed Representative Massing Diagram" as "A Range of Possible Height and Bulk Scenarios", or remove it entirely as misleading since many people who read an EIR are mainly guided by the diagrams;*
- *Add a new graphic (not outlines but fully blocked in) at this same scale to show that the worst case scenario is what is being studied in this EIR, as required by CEQA..*

38.4

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**2. A Zoning Map is needed as part of the Proposed Project.** The Zoning Map which will be sought for height allowances should be presented now so that the maximum heights can be analyzed as "the worst case" in this document. The Figure that calls for "flex" zones is insufficient and ambiguous because there is too great a range in heights (e.g. a range such as 70' to 450' cannot be analyzed). A Zoning Map should be provided that shows the maximum height allowed in that zone, e.g. 450'. Treasure Island is no different from any other part of the City in this respect. After examining the variants, the options and the flex zones and looking at the mitigation measures devised to address them, one wonders what the actual project being studied is; there are too many variables which are unresolved. The worst case must be what is being studied. (*Variants—Vol. II, Ch. VI, pp. VI.1-54*)

38.6

*Recommendation: Provide the current and proposed zoning maps for the project so that the proposed changes can be clearly understood and studied.*

### **3. Alternatives**

**Need for Alternatives** Because this range of options cited above ("flex" and "variants") is a moving target that cannot be nailed down for study, it would be more appropriate to set out several Alternatives that would contain this range of options and tag them Small, Medium and Large. In any case, CEQA requires that the alternative with the highest numbers, greatest size, most dense, etc. is the subject to be studied in the EIR. It is self-evident that options with lower numbers would have less environmental impact.

38.7

**Project Lacks an Environmentally Superior Alternative.** The identification of the "No Ferry" alternative as the environmentally superior alternative is flawed, as it fails to mitigate the extreme traffic impacts that make the preferred alternative so problematic. Eliminating ferry service eliminates the one mode of transit that is not dependent on the

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bridge. The proposal to increase bus service is great in concept, but is not studied for its feasibility in light of the increased congestion. How long will it take to travel to and from the island by bus at peak, near peak and off peak times? What impact will that have on the reliability and use of the service?

38.9,  
cont'd

It is also not clear why this document fails to identify an alternative that utilizes parking formulas employed in the rest of San Francisco. It seems wholly inappropriate for a community with limited access to provide not only 1:1 residential parking, but an additional 3100 spaces for other uses.

38.10

### *Recommendation:*

- *Provide an environmentally superior alternative that, at minimum, utilizes existing downtown parking ratios, reinstates neighborhood serving retail uses, and includes ferry service as means to reduce bridge congestion due to the project.*

**Rejection of reduced parking and reduced auto ownership alternatives was inappropriate.** The reasons provided for rejecting these alternatives do not conform to San Francisco's General Plan considerations or priorities, most significantly the City's Transit First policy; further, no evidence is provided to justify the reasoning provided – it is all supposition.

38.11

- Without a pro forma for the development, it is difficult to counter the economic argument used; however, redevelopment areas rely on a variety of revenue streams to pay for needed infrastructure. Relying on parking revenue to generate a majority of the funding for transit in a small area is a formula for a failed transit system, since the balance of parking revenue and transit availability will always restrict transit opportunities. This fails to achieve the sponsors' objectives of "providing a high-density, compact residential development located within walking distance of transit..." Under this scenario, the project will be auto-driven rather than transit-driven.
- The statement that "some prospective residents would not be able to easily reach their place of employment via public transit" is first, unlikely, given the availability of transit options in downtown San Francisco; and second, runs counter to San Francisco's transit first policy.
- The concern about home values being depressed because of lack of parking has been consistently proven false in San Francisco, where property values retain their greatest value in neighborhoods with limited parking. No evidence to the contrary is presented in this document.

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### ***Recommendation:***

- *Use the one of the two reduced auto alternatives as the environmentally superior alternative*
- *The City should evaluate ground leases rather than title conveyance as a way to generate a sustainable revenue stream to support island amenities such as adequate transit and maintenance of open space and infrastructure resources.*

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38.14

**Phases.** While a 15 to 20-year period to completion is anticipated, it would be useful to have the project studied in discrete phases; for each phase, there would be a separate time-line; the impacts would be assessed and appropriate mitigation measures suggested within that time frame. These phase-specific numbers are not in the DEIR and for massive projects such as this one, the document is of little use to the public and decision-makers to actually use in their approval decisions.

38.15

### ***Recommendation:***

- *provide a timeline that indicates when impacts would occur and mitigations be required*

**Uses.** The Reduced Development option should come in two sizes and made into two separate Alternatives: one the 2003 version which had approximately 3000 units and the 6,000-unit version of 2007. These alternatives should also consider a mix of uses that would help mitigate the extreme impacts of the preferred alternative. We recommend an alternative that replaces the commercial office use (large peak-hour traffic generator) with visitor attracting use (off peak traffic) that would be more likely to utilize a regular ferry service. The success of the "F" Embarcadero line shows how unique transportation alternatives attract visitors – a short ferry ride that also provide opportunities for unique views would be extremely popular and help subsidize the cost of the service. Both of these alternatives should show full ferry service as described in the document. A major justification for full ferry service has not been studied as such, which is the entertainment/tourism component. This is the one factor which would make ferry service marketable and feasible.

38.16

The tourist attraction of the islands should be studied in various mixes to see what quantity of visitor use is required to make full ferry service viable.

We are greatly concerned with the proposed regional-serving retail uses (a Regional Shopping Mall) which would only increase the number of discretionary trips to the Islands. This document should break down the transportation of this use, and identify the potential transit use of this visitor sector. Evidence should be given if this expectation or assumption (that they will use transit) is made.

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### *Recommendation;*

- *Study at least two alternatives which reduce or eliminate commercial office space, and vary visitor and resident numbers so that the important role of water transit can be seen to play a large part in mitigating the development of the islands.*

38.18

The label "Reduced Development Alternative" is a falsity: is it possible to present proofs that there would be a reduction of impacts due to creation of a Regional Shopping Mall? If not, then inclusion of a regional shopping center cannot be considered a reduced-impact alternative. If so, the reasons are not found in this DEIR.

38.19

Only by increasing public transit in the form of non-road transit, i.e. ferries, can auto trips be decreased. A regional shopping mall would increase, not decrease, the intensity of use. Further, it is not just by reducing the number of dwelling units and the number of parking spaces that transportation impacts would be lessened, as long as road-based (and bridge-based) travel is all that exists. Such a reduction would require a different mode, that is, ferries, a water-based mode. This mode of transit was envisioned from the very beginning of planning efforts for the islands more than twenty years ago; this has been the only way to bring numbers of people to Treasure Island without severe impacts to the Bay Bridge.

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### *Thus, in summary:*

- *the preferred project has not been identified and the mix-and-match possibilities are so infinite that there really is no Project and thus no grasp-able Project Description; there are no really supportable, viable alternatives given for the (absent) preferred project.*

### **3. Visual Quality (Aesthetics IV.B)**

There are two major ways that the public will experience this project: a) the distant view from San Francisco to the west, and the view from the East Bay cities; and b) the local internal views on the islands that island residents, visitors and other users will have of the new urban place that is created. Neither of these is well informed by the material that is presented in this DEIR.

There are presently no on- street views from within the new "downtown" Island high rise area to other parts of the development. Notably missing are visualizations of the row of massive medium and high-rise blocks along the southern shoreline park, as seen from the restored historic buildings and from the low-rise center-island area.

38.21

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### **Recommendation**

- *Provide more views to give a sense of the vistas from the water and from the East Bay cities;*
- *Construct internal views to simulate the experience of looking down Island streets, walking along the shore within the linear shore park, within the low rise residential in the Central Island area and from the open space and wetland to the north.*

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**4. Ownership of the Land.** Legal ownership of the submerged lands has not been resolved. The State of California owns the development site in perpetuity by virtue of federal law ("The Arkansas Act of 1850") which gave all states stewardship of coastal wetlands below mean high tide as of September 1850. Regarding a similar situation, the turnover of Hamilton Airbase, state officials commented on the Tidelands Trust situation as revealed in contemporary correspondence. Clearing title does not prevent the developer's proposal; it only affirms the need to go through the State Lands Commission for permission to LEASE the site instead of outright ownership.

38.24

The DEIR on page IV.A 12 asserts that state legislation in 1942 and 1997 both empowered the transfer of Treasure Island to the Navy, a wartime exercise as with Hamilton Airbase, and the release of Treasure Island from the terms of the Tidelands Trust. But State law is trumped by Federal law despite many attempts by the State to invalidate this principle.

While the ownership is still an open question, there is no possibility of assigning mitigations. Who would be charged under the law with any given mitigation? Clearing title does not prevent the developer's proposal; it only affirms the need to go through the State Lands Commission for permission to LEASE the site instead of outright ownership

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38.26

- The question of ownership underlies the legality and efficacy of the control of land uses and resources needed to mitigate the impacts of the proposed development. This issue is fundamental to the integrity and accuracy of the DEIR.
- Page II.15 shows that most of the uplands on the Navy-owned portion of YBI are proposed to be brought into the Trust. Unfortunately, the diagram fails to differentiate between what is already in the Trust and what is proposed to be brought into the Trust by virtue of the exchange.
- A map showing the effect of sea level rise on Trust holdings would be helpful.

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- 5. Seismic Issues.** The near liquefaction of Treasure Island during the moderate Loma Prieta earthquake of 1989 should give rise to special seismic safety requirements required both to insure the of survival of occupants and the survivability of structures. The DEIR on pages II.72 thru 76 raises skepticism as to this possibility. For one, compacting sand cannot reach the density of even sandstone or consolidated rock and therefore cannot be expected to provide a safe seismic underpinning. Further, foundation mats, while structurally useful, cannot be secure if their underpinnings are liquefiable.

38.30

One means of testing the viability of the proposed seismic security measure is for the developers and city to provide evidence of the fiscal insurability of both the survivability of the island's occupants and its structures and to demonstrate so before the DEIR is approved. Evidence of independent tests of these seismic safety measures should be obtained before final approval of the DEIR.

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38.32

**6. Utilities, Hydrology and water quality.**

**Wastewater treatment.** The preferred alternative for wastewater treatment proposes a traditional wastewater treatment plant which would treat most of the effluent to secondary standards, then disinfect and discharge into San Francisco Bay. However, this level of treatment may not be sufficient to meet reasonably foreseeable regulatory requirements. In particular, the new plant will need to comply with new mercury discharge requirements; mercury is not removed by secondary treatment. In addition, the Bay Area Regional Water Quality Control Board is considering expanding its nutrient limits in San Francisco Bay. This document needs to analyze reasonably foreseeable regulatory actions.

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There is no discussion of the disposal and handling of biosolids produced during wastewater treatment.

38.34

The review of the two wetlands treatment variants finds that the aesthetic and recreation impact would be similar to the proposed project. This is not correct. Treatment wetlands are almost universally considered an aesthetic and recreational benefit to the communities in which they're located - see

38.35

<http://water.epa.gov/type/wetlands/constructed/index.cfm> for examples. Additionally, the provision of tertiary treatment prior to discharge into San Francisco Bay is a net water quality benefit.

The review should calculate and compare the Greenhouse Gas (GHG) emissions of the preferred wastewater treatment alternative with the proposed variants. That comparison should include a discussion of biosolids handling, co-generation of electricity, and the potential of constructed treatment wetlands to act as a GHG sink. *Recommendation;*

38.36

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□□□ Provide an accurate comparison of the traditional wastewater treatment system included in the preferred alternative with the constructed treatment wetlands in variants D1 and D2, including widely available information on the multiple benefits of the latter options.

**Sea Level Rise.** It is not clear that the impacts of sea level rise on the wastewater and stormwater systems has been adequately assessed. The document does note that additional pumping may be needed, but doesn't explain how stormwater and wastewater will be discharged during storm surges and high tides as mean sea level increases. How will the system be protected from seawater intrusion during high tides and storm surges? The San Francisco Public Utilities Commission already sees saltwater intrusion in its system 6-8 times per year. It anticipates having to install baffles to block intrusion by 2015, and, as sea level rises, closing its nearshore outfalls and pumping all of the stormwater flows to the treatment plants and offshore outfalls. In the case of Treasure Island, we assume that levees will protect infrastructure that lies below sea level; in that case, however, the discharge of effluent will be more difficult and energy intensive; this is a near-term impact that must be analyzed in this document, particularly in terms of its energy use and GHG emissions.

*Recommendation; include increased GHG emissions due to sea level rise in GHG calculations*

**Water Quality Impairments.** The list of 303 (d) impairments for San Francisco Bay in the vicinity of Treasure Island should include Polycyclic Aromatic Hydrocarbons (PAHs) – see 2006 CWA Section 303 (d) list of Water Quality Limited Segments.

Sincerely,

Jennifer Clary, President

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38.36,  
cont'd

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September 10, 2009  
Via E-Mail

Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: COMMENTS ON DRAFT EIR FOR TREASURE ISLAND/YERBA BUENA ISLAND  
REDEVELOPMENT PROJECT -- Case No. 2007.0903E

Dear Mr. Wycko:

Telegraph Hill Dwellers (THD) write to provide comments on the Draft Environmental Impact Report ("DEIR") prepared for the Treasure Island (TI) and Yerba Buena Island (YBI) Redevelopment Plan. For the reasons listed below, we believe that the DEIR is incomplete and inadequate.

The most serious deficiency of this DEIR is that, although it identifies the Redevelopment Plan's impacts on aesthetics, historic resources, transportation, noise, air quality, wind and biological resources as "Significant and Unavoidable," it fails to even consider a "Minimum Impact Alternative" or an "Environmentally Superior Alternative" that would reduce or avoid these significant impacts.

39.1

Another incurable defect is that, given the almost total lack of information as to the individual specific projects that would form a part of this massive Redevelopment Plan, a program or first tier EIR would be the appropriate approach under the California Environmental Quality Act (CEQA), followed by later project-level EIRs once site specific issues are identified for individual projects and phases of the Project.

39.2

By approving the Redevelopment Plan for TI and authorizing the conveyance of TI to the Treasure Island Development Authority (TIDA), a redevelopment agency under state law, and by authorizing the *Design for Development* scheme for TI and YBI, the Proposed Project is a massive departure from longstanding City Policy. Under the proposed scheme, future development would not be subject to the City's Planning Code or General Plan or to review by the Planning Commission or the Board of Supervisors. By approving the Environmental Impact

Bill Wycko  
 September 10, 2010  
 Page 2

Report and Redevelopment Plan, the Board of Supervisors would in essence be relinquishing all authority to an appointed body with no accountability to an elected body.

Proclaimed to be a Redevelopment Plan that will “advance the sustainability of the islands” with the “potential to establish an international model for ecological urban development,” there is absolutely nothing in the DEIR to back up this claim. In stark contrast to these claims, the plan analyzed in this DIER as the “Proposed Project” appears to be just a new suburb in the middle of our Bay – a brand new downtown Walnut Creek -- in a location that is unequipped to deal with the significant amounts of new regional traffic it will generate. We are shocked that a decade into the 21<sup>st</sup> Century San Francisco decision-makers are even being asked to consider such a conventional 20<sup>th</sup> Century development.

If, as claimed in this DEIR, the only economically viable alternative is one that results in significant and unavoidable impacts to the environment of the entire Bay area, we would urge our decision-makers to wait until it does become economically viable to develop a sustainable project, one that truly represents an international model for ecological urban development without destroying forever the world-renowned splendor of our Bay.

We look forward to the responses to the questions, comments and requests for information set forth below.

### **Project Description and Objectives / Previous Plans**

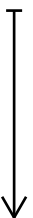
The sheer magnitude of the proposed Redevelopment Plan being considered in the DEIR and the significance of the plan’s regional impacts is shocking and certainly not what the ordinary citizens of San Francisco and the rest of the Bay Area expected after a multi-year process that began in 1996. The fact that the project has evolved to what it is today raises countless questions that are not adequately dealt with in the DEIR.

We always believed that the basic premise of developing Treasure Island was that it would be a true model of sustainability, a new residential community incorporating all of the “best practices” of sustainability: a limited number of private automobiles, the least amount of parking spaces possible, an emphasis on the development of ferry transportation and other public transportation, no regional shopping centers, no destination hotels, no regional destination sports complexes, a model of historic preservation and carbon neutrality, and that it would not cause significant regional transportation impacts. These best practices are not the premise of the Redevelopment Plan being considered in the DEIR. What happened?

### **Please respond to each the following requests/questions/comments:**

- Please explain in detail the components of the 1996 Draft Reuse Plan that was analyzed in the 2003 federal Environmental Impact Statement (2003 EIS). Include at least the following:

- Was any new development proposed for YBI?
- If so, exactly what development was proposed for YBI?



- Number of new buildings proposed for YBI and TI.
- Heights of all proposed new buildings?
- Number of residential units (rental vs. sales).
- Square feet of commercial and retail space (resident serving vs. regional).
- Square feet of office space.
- Number of hotel rooms.
- Transportation facilities.
- Marina development – how many slips.
- Acres of parks and open space.
- Total number of parking spaces (on street and off street).
- Number of historic buildings proposed to be demolished.

39.3,  
cont'd

• What were the transportation goals and objectives established by the 1996 Draft Reuse Plan that were considered in the 2003 EIS? Explain what “transit-oriented development” was incorporated into the 1996 Draft Reuse Plan to reduce automobile usage associated with suburban land uses? How many ferries were proposed? How many busses were proposed?

• Using the above list, please explain all changes made from the 1996 Draft Reuse Plan to the 2002 Development Plan, from the 2002 Plan to the Plan considered in the 2005 Transfer and Reuse Final EIR (2005 FEIR), to the 2006 Plan, and from the 2006 Plan to the plan now being considered in this DEIR. Include any other plans not mentioned. Include a chart comparing of all aspects of the Plans, including those items in the list above.

• Please explain how and why the project morphed from what was analyzed in the 2003 EIS to what is being considered in this DEIR.

• What mitigation measures were identified in the Navy’s Record of Decision (ROC)? How have each of these mitigation measures been incorporated in the Redevelopment Plan that is the subject of this DEIR and how will each mitigation measure be implemented and enforced?

39.4

• Please address the price to acquire TI from the Navy. How much was TI going to cost the City in 2003? How much in 2006? How much today?

The 2006 Term Sheet approved by the Board of Supervisors was accompanied by a *Transportation Plan, Land Plan, Sustainability Plan and Infrastructure Plan*.

39.5

• As to the 2006 *Sustainability Plan*, describe how the project being analyzed in this DEIR differs from the specific recommendations of the 2006 *Sustainability Plan*. What individual recommendations from that plan are *not included* or *not fully included* in the Redevelopment Plan being analyzed in this DEIR? Please list each such recommendation and explain why it has not been incorporated into the Proposed Project.

As to the 2006 *Transportation Plan*, describe how the Proposed Project being analyzed in this DEIR differs from the recommendations in the 2006 *Transportation Plan*. What individual recommendations from that plan are not included or not fully included in the Proposed Project /

Bill Wycko  
 September 10, 2010  
 Page 4

Redevelopment Plan being analyzed in this DEIR? Please list each such recommendation and explain why it has not been incorporated into the Proposed Project.

39.5,  
 cont'd

- Why is the Proposed Project being analyzed in this DEIR significantly different than the Proposed Project that was described in the Notice of Preparation of EIR? One example of the major differences between the project described in the Notice of Preparation and this DEIR is the increase in residential units from 6,000 to 8,000.

Why was an Initial Study not prepared as a part of the scoping process for this DEIR?

39.6

- Please explain in detail each amendment to the 2006 Term Sheet made by the Board of Supervisors in 2010. Why were these amendments necessary? What changed and why?

- Please explain why is it necessary for TI/YBI to be controlled by a “Redevelopment Agency”? Why couldn’t the City and County of San Francisco own and manage TI/YBI and regulate development under the SF Planning Code and its General Plan?

- Please explain what regulatory authority City and County of San Francisco will retain over future individual projects, including projects that will alter historic buildings and landscapes?

39.7

As disclosed in the DEIR there are many unknowns, including, to name only a few, the specific locations and designs for the “prominent cluster of 19 high-rise towers at the center of the San Francisco Bay,” the specific plans for the “retrofit” of and additions to historic buildings, the transit-related facilities, and the phasing of development over the next 20 years in relation to the implementation of transportation mitigation measures.

39.8

- Given these many unknowns, please explain how this DEIR complies with the requirement of CEQA that an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.

- Because so many aspects of the Redevelopment Plan have yet to be defined and are unknown at this time, will there be individual environmental review of site specific impacts once the details of individual projects and phases of the redevelopment have been identified?

- Will the implementation of each individual project and phase of development be subject to a project-specific EIR as plans become clear and impacts are identified?

- Please explain the CEQA guidelines as to when a program or first tiered EIR are appropriate.

- Please explain on what basis the decision was made not to prepare a program or first tiered EIR for the Redevelopment Plan?

- Because NEPA requires federal environmental review of the currently Proposed Project prior to transfer by the Navy, why is this DEIR not an EIS/EIR? Please explain why in detail.

39.9

Bill Wycko  
 September 10, 2010  
 Page 5

• Have other federal and state agencies had input into the preparation of this DEIR? Which state and federal agencies have been consulted? When did such consultation take place?

39.10

• When will NEPA be complied with? What is the relationship of this DEIR to the federal review of this proposed Redevelopment Plan under NEPA?

39.11

• Will a new Section 106 review and consultation under the NHPA be required prior to transfer by the Navy as a part of the updated federal environmental review? Will a new MOA be required? Why or why not?

• Why was the Clipper Cove Marina project not analyzed in this DEIR? It represents a 400% increase in the size of the Marina, which could have substantial impacts on traffic. It does not matter that it was analyzed in a 2005 FEIR. In 2005, the Development Plan for TI was an entirely different and much smaller project. The impacts of the Clipper Cove Marina project must analyzed cumulatively in this EIR.

39.12

### **Land Use and Land Use Planning**

**Significant Change in Height Limits:** Although the DEIR admits that increasing the height limit on TI/YBI from the existing 40X feet to heights up to 650 feet would conflict with existing zoning controls applicable to TI/YBI, and would require amendments to the General Plan and Planning Code, the DEIR concludes (**Impact LY-3**) that impacts on existing land use and land use planning would be *less than significant*. This is simply not an objective conclusion.

39.13

### **Please respond to each the following requests/questions/comments:**

As to the DEIR's conclusion that the Redevelopment Project would not have a substantial impact upon the existing character of the vicinity:

- Please explain objectively how the proposed height increase *from 40 feet to up to 650 feet* would *not* have a substantial impact upon the existing character of Treasure Island and the entire San Francisco Bay in terms aesthetics.
- Please explain how the proposed height increase *from 40 feet to up to 650 feet* would *not* have a substantial impact upon the existing character of Treasure Island and the entire San Francisco Bay in impacts upon cultural resources and their setting.
- Please explain how the Project's conflicts with the existing 40 ft height limits (and associated population increases – residents and visitors) would *not* impact traffic, air quality and greenhouse gas emissions.

**Significant Change in Density:** The DEIR discloses that the Planning Code's density would also have to be amended and would no longer apply to the Redevelopment Plan area. Instead, TI and YBI would be subject to a maximum number of residential units. According to the DEIR, this would increase the total number of dwelling units from the current 805 dwelling units to the

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8,000 dwelling units – increasing the population from 1,820 persons to 18,640 persons, representing an increase of 16,820 net new persons on TI/UBI.

39.14,  
cont'd

**Please respond to the following requests/comments:**

- Please explain objectively how this increase in density limits, with the accompanying increase in resident population *from 1,820 persons to 18,640 persons* would *not* have a substantial impact upon the existing character of Treasure Island and Yerba Buena Island, and the entire region, in terms of traffic and air quality.

**Other Significant Conflicts:** As to the DEIR's conclusion that the Redevelopment Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effects:

- The following regulations (and others) applicable to the Project were adopted for the specific purpose of avoiding environmental effects on biological resources. In addition to the materials contained in Chapter IV of the DEIR, please answer the following as to the regulations listed below: (1) On what factual basis does the DEIR conclude that the project does not conflict with each of these regulations? (2) What are the results of the required consultations with the applicable regulatory agency(ies), including the dates of these consultations?

Applied  
to 39.15  
– 39.17

- Federal Endangered Species Act (FESA)
- California Endangered Species Act (CESA)
- Section 404 of the Federal Clean Water Act (CWA)
- Rivers and Harbors Act
- Regulations of the SF Bay Conservation and Development Commission (BCDC)

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- How would compliance with NPDES permits prevent the discharge and transport of methyl mercury to Bay consumers? What conditions that would be placed on such permits?

39.18

**Aesthetics/Scenic Vistas**

The DEIR describes the Proposed Project as “*a prominent cluster of 19 high-rise towers at the center of the San Francisco Bay, which would be particularly prominent from public vantage points along the eastern shoreline of San Francisco, Telegraph Hill, and the East Bay shoreline, and from the Bay Bridge east span.*” Even though the EIR admits that the Proposed Project would adversely alter scenic vistas of San Francisco and San Francisco Bay, it underestimates the regional and international impact this project would have on the image of San Francisco.

39.19

**Please respond to each the following comments and questions:**

- Given the regional scope of the visual changes that the Proposed Project would have, to what extent has input been sought from the cities and counties surrounding the Bay?

39.20

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• Have copies of the Development Plan and this DEIR been distributed to the cities and counties surrounding the Bay with a request for comments and input? To which cities and counties? Have any comments been received?

39.20,  
cont'd

• The DEIR does not include adequate photographic views and visual simulations. Please include additional comparative views from each of the following vantage points:

39.21

- (1) From the surface of the Bay from ferries
- (2) From along the length of The Embarcadero along the Promenade and including at the following points:
  - Ferry Building (Ferry Terminal)
  - Exploratorium (end of Piers 15 & 17)
  - Open space designated at Pier 27
  - End of the Public Pier (Pier 7)
  - End of the Port's pedestrian-access Pier 14
- (3) From the top of YBI looking to TI
- (4) From the top of Angle Island
- (5) From Alcatraz
- (6) From East Shore State Park
- (7) From Rincon Point from the railing on Herb Cane Way (eliminating the extensive foreground of lawn)
- (8) Other views from the Marin (including but not limited to Tiburon)

• The aesthetic impacts at night could be even more significant. Please include comparative views from each of the above vantage points as well as from the vantage points included in the DEIR -- all against the night skyline.

39.22

• The angle of view in the photographs should be tightened to have less foreground.

39.23

• How were the photographic views simulated, given the fact that the location and siting of the tower volumes has not yet been determined? Please explain the method used in light of the fact that, as stated in the DEIR, *"the construction program allows for flexibility in the siting of tower volumes."* *"Wire-frame"* boxes are presented in a massing diagram to *"represent the spatial limits within which the tower volumes may shift when the development program is implemented and specific building designs are proposed."* This uncertainty makes the photographic views vague and potentially misleading.

39.24

• The DEIR's discussion of the view from Twin Peaks (View Point C) overlooks the fact that this view shows that the Proposed Project will have the effect of leveling out the familiar shape of the San Francisco skyline, which the DEIR describes on page V.B.1 as follows: *"The San Francisco skyline is a clear visual marker of San Francisco's regional importance"* and further describes the views of the skyline as being characterized by *"a strong visual hierarchy."* As shown by Viewpoint C, the Proposed Project would significantly alter this important visual marker and visual hierarchy. The nighttime view from this viewpoint could be even more revealing.

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- The significant impacts of the Proposed Project on the San Francisco's skyline is also shown in the view from the Berkeley Marina (View Point E) which reveals that the San Francisco skyline will be altered and muddled and will no longer read as a clear visual marker. Please include nighttime views from this viewpoint.

39.26

- Why are the East Bay hills not visible in the view from Rincon Point (View Point A)?

39.27

- The DEIR's discussion of the view from New Bay Bridge East Span (View Point F) completely overlooks the fact that the Proposed Project will completely block the iconic, internationally famous "first view" one gets when arriving in San Francisco over the Bay Bridge, including views of the Golden Gate Bridge and the Marin Hills, and of the three most significant National Register-listed historic buildings on Treasure Island, which remain from the 1939-1940 Golden Gate International Exposition (views of Buildings 2 & 3 are completely blocked and Building 1 is obscured). Depending on the color of the buildings to be constructed on TI, Building 1 may not be at all visible. The nighttime view from this viewpoint will be further revealing.

- The DEIR does not contain any discussion at all of the view from the TI Causeway (View Point G), a view that is shocking as to what it reveals. The Proposed Project appears as a new Walnut Creek right in the middle of our world-renowned Bay. Buildings 2 & 3 are buried beneath the proposed new high-rise buildings, and Building 1 is dwarfed by and is visually and aesthetically impacted by the surrounding super tall high-rise buildings. This view illustrates the severe visual impacts of the Proposed Project to the historic resources. The nighttime view from this viewpoint will be further revealing.

39.28

- The DEIR contains no photographic views or visual simulations of the proposed new construction on YBI. Please include these and address each of the following comments and questions:

39.29

- Will any new construction on YBI be visible from San Francisco? Show in a visual simulation.

- Will any new construction on YBI be visible from any points on the Bay Bridge? Show in a visual simulation.

- The DEIR reveals that new construction is to be placed on sites of existing buildings. Which buildings will be demolished and replaced?

39.30

- What are the existing heights of the buildings to be demolished and what are the heights of the buildings to be built in their place?

- The DEIR reveals that: "a mid-rise building up to 80 feet in height would be permitted in zone Y3." Where is zone Y3? How does an 80-foot building relate to the heights of the historic buildings on YBI, including the Nimitz House, the Torpedo Factory and all the buildings in the Senior Officers' Quarters historic district?

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- From what points around the Bay will this 80-foot tall building be visible? Show in a visual simulation.

- The DEIR reveals that: “Building height limitations [on YBI] would be established by the *Design for Development* to ensure that development would not substantially interfere with existing views from hilltop public park areas.” This means, in effect, that views from the hilltop public park areas *would* be impacted. Show exactly where all development on YBI is proposed and which buildings or areas of new development could interfere with views from the public hilltop park areas.

- Include photographic views or visual simulations of the proposed new construction on YBI and TI from the public hilltop park areas.

According to the DEIR, the northern part of TI currently contains almost exclusively two-story buildings, the central part contains buildings up to three or four stories tall in height, and the south end of the island contain five-story buildings and hangers that are the tallest structures on the island. These buildings are typically widely separated over the island.

- In addition to the more specific information requested under Impact CP-11 and CP-12, below under our comments on Historic Resources, please provide the following information:

- Please provide a list of the heights of all of existing buildings on TI, including the NR listed buildings 1, 2 and 3.

- What is the average height of all existing buildings on TI?

- Please provide in list format the heights of all of existing buildings on YBI, including the historic Nimitz House and Senior Officers’ Quarters and the Torpedo Factory.

- For both TI and YBI please show on a map a presentation of all existing buildings (with their heights) and indicate which buildings will be demolished as a part of the Proposed Project.

The DEIR says that 50 percent of the new housing units would be in “low rise buildings up to 70 feet,” Punctuated by “*mid-rise buildings from 70 to 130 feet and neighborhood high-rise towers up to 240 feet serving as neighborhood markers.*” The DEIR states that the tallest building would be 650 feet.

- What is a “*neighborhood marker*”?

- On what basis does the DEIR conclude that 70 ft tall buildings are “low rise” buildings, particularly when the tallest building on TI is 50 stories tall? Low-rise buildings in San Francisco are usually considered to be less than 40 feet tall.

- On what basis does the DEIR conclude between buildings between 70-130 feet in height are “mid-rise” buildings? Please compare these heights to buildings in San Francisco.

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39.34

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- Please compare the proposed heights of the 20 highest buildings proposed to be constructed on TI to the height of the west span towers of the Bay Bridge; the vertical clearance under the Bridge; and the height of YBI. Illustrate these height comparisons side by side for a visual comparison.

39.34,  
cont'd

- Explain in detail why the DEIR fails to identify the “Avenue of the Palms” as a prominent visual feature that will be impacted by the Propose Project? According to the DEIR, the Avenue of the Palms will be completely destroyed by the Proposed Project.

39.35

- Please refer to Figure 3-2 “Prominent Visual Features and Major Views” from the 2005 FEIR attached to these comments as **Exhibit A**, which specifically identifies the Avenue of the Palms as such a feature.

- Please include an analysis in this DEIR of each of the visual feature and major view identified on the attached **Exhibit A**. What has changed since 2006? Is the project sponsor EIR shopping?
- Consistent with the 2005 FEIR, the removal of the Avenue of the Palms must be identified as a significant aesthetic impact in this DEIR.

- In addition to the Avenue of the Palms, what other “Prominent Visual Features” identified on the attached Figure 3-2 are proposed for demolition or removal as a part of the Proposed Project? Please describe in detail.

39.36

- Please provide a detailed analysis of the impact of the Proposed Project on each “Major View” identified on Figure 3-2.

**Impacts AE-2 and AE-3:** We disagree with the DEIR conclusion that the Redevelopment Plan would not significantly alter existing features considered scenic resources on Treasure Island and Yerba Buena Island. Similarly, we disagree with the DEIR’s finding that the new construction on TI would not alter the existing visual character and visual quality of the project area, including Buildings 1, 2 and 3.

An objective look at the photo views contained in the DEIR conclusively shows that the new buildings constructed in the vicinity of the historic buildings on TI would effectively bury Buildings 2 & 3 behind the proposed new high-rise buildings, and that Building 1 would be obscured and dwarfed by the tallest buildings on the Island. These scenic resources would thus be significantly altered. The statement contained in the DEIR that the tallest building on TI, a 650-foot tall tower rising behind Building 1 would “reinforce the centrality of Building 1” is a desperate attempt to avoid a finding of significant impact that simply does not work by any objective standard. The only conclusion that can be reached is that the proposed new construction on TI would significantly alter existing features considered scenic resources, and would alter the visual character and visual quality of these scenic resources. Further comments regarding these impacts are contained in the comments under Historic Resources, below.

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As to whether the Redevelopment Plan would significantly alter existing scenic resources or impact the existing visual character and visual quality on YBI, the DEIR contains no photo views and does not contain sufficient information to reach a conclusion. We have requested additional information on YBI. See above.

39.38

**Impact AE-4:** We disagree with the DEIR conclusion that the implementation of the Redevelopment Plan would not significantly increase nighttime lighting, increasing potential sources of glare. It would further cause light pollution.

- We disagree that the project area is not a prominent visual presence within nighttime views of the Bay from mainland locations. As we have requested, please include nighttime photographic views from Telegraph Hill and other locations along the Northeast Waterfront, which will show that Building 1, with its subtle lighting has a lovely visual presence at night with the backdrop of the East Bay Hills. This scene with the subtle lighting of the Bay Bridge is a scenic visual resource that will be significantly impacted by the Proposed Project.

39.39

- What are the light impacts associated with a 25-40 acre regional sports complex?
- Please provide nighttime simulations from the mainland comparing the existing views to the proposed dense collection of 19 new high-rise buildings, together with the high-intensity nighttime lighting of the Sports Park. These simulations will show that the intensity of the light that will be caused by the project would be significant. We disagree with the subjective conclusion of the DEIR that this intense new light would somehow “be diffused by distance.”

- Please provide a visual analysis of the glare that will reflect back to San Francisco from the setting sun on the proposed new 19 high-rise structures, as well as from the new construction proposed on YBI. We disagree with the subjective conclusion of the DEIR that this glare would somehow “be diffused by distance.” This is simply untrue. We currently experience glare from Oakland and the East Bay Hills as well as from the current development on the west side of YBI.

39.40

- The DEIR concludes that “*the light levels resulting from build out of the Redevelopment Plan would be consistent with the urban character and associated ambient light levels of the City as a whole and would not exceed levels commonly accepted by residents in an urban setting.*” We disagree. This is not a development in the City, but a new “suburban city” in the middle of one of the most scenic places in the world. Such new lighting will significantly and permanently impact a prominent and unique scenic resource. This is particularly so at the central portion of the Bay, where dramatic environmental features combine to form iconic scenic views. Reliance on the *Design for Development* and voluntary “lights out” programs cannot prevent this significant impact on the nighttime views.

39.41

- Nighttime views of the Development Area from the Bay Bridge should also be analyzed in photographic simulations.

### **Historic Architectural Resources**

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Section D.2 on Historic Architectural Resources is confusing and raises many questions and concerns, especially as to the apparent “opinion shopping” regarding the impacts to Building 3. Further, we disagree with the DEIR’s conclusions as to the impacts of the Proposed Project on historic resources and with the DEIR’s the reliance on TIDA to reduce or mitigate potentially significant impacts to historic resources.

39.42

**Please respond to each the following comments and questions:**

- The DEIR states that Treasure Island was designated as State Historical Landmark No. 987 in 1989, and is therefore included in the California Register of Historic Resources. The DEIR further states that the basis for the island’s designation is its association with GGIE “*so only features associated with GGIE **would be** a part of the State Historic Landmark designation.*”

39.43

- How does the DEIR come to the conclusion that the basis for the island’s designation State Historical Landmark No. 987 is due only to its association with GGIE and that “*only features associated with GGIE **would be** [emphasis added] a part of the State Historic Landmark designation*”? Please explain the basis for this statement.

- What does the State designation include as being the significant buildings, features and periods that are the basis for Treasure Island’s designation as a State Historical Landmark? According to the California Office of Historic Preservation’s website, the island’s history from 1939 to 1944 as the landing site for flights of the *China Clipper*, as well as its history as a Naval Station also seem to be a part of the recognized historic significance of the island under this designation:

**“NO. 987 TREASURE ISLAND-GOLDEN GATE INTERNATIONAL**

**EXPOSITION, 1939-40** - This artificial island was constructed of bay sand in 1936-7. It was the site of the Golden Gate International Exposition, February 18, 1939-September 29, 1940. Tall towers, gigantic goddesses and dazzling lighting effects turned the Island into a “Magic City.” The exposition celebrated the ascendancy of California and San Francisco as economic, political and cultural forces in the increasingly important Pacific Region. From 1939 to 1944 the Island was the landing site for flights of the *China Clipper*. Treasure Island has been a U.S. Naval Station since 1941.

**Location:** Naval Station, Treasure Island, San Francisco”

- The DEIR refers to Section 106 compliance for Navy actions, including the transfer of Navy property out of federal ownership. Please respond to each of the following questions:

39.44

- (1) When did compliance with Section 106 occur?
- (2) What is the date of the MOA?
- (3) What is the term of the MOA?
- (4) Who were the parties to the MOA?
- (5) Who signed the MOA on behalf of the City of San Francisco?
- (6) Did the MOA include a list of historic resources to be protected?
- (7) What uses were proposed for historic resources on TI and YBI as of the date of the MOA?

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- (8) Explain in detail the specific provisions of the MOA.
- (9) What are the conditions of the MOA as to the treatment of each identified historic resource?
- (10) The DEIR states that upon conveyance to TIDA the MOA “expires.” Explain why.
- (11) Is TIDA a party to the MOA?

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- The DEIR refers to a 1997 Inventory and Evaluation undertaken by the Navy. Since this inventory is now over 13 years old, will the Navy undertake a new independent inventory prior to transfer in connection with its required NEPA and Section 106 compliance?

- The DEIR states that the Navy notified the Advisory Council on Historic Preservation in connection with the proposed conveyance from the Navy to TIDA and “*received notification that the Council declined to participate in the consultation.*” In what month/year did this notification by the Navy to the Advisory Council occur? Have they been notified in 2010?

- As to buildings on TI that are now 50 years in age or older that were not studied in the 1997 inventory:

39.45

- (1) Did the HRE conducted as a part of the environmental review for this DEIR evaluate the Treasure Island Chapel, which according to recent articles in the press has been a fixture on the island since 1943?
- (2) Why is the Treasure Island Chapel not considered a historic resource for purposes of evaluating the impacts of the Proposed Project?
- (3) Please include an evaluation of this potential historic resource.

- Because of the proximity of the proposed new buildings to the Job Corps campus, the buildings within the campus must be evaluated for their historic significance. Even if development would not occur on the campus, the scale and design of the proposed new construction in the vicinity could impact the integrity of setting, feeling and association of the campus buildings, resulting in potentially significant impact.

39.46

- (1) Include an evaluation of the historic significance of each of the buildings located within the federal Job Corps campus.
- (2) Analyze all potential impacts of the Project on historic resources within the Job Corps campus, including aesthetic impacts.

- The DEIR fails to evaluate any buildings on YBI that are now 50 years in age or older that were not already studied in the 1997 inventory. The DEIR cannot exclude these from evaluation by simply concluding that they “would not be *directly* affected by the Proposed Project.” Please respond to the following:

39.47

- (1) Provide a list of all buildings on YBI that are now 50 years in age or older that were not already studied in the 1997 inventory.
- (2) Evaluate each building for its historic significance.



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- (3) Show the location of each building in proximity to all proposed new development on YBI, including the height and mass of the proposed new buildings.
- (4) Evaluate whether the proposed new development on YBI could affect the integrity of the setting, feeling and association of any of these yet-to-be-identified historic resources.

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• On DEIR page IV.D.50 reference is made to SF Planning Code Section 101.1: Master Plan Priority Policies as being applicable to this project. The DEIR then states that the City must find that the Proposed Project is consistent “*on balance*” with the eight Priority Policies. This is an incorrect statement. The Priority Policies are not to be “balanced,” rather they are for the purpose of resolving inconsistencies of a project with the other General Plan policies. They were adopted by initiative of the voters to be “*the basis upon which inconsistencies in the City’s General Plan are resolved.*” Please add this clarification to the DEIR. We agree that Priority Policy No. 7 would apply to the Proposed Project and would take precedent over any conflicting policy of the General Plan.

39.48

**Impact CP-5:** The DEIR concludes that impacts upon historical resources from their reuse and rehabilitation under the proposed *Redevelopment Plan* would be “*Less than Significant.*”

39.49

We disagree and do not understand the basis for this conclusion given that the DEIR states, as to the three most significant National Register-listed buildings:

*“The specific nature and scope of such alterations have not been determined at this time but may include rehabilitation of the interior, rehabilitation of the exterior, and the addition of features (such as photovoltaic panels on Buildings 1, 2 and/or 3)” and that the rehabilitation of these buildings “may also include building additions.”*

The DEIR further states that the *Design for Development* “*establishes zones in which additions occur and the maximum height for the potential additions.*”

• Please include in your response to comments a copy of the referenced portions of the *Design for Development* that establishes these zones in which additions occur and the maximum height for the potential additions to Buildings 1, 2 and 3. Please provide illustrations of the application of these zones and maximum heights as they would apply to each of the National Register listed buildings.

• Does the *Design for Development* establish similar zones and maximum heights for other historic resources on TI and YBI? If so, please include a copy of the referenced portions of the *Design for Development* and provide illustrations of the application of such zones and heights to these other historic resources.

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• Because the nature and scope of the alterations is unknown, there is no adequate basis for the DEIR conclusion that the impacts of future projects to alter historic buildings will have a “*Less than Significant*” impact. The DEIR improperly relies on TIDA to review the proposed treatments to historic resources and to determine if the proposed work conforms to the Secretary

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of the Interior's Standards. A future review of an unknown project by a non-expert body is an inadequate basis for the DEIR's conclusion. Please respond to the each of the following questions:

- (1) How will review by TIDA be adequate to assure that historic resources will not be impacted by future rehabilitation projects?
- (2) Are members of the TIDA Board or its staff required to be trained and experienced experts in the field of historic preservation?
- (3) What public notice and process will be required as to each project that would alter or demolish a historic resource?
- (4) Did the DEIR consider other more effective ways to mitigate the potentially significant impacts on historic resources, such as requiring project-specific EIRs for each project that proposes to alter a historic property, and requiring review by the City's Historic Preservation Commission of each such project? Why are these not included in the DEIR? Future project-specific environmental review and review by an expert body within a public review process is the only way these impacts could be adequately mitigated.

• The DEIR contains a general statement that *"Buildings 1, 2, and 3 would be rehabilitated and converted to approximately 311,000 sq. ft. of commercial, retail, entertainment, and community services space."* Please respond to the following questions:

- (1) How many square feet does each building contain now?
- (2) What use is being proposed for each building?
- (3) How will the proposed new use impact the interior and exterior of each building?
- (4) Are additions planned for each building? How many square feet would be added to each building?

**Impact CP-6:** The DEIR concludes that proposed alterations to the contributing landscape areas of Buildings 1, 2, and 3 would be *"Less than Significant with Mitigation."*

The DEIR reveals that the current plan for landscapes around Building 1 would remove character defining retaining walls and alteration of the driveways west of Building 1 causing:

*"a substantial change in the significance of an historic resource, although it is not possible to foresee the ultimate impact from the current concept-level design for the landscape."*

The DEIR further discloses that: *"Alterations to the contributing landscapes could result in a significant adverse impact on the individual historic significance of Building 1."*

• Because the nature and scope of the alterations to contributing landscapes is unknown, there is no adequate basis for the DEIR conclusion that this identified "significant impact" be mitigated to "less than significant." Again, the DEIR improperly relies on a future review by TIDA to review proposed alterations to (and within) the contributing landscape areas to determine if the alterations conform to the Secretary of the Interior's Standards.

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A future review of an unknown project by a non-expert body is an inadequate mitigation measure (M-CP-6). Please respond to the each of the following questions:

- (1) Why did the DEIR not consider a Mitigation Measure that would simply require an amendment to the *Design for Development* requiring that no project shall remove any character defining features of any contributing landscape? The obvious Mitigation Measure is to require that the contributing landscapes be preserved in intact.
- (2) How would review by TIDA assure that historic landscapes and resources would not be impacted by future projects?
- (3) How would the proposed mitigation measure be enforced and who will enforce it?
- (4) Are members of the TIDA Board or staff required to be experienced and trained experts in the field of historic preservation and historic landscapes?
- (5) What public notice and process will be required as to each project that proposes to alter or demolish a historic resource or its contributing landscape?
- (6) Did the DEIR consider other ways to mitigate the potentially significant impacts on historic resources and their contributing landscapes, such as requiring project-specific EIRs for each project that proposes to alter a historic property, and requiring review by the City's Historic Preservation Commission of each such project? Future project-specific environmental review and review by an expert body within a public review process is the only way these impacts could be adequately mitigated.

**Impact CP-7:** The DEIR concludes that proposed new construction within the contributing landscapes of Buildings 1, 2, and 3 would be "*Less than Significant with Mitigation.*"

Remarkably, the DEIR reveals that the current *Design for Development* allows new freestanding construction within the contributing landscapes of the National Register listed buildings 1, 2 and 3. How could this impact this possibly be mitigated? The DEIR states, once again, that: "*the specific design of these new features has not been developed enough at this time to assess their impact.*"

And again, the DEIR recommends as a Mitigation Measure (M-CP-7) a future review by TIDA, which would apply the Secretary's Standards. Based on the fact that the DEIR states that there will be construction of buildings *within* the contributing landscapes, the Proposed Project would clearly cause a significant impact to these cultural landscapes that could not be adequately mitigated. Please respond to the following comments:

- (1) Why did the DEIR not consider a Mitigation Measure that would simply require an amendment to the *Design for Development* prohibiting any construction of new buildings within the contributing landscapes of Buildings 1, 2 and 3? The obvious Mitigation Measure is to require that the contributing landscapes be preserved in intact and that no buildings be placed within them. Please explain why this would not be the most appropriate approach under CEQA?
- (2) Again, the fact disclosed in the DEIR that the "*specific design of these new features has not been developed enough at this time to assess their impact*" is clear evidence that any

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- such project within the contributing landscapes would require a later project specific EIR. Please explain why this would not be the most appropriate approach under CEQA?
- (3) Please respond to all of comments (2) though (5) under Impact CP-6, above, pertaining to review by TIDA.

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**Impact CP-8:** The DEIR concludes that the demolition of Building 111 would *not* be a significant impact on this historic resource. This conclusion is obviously based entirely on “opinion shopping” by the project sponsor to get the result desired. The impact on Building 3 of the demolition of Building 111 is significant and can only be avoided by changing the Proposed Project to avoid its demolition.

39.53

- Confirm that Building 3 (including Building 111 as a contributing feature) is listed on the National Register of Historic Places.
- Confirm that the HRE determined that the demolition of Building 111 would result in a significant adverse impact on the significance of Building 3 as a historic resource.
- Confirm that the Planning Department’s Preservation Planner initially agreed with the HRE’s conclusion.
- Please explain why Page & Turnbull was hired to “provide additional information about Building 111” in contradiction to the HRE consultant’s conclusion?
- Was Page & Turnbull hired by the environmental consultant, the Planning Department, or by the project sponsor?
- Why does the preparer of this DEIR use this “additional information” to reach the opposite conclusion from that contained in the HRE?
- Does this “additional information” contradict the National Register listing?
- The DEIR fails to reveal on page IV.D.25, in the 4th paragraph, that the project sponsor hired Page & Turnbull to come up with some “findings” to contradict the HRE and National Register listing for Building 3 in order to justify the demolition of a portion of the historic resource.
- Why couldn’t the project be changed to avoid the demolition of this historic resource?
- The DEIR reveals that Page & Turnbull was hired by the project sponsor to avoid a finding that the Proposed Project would cause a Substantial Adverse Impact on a National Register property that could not be mitigated. We disagree with the DEIR’s conclusion that a second opinion, which contradicts the HRE and the National Register listing, constitutes “*substantial evidence in light of the whole record to support the conclusion that the removal of the building would be consistent with the Secretary’s Standards, and would not result in a substantial adverse change in the historic significance of the building.*” This kind of opinion shopping degrades the integrity of the CEQA process and should not be the basis for the DEIR’s conclusion that the demolition

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of a portion of a National Register-listed building would not cause a significant impact that cannot be mitigated.

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**Impact CP-9:** The DEIR properly concludes that demolition of the Damage Control Trainer (U.S.S. Buttercup) would be a significant impact on the significance of this historical resource that cannot be mitigated.

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As disclosed in the DEIR, the U.S.S. Buttercup (Damage Control Trainer) is a rare and distinctive object, exhibiting specialized design and construction for military training, which is an important aspect of military history. One of only a handful in the US and the only such object on the West Coast, it is significant historic resource. Please respond to the following:

- According to the DEIR, its demolition is unavoidable because it overlaps two development blocks, which cannot be modified without substantial change. Why is its demolition unavoidable? How could the development in those two blocks be changed to avoid the site?
- Please add to the DEIR's discussion of the "No Project Alternative" consideration of the development of this historic resource as a museum.
- Could the demolition of this historic resource be avoided as a part of the "Reduced Development Alternative"?
- Was the demolition of this historic resource known and considered at the time of the Section 106 consultation? Was it considered as a part of the 2003 EIS?

**Impact CP-11:** The DEIR concludes that the construction of new buildings in the vicinity of Buildings 1, 2 and 3 would not impair the significance of these historical resources. We completely disagree with this conclusion. A quick look at Figures IV.B.7 (View Point F) and IV.B.8 (View Point G) prove our point visually.

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• The first sentence of this discussion states that new buildings are proposed outside of the contributing landscapes sites of Buildings 1, 2 and 3. This directly conflicts with the discussion under Impact CP-7, which specifically addresses the impacts of proposed new construction within the contributing landscapes of these historic buildings. Please explain this inconsistency between Impact CP-7 and CP-11.

• Figure IV.D.6 is very hard to read and does not provide adequate information. Please add the following to this Figure:

- (1) A key to the colors and patterns used.
- (2) The heights of the three National Register buildings (1, 2 and 3). The lack of this information makes it difficult to compare the heights of the proposed new buildings in the immediate vicinity of the historic buildings.
- (3) The street names.

↓

(4) All proposed new buildings on the nearby and surrounding blocks – particularly all the proposed new buildings north of the historic buildings should be shown – including the heights of each of them.

- The height differences between the historic buildings and the proposed new buildings are extreme. Please list the heights of each historic building on TI and YBI and compare them to the heights of all proposed new buildings on TI and YBI.

- It appears that Buildings 2 and 3 will be completely hidden from all vantage points off the island. Please provide visual simulations showing these views.

- It appears that Building 1 will be dwarfed and overwhelmed by the buildings surrounding it, including the tallest building proposed on TI, and when viewing Building 1 it will be with the backdrop of the tallest buildings on the Island. Please provide visual simulations showing these views from Telegraph Hill and along the NE Waterfront at night and day. What color will the proposed new buildings be?

- The determination of the DEIR that new buildings in the vicinity of Buildings 1, 2 and 3 would not impair the significance of these historical resources is a subjective judgment regarding the relationship of the small scale historic buildings to the adjacent high rise towers – between Buildings 1 and 2 are two towers of 450 feet and 240 feet, and immediately to the north of Buildings 1, 2 and 3 are the tallest buildings on TI, one proposed at 650 feet.

- Please include in the DEIR an objective visual presentation of the transitions between the proposed new buildings and the small scale historic buildings. What materials and colors are anticipated for the new construction?

- Please include in the DEIR an impartial discussion of how the proposed new buildings would comply with each of the following objectives from the San Francisco General Plan:

*“Promote harmony in the visual relationships and transitions between new and older buildings”* [General Plan Objective 3, Policy 3.1]

*Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.* [General Plan Objective 3, Policy 3.4]

*Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.* [General Plan Objective 3, Policy 3.6]

*Design new buildings to respect the character of older development nearby.* [General Plan Objective 12, Policy 12.3]

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- Include a discussion of how the Proposed Project would “promote harmony in the visual relationships and transitions” between the proposed new buildings and the historic building on TI, including Buildings 1, 2 and 3.
- Include a discussion of how the Proposed Project would relate the height of the new buildings to the height and character of the historic building on TI, including Buildings 1, 2 and 3.
- Include a discussion of how the design of the proposed new buildings would respect the scale and character of the nearby historic building on TI, including Buildings 1, 2 and 3.
- Based on the objectives listed above, discuss the Proposed Project could impair the significance of the National Register buildings on TI as visual and aesthetic resources?
- Please discuss how the construction of two new towers between Buildings 1 and 2 (of 450 feet and 240 feet) and a 650 foot high rise immediately north of these low rise historic buildings would be consistent with any of the General Plan policies listed above.
- Please include a detailed objective discussion of how the new construction described in the DEIR could alter the integrity of the setting, feeling and association of Buildings 1, 2 and 3.
- We agree with the statement in the DEIR that “*the new buildings would alter the existing visual, urban, and architectural context of Buildings 1, 2 and 3.*” However, we completely disagree with the DEIR’s conclusion that this is not an impact because: “*the historic character of this surrounding context has already been altered with the Navy’s occupation of the CCIE site, and later with the Navy’s own demolition and new construction.*” Alterations by the Navy were small in scale and did not alter the visual and architectural context of the National Register buildings to a significant degree. The proposed new construction will destroy all remaining visual and architectural context. Please discuss this issue further in the DEIR.

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**Impact CP-12:** The DEIR finds that new construction within and adjacent to the Senior Officers’ Quarters Historic District on YBI would not have a significant impact on these historic resources because TIDA will review all proposed work to make sure the new construction complies with the Secretary’s Standards.

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- Please describe in detail and illustrate graphically exactly what new construction is proposed within the Senior Officers’ Quarters Historic District and where it would be located in relation to the buildings in the district. Please include maps and plans depicting the proposed additions.
- Include the proposed height of any such new construction or additions within the Senior Officers’ Quarters Historic District. Compare the height of proposed new construction or additions to the heights of the buildings within the historic district.
- Please describe in detail exactly what new construction is proposed *adjacent* to the Senior Officers’ Quarters Historic District, including its height and design.

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- Why is it necessary to build a parking lot adjacent to the historic district (per statement in DEIR)? Where would a new “fire station” be located?
- In lieu of relying on the TIDA board to ensure that the historic district will be protected from inappropriate, out of scale development, please discuss other, more effective ways to avoid or mitigate potentially significant impacts on these historic resources, including requiring a later project specific EIR for each project that proposes to alter historic district properties or add new construction within the historic district, and requiring review by the City’s Historic Preservation Commission of each such project. As stated previously in these comments, additional project-specific environmental review, together with public review by an expert body is the only way potentially significant impacts could be avoided or adequately mitigated.
- The DEIR states that the historic Nimitz House and Senior Officers’ Quarters will be “adaptively reused.”
- What uses are being programmed for the Nimitz House? For the other Senior Officers’ Quarters? For the Torpedo Assembly building? Discuss how each of these proposed uses would impact the significance of these historic resources?
- What standard will be used for alterations to these historic resources: preservation, rehabilitation or restoration?

The term “adaptive reuse” is vague and insufficient to determine if there will be significant impacts on these historic resources under CEQA/NEPA without later project specific review under CEQA.

**Impact CP-13:** Whether the Proposed Project could contribute cumulatively to impacts on historic resources on YBI when considered with nearby projects depends on how the resources within the Senior Officers’ Quarters Historic District are treated. Unless each proposed project on YBI is considered by a separate project specific EIR (see discussion under Impact CP-12 above), the impacts of the Proposed Project on this historic district could be cumulatively significant when considered together with those of the Bay Bridge East Span Project and YBI Ramps.

Further, given that the DEIR repeatedly says that: *“it is not possible to foresee the ultimate impact from the current concept-level design”* we do not believe the DEIR can possibly determine with any certainty what the cumulative impacts of the Proposed Project will be.

### **Parking and Transportation**

On page IV.E.33 of the DEIR, footnote 11 states that the 2006 *Transportation Plan* was an exhibit to the 2006 Redevelopment Plan and Term Sheet that was endorsed by the Board of Supervisors. The footnote further reveals that the current Development Plan does not include some of the improvements listed in the 2006 *Transportation Plan* because *“full funding for these improvements has not been identified.”* Given the very significant traffic impacts that are

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identified in the DEIR and the lack of full funding to implement the transit improvements, this raises many questions about the elements of the Redevelopment Plan that contribute to increased traffic impacts.

- According to the DEIR, the following transportation improvements and services are included as a part of the proposed Redevelopment Plan: Construction of the Ferry Terminal and Transit Hub improvements and funds for the lease of one ferry vessel (providing service at 50 minute intervals and operating only between 5 AM and 9 PM); the continued operation of MUNI's existing line 108-Treasure Island to the Transbay Terminal at existing service levels (one line); and the initiation of a new bus service to downtown Oakland (one line) to be operated by AC Transit.

**Please respond to the following questions/comments:**

- Please describe exactly which transportation improvements and services were included in the 2006 *Transportation Plan*.
- Please compare each improvement recommended in the 2006 *Transportation Plan* to those included in the Proposed Project analyzed by this DEIR.
- Which improvements from the 2006 *Transportation Plan* been eliminated from the Proposed Project because “full funding” is not available?
- Please compare the levels of ferry and bus service recommended in the 2006 *Transportation Plan* to those included in the Proposed Project analyzed by this DEIR.
- How many ferries were included in the 2006 *Transportation Plan* and what was the frequency of service? How many ferries are included in the Redevelopment Plan analyzed by this DEIR and what is the frequency of service?
- What was the level of Muni service to operate between TI and San Francisco under the 2006 *Transportation Plan*? How is this different from what is included in the Proposed Project analyzed by this DEIR?
- Exactly where is the “full funding” necessary to implement the improvements and service levels recommended in the 2006 *Transportation Plan* supposed to come from?
- How will any additional MUNI or ferry service be paid for? To what extent will the taxpayers have to pay for the existing or any increase in MUNI service, AC Transit service, and ferry service to TI/YBI under the currently proposed plan?
- As to total parking spaces proposed, we note that the number of parking places has increased significantly from the number included in the 2006 Redevelopment Plan. Comparing the 2006 Redevelopment Plan to the Plan being analyzed in the DEIR, there has been a 26% increase in the number of off-street parking places and a 40% increase in the number of on-street parking

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places for a net increase of 2,888 parking spaces on the island. Please explain how and why this increase occurred and how such an increase affects traffic impacts.

- How many parking places were included in the 1996 Draft Reuse Plan that was analyzed in the 2003 EIS?

- Given the significant traffic impacts that will result from the implementation of the Proposed Project, please explain why “regional-serving” retail and entertainment uses are being proposed?

- How much traffic would be generated by these regional-serving retail uses?

- As to the proposed 25-40 acre regional sports complex with baseball diamonds, soccer fields and other sports facilities, how many people/private automobiles will the sports events attract?

- Given the significant transportation impacts that the Proposed Project will have on the regional transportation system, have comments from the US Department of Transportation and CalTrans been requested and received?

- Why is the Clipper Cove Marina project not analyzed in the DEIR for its cumulative impacts on traffic? This project represents a 400% increase in the size of the Marina and includes the addition of 246 parking spaces (plus 94 temporary parking spaces), which could have a substantial additional impact on traffic that not considered in this DIER. See the attached Site Plan for the Clipper Cove Marina from the 2005 FEIR, which is attached as **Exhibit B**. It is irrelevant that the Marina project was analyzed in a 2005 FEIR. Not only was the Treasure Island development plan in 2005 a different and smaller project, but also traffic impacts of the Marina Cove project should have been cumulatively analyzed in this DEIR as a part of Proposed Project in this EIR.

- Will phasing of the development be limited until transportation infrastructure can be financed and built? Why isn't this a required Mitigation Measure for the Significant Traffic Impacts identified in the DEIR?

- What mitigation measures were required in the 2003 EIS and subsequent ROD to alleviate traffic impacts for a much smaller Reuse Plan?

- What were the peak AM and PM conditions assumed in the 1996 Reuse Plan and in the 2003 EIS?

- What are the are peak AM and PM conditions assumed in the DEIR?

- Why isn't the following Mitigation Measure recommended in the DEIR: “If it is determined that traffic from the Redevelopment Area is constraining the capacity of the SFOBB, either more aggressive transit improvements must be implemented or additional development should be delayed until such improvements are implemented.” Please explain why this is not a Mitigation Measure.

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• Please explain the disturbing statement in the Transportation Section of the DEIR which states as follows: *“Because the actual phasing of development would be market-driven and is unknown, it was determined that comparing the Proposed Project at full build out against two comparison points would best capture the full range of transportation impacts of the Proposed Project.”*

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### **Biological Resources**

As stated in the DEIR, the San Francisco Bay-Delta is the second largest estuary in the United States and supports numerous aquatic habitats and biological communities. San Francisco Bay is *an important wintering and stop-over site for the Pacific Flyway* for more than 300,000 wintering waterfowl. Further, the Project site is right in the path of what the DEIR describes as *“significant foraging habitats for at least 500,000 spring migrating shorebirds”*

• What evidence is there that the mitigation measures proposed to “minimize” bird strikes will in actually reduce this impact to “less than significant” given the undisputed facts that the Project is a prominent cluster of 19 high-rise towers at the center of the San Francisco Bay in the path of over 500,000 spring migrating shorebirds and more than 300,000 wintering waterfowl?

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• Please provide proof that the measures listed for “minimizing” bird strikes have been successfully used for similar clusters of high-rise buildings in the middle of a similar bay environment in the path of over 500,000 spring migrating shorebirds and more than 300,000 wintering waterfowl. Please list specific examples.

• How can the DEIR conclude that “minimizing” the impacts to birds - based on TIDA’s review of some future yet-to-be-designed buildings -- would result in a “less than significant” impact to birds?

• The mitigation measure (M-BI-4a) states that in the future *“[b]uilding developers are encouraged to coordinate with TIDA early in the design process regarding design features intended to minimize bird strikes.”* What expertise does TIDA have with regard to birds and bird strikes?

• What comments have been received from the Audubon California?

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### **Shadow Impacts**

The DEIR discloses that: *“shadows from the Proposed Project would reach both existing and proposed parks, open spaces, and recreation areas on TI and YBI and could substantially affect their usability.”*

According to the DEIR, shadows from the Proposed Project would impact the existing open spaces and recreation areas in the Job Corps campus, a federally owned property. It also concludes that shadows from the Proposed Project would impact 16 of the 19 parks and open

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spaces proposed as a part of the project, as well the proposed 7 individual neighborhood parks (to be called collectively the Cityside Neighborhood Park). The DEIR then goes through the approximately 27 total areas of parks and open spaces one by one and concludes that shadows on any individual park or open space would not be significant.

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**Please respond to each the following questions/comments:**

- Even though the DEIR concludes that the shadows cast by the Proposed Project on the open space and recreational areas, including those within the federal Jobs Corps area, would not be *individually* significant, how can the DEIR conclude that shadows from the Proposed Project on all but 3 of the approximately 27 parks/open space areas on TI and YBI, when considered *cumulatively*, would not be a significant impact?
- The Proposed Project would create a brand new island suburb. The DEIR states that the existing buildings do not cast shadows on the existing parks and open spaces. Please explain why the proposed new buildings cannot be located and designed so that they will not cast shadow on substantially all of the parks and open spaces on TI?

**Noise and Light Pollution**

The noise impacts are not adequately addressed or studied in the DEIR, as there appears to be no analysis at all of potential noise level increases as measured from locations along the NE Embarcadero and on Telegraph Hill. Based on the experience of our members, we know that when music events are held on TI, the noise levels reaching Telegraph Hill are significant. Thus, it is certain that the impacts of noise pollution from construction and other activities proposed on TI/YBI could cause significant noise and light pollution impacts at locations on the mainland. Construction noise over a 30-year period would definitely significantly impact the residents and visitors to these and other mainland locations.

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- In addition to noise generated by construction activities over a 30-year period, what other noise generating activities are proposed?

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- Quantify the noise levels and light pollution increases that would be caused from the proposed Sports Complex.

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- Please analyze all potential noise level increases to locations along the NE Embarcadero and on Telegraph Hill.

- Please analyze all potential light pollution increases to locations along the NE Embarcadero and on Telegraph Hill.

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**Mitigation Measures**

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The DEIR states: “*all mitigation measures proposed in the 2005 [F]EIR applicable to the Proposed Project that are not expressly restated or restated as being modified in this EIR are no longer applicable.*” [Page I-5] Please respond to the following comments and questions:

- What were the mitigation measures proposed and adopted in the 2005 FEIR? Please list each proposed mitigation measure in relation to the significant impacts it addressed – transportation, aesthetics, historic resources, etc.
- What mitigation measures recommended in the 2005 FEIR are **not** recommended in this DEIR and explain why each such mitigation measure was excluded/not recommended in this DEIR.
- What is the difference in the significant impacts identified in the 2005 FEIR from those identified in this DEIR?

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The DEIR confirms in numerous places throughout the document, particularly in relation to historic buildings and resources, that “*the specific design of these new features has not been developed enough at this time to assess their impact*” or that “*it is not possible to foresee the ultimate impact from the current concept-level design.*”

**Please address the following comments and questions:**

- Given this level of uncertainty and absence of accurate, stable and finite project descriptions, particularly as to historic resources and their contribution features, justify the adequacy of the DEIR’s recommended mitigation measures that rely on a future review of an unknown project by a non-expert body?
- Why does the DEIR not recommend mitigation measures requiring project-specific EIRs for each individual project that proposes to alter a historic property?
- Why does the DEIR not recommend mitigation measures requiring project-specific review of each individual project that proposes to alter a historic property by the City’s Historic Preservation Commission?
- Why isn’t a future project-specific environmental review and review by an expert body within a public review process the best way to adequately mitigate these yet unknown potentially significant impacts?

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**Inadequate Range of Alternatives**

The DEIR considers three (3) alternatives to the Proposed Project. In addition to the “no project alternative,” it includes an analysis of a “reduced development alternative” and a “no ferry service alternative.” The DEIR is inadequate because it fails to consider a “Minimum-Impact Alternative” or and “Environmentally Superior Alternative” that reduces or avoids the significant traffic impacts of the Proposed Project.

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As it is clear from the DEIR, neither the reduced development alternative nor no ferry service alternative would reduce the significant environmental impacts of the project. In fact, they increase the significant traffic impacts.

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As described in the DEIR, the reduced development alternative “reduces” only the number of residential units (from 8,000 units to 6,000 units). The DEIR explains that this would result in a 25% reduction in the amount of the “neighborhood-serving retail uses” and a 25% increase in “regional serving retail uses.”

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The “reduced development alternative” would not only necessitate more trips off-island by the residents, but the 25% increase in “regional serving retail uses” would attract more non-residents to the island. Logically, this alternative would result in even greater impacts related to private automobile use, as would the “no ferry service alternative.”

Without the inclusion of a “Minimum-Impact Alternative” or “Environmentally Superior Alternative” the DEIR is inadequate under CEQA because it fails to inform the decision makers and public citizens of a potentially feasible alternative that would reduce or avoid the significant traffic and air quality impacts of the Proposed Project identified in this DEIR. Without a “Minimum-Impact Alternative,” the decision makers and the public cannot make an informed decision.

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**Please respond to each the following requests/questions/comments:**

- Please explain exactly why the “reduced development alternative” included in the DEIR requires a 25% reduction in neighborhood serving retail uses and a 25% increase in regional serving retail uses. How many additional private automobile trips will this generate? Please provide the source for your answers to these questions.

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- Please include a “Minimum-Impact Alternative” or “Environmentally Superior Alternative” instead of the “Reduced Development Alternative.” The Minimum-Impact Alternative should call for less use of the private automobile and higher goals for energy efficiency, carbon neutrality, water quality and resource conservation. The Minimum-Impact Alternative would include all of the characteristics listed by Mr. Jared Blumenfeld, Director, SF Environment, to Mr. Bill Wycko, dated February 25, 2008, which letter is attached hereto as **Exhibit C**, and by this reference incorporated herein (the “Blumenfeld Letter”).

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- Please include the Blumenfeld Letter in its entirety as an attachment to this comment letter to be published in the Comments & Responses document to this DEIR.

39.85

- Please compare and explain why significant parts of the Blumenfeld Letter were deleted from the letter of the same date, which is published in the DEIR in Volume 3, Appendix C.

- Provide a comparative analysis of all alternatives, including the “Minimum-Impact Alternative.” For each alternative and variant, please assess, presented in a manner that facilitates comparisons between and among the alternatives, the following:

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<ul style="list-style-type: none"> <li>• The total quantity of greenhouse gases and other criteria pollutants generated per year;</li> <li>• Vehicle miles traveled;</li> <li>• Impacts on the Tuolumne Watershed;</li> <li>• Walking time radii to transit stops for YBI as well as TI;</li> <li>• Impacts on YBI's biodiversity for various levels of management of harmful species;</li> <li>• Transportation impacts on the entire region, including Bridge-related backups on I-80 in the East Bay and on San Francisco streets and freeways;</li> <li>• Off-peak analysis of transportation impacts; and</li> <li>• Respective carbon footprints, including impacts associated with demolition/deconstruction, disposal and re-building.</li> </ul>		39.86, cont'd
<ul style="list-style-type: none"> <li>• Is there a scenario with enough density for the residents to meet their basic retail and service needs on the islands with a maximum of transit options and a minimum of cars? Please discuss in detail.</li> </ul>		39.87
<ul style="list-style-type: none"> <li>• How can the DEIR conclude that the "No Ferry" alternative is the environmentally superior alternative -- with fewer transit options and with a 1:1 residential parking ratio?</li> </ul>		39.88
<ul style="list-style-type: none"> <li>• On what empirical basis did TIDA and the City and County of San Francisco conclude [Page VII.76] that a "Reduced Parking Alternative" would <i>"exacerbate significant traffic impacts and would be economically infeasible"</i>?</li> <li>• Given all of the significant auto-related negative impacts of this Proposed Project identified in this DEIR that cannot be mitigated, how did the City and TIDA determine not to consider a "Reduced Parking Alternative" in this DEIR?</li> <li>• Upon what expert evidence did the DEIR conclude that parking levels cannot be reduced because "the fees to be collected from commercial parking in the Proposed Project are necessary to fund transit improvements?"</li> <li>• Please discuss the basis for the following statements in the DEIR:  <i>"Removing or reducing this source of revenue planned to be used to support construction of the ferry quay and subsidize the on-island shuttles and off-island ferry and bus transit service would make the proposed level of transit service economically infeasible."</i> </li> </ul>		39.89

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*"...if reductions in funding based on reduced commercial parking were to lead to reductions in transit service, some residents may shift to automobile use, making more severe the significant traffic and air quality impacts identified for the Proposed Project."*

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- Why is the Proposed Project financially structured so that all of the proposed transit improvements (the only possible way to lessen the regionally significant transportation impacts from the Redevelopment Project) are to be paid for from parking fees on Treasure Island?
- Please analyze how many cars must come onto the Island and park each day/week/year in order to pay for all of the transit improvements and services identified in the 2006 *Transportation Plan* and in the 2006 *Sustainability Plan*.
- How can it be that the only way to reduce automobile use (and the resulting significant transportation and air quality impacts) is to increase parking on Treasure Island in order to generate funds to pay for the transit improvements in order to reduce the number of cars coming onto the Island to park? How is this financial scheme sustainable? Will the taxpayers of the region ultimately end up with this bill?

### Conclusion

For the reasons set forth above we believe the DEIR is seriously flawed and deficient.

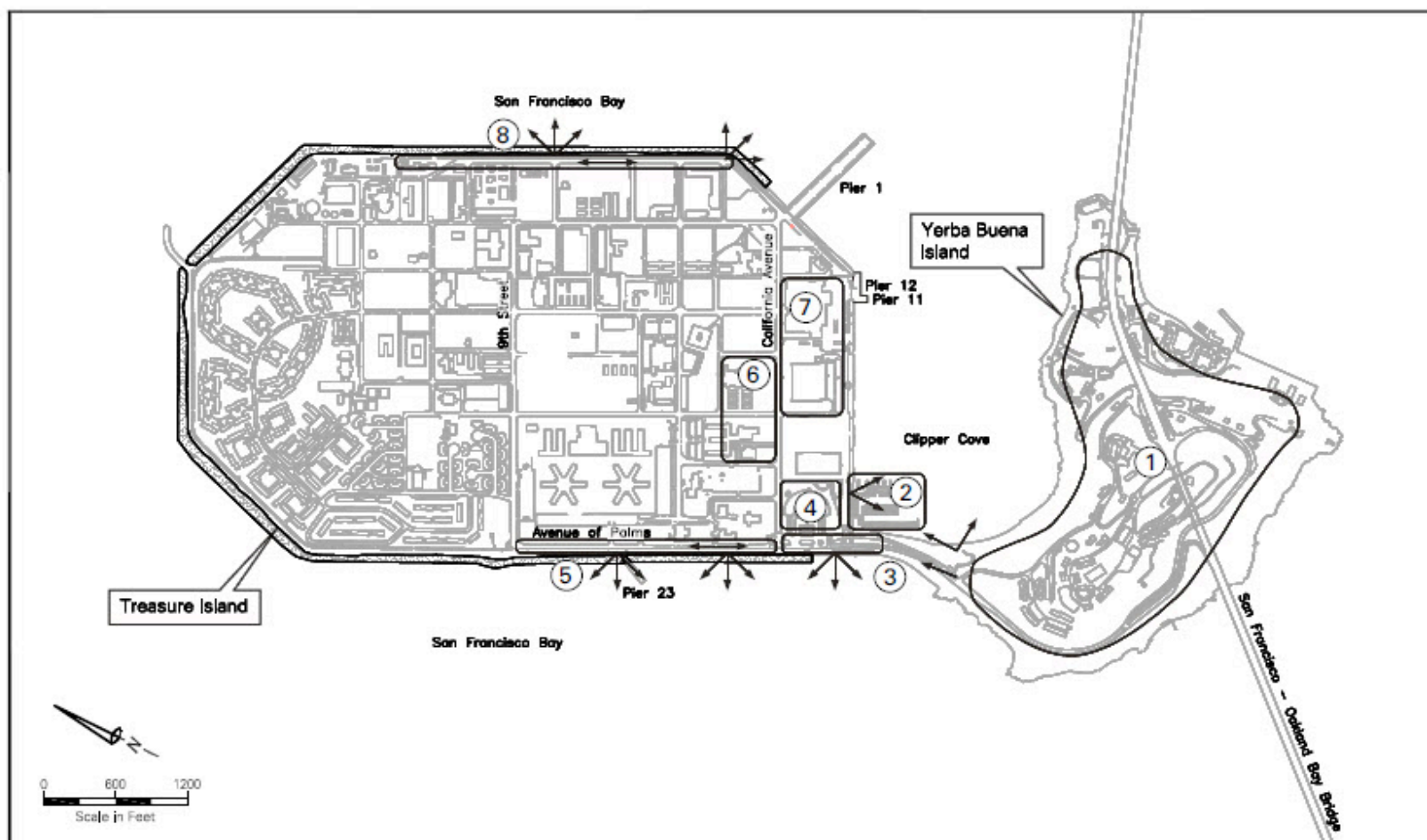
Sincerely,



Vedica Puri  
 President

cc: Advisory Council on Historic Preservation  
 National Trust for Historic Preservation  
 Bay Conservation & Development Commission  
 San Francisco Board of Supervisors  
 John Rahaim, Director, Planning Department





Situated in San Francisco Bay, Naval Station Treasure Island provides panoramic views.

Source: U.S. Navy, 2003

Prominent Visual Features:

- |                                       |                                      |
|---------------------------------------|--------------------------------------|
| ① Wooded Slopes of Yerba Buena Island | ⑤ Avenue of Palms                    |
| ② Clipper Cove Marinas                | ⑥ Conference Center Complex          |
| ③ Entry to Treasure Island            | ⑦ Hangar Buildings                   |
| ④ Museum                              | ⑧ East Side Frontage Road and Shores |

← Major Views

***Prominent Visual Features  
and Major Views***

Naval Station Treasure Island, California

Transfer and Reuse of Naval Station Treasure Island

**Figure 3-2**

8/07/03 via \_128066675 Treasure Island/FER aug03/3-2 Major Views.odt

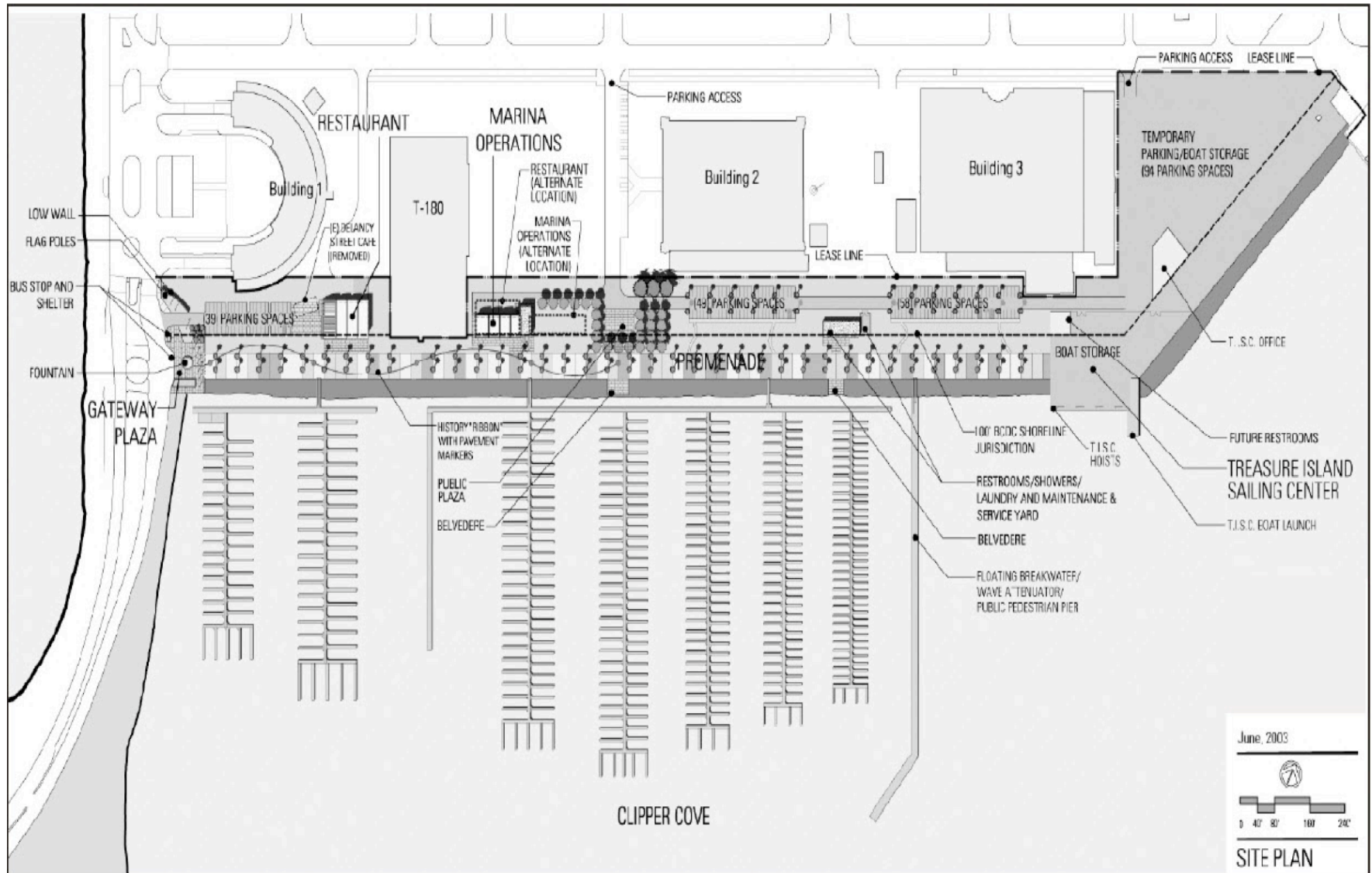


EXHIBIT B



**SF Environment**

**Our home. Our city. Our planet.**

**Letter 39**



GAVIN NEWSOM  
Mayor

JARED BLUMENFELD  
Director

February 25, 2008

Mr. Bill Wycko, Acting Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco CA 94103-2479

Re: Case 2007.0903E – TI/YBI EIR Scoping Comments

Dear Mr. Wycko:

On behalf of the Department of the Environment, I am pleased to be able to submit comments to you relating to Environmental Impact Report (EIR) Scoping for the redevelopment of Treasure Island and Yerba Buena Island (TI/YBI). This is a critical project that will advance the sustainability of the Islands and has the potential to establish an international model for ecological urban development. This Department has been involved in the planning of this project for more than five years.

The TI/YBI Notice of Preparation (NOP) states that the Planning Department will prepare four alternatives, one of which would be an analysis of a “less intensive development program.” However, less intensive development does not necessarily mean a reduction in environmental impacts. “Less intensive” could mean that there are not enough residents to support neighborhood-serving commercial uses, necessitating more trips off-island; and without the patronage needed to support frequent and reasonably priced transit, the impacts related to private automobile use could be worse. If the intent is to create an alternative that reduces or avoids the significant impacts of the Proposed Project, then we would recommend that the EIR include a “Minimum-Impact Alternative” instead of a “less intensive development” alternative.

The Minimum-Impact Alternative would call for less use of the private automobile and higher goals for energy efficiency, carbon neutrality, water-quality and resource conservation. This alternative would include the following characteristics:

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**Transportation**

- A reduction in the number of parking spaces, including reducing retail and commercial parking;
- Lowest feasible targets for vehicle miles traveled;
- Targets for minimizing automobile ownership, not just car use;
- Lockers at the transit hub so that visitors would be able to leave packages, extra shoes etc., there instead of in the trunks of cars – allowing fuller enjoyment of the variety of activities that the islands have to offer;
- Visitor draws that encourage ferry use, and marketing that encourages full ferries in both directions, to help assure economic viability of the ferry service;
- Weather-protected space for bikes on the ferries;
- Bus service to, from and on the islands that minimizes the number of transfers required;
- Dedicated bus access on the bridge; and
- Fully prepaid public transit passes for residents and employees, and transit fares bundled into the price of hotel rooms and any special events tickets

**Resource Conservation**

- Building standards to assure that high-rise buildings will be durable in an earthquake, avoiding the carbon emissions and waste of resources that would result from having to deconstruct, haul and re-build; performance standards that specify what is expected to happen to the buildings in quakes of various magnitudes; and
- On-site use of any clean excavation spoils

**Energy Conservation and Carbon Neutrality (non-transportation)**

- Remediation process to be as carbon neutral as possible, including hauling by rail instead of truck when long-distance hauling is required;
- Higher renewable energy generation targets, including on-island generation;
- Higher green building standards – higher LEED and Green Point Rated levels; and
- Maximum use of distributed energy systems

**Water Conservation and Water Quality**

- Higher standards for storm water discharges: higher level of treatment, greater detention times; more storage and reuse of roof runoff;
- Accommodation of flows greater than the 5-year storm event;
- Minimum of dredging;
- Tertiary-level treatment of all sewage;
- Maximum use of recycled water;
- Minimum use of Hetch-Hetchy water;
- Gray water systems in all residential buildings and hotels; and
- Climate-appropriate landscaping, requiring minimal supplemental water.

**Biology**

- Biodiversity targets that protect and restore ecosystems, not just sensitive species; and
- Highest Green Point Rated points (or equivalent) for Bay-Friendly landscaping – for water conservation, Bay water quality, and habitat value.

**Comparative Analysis of all alternatives**

For each alternative and variant, the EIR should assess, presented in a manner that facilitates comparisons between and among the alternatives, the following:

- The total quantity of greenhouse gases and other criteria pollutants generated per year;
- Vehicle miles traveled;
- Impacts on the Tuolumne Watershed;
- Walking time radii to transit stops for YBI as well as TI;
- Building durability: the EIR should undertake a comparative analysis of durable and non-durable high-rise buildings, assessing all environmental impacts, including the respective carbon footprints. The analysis should include all impacts related to seismic activity and any associated demolition/deconstruction, disposal and re-building. The EIR should also describe the performance standards that will apply to the proposed buildings in the various alternatives;
- Impacts on YBI's biodiversity for various levels of management of harmful species;
- Transportation impacts on the entire region, including bridge-related backups on I-80 in the East Bay and on San Francisco streets and freeways; and
- Off-peak analysis of transportation impacts.

39.91

Thank you for considering these comments. Please feel free to contact Jennifer Kass at 415-355-3762 for clarification of any of these suggestions.

Sincerely,



Jared Blumenfeld



# PAUL T. CURRIER

Letter 40

Candidate for Mayor of San Francisco 2011  
41 Jones Street, Suite 609  
San Francisco, California 94102  
415.571.1583  
[paulcurrier@me.com](mailto:paulcurrier@me.com)

RECEIVED

Friday, September 10, 2010

SEP 10 2010

Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK

Re: Written Opposition to any acceptance of the Draft EIR Published July 12th, 2010, and presented for public comment in Room 250 of City Hall on August 12th, 2010, titled: TREASURE ISLAND / YERBA BUENA ISLAND REDEVELOPMENT PROJECT

There is a great deal of clear graft and corruption here in San Francisco, which must come to a halt forward. We might as well start the arrest of this specific project, which contains all the elements of a coordinated pattern of official misconduct, fraud, and collusion, which appears on face to violate the Racketeering Laws of the People of the United States of America.

40.1

This project which I will refer to as "TI/YBI" forward, as presented in this Draft EIR is nothing more than a transparent attempt to steal approximately four hundred and fifty acres of California State Land, which is situated within the boundaries of the City and County of San Francisco, and commonly known as Treasure Island and Yerba Buena Island, and referred to by the City and County of San Francisco Planning Department as Case No. 2007-0903E.

The City Attorney, Mr. Dennis Herrera has failed to uphold his Oath of Office in this matter. Both Deputy City Attorneys John D. Malamut, and Andrea Ruiz-Esquide in their official capacity and who both report to Mr. Herrera, our City Attorney, at no point any of these three paid City and County Officials address the facts, and are now negligent in their dispatch of their official duties. All these City Lawyers know that according to both the Federal Law that governs the use, seizure of and return of State Wetlands (which I believe was enacted in the year 1850) by the Federal Government, and the Federal Law that governs the seizure, use and return of State Property from any State for use in National Emergency, that all of Treasure Island and Yerba Buena Islands, while these State Lands may exist within the boundaries of the City and County of San Francisco, and were confiscated by the US Navy and the Federal Government for use in World War II, that the US Government must clean all this land of environmental hazard and return the property to the People of the State of California.

40.2

As such, and spelled out in my paragraph that immediately precedes my statement now, the City and County of San Francisco can not seize State Land, without compensation.



Page Two

Clearly, the work of Congresswoman Nancy Pelosi and Mayor Gavin Newsom does not address the fact that the US Navy does not have clear title to these 450 acres of California State land.

40.2,  
cont'd

Clearly we have not heard from any of the members of the current Board of Supervisors on this topic, and whether the City and County should just seize this land from the State of California for the use of local government as we see fit.

Given the amount of graft and corruption that I believe took place between past Mayor Willy Brown and many LLC Entities in the build out of the Mission Bay Neighborhood and the South of Market Neighborhoods, which are also located in San Francisco Supervisorial District 6, I challenge this whole project. The whole project looks like an clear attempt to shunt the ownership and development rights of what may become a "Manhattan Island" in the middle of San Francisco Bay into the hands of campaign contributors by wealthy and powerful local Democratic Party Members, which appears to be for corrupt purpose and the further purpose of self dealing, in collusion with others.

I request a San Francisco Citizens Grand Jury convene now, and further, I request this Grand Jury be empowered by the Board of Supervisors to investigate this whole project independently.

I believe that the State of California should be allowed to financially participate in any future development of Treasure Island and Yerba Buena Island. This whole land area may be better situated for a State Park or a revenue generating source of funds to pay for our total California State Park System, by including the State in the Development demand that the California Coastal Commission be included in any and all decisions regarding the transformation of TI/YBI into first a Neighborhood of a hand full of 60 story high-rises, and then into a neighborhood of hundreds of new Sky Scrapers in the 100 to 250 Story size, that will occur over time, given the money at hand now.

40.3

\$100 Million of Lennar Money to buy master development rights of what currently holds a value of \$6 to \$20 Billion Dollars is criminal abuse of public office.

Paul Talcott Currier

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SEP 10 2010

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
RECEPTION DESK



Letter 41 San Francisco Bicycle Coalition  
833 Market Street, 10th Floor  
San Francisco, CA 94103  
T 415.431.BIKE  
F 415.431.2468  
sfbike.org

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SEP 14 2010

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

September 10, 2010

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**RE: Comments on Draft Environmental Impact Report for the Treasure Island and Yerba Buena Island Redevelopment Project**

On behalf of the 11,000 members of the San Francisco Bicycle Coalition (SFBC), I hereby submit our comments on the Draft Environmental Impact Report (DEIR) prepared for the Treasure Island and Yerba Buena Island Redevelopment Project. We note the following deficiencies in the DEIR as circulated on July 12, 2010:

**1. Project Description fails to include integral elements of the project:** The Project Description and numerous other areas of the DEIR present overall goals and policies regarding bicycle and pedestrian facilities that are in direct conflict with what is actually proposed for the project area, namely continuous Class I pathways encircling both islands. The DEIR must describe and analyze complete and continuous walkways fully encircling the islands, in addition to the trails and pathways currently captured in the Project Description.

41.1

The Bay Trail Project's comment letter for the *Design for Development Document* recommended a scenic overlook on the west side of Yerba Buena Island facing San Francisco just prior to the Highway 80 west onramp from Treasure Island Road, suggesting that such an overlook could also function to preserve right-of-way for bike/pedestrian ramp connection to the future path on the West Span of the Bay Bridge. Please include discussion of such an overlook in the FEIR, and include complete Class I multiuse paths to this location from both sides of the Island.

41.2



**2. Analyzed alternatives conflict with Bay Trail Plan and policies:** The DEIR's Plans and Policies section references the Bay Trail Plan, stating that the proposed project includes extensions to the Bay Trail "and was evaluated against Bay Trail Plan policies for...expanding proposed trail links, and no conflicts were identified." The Bay Trail Plan, policies, and staff commentary over the past 8 years have continually stated that a Class I multi-use pathway is needed to connect the East Span of the Bay Bridge to Treasure Island. A contra-flow bike lane on a steep narrow winding road (Macalla) is in conflict with Bay Trail Plans and policies, to wit:

41.3

*Bay Trail Plan Policy #12:* Provide access wherever feasible to the greatest range of trail users on each segment: It is the goal of the Bay Trail Plan that the full range of trail users be able to enjoy the trail, regardless of physical limitations due to age or disability.

*Bay Trail Plan Policy #13:* Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users: The possibility of conflict between automobiles and trail users is a serious safety concern.

A 6' wide bike lane, traveling in the opposite direction of traffic, up a very steep grade, with blind corners and no physical separation is a serious safety hazard and fails to meet the goals of the Bay Trail Project or the stated goals of the Treasure/Yerba Buena Island Development Plan. It is a commonsense and reasonably-anticipated phenomenon that drivers on a winding road with generous shoulders will cross the white line into the shoulder area in order to reduce the radius of the curve, a very significant impact to bicycle circulation.

41.4

No physical separation is proposed on this eleven foot traffic lane that is the main private vehicle, MUNI, AC Transit, and delivery truck access to 8,000 new residences, 16,000 new inhabitants, hotels, restaurants, entertainment and other new uses. Under the currently proposed scenario, families and inexperienced recreational riders will inevitably be confronted with a car, truck or bus drifting into their lane at 35+ mph. Such a facility will not meet the goals of the Transportation Demand Management Plan, San Francisco's "Better Streets" Plan, the Bay Trail Plan, or the Transportation Objectives Shared by TIDA and TICD.

The Macalla Road cross-section shown in DEIR Figure IV.E.13 shows a 32' right-of-way with an 11' vehicle lane. Retaining a 5' bike lane in the downhill direction leaves 21' in which to construct a world class bicycle/pedestrian facility that will match the caliber and functional integrity of the two facilities it will connect—the San Francisco-Oakland Bay Bridge and Treasure Island. Given the steepness of this route, design within the 21' ROW for the bike/pedestrian facility must be carefully planned, as many cyclists— young and old— will surely be walking the steepest pitches. During preliminary design discussions with the City and the development team, fire department emergency access

to the bike lane was cited as a reason for the lack of a physical barrier. If additional ROW is needed to achieve enough width for bicycles, pedestrians, and emergency access, retaining walls and other structures must be incorporated. In the FEIR, please provide detailed diagrams depicting how the Class I facility that ABAG has been requesting for the past 8 years will be incorporated on Macalla Road.

41.4,  
cont'd

**3. Transportation analysis fails to recognize significant impacts to pedestrian and bicycle circulation:** The DEIR's discussion of Pedestrian Circulation Improvements within Section IV E: Transportation, states that the pedestrian circulation network "would encourage walking as the primary mode within the Development Plan Area." However, this is followed with "Due to topography constraints, sidewalks on Yerba Buena Island would be limited to only one side of the street in many cases, and on some streets where there are no pedestrian destinations, sidewalks are not proposed."

41.5

*Treasure Island Road*

Page IV.E.39 describes the proposed bicycle facilities on Treasure Island Road as a "...one way counterclockwise Class II bicycle lane loop around Treasure Island Road, Hillcrest Road, and Macalla Road, with connections to the new Bay Bridge east span. One exception to the continuous Class II facility loop would be on a short section of Treasure Island Road, where the westbound on-ramp to the Bay Bridge diverges from Treasure Island Road, which is on an elevated structure. On this section, the Proposed Project calls for a Class III facility, with special colored pavement and frequent in-street stencils and signage to alert bicycles, autos, and buses that they must share the roadway at this location (see Figure IV.E.15)."

41.6

Under this proposal, cyclists are being asked to cross a freeway on-ramp, and pedestrians are simply not accommodated. Transportation planners and engineers as well as bicycle advocates nationwide constantly strive to address the inherent dangers associated with cyclists crossing existing free-right turns and freeway on-ramps. This project proposes crossing a freeway on-ramp as a "bicycle circulation improvement". The FEIR must include a fully separated Class I connection through this area with ROW reserved for future Class I connections to the west span of the Bay Bridge.

*Macalla Road*

See comments above in "2. Analyzed alternatives conflict with Bay Trail Plan and policies".

41.7

**4. Right-of-way classifications are imprecise and contradictory:** Throughout the document, reference is made to "bicycle paths" on Yerba Buena Island. The following

41.8

are Caltrans definitions of bicycle facilities from Section 1001.4 of the *Highway Design Manual*:

The *Streets and Highway Code* Section 890.4 defines a "Bikeway" as a facility that is provided primarily for bicycle travel.

(1) Class I Bikeway (Bike Path). Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.

(2) Class II Bikeway (Bike Lane). Provides a striped lane for one-way bike travel on a street or highway.

(3) Class III Bikeway (Bike Route). Provides for shared use with pedestrian or motor vehicle traffic.

Similarly, California Vehicle Code section 231.5 states:

A "bicycle path" or "bike path" is a Class I bikeway, as defined in subdivision (a) of Section 890.4 of the Streets and Highways Code.

Despite eight years of comment by the SFBC and Bay Trail Project through various public channels regarding the need for such Class I bike paths, none are proposed. Until such time as a Class I path is proposed on Macalla, Treasure Island Road and Hillcrest, please make proper reference to the proposed facilities using the above definitions.

**5. Mitigation Measure M-TR-24 introduces new significant impacts:** The DEIR states:

The adoption of Mitigation Measure M-TR-24 could require the removal of the proposed bicycle lane on Treasure Island Road to accommodate a transit-only lane if congestion on Treasure Island Road adversely affects transit operations. If the proposed bicycle lane is removed, cyclists would continue to have a Class II contra-flow facility connecting Treasure Island and the Bay Bridge, via Macalla Road.

The description of Impact TR-33 states that the removal of the bike lanes on Treasure Island Road "would not create potentially hazardous conditions for bicyclists on the Islands and (the Proposed Project) would provide more bicycle accessibility to the site than currently exists." The impact is deemed "Less than Significant". Class II bicycle lanes and the proposed Class III facility at the freeway on-ramp were already severely substandard proposals. The proposed removal of the Class II bike lane on Treasure Island Road further demonstrates the Project's lack of commitment to non-motorized

41.8,  
cont'd

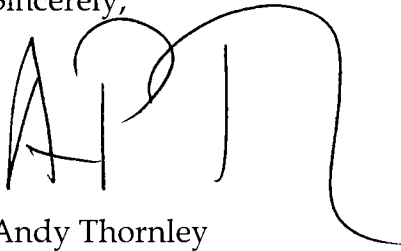
41.9

transportation. Mitigation Measure M-TR-24 should be struck from the DEIR as it will have a significant impact on bicycle circulation on the Islands.

↑ 41.9,  
| cont'd

On these points the SF Bicycle Coalition respectfully finds the Draft EIR of the Treasure Island and Yerba Buena Island Redevelopment project to be inadequate and deficient, and we ask that the DEIR account for these points in a fair estimation of the true impacts of the project.

Sincerely,

A handwritten signature in black ink, appearing to read 'ATM', with a long, sweeping horizontal line extending to the right.

Andy Thornley  
Program Director  
San Francisco Bicycle Coalition



Chris Stockton, Architect

September 14, 2010

RECEIVED

SEP 17 2010

Bill Wycko, Environmental Review Officer  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94104

CITY & COUNTY OF S.F.  
 PLANNING DEPARTMENT  
 M.E.A.

Subject: Treasure Island/Yerba Buena Island Redevelopment Project

Dear Mr. Wycko:

With regard to the Draft-EIR for subject project, item IV.B. Aesthetics, I am stunned that the discussion is so cursory and glib, concluding on page IV.B.30 that, "the proposed project would not have significant cumulative impacts related to Aesthetics." Why has no attempt been made to at least fundamentally discuss the aesthetics of Treasure Island as currently developed verses the aesthetics of the island as proposed? Are the authors of the Draft EIR unwilling to confront this issue? Is the issue too subjective? Too difficult? Too controversial? Or, simply, too insignificant? Is there no alternative to a bunch of massive high-rise buildings?

42.1

Treasure Island today is so low and inconspicuous that it almost disappears into the Bay, and that is its greatest aesthetic tribute. Its flatness is its greatest beauty; its flatness echos the surrounding expanses of Bay water. Its flatness is in perfect contrast to the natural ruggedness of Yerba Buena Island, and the other islands and hills, in every direction, surrounding the Bay. It sinks into the Bay like a great barge at anchor. It is in harmony with its surroundings. To take that great barge and build 19 high-rise towers is aesthetically very significant. To build one tower 45-stories (or more) tall and 205-feet higher than Yerba Buena Island is aesthetically very significant. To even build towers that are only 125-feet to 450-feet or 30-stories tall is aesthetically very significant.

42.2

Treasure Island can be a viable neighborhood without dreadfully inappropriate high-rise buildings such as One Rincon Hill. For example, look at Alameda Island or look at Balboa Island. Neither has high-rises and both flourish.

Sincerely yours,



Chris Stockton

274 Chestnut Street, San Francisco, California 94133  
 (415) 956-7345  
 castockton@gmail.com





# EAST BAY BICYCLE COALITION

P.O. BOX 1736 OAKLAND CALIFORNIA 94604

BERKELEY BIKESTATION 2208 SHATTUCK AVE BERKELEY

September 21, 2010

Mr. Bill Wycko  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**Subject: Draft Environmental Impact Report for the Treasure Island and Yerba Buena Island Redevelopment Project**

Dear Mr. Wycko:

The East Bay Bicycle Coalition is a grassroots, non-profit bicycle advocacy organization representing the interests of over 2,500 bicyclists in Alameda and Contra Costa Counties. We work with organizations like the San Francisco Bicycle Coalition and the Bay Trail Project of the Association of Bay Area Governments to improve conditions for bicycling in the Bay Area. Two of our highest priority projects are completion of the Bay Trail and a bikeway on the San Francisco Bay Bridge connecting Oakland with downtown San Francisco. I realize that the deadline for commenting on the Draft EIR has recently passed, but I would appreciate your consideration of our public input.

The East Bay Bicycle Coalition successfully advocated for a ped/bike pathway on the new East Span of the Bay Bridge and we are currently working with the Metropolitan Transportation Commission, the City of Oakland, and the East Bay Regional Parks District to design and complete pathway connections to the new East Span from West Oakland. We are also working closely with Caltrans to ensure that the new bikeway on the East Span opens as soon as the new bridge opens and has good connections onto Yerba Buena Island and onto a future pathway on the West Span of the Bay Bridge. Many thousands of bicyclists and pedestrians will make sure of new bike/ped connections from Oakland into San Francisco, which will not only make San Francisco a better place to live and work, but will also substantially reduce traffic on your local streets.

As others have commented and we agree, there are serious concerns regarding the proposed contra-flow bike lane on Macalla Road, and the overall lack of bicycle pedestrian facilities connecting the new pathway on the East Span to both Yerba Buena Island and to Treasure

43.1

*to promote bicycling as an everyday means of transportation and recreation*



**Letter 43**

Island. We completely support the proposal for a fully separated, continuous Class I multi-use pathway encircling Yerba Buena Island with connections to Treasure Island and to the future path on the West span of the Bay Bridge.

43.1,  
cont'd

It is estimated that more bicyclists will use a new bikeway on the Bay Bridge than currently use the bikeway on the Golden Gate Bridge, which sees 250 pedestrians/hour and 250 bicyclists/hour during weekday commutes. This estimate is not unexpected since both the City of San Francisco and the City of Oakland rank in the top 15 nationally as the cities with the highest numbers of bicyclists. The Bay Bridge is the only road between these two bike-centric cities.

43.2

Please re-evaluate your plans and the environmental documents for the Yerba Buena Island Redevelopment Project to include safe and inviting bikeways on the Bay Bridge, its connections to the Islands and on the Islands themselves.

Thank you very much for your consideration of our concerns and we look forward to your good work to improve this project for bicyclist and pedestrians.

Sincerely,



Dave Campbell  
Program Director

cc: Maureen Gaffney, ABAG  
Neal Patel, San Francisco Bicycle Coalition

09/13/2010 16:57 4155670432

COPYNET

Letter 44 PAGE 01/02

**copy.net**2404 california street  
san francisco, ca 94115  
tel 415.567.5888 • fax 567.0432**Fax.cover**TO: RICK COOPER / SAN FRANCISCOFROM: NEIL MALLICKFAX: 415-749-2525PO 2012  
FAX: S.F. 94126COMPANY: ENVIRONMENTAL REVIEW  
OFFICE S.F. PLANNING  
DEPARTMENT, 1650 MISSION ST  
SUITE 400 - S.F. CA 94103DATE: 9-13-10NUMBER OF PAGES (INCLUDING COVER PAGE): 1

Hello

THIS IS IN RESPONSE TO "T-1. / YBI REDEVELOPMENT  
PROJECT" (2 VOL) "DRAFT ENVIRONMENTAL IMPACT

REPORT due on SEPT. 10 or Sept. 13, 2010

Thank you for your attention. Will try to send  
a more detailed comment letter at some later date

a. d. n. m. d. m.

09/13/2010 16:57 4155670432

COPYNET

Letter 44 PAGE 02/02

From: Neil Malloch  
 PO 2012, San Francisco  
 CA 94126

COMMENTS ON THE TREASURE ISLAND  
 & YERBA BUENA ISLAND  
 REDEVELOPMENT PROJECT

Refer to: II.24, 26, 51, 75 & IV.A. 20:

- 44.1 Would hope "Main Tower" would truly be a beautiful structure. I can remember when the GGIE's "Tower of the Sun" glowed golden towards the city. The illustrated views in your EIR show the high rise buildings on T.I. colored (if tyhat is the word) in a dreadful grayish-black, appropriate for an oil well, steel mill, or power plant, but not for what will be one of the finest urban settings in the world
- 44.2 The Mews: This, or some nearby street in the SW sector should be brightly lit at least in the early hours of the night, for the restaurants, hotels, stores, cinemas, etc. that had better be there or else everyone on T.I. will head to the city on most nights
- 44.3 NORTH and EAST perimeters of T.I.: This side of the Island provides some excellent views of the Bay towards San Pablo Strait and the beautiful Berkeley Hills. At some future time it might be worth considering building some homes, only along the Perimeter Road, Such homes might also defray future increased expenses of the Project
- 44.4 Refer to: II. 17, 21: Heartily agree with recommendation for a Museum, presumably to focus on Pan Am Clippers, GGIE, the Navy, etc. Possibly also YBI history could be included. Also Covarrubias mural and Great Map of California (formerly in Ferry Building).
- 44.5 Refer to: 1.2, 1.3; II.28,29; IV.C.15: HOMELESS: I recall that on visits to T.I. that housing near homeless residences was marred by vandalism and graffiti. Would hope that perpetrators not be allowed to live on the Island.
- 44.6 Refer to: S.36-S.39: BIRD STRIKES: I believe views from windows should not be interfered with. Some of the mitigations sound extremely restrictive. The EIR does not say how widespread the threat to birds is. Is it worse than in the rest of the city? T.I. occupies only a small portion of the Bay over which the birds fly.
- 44.7 Refer to: IV.B 1 to IV. B, 23 VISUAL IMPACT: Some specific impacts not mentioned include-Telegraph Hill: Views mainly for Union and Calhoun Streets, Alta St, Lombard St. Lombard and Greenwich Streets have largely lost their views as a result of tree growth. Coit Tower (and the Mark Hopkins Hotel on Nob Hill remain important tourist spots for views. On Russian Hill, Lombard, Chestnut and Francisco streets (and the Fort Mason bluffs) are the main view sights. Not mentioned: The new Cruise Line Terminal at Pier 27-23. This is the closest spot in mainland S.F. to T.I., will be open to visitors and residents and produce a fairly close-up view of the Towers. Not mentioned: Main view loss from the city will not be of the Berkeley Hills generally, but of the UC Campus-Campanile & possibly Grizzly Peak.
- 44.8 Other Comments: Except for the windy nothe end, ythe Climate is not worse than the rest of S.F. Air conditioning should not be necessary. The plan for YBI is excellent, with some future modifications to be suggested. There should be a View Tower on YBI or on the

**APPENDIX K: TRANSCRIPT OF DRAFT EIR PUBLIC HEARING**

SAN FRANCISCO PLANNING COMMISSION  
PUBLIC HEARING  
Treasure Island Development Authority

Board of Supervisors Chamber - Room 250  
City Hall, 1 Dr. Carlton B. Goodlett Place  
San Francisco, CA  
Thursday, August 12, 2010  
10:00 p.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
BY: ELISE M. NOCK, SHORTHAND REPORTER

-----  
CLARK REPORTING AND VIDEOCONFERENCING  
2140 SHATTUCK AVENUE, SUITE 405  
BERKELEY, CALIFORNIA 94704  
(510) 486-0700

## APPEARANCES

(In order of appearance)

1  
2  
3  
4 TREASURE ISLAND DEVELOPMENT AUTHORITY  
5 Linda Avery-Herbert  
Ron Miguel  
6  
7 MAJOR ENVIRONMENTAL ANALYSIS SECTION  
8 Rick Cooper  
9 SPEAKER CARD AUDIENCE  
10 BERNIE CHODEN  
TIM COLEN  
11 MANUEL FLORES  
NICK ROSSI  
12 PAUL CURRIER  
RICHARD WELLER  
13 KAREN WEISS  
KEN MASTERS  
14 TONY GANTNER  
SHERRY WILLIAMS  
15 MICHAEL LYNES  
KATE KELLEY  
16 HOLLI BERT  
PAT UNIACKE  
17 JOEL KOPPEL  
SAL BLOOM  
18 ROSIE MASTERS  
ATLER PILRAM  
19  
20 PLANNING COMMISSIONERS/BOARD MEMBERS  
21 MICHAEL ANTONINI  
KATHRIN MOORE  
22 CHRISTINA OLAGUE  
CLAUDINE CHENG  
23 JOHN ELBERLING  
WILLIAM LEE  
24 HISASHI SUGAYA  
MICHAEL ANTONINI  
25 JEAN-PAUL SAMAHA

1  
2 ---oOo---

3 PROCEEDINGS  
4

5 COMMISSIONER SECRETARY: We thank you for your  
6 patience during the time that we are trying to get our  
7 technical difficulties resolved.

8 Before I take roll, let me just remind  
9 everyone to turn off your pagers, your cell phones, any  
10 electronic devices that may sound off during the  
11 proceedings. When speaking before the Commission, the  
12 joint bodies, please speak directly into the microphone,  
13 approximately, three to six inches away, and we ask that  
14 you state and spell your last name for the record.

15 Roll call for the planning commission.

16 Ron Miguel?

17 PRESIDENT MIGUEL: Here.

18 COMMISSIONER SECRETARY: Christina Olague.

19 COMMISSIONER OLAGUE: Here.

20 COMMISSIONER SECRETARY: Michael Antonini.

21 COMMISSIONER ANTONINI: Present.

22 COMMISSIONER SECRETARY: Gwyneth Borden.

23 COMMISSIONER BORDEN: Here.

24 COMMISSIONER SECRETARY: Kathrin Moore.

25 COMMISSIONER MOORE: Here.

1 COMMISSIONER SECRETARY: Bill Sugaya.

2 COMMISSIONER SUGAYA: Here.

3 COMMISSIONER SECRETARY: And Bill Lee.

4 COMMISSIONER LEE: Here.

5 COMMISSIONER SECRETARY: Thank you. TIHDI,  
6 President Owen Stevens.

7 COMMISSIONER STEVENS: Here.

8 COMMISSIONER SECRETARY: Claudine Cheng.

9 BOARD MEMBER CHENG: Here.

10 COMMISSIONER SECRETARY: John Elberling.

11 BOARD MEMBER ELBERLING: Here.

12 COMMISSIONER SECRETARY: Helen Nigg.

13 COMMISSIONER NIGG: Here.

14 COMMISSIONER SECRETARY: John Rahaim.

15 COMMISSION RAHAIM: Here.

16 COMMISSIONER SECRETARY: John Paul Samaha.

17 BOARD MEMBER SAMAHA: Here.

18 COMMISSIONER SECRETARY: Thank you,

19 Commissioners.

20 Commissioners, the first -- this is a  
21 single-subject calendar. The item before the joint body  
22 is Case No. 2007.0903E, Treasure Island/Yerba Buena  
23 Island Redevelopment Project. This is a public hearing  
24 on the Draft Environmental Impact Report.

25



1 MR. COOPER: Good morning, Presidents Miguel  
2 and President Stevens, and members of the Commission and  
3 Board. I am Rick Cooper, from the Major Environmental  
4 Analysis Section of the Planning Department.

5 As you know, this is a hearing to receive  
6 comments on the Draft Environmental Impact Report for  
7 the proposed Treasure Island/Yerba Buena Island  
8 Development Project.

9 As you have heard in greater detail in  
10 previous presentations, the proposed project, which  
11 would be carried out by the master developer, Treasure  
12 Island Community Development, LLC, would include  
13 development on Treasure Island and Yerba Buena Island,  
14 following transfer from the Navy of up to 8,000  
15 residential units, up to 140,000 square feet of new  
16 commercial and retail space, up to 100,000 square feet  
17 of new office space, adaptive reuse of three historic  
18 buildings on Treasure Island, with up to 311,000 square  
19 feet of commercial, retail or flex space. About 500  
20 hotel rooms.

21 Rehabilitation of the historic buildings on  
22 Yerba Buena Island. New or upgraded public and  
23 community facilities, new or upgraded public utilities.  
24 About 300 acres of parks and public open space,  
25 including shoreline access and cultural use, such as a

1 museum. New and upgraded streets and public ways.  
2 Bicycle, transit, and pedestrian facilities.

3 Landside and waterside facilities for the  
4 Treasure Island Sailing Center. Landside services for  
5 an expanded marina, and a new ferry terminal and  
6 intramodal hub -- excuse me, transit hub. Construction  
7 and buildout of the proposed Development Plan would be  
8 phased and would be anticipated to occur over an  
9 approximately 15-to-20-year period.

10 The Draft EIR identifies potentially  
11 significant, unavoidable environmental impacts on  
12 esthetics, historical architectural resources,  
13 transportation, noise, air quality, wind, and biological  
14 resources.

15 Please note that staff is not here today to  
16 answer comments on the Draft EIR today. All comments  
17 made today will be transcribed and responded to in  
18 writing in the Comments and Responses Document, which  
19 will respond to all verbal and written comments received  
20 and make revisions to the Draft EIR, as appropriate.

21 I would like to remind all speakers that this  
22 is not a hearing to consider approval or disapproval of  
23 the proposed project. Approval hearings will follow  
24 final EIR certification. Your comments today should be  
25 confined to the adequacy and accuracy of information and

1 analysis contained in the Draft EIR.

2 I would also like to request that you speak as  
3 slowly and clearly as possible so that the court  
4 reporter can produce an accurate transcript of today's  
5 hearing. Also, commenters should state their name and  
6 address so they can be properly identified, and they can  
7 then receive a copy of the Comments and Responses  
8 Document when it is completed.

9 After hearing comments from the general  
10 public, we will also receive any comments on the Draft  
11 EIR by the members of the Commission and Board.

12 The public comment period for this project --  
13 for this EIR began on July 12, 2010 and extends until  
14 5:00 p.m. on August 26, 2010.

15 The Historic Preservation Commission held a  
16 hearing on the Draft EIR on August 4th, at which time it  
17 determined that it had no comment on the Draft EIR.  
18 However, members of the Commission did express their  
19 desire for the project to include a monument to those  
20 who served on the island during its military period,  
21 perhaps employing some materials salvaged from that era,  
22 such as the cannon that is now placed at the entrance to  
23 Treasure Island. At that hearing, the project sponsor  
24 readily agreed to pursue this project element.

25 This concludes my presentation, unless the

1 Commission or Board members have any questions, we can  
2 open the public hearing.

3 Thank you.

4 PRESIDENT MIGUEL: Thank you. The project,  
5 staff?

6 All right.

7 PANEL SPEAKER: We have no additional  
8 comments.

9 PRESIDENT MIGUEL: There are a number of  
10 speaker cards. When I call your name, if you would line  
11 up in the center aisle, I would appreciate it.

12 Michael Theriault. Karen Knowles Pearce.  
13 Bernie Choden. Tim Colen. It is three minutes time on  
14 everyone.

15 (10 MINUTE-INTERVAL WITHOUT AUDIO)

16 COMMISSIONER SECRETARY: Mr. Choden, excuse me  
17 for interrupting, but the court reporter is having a  
18 very difficult time picking you up. Can you speak a  
19 little louder?

20 PANEL SPEAKER: I don't think the microphone  
21 is turned on.

22 COMMISSIONER SECRETARY: Oh, there we go.

23 NEW SPEAKER CARD MR. CHODEN

24 MR. CHODEN: That's so much better. All  
25 right, I'll repeat. I'm Bernard Choden, and I'm a San

1 Francisco Tomorrow, representing, in effect, the  
2 question of whether due diligence has been exercised  
3 regarding title to Treasure Island, that must be cleared  
4 in accord with the federal law, the Arkansas Act of 1850  
5 that said that lands below mean high tide, including  
6 state Louisiana, Texas -- belong to states of Louisiana,  
7 Texas, Florida -- belong to the State of California  
8 forever in perpetuity. Clearing that title is for most  
9 because the mitigations that will be required to pay for  
10 the -- for the environmental defects of the island will  
11 not be operable. Also federal laws will either put  
12 certain operational constraints that need to be cleared  
13 first, then you can do your job.

14 My second question deals with my background as  
15 an architectural engineer, as to whether there's  
16 sufficient test regarding compaction of the sand with  
17 regard, for example, the Loma Prieta earthquake, that  
18 under very mild conditions caused much of the pipage on  
19 the island to float to liquefaction. In fact, if one  
20 has satisfaction, liquefaction, you've got your answer.  
21 But in a severe earthquake this, in effect, proposal  
22 will not stand. And I thank you, and if you haven't  
23 enough copies, there is the various legal correspondence  
24 that I had, as a representative of the State regarding  
25 the heirity of the title. You can pass that up to them.

1 PRESIDENT MIGUEL: Thank you.

2 MR. CHODEN: Thank you for your attention.

3 NEW SPEAKER CARD MR. COLEN

4 MR. COLEN: Good morning, I am Tim Colen,  
5 executive director of the San Francisco Housing Action  
6 Coalition. We've been following this project for a  
7 couple of years now, and are very excited about it. I  
8 think that this project, as much as any we've seen, is  
9 going to push the envelope, really expand what's  
10 possible, and where the direction of new housing and new  
11 community and design and balance is going to go in the  
12 United States.

TR2.1

13 One of the curious features about the island,  
14 its relative isolation in terms of its connection to the  
15 bridge and the rest is actually, I think, going to turn  
16 out to be a huge plus for it, because of the way the  
17 project is approaching transportation and minimizing the  
18 influence of the CAB.

TR2.2

19 We love this project, and we hope that it will  
20 move forward as quickly as possible. We're heartbroken  
21 about the current economic conditions that are holding  
22 it back. I think that anything you can do to move it  
23 forward quickly is all to the good.

TR2.3

24 Thanks an awful lot.

25 PRESIDENT MIGUEL: Thank you.

1 Manny Flores, Sherry Williams, Paul Currier,  
2 Nick Rossi.

3 NEW SPEAKER CARD MR. FLORES

4 MR. FLORES: Thank you. My name is Manny  
5 Flores, F-L-O-R-E-S, Carpenters Local 22. Obviously, we  
6 are here in full support of the project. I mean, it's a  
7 no-brainer. We're excited about it, and we'd like to  
8 plant the seed now and get going. We currently -- we're  
9 already out that as it is. The United Brotherhood of  
10 Carpenters and Joiners of America, we have a -- we're in TR3.1  
11 partners with the Job Corp out there, so we currently  
12 have a training facility going out there, and bring us  
13 some classes there. So we've already landed, we just  
14 need -- bring the jobs in and we are currently looking  
15 for more women for our program, also. So with that, we  
16 will look for your blessing with the project of the  
17 Treasure Island. Thank you very much.

18 PRESIDENT MIGUEL: Thank you.

19 NEXT SPEAKER CARD MS. WILLIAMS

20 MS. WILLIAMS: Morning, Commissioners. I'm --  
21 for the record, I'm Sherry Williams, executive director  
22 of the Treasure Island Homeless Development Initiative  
23 known as TIHDI. We're very supportive of the  
24 redevelopment plan for Treasure Island and are pleased TR4.1  
25 to make some comments today.

1           As the next milestone, the Draft EIR is before  
2   you. The plan represents real opportunities to provide  
3   housing and jobs for 4 million homeless and very low  
4   income San Franciscans. EIR cites both the housing that  
5   will be available for TIHDI and the job opportunities  
6   that will be created through redevelopment. We look  
7   forward to both expanding the number of formerly  
8   homeless people who will now have a place to call home,  
9   as well as those who will earn income through the TI  
10   Redevelopment.

11           A key component of this for us is that none of  
12   our existing residents will be displaced. All will have  
13   an opportunity for replacement housing. In the land-use  
14   section of the EIR, it states that TIHDI occupies the  
15   fitness center and gymnasium. For the record, we no  
16   longer operate the gym. It's operated by the YMCA.  
17   However, we do use the former fitness center as a  
18   community center, and this is a critical resource for  
19   existing residents. It is a site of numerous community  
20   meetings and events, a weekly food pantry program, a  
21   computer lab and workshops. It provides a venue for  
22   residents to come together as a community.

23           The EIR cites that there is space allocated  
24   for community center and redevelopment, and we're very  
25   pleased to see this. While we're in an interim phase on

TR4.2

TR4.3



1 the island now, over the past 13 or so years, we have  
2 tried to create and support community by providing, at  
3 least, basic services, such as childcare, youth  
4 programming, recreational programming, and so on. It's  
5 very important to us and we believe the future of the  
6 new Treasure Island community to have such services in  
7 place and to plan for them.

8 We're assuming at this point that the 480,500  
9 square feet allocated to the community center and the  
10 30,000 square feet for community services will be used  
11 to support everything from youth programming to a  
12 wellness center to a general purpose community center,  
13 like we have currently. It will be important to keep  
14 these basic services in place to support existing  
15 residents, as construction occurs, and until their  
16 replacements are developed.

17 So, again, we're very supportive of the  
18 project, and we, too, are looking forward to it moving  
19 forward and implemented. Thank you very much.

20 PRESIDENT MIGUEL: Thank you.

21 NEXT SPEAKER CARD MR. ROSSI

22 MR. ROSSI: Nick Rossi. I represent Ken  
23 Masters in co-counsel with Rupert Hanson of Cox,  
24 Wootten, Griffin, Hansen and Poulos. I have reviewed  
25 the Draft EIR and I have the following comments.

TR4.4

1 We believe that there's no mechanism for the  
2 maintenance of the perimeter berm. It wasn't stated.  
3 It's not addressed under the Hazards and Hydrology  
4 section. And like other structures, like levies that  
5 serve the purpose of flood and storm weather control,  
6 berms are regulated to ensure they are maintained.

7 Future operations and maintenance should -- I  
8 am constrained by the three minutes.

9 We believe that the future operation and  
10 maintenance should be included in the project  
11 description, and further analysis should be evaluated.

12 In the previous staff reports, and I reference you to  
13 the addendum to the Commission meeting for Friday  
14 June 2nd, 2012 -- 2009, North Coast District, Item F4A,  
15 Local Coastal Program Amendment, No. CRCMAJ-1-09, Costo  
16 Norday.

17 For the SUMI Reliance design purposes, a  
18 minimum sea level rate of 3 feet per century is going to  
19 be used. You mention in the report that the Tsunami  
20 hazards should account for sea levels of 3 to 6 feet per  
21 century; however, the project plans are accommodating  
22 only 36 inches of sea level rise plus an additional 6  
23 inches of freeboard. You can find this reference in the  
24 Hydrology and Water Quality page, section 4, No. 29.  
25 However, we believe it won't be adequate for the

TR5.1

TR5.2

1 lifetime of the project.

2 No definitive publication has been produced in TR5.2,  
3 the report that addresses the sea level rise, making it cont'd  
4 impossible to determine the appropriate height. It's  
5 conceivable that during the lifetime of the project, the  
6 sea level may increase more than the project design.  
7 Sea level is especially problematic for Treasure Island.

8 No. 2. We believe that the Coastal  
9 Commission, because this project involves rezoning and  
10 general plan amendments, a discussion of its TR5.3  
11 requirements should have been included and it was  
12 omitted. Under Government Code Section 65860A, it  
13 requires that the land uses that are authorized by the  
14 ordinances be compatible with the policies, objectives,  
15 programs, in general, and specific uses of the general  
16 plan. And we think the omission of the Coastal  
17 Commission's involvement is a serious violation of that.

18 And I've mentioned before, Treasure Island,  
19 being located in a Tsunami location, we don't think the TR5.4  
20 emergency response plan adequately addresses that, nor  
21 does it provide for drills or practical responses.

22 With respect to the Waste Water Proposal  
23 Discussion, as you may know, the Regional Water Quality TR5.5  
24 Board will permit a new facility. However, there has  
25 not been a proper discussion of the waste reduction, as TR5.6

1 required under the Waste Management Act of 1989. And  
2 that plays right into the greenhouse discussion, and we  
3 would like to have a further study of how the greenhouse  
4 gasses are going to be studied with respect to the waste  
5 reduction. May I have one more minute?

6 PRESIDENT MIGUEL: Thank you, Mr. Currier.

7 (sic) As you know the time for -- I'm sorry.

8 MR. ROSSI: May I have sixty more seconds?

9 PRESIDENT MIGUEL: You may not. I'm sorry.  
10 As you know comments may be received in writing until  
11 the 26th of this month. So, certainly, you and anyone  
12 else should feel free to submit those. They'll be  
13 considered just as oral comments.

14 MR. ROSSI: I will do that.

15 PRESIDENT MIGUEL: Thank you.

16 MR. ROSSI: And with a parting shot, I will  
17 just say that Regional Housing needs allocation --

18 PRESIDENT MIGUEL: Thank you.

19 MR. ROSSI: -- which has not been properly  
20 studied under the --

21 PRESIDENT MIGUEL: Thank you.

22 NEXT SPEAKER CARD MR. CURRIER

23 MR. CURRIER: Good morning, ladies and  
24 gentlemen. My name is Paul Currier. I'm an internet  
25 committee organizer, and some of the people that are

TR5.6,  
cont'd

1 going to be watching this video know me nationwide as  
2 one of the Obama organizers, and a candidate for mayor  
3 in San Francisco in 2011. And I'm speaking in the  
4 public house on behalf of the public interest, and I'm a  
5 little shocked.

6 It's nice to be here in a room that's owned by  
7 the people of the City and County of San Francisco.  
8 It's nice to see you people honor the supervisor's  
9 chambers of the elected representatives, and using this  
10 facility courteously for the planning and development of  
11 Treasure Island.

12 I'd like to ask a simple question. Are we  
13 going to charge ourselves for what we already own, or  
14 are we going to delegate that to corporations to charge  
15 us rent for the resources that are already ours? Is  
16 that what we're going to do here? Or are we going to  
17 disrespect the fact that this property was already owned  
18 by the federal government, and there's a claim -- a  
19 title claim that one of the other gentlemen has already  
20 spoken to today.

21 We're going to disregard the people of the  
22 City and the State of California and the claims of the  
23 Coastal Commission to regulate the coastal properties  
24 and waters of the State of California. We going to do  
25 that? That's what we're going to do? I caution us to

TR6.1

1 pay attention to what's going on here. I want to speak  
2 about three simple concepts. One is them is called  
3 secrecy. The next one is called craft. Another one is  
4 called corruption. Maybe some of you have profited from  
5 this, maybe not. How come there's no inspector general  
6 function in any of this?

TR6.1,  
cont'd

7 We're privatizing 150 acres in the City and  
8 County of San Francisco. There's money at stake here.  
9 This is public property. Where's the cops? Where's the  
10 oversight? Secrecy. I went into the Planning  
11 Commission. Actually went down there yesterday, and  
12 they sent me to another department, and I was actually  
13 able to get two volumes. I just brought one here so  
14 everybody could see, this is one. It references two  
15 more, called the Planning Guide or the Design for  
16 Development. And those other two documents, that means  
17 four, they're not available online.

TR6.2

18 Why call for sunshine? How come they're not  
19 available online? How come I can't go online and look  
20 at the pictures of the high-rises of the Financial  
21 District that you guys are proposing to build in the  
22 middle of the Bay? How come the people from Berkeley  
23 and Alameda and Sacramento and Stockton and Tracy can't  
24 look at what the Bay Bridge will look like when we lose  
25 the view of the Golden Gate when they drive into San

TR  
6.3

1 Francisco? How come people can't see that? How come  
2 the secrecy? Maybe it's because there's a lot of money  
3 in those high-rise developments; right?

4 I want to close with a concept. It appears  
5 that we have an organized theft of public property going  
6 on with a process of methodology, where incrementally we  
7 meet and we take this, we take that, we take this, we  
8 take that, and then 30 to 50 years, what's going to be  
9 left? Treasure Island's a gem. It belongs to the  
10 people of the Bay Area as much as it -- it has concerns  
11 for supervisor of District 6. Hopefully the next  
12 supervisor will speak up to this. I'm surprised Chris  
13 Daily hasn't been more vocal.

14 I actually don't think that the Environmental  
15 Impact Report should be approved until it's been open to  
16 the sunshine and people in the City and County of San  
17 Francisco and the people of the State of California can  
18 look at what you guys are doing. Thank you very much.

19 PRESIDENT MIGUEL: Thank you.

20 Richard Weller, Ken Masters, Tony Gantner,  
21 Karen Weiss.

22 NEXT SPEAKER CARD MR. WELLER

23 MR. WELLER: Good morning, ladies and  
24 gentlemen. Richard Weller. I represent the Pile  
25 Drivers, Local 34 in Northern California, all 46

1 counties. We have a long history of developments since  
2 the Gold Rush to the war docks and so on, to heavy  
3 foundation for all the buildings in San Francisco. I'm  
4 not here to pontificate to the negative or to the  
5 positive, but to the facts that the jobs that are needed  
6 in the entire California. It's a known fact that for  
7 every construction worker employed it creates many  
8 residual jobs in the process. The engineering feeds --  
9 in this era and day, if they can put people on the moon  
10 and drive trains under the Bay, I am sure we can support  
11 Treasure Island to the fact of -- to be a positive  
12 addition to the San Francisco area.

TR7.1

TR7.2

13 A bit of trivia. I worked on the dock on the  
14 west side of Treasure Island in the mid '80s that was  
15 supposed to dock the Missouri. In that dock is the  
16 longest one-piece continuous prestressed piling in the  
17 world at that time. I am very confident of the  
18 engineering abilities of this area in the world. We can  
19 support Treasure Island with many new jobs. It would  
20 also create jobs, full-time jobs, other than  
21 construction work. I thank you very much for your time.

TR7.3

22 PRESIDENT MIGUEL: Thank you.

23 NEXT SPEAKER CARD MS. WEISS

24 MS. WEISS: Hi, my name is Karen Weiss,  
25 W-E-I-S-S, and I am speaking on behalf of the Bay

TR8.1



1 Conservation and Development Commission. And I just  
2 wanted to draw attention to a letter that was written by  
3 our executive director, Will Travis, in support of the  
4 project and in support of the work that TIHDI has done  
5 with us on sea level rise. And also the letter written  
6 by the governor in support of the project, as well.

7 Thank you.

8 PRESIDENT MIGUEL: Thank you.

9 MS. WEISS: Oh, and also that we will be  
10 providing further comments written, written comments  
11 before the time period ends.

12 PRESIDENT MIGUEL: Thank you very much.

13 NEXT SPEAKER CARD MR. MASTERS

14 MR. MASTERS: I am Ken Masters, M-A-S-T-E-R-S.  
15 I hope you enjoyed Nick's three minutes. I probably  
16 paid about \$2,000 for getting him down here and stating  
17 that. You know, time and time again, the voice of the  
18 residents of the island have been shut down. My  
19 opposition to this plan really starts with the  
20 contradiction in the Mission Statement, which is,  
21 includes to create community and identity, when actually  
22 this is going to destroy the community and identity that  
23 exists on Yerba Buena Island today.

24 And also the precedence that this creates,  
25 further empowers certain developers and politicians, and

TR8.1,  
cont'd

TR9.1a

1 weakens the individuals and communities in San  
2 Francisco. Just as an example, I had to call -- I  
3 called 15 law firms before I found an attorney. All of  
4 them had conflicts. All of them. How does an  
5 individual get access to justice if every law firm  
6 doesn't want to take a case, either because they're  
7 already employed by the developers or the city, or  
8 because they just think it's bad for business.

9 Furthermore, there's a council member, I can't  
10 remember who it was, but stated what I hope will be a  
11 career limiting opinion, that there are no "Nimbies" on  
12 Treasure Island. It's insulting to a ten-year resident  
13 and to the community created and supported by the  
14 residents of YBI. We have no representation on the  
15 council. Where is Chris Daily? Chris Daily has been  
16 absent for how long?

17 Furthermore, the Relocation Plan, as it stands  
18 today, will tear us apart. It will scatter us out onto  
19 Treasure Island indefinitely, not keep us together as a  
20 group, and then make it so onerous that we have no  
21 interest in staying. For example, I'm expected to move  
22 from a three-bedroom apartment with my wife to a  
23 one-bedroom on Treasure Island. And then after, that  
24 prices out of YBI after development. Why not designate  
25 land on Yerba Buena Island that will accommodate the

TR  
9.1b

1 residents who live there today? If we know we have  
2 somewhere to come back to, we can take care of ourselves  
3 during the redevelopment. We'll be fine.

TR  
9.1b,  
cont'  
d

4 Furthermore, the CAB has failed us. The CAB  
5 ignored us and shut us out. Each time I attended a CAB,  
6 after listening to hours and hours of, you know, no  
7 representation, watching the one resident on Yerba Buena  
8 Island, who is on the council -- or the board, who  
9 joined just, what, six months ago, condescending, kind  
10 of like expressions and, you know, eye rolling every  
11 time he speaks about our concerns. And then finally  
12 residential --

13 PRESIDENT MIGUEL: Thank you.

14 MR. MASTERS: Thank you.

15 NEXT SPEAKER CARD MR. GANTNER

16 MR. GANTNER: Commissioners, good morning.

17 Tony Gantner. For many, it is startling to see the  
18 nearly 600-foot One Rincon loam next to the Bay Bridge  
19 approach. What would it like to see, a series of  
20 towers, including one higher than One Rincon -- Treasure  
21 Island. Are we not comfortable with the historic scale  
22 of the buildings currently on the island? Is this not  
23 something to be maintained? Do we really want to alter  
24 the island profile with towers jetting up from the Bay,  
25 including a central tower exceeding the height of the

TR  
10.1

1 Bay Bridge?

2 And we should not forget the impact of the  
3 Loma Prieta earthquake on the island. The Army Corp of  
4 Engineers dredged several hundred million cubic yards of TR10.2  
5 material, most of it sand, from the bottom of the Bay to  
6 build the island. During the Loma Prieta earthquake,  
7 there were unmistakable signs of soil liquefaction and  
8 numerous gas, sewage and water line breaks. Round  
9 motion was among the strongest recorded in the Bay Area,  
10 despite being 60 miles from the epicenter.

11 This may pale in comparison to what could  
12 happen during a similar if not more powerful quake along  
13 either the San Andreas or Hayward Faults with an  
14 epicenter closer than Loma Prieta.

15 As the 1990 report compiled for the Navy  
16 warned, such a quake could cause substantially more  
17 severe shaking on the island, and that liquefaction  
18 could be expected to be widespread. Be wary of terms  
19 like geotechnological stabilization, when the forces of  
20 nature are so great in an artificial island so weak. A  
21 liveable, sustainable and safe Treasure Island does not  
22 need high-rises. Thank you.

23 PRESIDENT MIGUEL: Thank you.

24 Melanie (sic) Williams, Michael Lynes, Kate  
25 Kelley, Holli Bert.

1                   NEXT SPEAKER CARD MS. WILLIAMS

2                   MS. WILLIAMS: Good morning. Hi, my name is  
3   Melanie Williams. I live at 1215 Bayside Drive on  
4   Treasure Island. I have been a resident since 1999, and  
5   I am just here to speak on behalf of that. I really  
6   appreciate all what you all are doing to fix up the  
7   island because when we first came out there I was  
8   pregnant with my son and it wasn't nothing. And I  
9   really want to see something really nice. I want to see  
10  the bridge. I want to see other families, like me,  
11  because I have been there for a long time, for my son to  
12  go places, to go on a ferry.

13                  So I just really appreciate what you all are  
14  doing, and I just want to make sure that everybody could  
15  come together on the island, because it's a beautiful  
16  place. There's some schools. You know, we have  
17  community meetings. The programs are out there. And  
18  where I come from is a better place for me to be. So I  
19  am glad that you all could get together, put the work  
20  together, and make it a happy home for the families.  
21  Thank you so much.

22                  PRESIDENT MIGUEL: Thank you.

23                  NEXT SPEAKER CARD MR. LYNES

24                  MR. LYNES: Hello, my name is Mike Lynes. I  
25  am the conservation director with the Golden Gate

TR  
11.1

1 Audubon Society, and I'm here to present some oral  
2 comments on behalf of the society. Written comments  
3 will follow. One of the things I want to start with --  
4 we're going to hear a lot of comments throughout this  
5 process about overall support for the project, and I  
6 would ask the commissioners and the redevelopment agency  
7 to always, at this point, just remember that we need a  
8 good Environmental Impact Report. And concerns about  
9 the EIR do not reflect our opposition, necessarily, to  
10 the project.

11 But I also don't want to see what's happened  
12 in some of the other projects that have been before the  
13 City recently, where the push for jobs and the push for  
14 redevelopment, while justified, have outweighed the  
15 environmental concerns and the creation of an adequate  
16 EIR. If an adequate EIR is produced right now, then we  
17 can get to creating those jobs and improving housing  
18 quicker. But if you compromise and produce inadequate  
19 EIR, then it's going to lead to additional conflicts and  
20 delays that aren't necessary.

21 So I would ask you to take a hard look and not  
22 just be pushed by the politics and the money, to push  
23 through an EIR that's inadequate at this point. San  
24 Francisco has made some recent positive gains for the  
25 environment, particularly, the mayor's recent proposed

1 legislation to improve energy efficiency on buildings,  
2 and Supervisor McCready's proposal to ban plastic bags  
3 in the City. These are both good benefits for San  
4 Francisco, and continue, I think, a history of trying to  
5 attend to environmental matters.

6 But one constant that has been missing in this  
7 City has been protection of wildlife and habitats. It's  
8 always a secondary or tertiary consideration in any of  
9 these. And the EIR should address those. The EIR is  
10 adequate in saying that the habitat, particularly on  
11 Yerba Buena Island, has been compromised, but there are  
12 still very valuable habitat types out there. Coastal  
13 scrub, coastal riparian, the near intertidal zones,  
14 offshore eel grass, and each of these will be -- will  
15 suffer impacts because of the proposed project. The EIR  
16 concedes these, but says that each of them is less than  
17 significant.

18 We would ask that the drafters of the EIR look  
19 at the written comments that are proposed and also  
20 really ask itself whether these, the mitigations that  
21 are proposed, really do reduce it to a  
22 less-than-significant impact. We understand that if it  
23 were to find that there were significant impact that has  
24 economic impacts for the project overall, but, again,  
25 we're talking about the sufficiency of the EIR and the

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1 sufficiency of the review. And we ask the Planning  
2 Department, the Commission, ultimately, not be  
3 compromised by pushes to push the project through and  
4 result in inadequate descriptions of impact and  
5 inadequate mitigations.

6 A particular concern to the Audubon Society  
7 are the impacts, the unavoidable impacts to birds. The  
8 first and easiest one to identify is the massive  
9 increase in population on the island, itself. There is  
10 no doubt by increasing the population overall --

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11 PRESIDENT MIGUEL: Thank you.

12 MR. LYNES: Thank you for your time.

13 NEXT SPEAKER CARD MS. KELLEY

14 MS. KELLEY: Good morning. My name is Kate  
15 Kelley, K-E-L-L-E-Y, and I represent Sierra Club. I'm  
16 the chapter director for the local chapter of the Sierra  
17 Club. First of all, I want to say that we support  
18 development on Treasure Island. We are not opposed to  
19 development on the island, but we want to make sure that  
20 the development is the proper development, and it's so  
21 important.

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22 We have some serious concerns about the  
23 transportation plan, about the habitat preservation, air  
24 quality issues, and impact on climate change, as well as  
25 many other issues. Our request today, and I'll be very

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1 brief, is that you please consider and we respectfully  
2 request a two-week extension on the public comment  
3 period for the Draft EIR.

4 It's a very long and complicated document, and  
5 we, along with many other organizations who have an  
6 interest in this development, are not a staff-driven  
7 organization. We don't have large staffs the way that  
8 the City and the developers do. We rely on our  
9 volunteers, and our volunteers have jobs. They have  
10 families, they have other commitments, travel  
11 commitments. And the short duration of this public  
12 comment period is inadequate for all of the issues that  
13 need to be addressed to be adequately addressed. So we  
14 respectfully request a two-week extension on the public  
15 comment period.

16 Thank you very much for your time.

17 PRESIDENT MIGUEL: Thank you.

18 NEXT SPEAKER CARD MS. BERT

19 MS. BERT: Hi, my name is Holli Bert. I am an  
20 organizer with the local Bay Chapter of the Sierra Club,  
21 and I also want to encourage the planning commission to  
22 extend the time for public comment.

23 You know, this is -- it's vital that the San  
24 Francisco community have adequate time to address their  
25 concerns and ask questions of you about the project.

1 You know, looking back at the Hunter's Point Candlestick  
2 Redevelopment Project, it received two months' worth of  
3 public comment. And I think it's important that a  
4 project of this magnitude also gets the same amount of  
5 time for public comment. You know, I think with the  
6 lessons learned from that project, we really need to be  
7 able to give it the time it deserves. And, you know, it  
8 is important that the project move forward, with the  
9 best project that it can be, one that benefits the  
10 community as a whole.

11 Thank you.

12 PRESIDENT MIGUEL: Thank you.

13 Pat Huniacke.

14 NEXT SPEAKER CARD MR. HUNIACKE

15 MR. HUNIACKE: Good morning, Commissioners.

16 My name is Patrick Huniacke with GAA Athletic  
17 Association. And we're in full support of this project  
18 because of the many positive aspects to it. Community  
19 housing, open space, jobs, et cetera. However, what we  
20 like about this development is the very favorable ratio  
21 of open space to development. Out of the 420 acres, I  
22 believe 300 acres are designed -- designated open space.  
23 Wetlands, urban farm, flatland, and 40 acres of athletic  
24 fields.

25 And it is from that perspective that I speak

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1 from the 40 acres of athletic sports fields. Our  
2 organization have and represent thousands of kids in San  
3 Francisco and the Bay Area, through our own  
4 organization, the Boys and Girl Club, Rhythm and Moves,  
5 CYO, YMCA, et cetera. I want -- the kids in San  
6 Francisco are literally crying out for quality playing  
7 fields.

8 Two years ago our own organization was at a  
9 crossroads. We were on the verge of dying. So we took  
10 an enormous leap of faith and developed 15 acres of  
11 derelict land that was a blight on the island of  
12 Treasure Island, and converted it into 15 acres of  
13 pristine athletic fields at zero cost to the City of San  
14 Francisco, where it was an estimated cost to our own  
15 organization of \$5 million. These fields have been an  
16 enormous benefit to the kids of San Francisco and the  
17 Bay Area, and indeed the disadvantaged kids of the  
18 island.

19 In collaboration with TIHDI and the City of  
20 San Francisco, we also built a 10,000-square-foot  
21 playing structure for the kids on the island. The  
22 fields have been the site for several local regional  
23 international tournaments, which has resulted in  
24 millions of dollars of revenue to the City of San  
25 Francisco. In view of the enormous voluntary, human and

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1 financial, investment, we have made on behalf of our  
2 kids and the young adults in the Bay Area, and because  
3 of the regional nature of our fields, we request that  
4 our usage of the existing athletic fields be interpreted  
5 as being compliant with the requirements of the  
6 Tidelands Trust.

7 It is also our wish that when these, the  
8 40-acre fields are complete, that the proposed 40-acre  
9 fields are complete, that provision be made or  
10 legislation drafted, to keep amateur and voluntary and  
11 community-based organizations, such as ourselves, be a  
12 permanent part of the proposed athletic fields. We are,  
13 having said all of that, we are in full support of the  
14 EIR.

15 Thank you very, very much for your time.

16 PRESIDENT MIGUEL: Thank you.

17 Is there additional public comment?

18 NEXT SPEAKER CARD MR. KOPPEL

19 MR. KOPPEL: Hi. Good morning, Commissioners,  
20 President Miguel, President Stevens. My name is Joel  
21 Koppel, K-O-P-P-E-L. Let me first give you a personal  
22 opinion as a District 4 homeowner and musician. I  
23 really look forward to going to the Treasure Island  
24 Music Festival every year, and the island has  
25 surprisingly good acoustics. And I think it's very

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1 healthy for the social environment out there on the  
2 island.

3           Also, I do represent the San Francisco  
4 Electrical Construction Industry. I have been  
5 intimately involved in discussions about this project  
6 through the mayor's office, with attendance in the Solar  
7 Power Task Force and the Wind Power Task force, and  
8 we're often addressing issues for Treasure Island and  
9 its importance. Like Bay View Hunter's Point and Park  
10 Merced, we're dealing with a very sizeable plot, which  
11 we don't usually encounter with projects in San  
12 Francisco. So we're really looking to utilize the land  
13 for wind power technology, and other renewable clean  
14 sources of energy, like solar power and energy storage.

15           So really, really thrilled just to be part of  
16 the project and really looking forward to building and  
17 installing our new Treasure Island.

18           Thanks.

19           PRESIDENT MIGUEL: Thank you.

20           NEXT SPEAKER CARD MR. BLOOM

21           MR. BLOOM: Commissioners, nice to see you  
22 again. My name is Sal Bloom. I am the executive  
23 director of archeology. I was an original member of  
24 the Treasure Island Reuse Authority way back when, and  
25 one of the founding members of the Treasure Island

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1 Restoration Advisory Board. Eve Boch had been our staff  
2 person assigned to this project up until he got -- this  
3 year, so I am filling in, somewhat inadequately, for the  
4 major role that she played.

5 Our lawsuit against the Navy helped ensure  
6 that this island is put on a proper track for the  
7 clean-up and is well remediated. And our campaign to  
8 correct the location of the Ferry Building -- the Ferry  
9 Terminal at the site, help lead to its current location.  
10 So we've been involved in this for some time. We are  
11 speaking to you today -- I'm speaking to you today to  
12 ask for a two-week extension of the review period.

13 We have just concluded a very intensive review  
14 of the assembly complicated environmental impact report,  
15 administrative process for the Candlestick Point  
16 Treasure Island Project, and equally sized complicated  
17 project, and we need the additional time in order to  
18 focus our attention on this project now.

19 The EIR received the Hunter's Point, the  
20 Candlestick Point -- the EIR received 60 days for public  
21 review. The project was far less complicated, from a  
22 transit and traffic issue point of view, than this one  
23 is. We have multiple points of entry, whereas here we  
24 have only three. And so we really need the time to look  
25 at the changes in definition of form, the structures,

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1 impacts on bridge traffic, environmental effects, the  
2 actual benefits of the sustainability plan, scoping  
3 comments call for density, but did it call for this  
4 level of density? We don't think so. We have concerns  
5 about this level of density.

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6 A primary principle of sustainability is  
7 carrying capacity. And this plan appears to exceed the  
8 island's carrying capacity. We have been engaged in the  
9 island's impact on the environment since the Navy  
10 controlled it, and we have been watching it grow. Been  
11 very excited about it. We have invested tens of  
12 thousands of dollars in review and assistance on this  
13 project, and we would love to see it succeed. We want  
14 to see jobs. We want to see the new vision for Treasure  
15 Island be implemented, but we want to see it properly  
16 sized for the carrying capacity of the island, so we can  
17 make this project as successful as possible.

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18 And so we are asking for an additional two  
19 weeks so we can do the review of the EIR necessary to  
20 make that happen. And as you know, we do these things  
21 during Christmas and Thanksgiving and the summer  
22 vacation. I just cut mine short to be here today. I  
23 would very much appreciate more time to be able to go  
24 ahead and review this. All we're asking for is two  
25 weeks.

1 Thank you very much, Commissioners.

2 PRESIDENT MIGUEL: Thank you.

3 NEXT SPEAKER CARD MS. MASTERS

4 MS. MASTERS: Good morning. My name is Rosie  
5 Masters and I'm a resident of YBI, and I'm on the board  
6 of directors for the YBI Mutual Benefit Corporation and  
7 Mutual Development Corporation. I, too, would like to  
8 request a two-week extension for review of the EIR. In  
9 addition, I would like to read a statement.

10 Although economic impacts are not evaluated in  
11 an EIR, the project should include an analysis of  
12 funding sources to determine if the project can remain  
13 revenue neutral. The analysis should review the  
14 relocation of residents if they would not be able to  
15 afford the rates. Prior to decision making, it is  
16 important to know if San Francisco residents will be  
17 burdened by the costs, and if affordable rules can be  
18 guaranteed for Treasure Island residents.

19 The rate structure may limit the ability for  
20 middle-to-low-income residents to remain on Treasure  
21 Island. Once the rates are established, an analysis  
22 could be conducted for population and housing. Until  
23 then, it is unknown if the rates are acceptable and  
24 support middle-to-low-income residents.

25 As we discussed today, the traffic analysis

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1 mitigation focuses on transit options, not providing the  
2 services on Treasure Island that would reduce  
3 transportation. Since public transportation is  
4 voluntary, it is difficult to determine the amount of  
5 traffic that would be reduced, but the majority of  
6 impacts are deemed significant and unavoidable.

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7 Regional housing needs allocation should be  
8 specifically reviewed to determine the personal  
9 affordable units and income levels, with the subset  
10 analysis on costs to those qualified for affordable  
11 housing application.

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12 Thank you.

13 PRESIDENT MIGUEL: Thank you. Is there  
14 additional public comment? If you'll just line up in  
15 the center aisle, I would appreciate it.

16 On the mike.

17 NEXT SPEAKER CARD MR. PILRAM

18 MR. PILRAM: My name is Atler Pilram,  
19 P-I-L-R-A-M. I am a resident of YBI, as well as a  
20 member of the Citizen Advisory Board, and also a member  
21 of Yerba Buena Island Mutual Residents. One of the  
22 concerns that came up in one of our sessions at CAP was  
23 the removal of nonindigenous plants. And I notice that  
24 also some of the costs of removal and continued costs of  
25 maintaining removal of the nonindigenous plants are kind

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1 of brought up to the residents or added to the  
2 resident's costs. We brought up that concern, that  
3 50 percent of the lands right now are going to be owned  
4 by Coast Guards.

5 We'd like to incorporate some of the costs to  
6 be shared also by the federal government, because this  
7 removal of this plant is going to be continuously asked  
8 of us. And if half of the plant is also going to be  
9 located on the other side of the land, we need to  
10 incorporate some kind of considerations as far as the  
11 cost so it won't be burdened on the residents  
12 continuously.

13 Thank you.

14 PRESIDENT MIGUEL: Thank you. Is there  
15 additional public comment? If not, public comment is  
16 closed. I need the Board of Commissioners to bring --  
17 nothing is coming up.

18 Commissioner Antonini.

19 COMMISSIONER ANTONINI

20 COMMISSIONER ANTONINI: Oh, thank you. Thank  
21 you for the presentation. I thought it was extremely  
22 thorough, and in particular, very instructive in regards  
23 to the Tidelands Trust issue, which is something that we  
24 haven't had occasion to deal with in the past very  
25 often, because it deals with submerged lands. And I

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1 think it was very important that it mentions discretion  
2 over recreational uses, which I think is an important  
3 feature subject to, of course, the authority of the  
4 Attorney General or the State, California States Land  
5 Commission, and also the fact that recreational uses  
6 should be regional in their scope, and this is certainly  
7 a factor. So I think those are interesting things to  
8 look at.

9 Because certainly there are many, many good  
10 things about this project, and one of them is the fact  
11 that it creates a lot of public open space, and  
12 particularly recreation uses, which is something that we  
13 are in great need of in San Francisco. So I thought the  
14 analysis was very thorough. Oh, was my mike not on? It  
15 says "mike on." Couldn't hear me? Should I repeat  
16 because --

17 PRESIDENT MIGUEL: Yeah, I think so,  
18 because --

19 COMMISSIONER ANTONINI: I'm sorry.

20 PRESIDENT MIGUEL: I don't think it is on.

21 COMMISSIONER ANTONINI: Let's try it.

22 PRESIDENT MIGUEL: This is a different system  
23 than we're used to.

24 COMMISSIONER ANTONINI: Okay, is it on now?

25 PRESIDENT MIGUEL: Yes.

1 COMMISSIONER ANTONINI: Okay. Let me just try  
2 to summarize this in a shorter time the second time  
3 around. I just -- I thought it was particularly  
4 instructive of the Tidelands Trust information in there.  
5 Because it's an issue regarding previously submerged  
6 lands that we don't have occasion to deal with as often.  
7 And I thought it was very important that it talked about  
8 the discretion that the Tidelands Trust has overuses,  
9 particularly recreational ones, which are very  
10 important. And that there was an emphasis on  
11 recreational uses that had a regional aspect to them.

12 So I think these are important things, and I'm  
13 glad that that was thoroughly analyzed, as was the other  
14 parts of the report. So I wanted to bring that up, in  
15 particular, because I think it's an area that we may not  
16 have been as familiar with as some of the other uses  
17 that are historically analyzed in environmental impact  
18 reports. And I certainly want to put an emphasis on  
19 recreational uses, which we are sadly lacking in acreage  
20 for.

21 Thank you.

22 PRESIDENT MIGUEL: Thank you.

23 Commissioner Moore.

24 COMMISSIONER MOORE

25 COMMISSIONER MOORE: For the record, I'd like

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1 to disclose, I also sit on the Treasure Island CAB in  
2 the beginning. And when I was appointed to the planning  
3 commission, the City Attorney deemed that there was no  
4 conflict. And I do speak without conflict, and have  
5 been in strong support of the project, have watched it  
6 closely grow, and my comments today really are solely  
7 directed towards the EIR, the Draft EIR in front of us.  
8 Let me first say that I am very appreciative of the  
9 table of the broad range of comments. For me, it  
10 resonates quite well to ask for an additional two weeks  
11 of comment, because the issues are quite complicated.

12 And I do think, while the two projects are not  
13 quite comparable, the extent of issues which do rise to  
14 the surface require more time. So I would support  
15 public comment in that direction. I will actually  
16 submit my own comments in writing. I have a number, but  
17 the one thing I would like to put on the public record  
18 today is the fact that the Sequel required environmental  
19 superior alternative is really not enclosed in this  
20 document. And I'm actually surprised.

21 The project is very strong, and I think it  
22 should have dared to indeed address the environmentally  
23 superior alternative. Throughout the years of creating  
24 this project, there has been a strong emphasis on green,  
25 on the first truly green neighborhood of San Francisco. ✓

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1 And the record shows that during the scoping process,  
2 scoping documents pointed out that the superior  
3 alternative would be one that would plan for enough  
4 density to support a robust public transit system, and  
5 basic neighborhood serving retail would minimize cars.

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6 I can quote our former director of San  
7 Francisco Environmental, Art Bloomfield, who very  
8 eloquently, in his scoping comments, indicates that the  
9 EIR should include a minimum impact alternative instead  
10 of a less intensive development alternative. What  
11 really the challenges are here is, to balance high  
12 density with a decrease in cars, and not use parking as  
13 an argument for economic feasibility. I regret that,  
14 and I strongly urge that the EIR indeed, looks at, with  
15 the challenges it poses.

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16 I think if we want to be truly a green  
17 neighborhood, we need to be able to at least go through  
18 the motions and examine how we can do that with an  
19 emphasis on a robust transportation network. I want to  
20 leave it, I think, with that. And I am in support of  
21 the number of comments which were made by people in the  
22 audience.

23 PRESIDENT MIGUEL: Thank you.

24 Commissioner Olague.

25 // //

1 COMMISSIONER OLAGUE

2 COMMISSIONER OLAGUE: Yeah. I just -- I also  
3 want to support a two-week extension on the comment  
4 period. I would even support going beyond that, because  
5 we're many people who are -- this isn't the only issue  
6 that's out there where -- this isn't the only EIR that  
7 people are currently reviewing. We're also in the  
8 middle of the draft housing element review, which we  
9 extended to the end of the month. So I think it would  
10 only be fair to extend the comment period on this  
11 project also to allow for -- to meet the Commission, as  
12 well as the public to look at it some more. And I'll  
13 submit most of my comments in writing.

14 The only thing that sort of struck me would be  
15 an alternative, I feel should be provided. And kind of  
16 along the lines of a commission, and more said. But I'm  
17 focused on the parking piece that would look at an  
18 alternative to what we have here, which would see a  
19 reduction in parking, a project alternative with a  
20 reduction in parking. So I would like to see something  
21 like that provided in the future.

22 There is some much rhetoric around  
23 sustainability. We have AB32 and SB375. Mandates that  
24 are coming from the federal government, as well as state  
25 government, that is directing, I think, local planning

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1 efforts to consider reduction in carbon emissions. And  
2 it seems to me that, given that focus or that -- we  
3 should be looking at an alternative that would provide  
4 at least a .5 or something, some reduction in parking.  
5 So, again, I'll submit most of my comments in writing  
6 and I do support an extension in the comment period of  
7 time.

8 PRESIDENT MIGUEL: Thank you.

9 Board Member Cheng.

10 BOARD MEMBER CHENG

11 BOARD MEMBER CHENG: Thank you. I would like  
12 to thank the members of the public for sharing their  
13 important thoughts today, and I also want to thank  
14 members of the Environment, Division of the Planning  
15 Staff for preparing the report. I will be submitting  
16 written comments, but I want to bring two subjects that  
17 drum up in my mind as I went through the EIR.

18 The first one is on transportation. It  
19 appears that out of all the topics and all the impact  
20 being analyzed, I think the area of transportation  
21 really suffers the most impact. Out of the 60-some  
22 impacts stated in the report, over 35 or up to 38 are  
23 considered significant and unavoidable. And the  
24 mitigation measure suggested -- the one mitigation  
25 measure that was suggested for this significant and

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1 unavoidable impact, or 38 of them, happens to be to  
2 expand transit service, NTR-2.

3 And the report also stated that funding for  
4 extended transit service are not identified and secured,  
5 and therefore, its implementation must be considered  
6 uncertain at this time. I think we all understand that,  
7 given the budget of the City and the budget of Muni.  
8 It's understandable.

9 But I wish, because of the totality of the  
10 impact, and so many of them, I just wish that planning  
11 staff would consider adding more information, as far as  
12 alternatives as to how we can or possibilities of how we  
13 can -- the transit service can be extended. Will it be  
14 a function of the soon to be newly created Treasure  
15 Island Transportation Management Agency, which is  
16 supposed to be appointed by the board of supervisors?  
17 Will it be one of the responsibilities of the  
18 transportation management agency to oversee and guide us  
19 in the future in developing policies, mitigation  
20 measures, and how we can afford it.

21 Maybe we can also consider giving some  
22 options, so that we, as well as members of the public,  
23 can look into, can understand what other possibilities,  
24 because the impacts are quite immense. And I would  
25 really like to see some alternatives being suggested or

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1 options into how these mitigation measures can be  
2 funded.

3 The second area that I would like to bring up  
4 is public -- is the public service section. Over the  
5 years, I've always been keen about asking about  
6 emergency services, because of the unique location of  
7 the island. And the study, of course, stated, and all  
8 of us know that the Bay Bridge is the only emergency  
9 access to and from San Francisco as well as the East  
10 Bay. I feel that there could be a little bit more  
11 adequate information in terms of how we mitigate the  
12 measures, because certainly the increase in population  
13 over tenfold from what it is to date between now and  
14 built out, fully built out other projects will increase  
15 the amount in public services. I am, specifically,  
16 referring to under the analysis for fire department.

17 We are looking at national -- natural  
18 disasters, emergency medical services. The EIR talked  
19 about the new joined police and fire station. I think  
20 that's definitely something that needs to be done, but I  
21 would like to have more adequate information in terms of  
22 mitigation measures, because I think, purely because of  
23 the population increase, the impact is not insignificant  
24 or less significant.

25 And members of the public have mentioned that,

1 you know, we are within the earthquake zone, and I think  
2 that many natural disasters can happen, as well as just  
3 because of the pure population increase, and I would  
4 like to see mitigation measures being suggested in terms  
5 of how we would deal with these situations.

6 PRESIDENT MIGUEL: Thank you.

7 BOARD MEMBER CHENG: Thank you.

8 PRESIDENT MIGUEL: Board Member Elberling.

9 BOARD MEMBER ELBERLING

10 BOARD MEMBER ELBERLING: Thank you. First, I  
11 do agree that a two-week extension of comment period  
12 would make sense. This clearly is a very complex  
13 technical document, and if the organizations that are  
14 most able to provide expert comment on it feel they need  
15 an additional two weeks to do that, I really think that  
16 we would all benefit from that input.

17 On the document, reading it reminds me of  
18 when, back in the late '80s, an organization that I was  
19 a member of, that had sued the City on a downtown plan,  
20 settled with them, and one of the settlement provisions  
21 was that EIR should be easy to understand for laypeople.  
22 And as I was reading this document I got the distinct  
23 impression that that vision has been lost. It's -- it's  
24 very much a document written by consultants and experts  
25 and engineers for other consultants, experts, and

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1 engineers.

2 Our hope had been that the summary would  
3 really embody the essence of the story about the  
4 project. And I don't find that essence of the story  
5 here. This project, of course, is creating a whole new  
6 neighborhood, actually the size of a small city, in a  
7 uniquely physically isolated location, in the Bay, in  
8 the City of San Francisco. That makes it very different  
9 than the other similarly-scaled projects at Mission Bay  
10 and Hunter's Point Shipyard, where there are adjacent  
11 neighborhoods right next to them, literally, physically,  
12 to support them. And in my mind, that's a critical  
13 thing that really is crucial when considering the  
14 environmental consequences of what we're doing.

15 I looked to find out the tails of the  
16 population of this future new small city we're building  
17 in the Bay, and I could find a number of 18,000 and some  
18 in the Public Services section, but I really couldn't  
19 find anything else about who they might be in that  
20 location. Looking around, you could find a school-age  
21 population, but I couldn't find a preschool population.  
22 I couldn't find a senior population. I didn't see  
23 estimates for how many would be lower income households  
24 for affordable housing. I just really couldn't get a  
25 handle on who is going to live there.

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1 I also could not find, although it probably  
2 exists in some appendix, where they would work. I was  
3 really curious how many would be working in the East  
4 Bay, for example. You know, one of the major things  
5 about Mission Bay we've learned is that many Mission Bay  
6 residents work in the South Bay. That was not foreseen  
7 in any EIR, believe me, when it was done 15 years ago.  
8 And I'm curious to what extent many of the TI residents  
9 may, in fact, be working in the East Bay, which is very  
10 consequential for the EIR. There is probably an  
11 estimate. I just couldn't find it.

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12 But out of that, I think there is a crucial  
13 missing overarching mitigation for the whole project  
14 that really needs to be stated as a mitigation, and it's  
15 an important one to guide its long-term development over  
16 the next 20 to 30 years. Which is that, the project  
17 should minimize the necessity for residents to travel  
18 off island for their everyday needs and lives. We have  
19 to, in other words, include on the island, as much of  
20 the facilities and services as feasible that residents  
21 routinely need. Because otherwise, they will have to go  
22 to -- onto the bridge or onto the ferry or onto  
23 something to come to the mainland.

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24 I am using an example, which is noted in a  
25 document but not quantified, is childcare. All working

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1 parents are going to have arrangements for childcare.  
2 If it's not on the island, they are going to have to go  
3 off the island to do that, and they will almost  
4 certainly drive a car to do that. That's an obvious  
5 example of something that we have to be sure that there  
6 is the most adequate childcare we've ever seen in a  
7 Master Plan San Francisco neighborhood. And that  
8 concept is not in this document, although clearly it has  
9 an environmental impact.

10 In looking at other such everyday necessities,  
11 it's really hard to project now, you know, looking at  
12 years down the road, how those 18,000 people and what  
13 they will need. Obviously, projects adapt. We can't  
14 figure it all out in advance now, and the program that's  
15 specified here in terms of square footages of this and  
16 that may be adequate or it may not. But there is always  
17 the opportunity for big course corrections.

18 These massive projects almost always have  
19 major amendments and new environmental work done 10 to  
20 15 years down the road. And I'm sure that whoever is in  
21 charge of the project at that time can take this into  
22 account, if we have laid that initial groundwork that  
23 tells them, Be sure to minimize the needs of residents  
24 to travel off the island.

25 The one particular detail that I couldn't find

1 in a document at all and I can't find in a program is  
2 public assembly. There are all kinds of reasons that  
3 residents need to assemble in groups in order to do  
4 things. There is nothing in our program, and I asked,  
5 we don't have any such facilities, specifically, in our  
6 development program today. I think that's a glaring  
7 omission. It's needed.

8 I wanted, though, to focus on one everyday  
9 thing that particularly stands out in my mind, which is  
10 communities of faith need places to gather on Fridays,  
11 Saturdays, or Sundays, and various holy days,  
12 respectively, throughout the year, to share their faith.  
13 And when I asked, where can there be -- could there be a  
14 church on Treasure Island? Where would congregations of  
15 any description gather, there is no provision for this.  
16 It just hasn't been included. I asked if some  
17 organization could buy a piece of land and build a  
18 church, and, basically, the answer was no. And I  
19 really -- and I'm a secular person, but I understand  
20 clearly that communities of faith are really vital parts  
21 of building real cities and real neighborhoods. And to  
22 exclude that almost -- well, I'm not saying it's  
23 conscious, but to exclude it de facto, it's something I  
24 really think is very inappropriate.

25 In an environmental sense, of course, if we do

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1 not accommodate them on the island, they will be driving  
2 on Fridays, Saturdays, and Sundays to various places  
3 elsewhere. And -- but even beyond that, we will lose  
4 the resource of their good energies to building our  
5 neighborhood, and I don't think it's right. There is,  
6 of course, a church on the island now. It's a Christian  
7 church, but it's a church.

8 When I looked at the historic section, I  
9 couldn't find a church in the IR. I couldn't find a  
10 single mention of a Treasure Island Church, and I tried  
11 to understand this. The historic methodology was, the  
12 document relies on the Navy's evaluation of historic  
13 resources for everything built before 1947, and just  
14 kind of includes that as if it's a done deal. But as it  
15 notes, the Navy's methodology is not the same as the  
16 City's, that the City practices under our planning, you  
17 know, requirements and so on. And -- but it only  
18 applied those new standards to buildings built after  
19 1947. So neatly, the Treasure Island Church, because it  
20 existed before 1947, just doesn't get considered. It's  
21 like it doesn't exist. That the Navy did not identify  
22 it as a historic resource.

23 And in looking at all these issues, and public  
24 assembly and so on, I was really struck with the fact  
25 that that church, obviously, played an important role in

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1 the history of the island all through the era of World  
2 War II, the Korean war, the Vietnam war, when it was a  
3 very central focus of community for the military  
4 personnel, who are certainly a part of the history of  
5 Treasure Island in San Francisco. And I really find its  
6 submission inexplicable in my mind.

7 So I just wanted it noted, that the Navy's  
8 assessment cannot be relied on as satisfactory for our  
9 local approval process. We have our own standards and  
10 they should be applied to the pre-1947 buildings as well  
11 as the post-1947 buildings. And perhaps that can help  
12 solve, at least, part of the problem that I referred to  
13 earlier.

14 Thank you.

15 PRESIDENT MIGUEL: Thank you.

16 Commissioner Sugaya -- oh, you're sharing a  
17 mike.

18 COMMISSIONER LEE

19 COMMISSIONER LEE: You want to go first,  
20 Commissioner? No, okay.

21 Okay, I guess the main issue that I look at  
22 Treasure Island, frankly, is going to be the  
23 transportation issue. But taking a step back, I think  
24 many people need to understand that this is an  
25 environmental document, and the role of the "SEQUA"

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1 document here is looking at alternatives in impacts in  
2 mitigation. If you just look at the transportation  
3 area, which I think is the No. 1 issue with Treasure  
4 Island, there's 141 pages of Section 4E.

5 If you review this section and compare this to  
6 other "SEQUA" documents that we have produced as a City,  
7 this is the most comprehensive look for getting on and  
8 off the island, whether it's through water taxis or  
9 hydrofoil or mass transit for the future. And I think  
10 if we take a step back and look at this document, that  
11 it's been very well-prepared when it comes to the  
12 transportation era, which actually surprised me.

13 In addition to that, we have a unique  
14 opportunity where it is an island. If you look at Hong  
15 Kong Island and you look at Venice, both of those  
16 islands, how do you get on and off? Venice is one area  
17 where you look at the future of the environment, where  
18 you work, look at Venice during parts of the year and  
19 the tide, the high tide and low tide, it floods St.  
20 Mark's Square in those areas. But I think we also look  
21 at the document here. Someone brought the issue about  
22 global warming and the issues of global warming and  
23 tides. In the next hundred years or so, how many feet  
24 will it go up? Or if you look at a hundred-year-flood  
25 area, I think the document addresses that adequately.

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1 Another gentleman brought up the issue again  
2 about the seismic issue. If you look at the density of  
3 the north part of Treasure Island, it has the least  
4 development on the north side regarding density. I  
5 think you are going to have some sort of soccer, some  
6 field there. I think we need to focus.

7 People say, Well, this is a very tough  
8 document. Well, part of the issue of a tough document  
9 is our planning code is the most comprehensive planning  
10 code in the world at this time, because the people have  
11 voted it in and the board of supervisors have added  
12 certain sections. You can't make it any simpler than it  
13 is now because the way the rules and regulations are set  
14 up.

15 Because if you look at the adequacy, and I  
16 want to turn, specifically, to the comments about, Is  
17 this considered adequate? Does it address all the  
18 alternatives? I didn't hear any public comment at this  
19 time that leads me to believe that we have not addressed  
20 the alternatives or the adequacy of this.

21 For disclosure, I served under the Restoration  
22 Advisory Board back in, I think, '86 to about '89.  
23 Diane Feinstein appointed me to that RAB to serve under  
24 the Navy, I guess, in the City, along Hunter's Point,  
25 also the Presidio. The environmental issues here with

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1 hazardous waste, I am not worried about, the underground  
2 tanks have been removed. We have the oversight of the  
3 Water Resources Control Board and state toxics along  
4 BCDC also control the tide, the hundred feet where it  
5 comes in and out.

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6 Now, I think the question for us to look at  
7 here, if you want to add another two weeks for public  
8 comment, what is different with this EIR versus other  
9 EIRs that we have done the same? And I didn't hear any  
10 public testimony that led me to believe that we need  
11 additional information. Whether or not Board Member  
12 Elberling is right or not about the 47 -- 1947 with the  
13 church issue there, I think this is an environmental  
14 document. Assembly could be one issue, but I don't  
15 remember any time that we have to address assembly  
16 issues in any other EIRs.

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17 I don't disagree that maybe we should look at  
18 faith-base facilities being there, but that's -- the  
19 Treasure Island plan, itself, they can negotiate some  
20 sort of rental there -- that's a separate document. / So  
21 regarding the EIR with the transportation and the  
22 environment and some of the alternatives, again, I am  
23 going back to the role of the EIR, how we look at the  
24 alternatives, how we look at -- and I think we have  
25 adequately looked at the alternatives. We know we have

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1 -- there is mitigation issues, but going back again, the  
2 public should understand, this is a document to look --  
3 how we look at all the alternatives.

4 PRESIDENT MIGUEL: A couple of things. One --  
5 oh, I'm sorry. I forgot you were sharing a mike there.

6 COMMISSIONER SUGAYA: Yeah, this always  
7 happen. And I also got the shortest seat, you know.  
8 Anyway, I am a little taller than I really am here. In  
9 any case, I'd like to support the two-week extension,  
10 and I would make a motion to do that. I can't remember  
11 how we do this, but --

12 PRESIDENT MIGUEL: I was about to say that  
13 it's one of the few prerogatives of the chair. I have  
14 discussed it with Board Chair Owen, and we have two  
15 weeks additional until, if my check of the calendar is  
16 correct, September 8th.

17 COMMISSIONER SUGAYA

18 COMMISSIONER SUGAYA: Thank you. I have  
19 additional comments that I'll just submit in writing and  
20 not take up any more time. I thank Mr. Elberling for  
21 his observation with respect to the Navy's valuation,  
22 and since my area of expertise happens to be in that  
23 direction, some of my comments will be focused on that  
24 as well as perhaps transportation of the land use.

25 So thank you.

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1           PRESIDENT MIGUEL: Thank you. The other  
2 comments I was going to make, although I will probably  
3 submit it in writing as well, and one of the reasons  
4 that I felt and agreed with a number of the speakers,  
5 including commissioners and board members regarding a  
6 two-week extension, is the fact that, although this has  
7 different situations than what we just went into with  
8 Hunter's Point, it has very serious implications for the  
9 City, and certainly an additional two weeks or 60 days  
10 is not out of line.

11           Here, rather than being a superfund site,  
12 which was one of the major situations at Hunter's Point,  
13 we have a totally different area, not connected to the  
14 land, other than by very attenuous transportation roads.  
15 What I'm concerned about is the density of the project  
16 as it's proposed. Density transportation services are  
17 intimately linked.

18           I'm not positive in my mind that that linkage  
19 has been properly explored or considered, SB375, all of  
20 the other environmental acts, as far as cutting down on  
21 greenhouse gas emissions. Everything else involved in  
22 that area of the environment I know has been looked at,  
23 but I think they will become, at least in my mind, more  
24 serious when we get to this 15 or 20 or longer build-out  
25 of the project itself. And I'm not totally convinced of

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1 that.

2 The density, as currently proposed, should be  
3 as high as it is. Because of the transportation, which  
4 is very, very difficult. I have a long history with the  
5 island, what is now called "Building Two" was in the  
6 '50s called "Hangar Two," and that's where I used to go  
7 constantly for naval reserve meetings back when the Navy  
8 had it.

9 Many of the items that were mentioned today  
10 will be handled in a development agreement itself. They  
11 do not necessarily belong in the EIR. And that  
12 development agreement should be very, very carefully  
13 studied to cover those items particular to what it will  
14 be like on the island.

15 But I do believe that the density and  
16 transportation issues need further examination. In my  
17 mind, they have not been linked successfully.

18 Commissioner Antonini.

19 COMMISSIONER ANTONINI

20 COMMISSIONER ANTONINI: Thank you. And I am,  
21 too, okay with the two-week extension that's been  
22 proposed, the motion on the floor. And I want to thank  
23 Mr. Elberling for bringing up the concerns about jobs on  
24 the island, particularly, those that deal with  
25 neighborhood serving, and I think it is well analyzed in

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1 the EIR that there are, I believe, a total of around  
2 451,000 square feet, between the commercial, retail,  
3 square footage on there, and maybe a little bit more,  
4 when we consider the hotels and perhaps even some of the  
5 recreational uses. But I think it is important that the  
6 residents, as it is analyzed, be able to find those uses  
7 that they use on a daily basis to be present on the  
8 island. And I think that's good.

9 And while this isn't a subject for discussion  
10 today, it's a future subject for -- by other bodies,  
11 that being, BART and regional transportation agencies.  
12 But we know there will be a time when they look for  
13 redundancy to their present tube, and if there is ever a  
14 possibility to that linking up to Yerba Buena and  
15 Treasure Island, it makes a lot of sense to me. As an  
16 additional alternative, to allow people to travel into  
17 San Francisco, particularly, easily and quickly, even  
18 though the analysis of the Ferry Terminal and those  
19 things are quite well analyzed to address the  
20 transportation needs.

21 PRESIDENT MIGUEL: Board Member Samaha.

22 BOARD MEMBER SAMAHA

23 BOARD MEMBER SAMAHA: Well, first of all, I do  
24 want to thank our staff and consultants for a document  
25 that I think is very thorough. I'm not surprised that a

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1 project of this magnitude has had such little  
2 controversy. And I'm really quite surprised that we  
3 have not had more controversial comments to this  
4 document. But I do support a two-week extension. I  
5 think it is a reasonable request for a project of this  
6 magnitude.

7 I do want to echo Commissioner Elberling's  
8 comments about the East Bay, the link to the East Bay  
9 and those jobs. I think that had not been adequately  
10 addressed in this document. And then the comment that  
11 we heard today, which are new to me, about the athletic  
12 fields and the Tidelands Trust interpretation. I do  
13 want that to be looked at by staff, and hopefully when  
14 we revisit this in September we can look at that  
15 further.

16 Thank you.

17 PRESIDENT MIGUEL: Just a correction, if I  
18 may. I was looking incorrectly at my calendar. A  
19 two-week extension would bring it to September 9th.  
20 That is a Jewish holiday. I don't think we should  
21 include that. So arbitrarily I'm going to make it  
22 September 10th. Just so everyone understands, you have  
23 until September 10th to submit your written comments,  
24 until close of business on September 10th, to be  
25 official about it. Thank you.

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1           Anything else from the Commissioners or the  
2 Board? Anything further? All right. With that, this  
3 public hearing to take comments on Treasure Island is  
4 closed. I thank everyone and ask them to please submit  
5 as in the normal manner their comments to the Board.

6           (Whereupon, hearing concluded.)

7                       ---oOo---

## REPORTER'S CERTIFICATE

I, Elise Nock, Certified Shorthand Reporter,  
in and for the State of California, do hereby certify:

That the foregoing proceedings, previously  
recorded, produced by me stenographically and later  
transcribed into typewriting under my direction; that  
the foregoing is a true record of the proceedings taken  
at that time.

IN WITNESS WHEREOF, I have subscribed by name  
this 15th day of August, 2010.

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Elise M. Nock CSR 13246