Letter 83: Arc Ecology (1/12/10)

Letter 83

Arc Ecology

Environment, Economy, Society, & Peace

12 January 2010

Mr. Stanley Muraoka
Environmental Review Officer
San Francisco Redevelopment Agency
One South Van Ness Avenue, Fifth Floor
San Francisco, California 94103

RE: Public Comment on Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project *(formerly the "Bayview Waterfront Project")* Draft EIR [DEIR]

Dear Sirs:

Arc Ecology has been forwarded these comments from the following individual(s):

Literacy for Environmental Justice (LEJ)

Arc Ecology is submitting these comments to the Agency on behalf of the commenter and also referencing them as a portion of our own commentary on Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project *(formerly the "Bayview Waterfront Project")* Draft EIR [DEIR].

Sincerely,

Saul Bloom
Executive Director
Arc Ecology

Enclosures: LEJ letter

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RE: Public Comments on the November 12, 2009 Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project Draft EIR

83-1

Literacy for Environmental Justice (LEJ) is an environmental education and youth empowerment organization located in the Bayview Hunters Point neighborhood of San Francisco. Bayview Hunters Point (BVHP) is predominantly a low-income community of color, which has historically served as the dumping ground for San Francisco's most toxic industries. The mission of Literacy for Environmental Justice is to foster an understanding of the principles of environmental justice and urban sustainability in our young people in order to promote the long-term health of our communities. LEJ trains youth from Bayview Hunters Point to become authorities and activists in environmental health research, education, and advocacy; sustainable foods production, marketing, and nutrition education; and environmental conservation, restoration, and horticulture.
Our youth programs combine education sessions with action-based projects, drawing concrete linkages between human health, the environment, and urban quality of life:

* The ***Bay Youth for the Environment Program*** operates a native plants nursery at Candlestick Point State Park Recreational Area, and is the primary supplier of plant stock to two major restoration projects on San Francisco Bay; including the ***Yosemite Slough Restoration Project***.

* Interns in the ***Youth With A Plan*** -- an environmental health and justice program contribute a strong youth voice to the redevelopment of southeast San Francisco.

* LEJ also spearheads the restoration and stewardship at ***Heron's Head Park*** (formerly Pier 98). Through the efforts of thousands of community volunteers, we've transformed a brownfield into one of the most vibrant wetlands on the southern bay front shoreline. Each year we host some 1,200 school-age youth at the park for free site-based environmental education programs that link science curricula to real-life environmental health and justice issues.

* We're in the final stages of constructing ***The EcoCenter at Heron's Head Park***, a 1,500-square-foot environmental education facility that will model alternative energy and waste water technologies and be San Francisco's first 100% "off-grid" building. Situated at the foot of the former PG&E Hunters Point Power Plant — closed in 2006 after years of community advocacy — the EcoCenter is a success story that will empower youth to act for environmental health and justice.

Youth With A Plan is LEJ's newest program and brings youth engagement to the public process involving the redevelopment of the Hunters Point Shipyard and Candlestick Park. LEJ recruited youth ages 14-17 from area schools to participate in the Youth With A Plan program. These

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paid youth interns were educated about the history of BVHP and this joint redevelopment project, in the context of the standards and practices of urban development. During their first eight weeks, the youth learned about city planning; case studies of other redeveloped communities and attended BVHP public meetings addressing environmental conservation, city planning, redevelopment, safety, community design, and transportation. LEJ youth then convened a community panel of longtime leaders of the Bayview Hunters Point community at the Waden Branch of the San Francisco Public Library. Youth led this meeting which included a presentation and Q&A on their experience living, working, educating, and advocating in the Bayview and their hopes for the community's future. This event generated public engagement around the Youth With A Plan project, formed inter-generational connections between elders and upcoming leaders.

83-1 cont'd.

Our goal is to support youth in the community and find effective ways to included youth input into public policy decisions. Our public comments for the draft environmental impact report resulted from a survey created by youth for youth. The surveys were completed by youth who live, work or attend schools in Supervisorial District 10. We have identified four areas that we believe should be addressed in the DEIR. These areas are transportation, housing, youth development and education, and access to parks and open space.

The survey asked youth to answers two key questions:
1) *What do youth need to thrive here in Bayview/Hunter's Point?*
2) How can the redevelopment of the southeast San Francisco support youth education and health?

Through our process, 78 surveys were completed. The youth surveyed ranged from age 11 to age 20, with an average age of 15.6. Of the youth surveyed, 66.2% were female. The youth surveyed belonged to the following race/ethnicity groups: 33.8% were Asian/ Pacific Islander, 29.9% were African American/Black, 31.2% were Latino/Hispanic, 2.6 % were White/Caucasian, 2.6% reported more than one race. 60.3 % of the youth surveyed live in District 10, of these 57% live in Hunters Point, 13% live in Candlestick Point/Executive Park. 11% live in Potrero Hill, 15% live in Visitacion Valley.

Out of a total of 42 question asked on the survey, Youth With a Plan have selected the top questions and responses that we believe are important for City Officials and planners to know in order to properly address the needs of youth in District 10. We have found that safety is a reoccurring concern for youth in District 10 and should be addressed during the evaluation of impacts on the Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project Draft Environmental Impact Report. What follows below are additional comments gathered from youth by LEJ via this program.

Respectfully Submitted By,

Malik Looper, Executive Director
Literacy for Environmental Justice

Rachel Russell, Program Manager
Youth With A Plan

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Public Comments on the November 12, 2009 Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project Draft EIR

TRANSPORTATION

Safety on transportation is a major concern for youth. An astounding 97.1 % of youth have witnessed a crime while on MUNI/school bus. 89.6 % of the youth surveyed ride MUNI. 73.1 % of the youth surveyed feel unsafe riding MUNI or the school bus in District 10 communities. 83-2

How many youth have witnessed a crime while on MUNI/school bus?

- 97.1% of youth surveyed have witnessed a crime while on the MUNI or a school bus

Out of youth riding MUNI/school bus in the following neighborhoods (3rd Street, West Point, Harbor, Oakdale, Alice Griffith/Double Rock, Visitation Valley, Potrero Hill, or Candlestick Park/Executive Park), how many feel unsafe?

- 73.1% of the youth surveyed feel unsafe riding the MUNI or a school bus in the following neighborhoods (3rd Street, West Point, Harbor, Oakdale, Alice Griffith/Double Rock, Visitation Valley, Potrero Hill, or Candlestick Park/Executive Park)

How many kids ride MUNI?

- 89.6% of youth surveyed ride the MUNI

Out of the youth surveyed, how many have witnessed sexual harassment while on the MUNI or school bus?

- 34.2% of the youth surveyed have witnessed sexual harassment while on the MUNI or school bus

COMMENT: We believe that safety of youth on transportation should be addressed.

HOUSING

During our survey we asked youth if they live near a toxic producing location. We considered near to be any location that is close enough to be considered a concern to one's health. 73.2% of youth surveyed live near one or more toxic-producing location (auto repair shop, dry cleaners, freeways and/or a gas station). 23% of youth surveyed live near a power plant, waste treatment facility or the Hunters Point Naval Shipyard. We also found that of the youth living near a current or past toxic-producing location 46.8% have a family member or is dealing with chronic health issues such as asthma, cancer diabetes or heart disease. 83-3

Auto repair shops, dry cleaners, freeways and gas stations all produce toxic chemicals. How many youth live near one of these toxic-producing locations?

- Auto repair shops, dry cleaners, freeways and gas stations all produce toxic chemicals. 73.1% of youth surveyed live near one of these toxic-producing locations

How many youth live near a power plant, a waste treatment plant or the Hunters Point Naval Shipyard?

- 23.9% of youth surveyed live near a power plant, a waste treatment plant or the Hunters Point Naval Shipyard

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How many youth that live near a power plant, waste treatment plant, auto repair shop, dry cleaner, freeway, gas station or the Hunters Point Naval Shipyard have a family member or is dealing with chronic health issues such as asthma, cancer, diabetes or heart disease?

- 46.8% of youth who live near a power plant, waste treatment plant, auto repair shop, dry cleaner, freeway, gas station or the Hunters Point Naval Shipyard have a family member or is dealing with chronic health issues such as asthma, cancer, diabetes or heart disease

Out of the youth surveyed how many do not feel safe in their communities?

- 12.2% of the youth surveyed do not feel safe in their communities

Out of the youth surveyed, how many live in public housing?

- 47.7% of the youth surveyed live in public housing

How many youth have water leaks in their homes?

- 13.8% of the youth surveyed have water leaks in their home

COMMENT: We believe housing development considerations need to address the environmental health of youth and their families.

83-3 cont'd.

YOUTH DEVELOPMENT AND EDUCATION

What are the top five extracurricular activities that youth are interested in?

- The top 5 extracurricular activities that youth surveyed are interested in are:
  - Music: 83.3%
  - Sports: 81%
  - College prep: 78.6%
  - Driving education: 73.8%
  - Technology: 69%

How many youth are interested in extracurricular activities?

- 100% of the youth surveyed are interested in extracurricular activities

How many youth think that their school has adequate facilities?

- 30.7% of youth surveyed think that their school has adequate facilities

How many youth feel safe at their after school or summer programs?

- Among youth surveyed who attend an after school or summer program, 83.3% feel safe at their after school or summer program

COMMENT: We believe that the need for age-appropriate extracurricular activities for youth should be addressed.

83-4

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PARKS AND OPEN SPACE

Safety is also a concern for youth at their local parks. Only 44.1% of youth surveyed feel safe at their local park. 85.2% of youth surveyed have witnessed a crime at the park they visit.

How many actually go to their local park (the nearest one)?

- 78.9% of youth surveyed actually go to their local park (the one nearest to their home)

How many youth have witnessed a crime at the park they visit?

- 85.2% of youth surveyed have witnessed a crime at the park they visit

How many youth feel safe at their local park?

- 44.1% of youth surveyed feel safe at their local park

COMMENT: We believe that the need for safe local parks and open space should be addressed.

83-5

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Preliminary comments on selected impacts and mitigation measures listed in Table ES-2.
Michael F. McGowan, Ph.D. Staff Scientist, Arc Ecology. 12/8/2009

Impact AQ-4 Operation of the Project would violate BAAQMD CEQA significance thresholds for mass criteria pollutant emissions from mobile and area sources and contribute substantially to an existing or projected air quality violation at full build-out in the year 2029.

83-6

1. This significant and unmitigated impact exacerbates local environmental injustice with respect to public health and constitutes a cumulative negative impact on the quality of the environment for the city of San Francisco and the Bay Area. The project should be modified such that project air quality emissions would neither worsen existing air quality, nor contribute substantially to projected air quality violations.

Impact HZ-1 Construction activities associated with the Project would not expose construction workers, the
Public, or the environment to unacceptable levels of hazardous materials as a result of the disturbance of soil and/or groundwater with known contaminants from historic uses.
Impacts HZ-2 to HZ-14

83-7

2. The mitigation measures proposed for these potentially significant impacts are not spelled out in adequate detail to judge whether they would be effective in mitigating the impacts to less than significant. Stating that a plan will be made later to mitigate any hazardous release from construction impacts is not a mitigation measure but a promise of the intent to have a mitigation measure. There is no certainty that any mitigation measures will be possible, therefore these impacts should be considered potentially significant and unmitigable, not less than significant and mitigable.
3. This comment applies especially to **HZ-10b** and its mitigation measure. The installation of pilings through a landfill cap that will be used to contain likely, but unspecified contaminants including radiological materials is extremely problematic. This impact should be considered potentially significant and unmitigable. An unmitigable radiological release is not acceptable, therefore the plan needs to be revised to provide a clear alternative to any option for placing pilings through the cap or cover into contaminated fill.

83-8

Impact HZ-15 Construction and grading activities associated with the Project would not disturb soil or rock that could be a source of naturally occurring asbestos in a manner that would present a human health hazard.

MM HZ-15 Asbestos Dust Mitigation Plans and Dust Control Plans.

83-9

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4. The asbestos air monitoring should be required, not at the option of BAAQMD, because the "no visible dust" standard does not protect against asbestos dust which is not visible to the naked eye.
5. The threshold of asbestos concentration requiring shut-down and implementation of dust control measures should be specified based on accepted cancer risk assessment guidelines and Hunters Point current standards, i.e., fewer than 1 in 10,000 excess cancers.
6. Mitigation should include hiring an independent third party to validate the positioning of the asbestos dust monitors and to review and report the monitoring data to the public.

83-9 cont'd.

83-10

83-11

Impact BI-10a and BI-10b and BI-10c Construction of the Candlestick Point would require the removal of hard substrates (riprap) used by native oysters, but would not have a substantial adverse effect, either directly or through habitat modifications, on this species.

83-12

7. This impact statement is incorrect because the hard substrate used by native oysters is the limiting habitat for the species, therefore removing it would be a significant impact. Acceptable mitigation would be replacement of the square footage of hard substrate with a similar amount of hard substrate preferably made from oyster shells. The mitigation habitat could be placed at or below the tide level of the hard substrate removed by the project. The mitigation should be monitored by a competent biologist to demonstrate successful mitigation.

Impact BI-11c Construction of the Yosemite Slough bridge would not have a substantial adverse effect on designated
critical habitat for green sturgeon and Central California Coast steelhead through permanent and temporary impacts to aquatic
and mudflat foraging habitat.

83-13

8. The mitigation measures for this impact are not complete. A Section 7 consultation with the National Marine Fisheries Service is required to determine potential impacts to green sturgeon and their critical habitat in San Francisco Bay. Depending on the outcome of this consultation, the impact may not be mitigable, in which case the bridge would not be allowed. This should be spelled out clearly in the project description.

Impact BI-19a Implementation of the Project at Candlestick Point would not result in impacts to aquatic organisms through the
re-suspension of contaminated sediments.

83-14

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9. Re-suspension of sediments potentially impact eelgrass, macroalgae, and phytoplankton by blocking sunlight. The potential impacts of re-suspended sediments, whether contaminated or not, on such organisms should be evaluated, or there should be a full explanation why not.

83-14 cont'd.

Impact BI-19b and Mitigation Measure MM BI-19b.1 Work Windows to Reduce Maintenance Dredging Impacts to Fish during Operation of the Marina.

83-15

10. The LTMS (2001) standard is no longer the only regulation that must be considered to protect fish and fish habitat from impacts of dredging. There are no work windows for green sturgeon (federal) or longfin smelt (state) so Section 7 consultations and/or California Department of Fish and Game biological opinions will need to be prepared to mitigate for potential dredging impacts. In addition, if any eelgrass beds are nearby, then light monitoring in compliance with National Marine Fisheries Service protocols will need to be done as a condition of the dredging permits.

Impact BI-20a and MM BI-20a Lighting Measures to Reduce Impacts to Birds.

83-16

11. The proposed mitigation measure in MM BI-20a, "Use strobe or flashing lights in place of continuously burning lights for obstruction lighting. Use flashing white lights rather than continuous light, red light, or rotating beams." May not be permissible near water because the U.S. Coast Guard restricts flashing (strobe) white lights to emergency beacons. Please confirm that the use of white strobe lights to deter birds is allowed under these circumstances or propose a different mitigation measure.

MM BI-18b.1 Maintenance Dredging and Turbidity Minimization Measures for the Operation of the Marina. Maintenance dredging for the marina could remove or generate sediment plumes that could impact special status species, their habitats, and Essential Fish Habitat (EFH). To minimize this effect, the following measures shall be implemented by the Project Applicant:
1. Conduct a detailed survey for native oysters in all suitable substrates within the marina, (and the following under this Mitigation Measure).

83-17

12. This mitigation measure is ill-conceived to address habitat impacts of turbidity plumes from dredging in the new Hunters Point marina. First, native oysters have no special status under federal or state law except catch limits under the Fish and Game Code. Second, substrate within a marina is not the natural habitat of this species so possible effects of dredge sediment plumes are not relevant to protecting native oyster habitat within the marina. Third, dredge sediment plumes should be measured during the first dredging episode to assess potential impact, if any, outside the marina. If no impact is

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found then the monitoring should not be needed in subsequent dredging episodes. Fourth, a detailed hydrodynamic plume model requires extensive data on bathymetry, tidal currents, and other factors, including actual verification and validation of the model by collecting field data. With good field data on the sediment plume there is no need for the model and its input data. Fifth, native oysters are widely distributed in San Francisco Bay but their settlement and survival in any one area is highly variable and good cause and effect relationships with, e.g., suspended sediment, are lacking. While monitoring and restoration of native oysters and their habitat in San Francisco Bay is a worthy endeavor, making it a costly requirement of maintenance dredging in a new marina is not justified.

83-17 cont'd.

MM BI-19b.1 in part "The spawning season for the Pacific herring is March 1 to November 30. Therefore, the window that shall be applied to minimize impacts to sensitive fish species (during which dredging activities cannot occur) is March 1 to November 30."

83-18

13. My comment. This statement about the spawning season is incorrect. In San Francisco Bay the spawning season for Pacific herring is October to April (California Department of Fish and Game website). Therefore an arbitrary dredging window would be May-September. In practice, regulation of dredging impacts on herring is done on an ad hoc basis using real time observations of herring spawning so as not to unneccessarily constrain dredging projects when there are no herring spawning in the bay. The LTMS 2001 Management Strategy Appendix F that was cited in the mitigation measure actually says that dredging will be restricted in historic herring spawning areas, when they are present, during December 1-February 28. Please change the wording in the mitigation measure to reflect the correct spawning season and the correct wording of the regulation with regard to Pacific herring.

Hazardous Materials

In MM HZ-1a: change the word "comparable" in the second paragraph to "equivalent" because the investigation and treatment should be at the same level of protectiveness in the CPSRA areas as in the land subject to San Francisco Health Department Article 22a.

83-19

The proposed mitigation measures seem appropriate if they are properly implemented. There should be a mechanism for peer review of the plans, independent verification of the performance of the mitigation, and community outreach to reassure and confirm the success of the mitigation as implemented.

83-20

Hydrology and Water Quality

The mitigation measures should specify that revegetation will be done with native, non-invasive species.

83-21

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The mitigation measures should specify that shoreline improvements will incorporate the principles of natural, living shorelines, wherever feasible. 83-22

The allowance of three feet for future sea level rise may not be adequate. Other California authorities are using a 55 inches by year 2100 estimate. It would be prudent to allow for more sea level rise because it will be much easier to build out farther if sea level doesn't rise more than expected than it will be to protect existing structures from more than three feet of sea level rise if it does occur.. 83-23

The proposed mitigation measures seem appropriate if they are properly implemented. There should be a mechanism for peer review of the plans, independent verification of the performance of the mitigation, and community outreach to reassure and confirm the success of the mitigation as implemented. 83-24

Shoreline Improvements

The frequent mention of the potential use of natural shorelines is to be commended. Arc Ecology endorses the use of living shorelines for erosion protection, public access and education, and habitat preservation and enhancement. The relative amounts of sandy beach and natural shoreline in the plan are small compared to their potential development. Please consider living shorelines for erosion protection where there is now deteriorating riprap, e.g., at much of the Candlestick Point shoreline where rubble riprap is ineffective, unattractive, and hazardous. Moreover, some areas suitable for natural shorelines were stated to be planned for riprap by the Navy. Please plan for natural shoreline areas at these locations and encourage the Navy to implement them as part of the remedy for contamination so they do not have to be redone later. Examples of these areas are Parcel B IR 7, Parcel B Drydocks 5 to 7, Parcel D Berths 16 to 20, Parcel E Berths 37-42, Parcel E-2 entire shoreline. 83-25

When considering the suitability of the natural, living shoreline, approach to shoreline protection and enhancement be sure to include the construction of deep intertidal and shallow subtidal eelgrass meadows and native oyster beds and reefs. These habitat enhancements also attenuate wave action and thus reinforce the effectiveness of marsh and wetlands plants in stabilizing soil along the shore. 83-26

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COMMENTS ON THE CANDLESTICK POINT-HUNTERS POINT SHIPYARD PHASE II DEVELOPMENT PLAN PROJECT DRAFT EIR DATED NOVEMBER 12, 2009

Section 6, Page 30

Comment 1: "Under Alternative 2, motorized and non-motorized traffic would be required to circumnavigate Yosemite Slough because no bridge would be constructed." 83-27

This statement misleads the reader by implying that additional automobiles would be added to the street network without the bridge when in fact, automobiles would not be allowed on the bridge. The section should correctly inform readers that neither the Project or Alternative 2 would provide bridge access for automobiles.

Comment 2: "The primary roadway connection for automobiles and other vehicular traffic between Candlestick Point and HPS Phase II…" 83-28

This statement is similarly misleading. A more accurate statement would inform the reader that the circulation system proposed for automobiles is the same for the Project and Alternative 2.

Figure VI-1

Comment 3: Although the text clearly indicates that the abandoned rail route would provide dedicated right-of-way for the BRT, the figure displays an "Alternative 2 Proposed BRT Route" along Ingalls Street. This could confuse readers who view the figure without reading the text in depth. Figure VI-1 should be corrected to show the BRT route along the RR ROW, as described in the text. 83-29

Comment 4: At the same time, the line along Innes Avenue should be discussed in the text or removed from Figure VI-1 if Figure VI-1 is in error. 83-30

Section 6, Page 32

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Comment 5: The first paragraph should indicate that, similar to the project, the alternative BRT route would be "rail ready" (not to preclude possible conversion to light-rail). It is illogical to state that the rail right-of-way, to be utilized by the BRT to circumnavigate Yosemite Slough, would not be capable of accommodating rail. 83-31

Section 6, Page 33 – Transportation and Circulation

Comment 6: "The main roadway connection between Candlestick Point and HPS Phase II would be via Ingalls Street." 83-32

This statement misleads the reader by implying that additional automobiles would be added to the street network without the bridge when in fact, automobiles would not be allowed on the bridge. A more accurate statement would inform the reader that the circulation system proposed for automobiles is the same for the Project and Alternative 2.

Section 6, Page 34 – Intersection Conditions

Comment 7: "In general, intersection conditions would be significant and unavoidable effect of Alternative 2." This sentence misleads the reader into believing that Alternative 2 has significant impacts that the Project avoids, when in fact Alternative 2 and the Project have identical impacts to intersections. This section should inform readers that impacts of Alternative 2 are the same as the Project. 83-33

Comment 8: "During game days at the football stadium, with no Yosemite Slough Bridge, the entrance and exiting capacity for vehicles would be reduced about 40 percent compared to the Project; four out of a total 11 exit lanes would be available without the bridge." 83-34

This statement is in error. Section III.D, page 45 indicates that one out of the bridge's four lanes would remain open to off-peak direction traffic for local traffic and emergency vehicles. In addition, Alternative 2 would provide the same number of lanes accessing regional transportation facilities and the same number of lanes in the local street system. Only the number of lanes leaving the parking lot is reduced from ten to seven.

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Comment 9: "A mitigation measure to implement a Travel Demand Management Plan for the stadium events would reduce but not avoid traffic impacts, which would be significant and unavoidable." 83-35

This statement misleads the reader by implying that impacts associated with Alternative 2 cannot be mitigated whereas similar Project impacts could be mitigated. The statement should inform the reader that the Project's Travel Demand Management Plan would also reduce but not avoid stadium traffic impacts which would also be significant and unavoidable.

Section 6, Page 34 – Transit Impacts

Comment 10: The second paragraph misleads the reader into believing that the Alternative 2 route does not provide dedicated right-of-way when in fact the alternative BRT route around Yosemite Slough would still operate in dedicated right-of-way and is technically feasible. 83-36

Comment 11: Pursuant to State CEQA Guidelines Section 15151, the EIR should provide a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which takes into account the environmental consequences of the project. While an EIR must contain facts and analysis, not just an agency's conclusions or opinions (Citizens of Goleta Valley v. Board of Supervisors, 1990), no technical analysis is presented in the Draft EIR justifying the claimed travel time savings. Based on the additional distance around Yosemite Slough (3,205 feet) and average BRT travel speeds (20 to 25 miles per hour), the alternate BRT route should require between 1 minute 27 seconds and 1 minute 49 seconds of additional travel time. 83-37

Comment 12: Identical misleading statements regarding dedicated right-of-way and travel time are made in Appendix D (Transportation Study) and should be removed because these statements are not supported by facts or analysis presented in the Draft EIR. 83-38

Comment 13: The reference to VRT on this page is a typographical error. 83-39

Section 6, Page 58 – Attainment of Project Objectives 83-40

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Comment 14: The statement that Alternative 2 would meet transportation-related objectives to a lesser extent than the Project is inconsistent with the remainder of the section and should be removed from the Final EIR. Earlier in Section 6 the Draft EIR states that construction, intersection, freeway, transit, bicycle, pedestrian, and parking impacts of Alternative 2 are the same as or similar to the Project (Section 6, Pages 33-35). Additionally, Appendix D (Transportation Study) makes the same conclusions:

- "Therefore, the traffic impacts associated with Alternative 2 would be the same as the Project." (Page 235)
- Impacts at Mainline and Weaving Segments are the same (Page 212) and Impacts at Ramp Junctions are the same (Page 216)
- "As with the Project, Alternative 2 impacts on transit capacity would be less than significant." (Page 288)
- "As with the Project, Alternative 2 impacts on bicycle circulation would be less than significant." (Page 295)
- "As with the Project, Alternative 2 impacts on pedestrian circulation would be less than significant." (Page 300)

83-40 cont'd.

Comment 15: Stating that Alternative 2 meets most of the Project objectives is incorrect. Like the Project, Alternative 2 provides for BRT connection between Candlestick Point and Hunters Point along dedicated right-of-way. Alternative 2 and the Project have identical traffic-related impacts. Additionally, the Draft EIR does not provide analysis demonstrating the necessity of the bridge to accommodate game day traffic (a scenario occurring only 10 or 12 times a year). Based on the analysis provided in the Draft EIR, Alternative 2 meets all the Project objectives while reducing impacts to Hazards and Hazardous Material (Section 6, Page 42), Geology and Soils (Section 6, Page 44), and Biological Resources (Section 6, Page 47).

83-41

Table VI-4 – Attainment of Project Objectives Alternative 2

Objective 1

Comment 16: The statement that removing the bridge eliminates direct transit connection is false; Alternative 2 provides a BRT connection in dedicated right-of-way.

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Comment 17: The statement that removing the bridge eliminates continuous shoreline and open space access contradicts the previous sentence which correctly states that Alternative 2 provides "the same shoreline improvements and open space network" as the Project. 83-43

Comment 18: Alternative 2 meets this objective to the same extent as the Project because a grade-separated connection is not necessary to produce tangible community benefits. 83-44

Objective 2

Comment 19: The statement that removing the bridge eliminates a direct connection between Candlestick Point and Hunters Point Shipyard is false; Alternative 2 provides a BRT connection in dedicated right-of-way. 83-45

Comment 20: Alternative 2 meets this objective to the same extent as the Project because direct connection is provided by transit in dedicated lanes and the opening of Crisp Avenue. 83-46

Objective 5

Comment 21: Alternative 2 includes the same stadium as the Project, the same number of lanes on local streets as the Project, the same connection to U.S. 101 as the Project, and meets Objective 5 as well as the Project. The technical analysis in the Draft EIR does not support the statement that a bridge over Yosemite Slough is necessary infrastructure. An EIR must contain facts, not just an agency's conclusions or opinions (Citizens of Goleta Valley v. Board of Supervisors, 1990). Because the conclusion that the bridge is "necessary infrastructure" is not supported by fact, such statements should be removed from the Final EIR. 83-47

Comment 22: The Draft EIR does not provide an analysis of post-game traffic flow with and without the bridge. The Draft EIR only assumes that a greater number of lanes exiting the parking lot is beneficial. It is possible that a greater number of lanes exiting the parking lot will overwhelm the local street system without speeding the delivery of vehicles onto U.S. 101. 83-48

Comment 23: Because the Draft EIR does not provide an analysis of post-game traffic flow with and without the bridge, it is improper to make a conclusion that the bridge is necessary infrastructure. Such statements should be removed from the Final EIR. 83-49

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Section 6, Page 160 – Environmentally Superior Alternative

Comment 24: "Alternative 2... would avoid Project impacts related to biological resources, water quality, and hazardous materials because the Yosemite Slough [bridge] would not be constructed. However, because the Yosemite Slough bridge would not be constructed, Alternative 2 would result in increased traffic-related impacts, particularly on game days."

This statement is inconsistent with the analysis contained within the section. Earlier in Section 6 the Draft EIR states that construction, intersection, freeway, transit, bicycle, pedestrian, and parking impacts are the same as or similar to the Project (Section 6, Pages 33-35). Additionally, Appendix D (Transportation Study) makes the same conclusions:

- "Therefore, the traffic impacts associated with Alternative 2 would be the same as the Project." (Page 235)
- Impacts at Mainline and Weaving Segments are the same (Page 212) and Impacts at Ramp Junctions are the same (Page 216)
- "As with the Project, Alternative 2 impacts on transit capacity would be less than significant." (Page 288)
- "As with the Project, Alternative 2 impacts on bicycle circulation would be less than significant." (Page 295)
- "As with the Project, Alternative 2 impacts on pedestrian circulation would be less than significant." (Page 300)

83-50

Comment 25: Please explain how this paragraph can state Alternative 2 would result in increased traffic-related impacts when that statement is in direct conflict with Table VI-12: Comparison of the Significant and Unavoidable Impacts of the Project to Each of the Alternatives, which found Alternative 2 to be equal to the Project.

83-51

Comment 26: The Draft EIR assumes that a greater number of lanes exiting the stadium parking lot is beneficial, but provides no analysis demonstrating that the number of vehicles delivered by Ingalls Street and the bridge (three outbound lanes each) will not exceed the capacity of the Harney Way and 3rd Street ramps and U.S. 101. It is possible that metering the flow of vehicles exiting the parking lot, by not providing a bridge, would result in more efficient handling of vehicles and reduce the level of queuing and congestion on local streets.

83-52

Appendix D, Chapter 6, Page 288

83-53

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Comment 27: The second paragraph of Alternative 2-No Bridge misleads the reader into believing that the Alternative 2 route does not provide dedicated right-of-way when in fact the alternative BRT route around Yosemite Slough would still operate in dedicated right-of-way and is technically feasible. **83-53 cont'd.**

Comment 28: Pursuant to State CEQA Guidelines Section 15151, the EIR should provide a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which takes into account the environmental consequences of the project. While an EIR must contain facts and analysis, not just an agency's conclusions or opinions (Citizens of Goleta Valley v. Board of Supervisors, 1990), no technical analysis is presented in the Draft EIR justifying the claimed travel time savings. Based on the additional distance around Yosemite Slough (3,205 feet) and average BRT travel speeds (20 to 25 miles per hour), the alternate BRT route should require between 1 minute 27 seconds and 1 minute 49 seconds of additional travel time. **83-54**

Comment 29: The third paragraph of Alternative 2-No Bridge asserts that the alternative BRT route would increase travel time by 5 minutes and decreases ridership by 15 percent. These statements are not supported by analysis presented anywhere in the Draft EIR and should be removed from the Final EIR. **83-55**

Comment 30: The travel time increase in the Draft EIR is similar to statements made in the Bayview Transportation Improvements Project (BTIP) Transportation Study dated August 15, 2008 which identified 4 minutes 37 seconds in travel time savings with the bridge. The BTIP, however, erred when determining the differences in travel time by adding 1 minute to the travel time of the no-bridge alternative west of the bridge and failing to add travel time across the bridge to the with-bridge alternative. It should be noted that the BTIP no-bridge alternative assumed the BRT would travel on Ingalls Street in mixed-flow lanes. Alternative 2 of the Draft EIR includes use of dedicated lanes within abandoned Navy rail right-of-way. The Project BRT route and Alternative 2 BRT route would both utilize dedicated lanes for the entire trip. Because the BRT would not travel in mixed-flow lanes in Alternative 2, the travel time savings of the bridge identified in the Draft EIR would be less than the corrected BTIP travel time savings. **83-56**

Comment 31: The stated 5 minute increase in travel time with Alternative 2 is greatly exaggerated. Between Carroll Avenue and Shafter Avenue the bridge route would travel approximately 2,245 feet. The route around Yosemite Slough for Alternative 2 is approximately 5,450 feet. Stating that the trip around Yosemite Slough, in dedicated lanes, requires 5 additional minutes is equivalent to stating that the BRT has an average speed of 7.3 miles per hour. **83-57**

20 of 20

Comment 32: Based on other BRT lines operating in dedicated lanes, the expected average speed should be between 20 and 25 miles per hour. This would equate to a travel time savings for the Yosemite Slough Bridge of between 1 minute 27 seconds and 1 minute 49 seconds. 83-58

Comment 33: Errors in calculating the travel time savings of the bridge were undoubtedly carried forward into estimations of BRT ridership to and from the Hunters Point Shipyard and impacts to route 28L-19th Avenue/Geneva BRT route. All analyses that utilized the incorrectly calculated travel time savings should be corrected and reported so that the actual costs and benefits of the bridge can be considered. 83-59

Appendix D, Chapter 6, Page 290

Comment 34: Please explain how development in Bayview (and specifically whether or not a bridge providing approximately 1.5 minutes of travel time savings is built) affects a bus line travelling between Daly City and the Presidio. 83-60

Letter 83: Arc Ecology (1/12/10)

Response to Comment 83-1

This comment contains introductory, closing, or general background information and is not a direct comment on environmental issues or the content or adequacy of the Draft EIR. No response is required.

Response to Comment 83-2

The comment cites a number of statistics regarding crime rates on Muni, and comments that the safety of youth on transportation should be addressed. Although crime on Muni is an existing serious concern, the commenter provides no evidence suggesting that the Project would have any impact on crime rates on Muni.

Draft EIR page III.D-119 presents a discussion of potential pedestrian safety impacts resulting from increased travel demand. With the Project, the number of pedestrians on streets outside of the Project site would increase as a result of the expanded recreational uses, extension of transit lines, and overall increase in commercial activity in the area. Similar to the anticipated "safety in numbers" benefit from increased pedestrian activity in the Project area, the increase in Muni ridership and the general overall increase in pedestrians, bicyclists, and transit riders for a variety of purposes throughout the day could increase safety conditions on Muni and on the streets and sidewalks. No further analysis is required.

Response to Comment 83-3

Impact AQ-6, which is provided on Draft EIR pages III.H-33 through -34, assessed the environmental health concerns associated with Project operation. Because new R&D facilities would be located on HPS Phase II, the potential for cancer and non-cancer health risks was evaluated. With certain locational requirements identified in MM AQ-6.1 and MM AQ-6.2, potential exposure would be below the BAAQMD thresholds. Consequently, future residents of HPS Phase II would be protected from significant health effects.

The BAAQMD is recommending community-scale impact analyses for TAC and $PM_{2.5}$. Refer to Master Response 19 (Proposed BAAQMD Guidelines), which provides updated community-scale analyses based on the most recent guidance. Refer also to Master Response 5 (Health of the Bayview Hunters Point Community) for a discussion of health outcomes in the Bayview community.

Response to Comment 83-4

This comment does not provide a direct comment on environmental issues or the content or adequacy of the Draft EIR. No response is required.

Response to Comment 83-5

Provisions for adequate law enforcement services are discussed on pages III.O-1 through -12 of Draft EIR Section III.O (Public Services). The Draft EIR identified no need for new or improved services as a result of the Project. Also, the Project aims to provide high-quality parks that will encourage use and help

anchor a vibrant, safe community. This comment is not a comment on the technical adequacy of the environmental analysis of the Project.

Response to Comments 83-6

Comments 83-6 through 83-26 are identical to Comments 82-2 through 82-22. Therefore, the following responses to these comments 83-6 through 83-25 reference the corresponding responses in Letter 82 without the need to summarize the issues.

Refer to Response to Comment 82-2.

Response to Comment 83-7

Refer to Response to Comment 82-3.

Response to Comment 83-8

Refer to Response to Comment 82-4.

Response to Comment 83-9

Refer to Response to Comment 82-5.

Response to Comment 83-10

Refer to Response to Comment 82-6.

Response to Comment 83-11

Refer to Response to Comment 82-7.

Response to Comment 83-12

Refer to Response to Comment 82-8.

Response to Comment 83-13

Refer to Response to Comment 82-9.

Response to Comment 83-14

Refer to Response to Comment 82-10.

Response to Comment 83-15

Refer to Response to Comment 82-11.

Response to Comment 83-16

Refer to Response to Comment 82-12.

Response to Comment 83-17

Refer to Response to Comment 82-13.

Response to Comment 83-18

Refer to Response to Comment 82-14.

Response to Comment 83-19

Refer to Response to Comment 82-15.

Response to Comment 83-20

Refer to Response to Comment 82-16.

Response to Comment 83-21

Refer to Response to Comment 82-17.

Response to Comment 83-22

Refer to Response to Comment 82-18.

Response to Comment 83-23

Refer to Response to Comment 82-19.

Response to Comment 83-24

Refer to Response to Comment 82-20.

Response to Comment 83-25

Refer to Response to Comment 82-21.

Response to Comment 83-26

Refer to Response to Comment 82-22.

Response to Comment 83-27

Comments 83-27 through 83-60 are identical to Comments 82-35 through 82-68. Therefore, Responses to Comments 83-27 through 83-60 refer to the corresponding responses in Letter 82 without the need to summarize the issues.

Refer to Response to Comment 82-35 for text changes to the description of Alternative 2.

Response to Comment 83-28

Refer to Response to Comment 82-36.

Response to Comment 83-29

Refer to Response to Comment 82-37.

Response to Comment 83-30

Refer to Response to Comment 82-38.

Response to Comment 83-31

Refer to Response to Comment 82-39.

Response to Comment 83-32

Refer to Response to Comment 82-40.

Response to Comment 83-33

Refer to Response to Comment 82-41.

Response to Comment 83-34

Refer to Response to Comment 82-42.

Response to Comment 83-35

Refer to Response to Comment 82-43.

Response to Comment 83-36

Refer to Response to Comment 82-44. Refer also to Response to Comment 82-27 for revisions to Figure VI-1 and a description of BRT routing.

Response to Comment 83-37

Refer to Response to Comment 82-45. Refer also to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for discussion of BRT travel time estimates.

Response to Comment 83-38

Refer to Response to Comment 82-46. Refer also to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for discussion of BRT travel time estimates.

Response to Comment 83-39

Refer to Response to Comment 82-47.

Response to Comment 83-40

Refer to Response to Comment 82-48.

Response to Comment 83-41

Refer to Response to Comment 82-49.

Response to Comment 83-42

Refer to Response to Comment 82-50. Refer also to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) for BRT routing under Alternative 2.

Response to Comment 83-43

Refer to Response to Comment 82-51.

Response to Comment 83-44

Refer to Response to Comment 82-52.

Response to Comment 83-45

Refer to Response to Comment 82-53. Refer also to Response to Comment 82-50 for discussion of BRT routing for Alternative 2 and Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) for BRT routing under Alternative 2.

Response to Comment 83-46

Refer to Response to Comment 82-54.

Response to Comment 83-47

Refer to Response to Comment 82-55.

Response to Comment 83-48

Refer to Response to Comment 82-56. Refer also to Response to Comment 82-32 for discussion of capacity constraints at regional transit facilities and Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) for BRT routing under Alternative 2.

Response to Comment 83-49

Refer to Response to Comment 82-57.

Response to Comment 83-50

Refer to Response to Comment 82-58.

Response to Comment 83-51

Refer to Response to Comment 82-59. Refer also to Response to Comment 82-26 for revisions to Alternative 2 impact discussion.

Response to Comment 83-52

Refer to Response to Comment 82-60.

Response to Comment 83-53

Refer to Response to Comment 82-61. Refer also to Response to Comment 82-27 for revisions to Figure VI-1 and description of BRT route.

Response to Comment 83-54

Refer to Response to Comment 82-62. Refer to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for an estimate of BRT travel time around Yosemite Slough.

Response to Comment 83-55

Refer to Response to Comment 82-63. Refer to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for an estimate of BRT travel time around Yosemite Slough.

Response to Comment 83-56

Refer to Response to Comment 82-64. Refer to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for an estimate of BRT travel time around Yosemite Slough.

Response to Comment 83-57

Refer to Response to Comment 82-65. Refer to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for an estimate of BRT travel time around Yosemite Slough.

Response to Comment 83-58

Refer to Response to Comment 82-66. Refer to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) and Responses to Comments 47-4 and 82-30 for an estimate of BRT travel time around Yosemite Slough.

Response to Comment 83-59

Refer to Response to Comment 82-67. Refer also to Response to Comment 82-30 for discussion of BRT travel time estimates.

Response to Comment 83-60

Refer to Response to Comment 82-68.

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Letter 84: Arc Ecology (1/12/10)

Letter 84

Arc Ecology

Environment, Economy, Society, & Peace

January 12, 2010

Mr. Stanley Muraoka
Environmental Project Officer
San Francisco Redevelopment Agency
One South Van Ness Avenue
San Francisco, CA 94102

Mr. Muraoka:

Attached please find the Alternatives for Study commentary on the Candlestick Point Hunters Point Shipyard Draft Environmental Impact Report and supplementary materials from LSA Associates, Far West Engineering and other associated comments and materials. Arc Ecology by reference incorporates the Santa Clara Draft Environmental Impact Report for the proposed Forty Niner Stadium.

We are submitting this comment under protest for the inadequate extension of the public comment period which we believe unfairly penalizes the public's review of this Draft Environmental Impact Report.

Thank you,

Saul Bloom
Executive Director

4634 3rd Street, San Francisco, California 94124, United States of America
PHONE: 415.643.1190 | *FAX:* 415.643.1142 | *EMAIL:* info@arcecology.org

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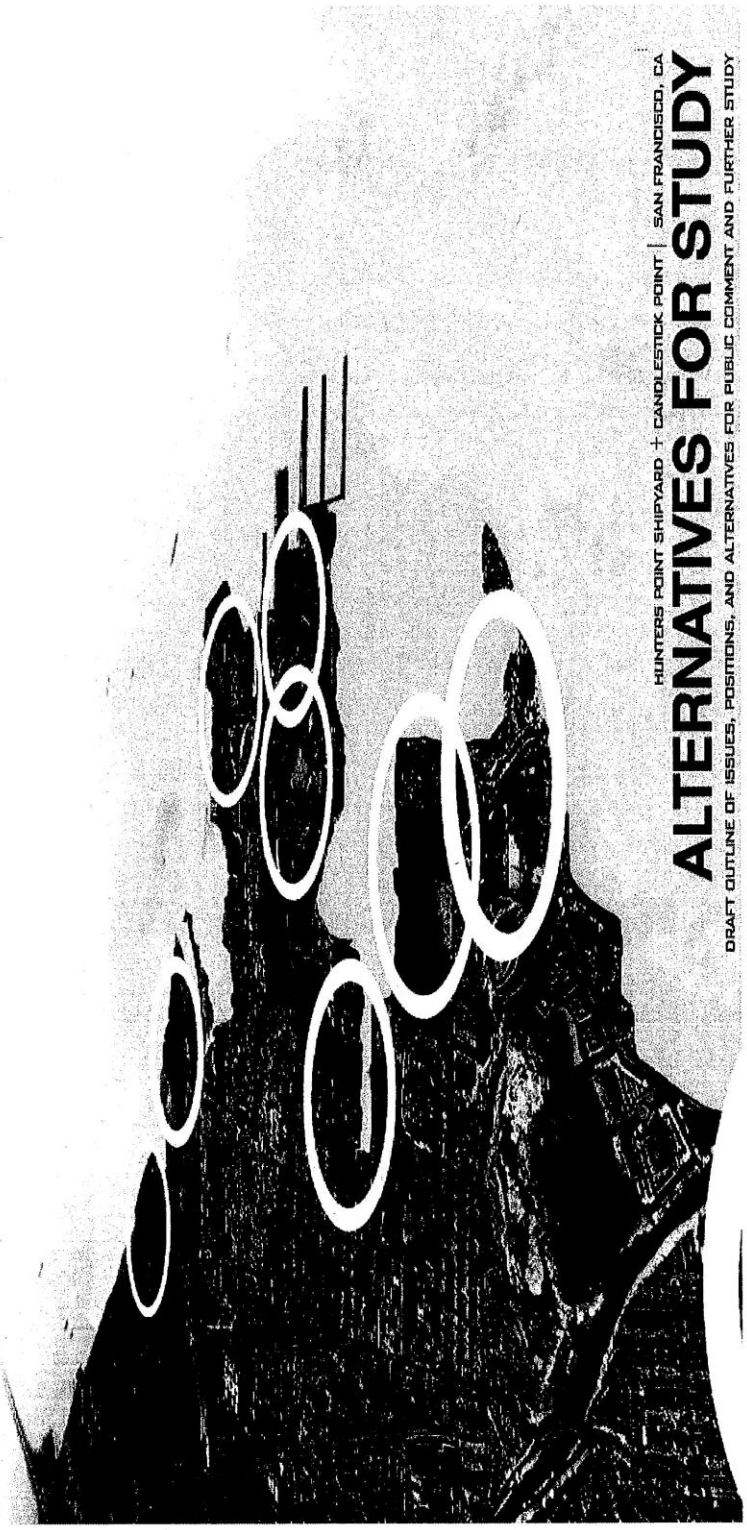

COMMENTARY ON THE CANDLESTICK POINT HUNTERS POINT SHIPYARD DRAFT ENVIRONMENTAL IMPACT STATEMENT JANUARY 12, 2010

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Preface

The purpose of this *Final Alternatives for Study Preferred Alternatives Report (AFS FINAL)* is to present two of the Alternatives discussed in the DEIR in a different light, thereby demonstrating how a different orientation toward this effort could satisfy the criteria established for the development while lessening its environmental impacts. We present this document as commentary on the Candlestick Point Hunters Point Shipyard DEIR.

Arc Ecology
Golden Gate Audubon
Kristine Enea, resident of India Basin
Literacy for Environmental Justice,
Sierra Club San Francisco Bay Chapter,
Scott Madison, former Chair, Hunters Point Shipyard Citizens Advisory Committee
Urban Strategies Council
Visitation Valley Greenway Project
Visitation Valley Planning Alliance

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Alternatives for Study – Presentation of Final & Preferred Project Alternatives

In January 2009, Arc Ecology and our consultant planning team from Bionic Planning & Landscape produced and distributed *Hunters Point Shipyard & Candlestick Point Alternatives for Study: Draft Outline of Issues, Positions and Alternatives for Public Comment and Further Study DRAFT (AFS DRAFT)*. The goal of Alternatives for Study was to "address shortcomings" within the City's and Lennar's planning process and investigate issues and strategies to help inform the development of the Candlestick Point Hunters Point Shipyard Draft Environmental Impact Report.

After the release of the report, a series of three Alternatives for Study community dialogues were held at the Bayview Opera House. The purpose of these dialogues was to engage community residents in a discussion regarding the concepts posed in AFS, provide the attending public with an overview of the planning and entitlement process for the Candlestick Shipyard development, and to deepen our understanding of how residents used transit and gain their views on how transit in the Bayview could be improved. Over the course of these workshops the Urban Strategies Council and the Sierra Club San Francisco chapter joined the process of sponsoring the dialogues and, thus, the project grew beyond Arc Ecology to something larger. Some 200 unduplicated individuals attended the AFS Dialogues.

A fourth "workshop on wheels" was provided at which members of the Shipyard Citizens Advisory Committee, Project Area Committee, and members of other related advisory committees toured China Basin Park, the Embarcadero, the Moscone Playing Fields, Crissy Field, Coyote Point, and Candlestick Point State Recreation Area to compare and contrast the park and open space strategies proposed in the Lennar Urban Design plan with actual examples. Participants in the tour filled out a survey to help us understand their response to what they had seen.

84-1

On November 12, 2009, eleven months after the release of AFS *DRAFT*, the San Francisco Redevelopment Agency and the Planning Department produced the Candlestick Point Hunters Point Shipyard Draft Environmental Impact Report (DEIR).

84-1 cont'd.

AFS Comment 1: Unfortunately, many of the same shortcomings identified in *AFS Draft* remain in place today.

- The DEIR does not provide a comprehensive sustainability plan, although elements are presented as impact mitigations; 84-2
- The DEIR fails to address other adjacent development projects such as the Area C plan, piecemealing the evaluation of the project's impact; 84-3
- The DEIR fails to present reasonable justification and/or mitigations for the impacts of locating the proposed stadium on the Shipyard; 84-4
- The DEIR fails to evaluate the potential for the development of port-related heavy industrial activities on the Hunters Point Shipyard, possibly excluding this use from future consideration for this site; 84-5
- The DEIR does not evaluate the alternate route around Yosemite Slough proposed by the environmental community to protect and enhance the environment of the last unbridged inlet of San Francisco Bay on San Francisco's eastern waterfront; 84-6
- The DEIR does not adequately disclose the massing and girth of structures on Candlestick Point despite the substantial variance in environmental impacts these factors might produce; 84-7
- The DEIR innaccurately analizes the environmental benefits of alternate park, open space, shoreline, and waterfront access activities; 84-8
- The DEIR does not address the CEQA and Proposition P implications of early transfer. 84-9
- The DEIR does not adequately address impacts to wildlife species 84-10

Alternatives for Study: Comments on Candlestick Point Hunters Point Shipyard DEIR - Final Page 3

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AFS Comment 2: The public comment period was inadequate for a document this complex; the release of the DEIR over the winter holiday season undermined public review; in particular, the short time for review and the timing of the release added to the difficulty of compiling these comments; the release of the DEIR at this time contravenes a commitment made by the Mayor's office of this and prior administrations to refrain from releasing a shipyard related document like this over the holidays.

There is the sense among some in San Francisco's political community that organizations and individuals asking for an extension of public comment periods are simply waging a project opposition campaign by other means. This is unfortunate. True, some may attempt to wage a campaign of delay to bring down a project, but there is danger in this view because it discounts the views of those, like the organizations contributing to these comments, that support the project but see serious deficiencies, wish to address those weaknesses in the proposed plan and contribute proposals to make substantive improvements.

Were government and industry always right, a public comment period would be unnecessary. However the California Environmental Quality Act and its associated Environmental Impact Report Process were enacted precisely because government and industry aren't always right.

CEQA was created because projects have environmental impacts. CEQA was created because the neighborhoods, the interested public, and those we share this planet with were being forced to live with the consequences of bad decisions by government and industry. These decisions often imperiled their health, environment, livelihood and community. Therefore, CEQA was created to ensure that the public understood the large details of a project and its impacts on the environmental health and wellbeing of the affected community and its ecology.

Governments and industry frequently focus on this specific aspect of CEQA; that environmental impact reports are disclosure documents. Often the argument goes as follows: because an EIR is effectively a disclosure document, and because there have been numerous public discussions, presentations, and meetings, extending public comment periods are unnecessary. This, however, is only part of the story because CEQA does one other important thing, it gives the participating public legal standing in the decision making process regarding a project's approval. For the length of a public comment period, during that brief moment of time in the lifespan of a project, the door has been opened to the public to read, learn, and opine on its impacts. Government and industry must then respond in writing to these concerns on pain of possible lawsuit.

84-11

84-11 cont'd.

Furthermore, not only is the decision-making authority formally opened for that time only, it is also a requisite for a project's approval. Without an approved Environmental Impact Report, a project cannot be permitted and built.

In the seven meetings before the Hunters Point Shipyard Citizens Advisory Committee, the Bayview Hunters Point Project Area Committee, the Redevelopment Commission and the Planning Commission, this point was never mentioned and understandably so. If one views these procedures as a battleground, one does not disclose a potential tactical advantage to one's potential adversary. One certainly would try to minimize any extension of the public review process because the longer the look, the better a project and its impacts are understood, and the flaws of any report are identified.

The rub is, of course, that a democracy exists only through the informed consent of the governed and that efforts to hide the ball, unreasonably limit public comment periods, and limit the public's understanding of a process are all inherently unhealthy for our system.

On a very practical level, the release of the DEIR over the holidays, and the inadequate review period:

- Dramatically limited the time professional consultants had to review portions of the DEIR;

Alternatives for Study: Comments on Candlestick Point Hunters Point Shipyard DEIR - Final Page 4

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- Made it very difficult to acquire documents referenced in the DEIR but not included in the DEIR and other assistance since Agencies and Departments were closed and staffs were on vacation;
- Made it impossible for us to conduct public workshops to gain constituent feedback on the DEIR.

84-11 cont'd.

AFS Comment 3: The problems with the DEIR public comment process are further complicated by the appearance that the City may be in violation of the State's requirement to notify Native Americans. Discussions with representatives of the Ohlone People indicate that the San Francisco Planning Department was in possession of an official list of Ohlone representatives to contact in these instances, but that they failed to contact any of these individuals. The lack of specific formal notification and the failure to extend the deadline for public comment period to allow the Ohlone to properly evaluate the document and obtain technical services in that regard has undermined their capacity to comment, further disenfranchising this community.

Bayview Hunters Point is a polyglot community with residents hailing from all corners of the globe. Of this multitude of communities, the African American community is a plurality and it continues to confront many of the historic challenges that have marred this nation's history.

One community that has been all but invisible in Bayview Hunters Point is Native Americans and, specifically, the Ohlone, who are the indigenous residents of Bayview Hunters Point with historic hunting grounds on both Hunters Point and Bayview Hill prior to the invasion of Spanish settlers. The DEIR presents the Ohlone associated with the project area as lost, the victims of western genocide. However remnants of the Ohlone People continue to live in Bayview Hunters Point and are part of a larger community of Ohlone who have recently rediscovered their historic roots to the district through research conducted in the archives of Mission Dolores.

Recent attempts to reassert an Ohlone voice into the process of redeveloping the Hunters Point Shipyard and Candlestick Point have been undermined by the lack of a credible messenger. This individual notwithstanding, the San Francisco Planning Department is in possession of documentation regarding the presence of Ohlone artifacts in the vicinity of the project area. The Planning Department is also in possession of a list of Ohlone leaders to contact when a project planned for this area may come into conflict with known—and areas with potential—finds of patrimony and archeological/ historic significance.

84-12

There is already good reason to be concerned about the management of the project relative to the rights of Native Americans. Recent inquiries into the process for preparing Parcel A for grading revealed that required archeological core samples may not have been taken. The failure to appropriately consult and the potential lack of samples may have seriously compromised the environmental review process. Ohlone representatives have indicated that a dialogue has recently opened with the Planning Department. Nevertheless, the cure for the failure to consult must be the extension of the public comment period for the DEIR to allow this community the opportunity to comment on the administrative record.

84-12 cont'd.

AFS Comment 4: The Proposed Project presents the most significant and substantial impacts of any of the five scenarios presented in the DEIR.

84-13

While CEQA does not require the selection of the scenario with the least damaging environmental impacts, the DEIR Executive Summary and descriptions of alternatives, use the term "reduced development" for anything but the full build out with stadium and bridge. This terminology suggests that anything other than the full development is somehow inferior to the other alternatives—as if the other alternatives don't live up to the full potential of the project. This pre-judges consideration of alternatives such that the most housing units and the highest impacts are presumed to be superior, with all other choices inferior. In effect, the alternatives are lumped in with the "no-project" alternative as unacceptable. This presentation is argumentative and prejudicial to a fair consideration of alternatives. The two AFS Alternatives presented below pose fewer and less substantial impacts than any of the DEIR discussed Alternatives.

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AFS Comment 5: Brisbane Baylands

In the draft version of Alternatives for Study, the Brisbane Baylands were identified as a potential alternate site for a new 49ers Stadium. For a number of reasons it is likely that this site is the best in the region to host a new Stadium.

Like the Oakland Coliseum, this site fronts a major highway. The Brisbane Baylands site fronts Highway 101 and is a few miles from Highway 380, which joins Highway 280 with 101. This makes the site accessible by essentially three freeways. Furthermore, the site is less than 15 miles miles further north from the San Mateo Bridge giving East Bay fans two major bridges from which to easily access the stadium. As such, the site is superior to that of the Coliseum, the Hunters Point Shipyard, and the proposed Santa Clara location for vehicular access. In addition, the site is located along what will in the future be the new BART Geneva extension, making access to the site from the southern portion of San Francisco more direct than it has been in the past.

The Brisbane site also provides opportunity for ample parking, which would have the impact of reducing parking on neighborhood streets in Visitation Valley, Little Hollywood and other adjacent communities.

Also like the Coliseum, the Brisbane site is located along a major commuter rail line – in this case CALTRAIN. The proximity to CALTRAIN makes this site easily accessible via mass transit from either San Jose or San Francisco. Furthermore, the adjacent location to CALTRAIN is vastly superior to that of an adjacent ferry terminal as the capacity for passengers is much greater. The nearby T Line, Geneva Avenue bus service, and SAMTRANS San Mateo Bus Service all make this site a highly effective location for access via mass transit.

Given its proximity to transit, freeways, and the lack of immediately adjacent neighborhoods, the Brisbane Baylands location is likely least impactful from an environmental, ecological, and public health standpoint.

84-14

The City rejected study of this site because it is not within San Francisco's jurisdiction. While this change of heart may make our adjacent neighbors very happy, the fact remains that San Francisco Airport, the Hetch Hetchy Reservoir, the Sunol Reservoir and most of the San Francisco Water Districts fresh water supply, the Hetch Hetchy Electrical Transmission Lines, and our County Jail all are located outside of the physical bounds of the City and County of San Francisco. Given this precedents, the argument that the Baylands lies outside of San Francisco and, therefore, cannot be considered is faulty. Furthermore, discussions with the staff and locally elected officials of the Brisbane City Government all indicated a willingness to enter into discussions regarding the potential location of a Stadium on the Baylands.

84-14 cont'd.

We recognize that the property is in private hands and that the Universal Paragon Corporation may see this use as significantly less profitable than their other plans for the site. Nevertheless, the failure to give this option serious consideration—a nearby site that is literally a ten minute drive from the stadium's current location and poses potentially fewer environmental impacts than any competing location—is a significant and important weakness of the DEIR.

AFS Comment 6: AFS Major Differences with the DEIR Preferred Plan

84-15

AFS 6A: Economic Development & Employment

The original goal for the redevelopment of the Hunters Point Shipyard was to help lift the residents and economy of Bayview Hunters Point out of poverty. While there is reason to be concerned that far too much responsibility for this goal has been placed on the Shipyard and Candlestick project, there is ample cause for concern that the economic development and employment strategy will not reach as far into the Bayview Hunters Point community as could reasonably be accomplished.

Economies and societies mirror the natural ecology in that the more diverse a system is, the more stable it becomes. The AFS analysis focused

Alternatives for Study: Comments on Candlestick Point Hunters Point Shipyard DEIR - Final Page 6

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on the following criteria for investigating economic development and employment opportunities in the project area:

- Must include a broader range of industrial, commercial, small scale entertainment and hospitality business strategies and employment opportunities;
- Must give priority to activities that create jobs with a future and maximize long-term employment or career opportunities;
- Must include opportunities for ownership by District 10 residents.

DEIR Proposed Activities: The DEIR proposed project promotes four basic forms of economic activity:

- Construction (temporary/short term);
- Sports (temporary/short term);
- Retail & Entertainment (temporary/short term);
- Green Tech/ Research & Development (long-term & career oriented).

AFS Proposed Alternatives embrace these forms of economic and employment development strategies and add the following:

- Port-oriented Heavy Industry (temporary/ short terms/ long-term & career oriented);
- Enhancement of Waterfront Oriented Retail, Food & Entertainment.

AFS 6A.1: Heavy Industry - Maritime Activities: The lack of a meaningful assessment of Maritime Port usage for the Hunters Point Shipyard waterfront in the DEIR will preclude this use in the future, at a minimum requiring an additional costly supplemental EIR process.

In 1994, the San Francisco Redevelopment Agency and Arc Ecology cooperated in the creation of an obsolete ship recycling program. In 1995 the Navy leased the dry dock, and scrapping took place at the facility until the election of George Bush in 2000 when this pilot project was ended.

In 2002, it was not unreasonable to be skeptical about the potential for including maritime activities on the Hunters Point Shipyard. At that time, the Navy's pilot ship dismantling program had been discontinued, the Maritime Administration was shipping Non Retention Fleet vessels to Brownsville in Texas for dismantling, and a conveyance agreement for Shipyard Parcels had not yet been concluded.

Today, however, the conditions are very different and this perspective needs to be reassessed. The Navy's aging fleet and other issues have created an environment in which the return of this asset to active duty can be contemplated.

The Hunters Point Shipyard contains one of the most unique maritime assets on the West Coast of the United States: Dry Dock 4, the largest graven dry dock on the coast and the only such dry dock capable of hosting a 90,000 ton Nimitz Class Carrier – the largest class of Naval vessel. Changes in the maritime industry present new and important options for the Hunters Point Shipyard. A substantial portion of the Navy's fleet—particularly Capital Ships, the largest vessels in the Navy—are in excess of 25 years old and some are beyond their useful service life. As such, a new decommissioning and recycling program for these vessels is being contemplated. In addition, the Maritime Administration recently entered into an agreement with BAE at Pier 70 to conduct short term paint scraping and sea grass removal for vessels slated for sale or recycling. A contract is also being let at Mare Island for use of its dry docks for ship recycling. The Suisun Bay Non Retention Fleet offers a potentially permanent source of vessels for eventual recycling. While some of this work could be accommodated at Pier 70, ship recycling is a lengthy process and encumbering the floating dry docks at that location with this activity would interfere with an already thriving ship repair business. Augmenting the activities at Pier 70 with the use of dry docks at Hunters Point opens a new and exciting opportunity for local industry and neighborhood residents with metal and building trades experience with minor training requirements. Dry Dock 4 and the Shipyard's industrial waterfront afford an opportunity to expand this industry in San Francisco by bringing to market one of the truly unique assets of the facility.

84-15 cont'd.

84-16

84-16 cont'd.

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AFS 6A.2: Failure to present a robust study of the impacts of a substantial waterfront oriented retail, food & entertainment district within the DEIR may also preclude some or most of the activities potentially able to be located along this very important asset.

The Shipyard's second most significant economic development opportunity is its substantial waterfront. While the view from this waterfront is different than the dynamic scenery of the City's northeastern waterfront from AT&T Park to Crissy Field, the placid waters and East Bay and South Bay views, in combination with the best weather in San Francisco, offer an equally compelling development portfolio. On the other hand, improvements to the waterfront to make these assets viable require a deeper discussion within the DEIR relative to traffic, waste, and related issues. At this point the project descriptions for Hunters Point North and East seem to ignore this potential reuse and instead focus on more pedestrian and marina-oriented uses and impacts.

AFS 6B: Transit & Transportation

It is unclear from reading the DEIR whether the transportation analysis is based upon how the Bayview Hunters Point Community and the new residents of this development currently use and will use mass transit or whether it is based on how the MTC and the Developer would prefer for them to use transit and transportation. This difference is not insignificant because for these strategies to succeed they must meet both the user and the Agency/ Developer's needs.

AFS 6B.1: Extension of MUNI Lines. While some extension of the lines to the project area makes sense, a system providing better connection between the neighborhoods of Bayview Hunters Point should also be studied.

One consistent theme of the project appears to be that mass transit planners have focused on getting people to and from the project area through the Bayview, however connections to the neighborhood seem to be included only as stops along the way as opposed to destinations in and of themselves. It is our view that this paradigm will exacerbate the community's feeling of isolation from the City and the project rather than their integration within the fabric of San Francisco as a whole. 84-17

Our recommendation i to study implementing a Bayview Hunters Point Loop route that connects the neighborhoods South to North utilizing Third Street as the transit hub, as well as providing connections to the City's outlying neighborhoods and downtown. 84-19 cont'd.

AFS 6B.2: The Yosemite Slough Bridge: Presentation of the Yosemite Slough Bridge as a transit-only or a game day traffic bridge is dishonest and is an effort to evade regulatory review what is essentially the proposed construction of an alternate Highway 101 Business Route equivalent. This route joins Harney Way, Hunters Point Expressway, the putative Arelious Walker Bridge, Crisp Avenue, Spring/Galvez, Innes, and Cargo Way to create a business bypass to either Third Street North or Highway 280 on the North side and Highway 101 on the South. 84-20

The image to the left shows the completed route. The segmentation of this route between the Candlestick Point Hunters Point Shipyard DEIR, the forthcoming Area C DEIR, and the prior Bayview Hunters Point Project Area Plan masks the full impact of the entire route. Total expected vehicular use, noise, congestion, and air pollution impacts are underestimated as a result of the failure to link the segments in one comprehensive analysis. Addressing this question in the forthcoming Bayview Transportation Improvement Project analysis undermines the assessment of the contribution of the Candlestick Hunters Point Shipyard project to the impacts of the route. 84-18 84-19

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AFS Comment 7: Alternatives to the Proposed Project

AFS 7A: Alternatives to the Proposed Project are not inconsistent with Proposition G

We believe other scenarios presented within the DEIR and below in this document are consistent with the goals and objectives outlined and supported by the voters in Proposition G. Proposition G, otherwise called the Jobs, Housing, Park, and Stadium initiative, called for the construction of a stadium on the Shipyard – *pending environmental review*. It is our conclusion that the DEIR demonstrates that the proposed Stadium on the Shipyard presents the most extreme environmental impacts of any of the DEIR proposed alternatives and, therefore, fails to meet the environmental review provision in Prop G. The scenarios presented herein, on the other hand, meet the Prop G criteria of creating housing, jobs, parks, and a premier stadium location as well or better than any of the scenarios evaluated in the DEIR.

84-21

AFS 7B: Criteria for AFS Alternative Development

1. **Land use**
   - Must include all or most of the activities in the City/Lennar urban development plan/DEIR;
   - Must make more efficient use of available property based upon the Proposition G criteria of lawyers, guns and money;
   - Must avoid displacement of commercial/residential property;
   - Must not compete with development plans for Third Street or contribute to the blighting of other areas of BVHP.
2. **Employment & Economic Development**
   - Must include a broader range of industrial, commercial, small scale entertainment and hospitality business strategies and employment opportunities;
   - Must give priority to activities that create jobs with a future and maximize long term employment or career opportunities;
   - Must include opportunities for ownership by D10 residents.
3. **Sustainability**
   - Low impact on surrounding environment/infrastructure;
   - Must attempt energy self-sufficiency;
   - Must be sustainable over next 100 year projected criteria.
4. **Environment & Public Health**
   - Must create a livable, walkable community environment;
   - Must meet Prop P cleanup criteria on Shipyard;
   - Must be fully compliant with standards for residential development on non-shipyard project property.
5. **Transit & Transportation**
   - Must service the needs of both the existing and new communities;
   - Must reduce dependence on cars;
   - Must increase available mass transit & make logical connections with existing BVHP transit grid.
6. **Housing**
   - Must be consistent with the scale of the surrounding community;
   - Must integrate subsidized housing/public housing into market rate developments;
   - Must produce a similar number of units (+/- 1,000 u) as the Lennar/City project.
7. **Parks & Open Space**
   - Must create an integrated strategy of park and open spaces;
   - Must create logical and substantive connections between parks and open spaces, such as Bayview Hill and Candlestick Point State Park;
   - Must enhance, not stress, existing biological resources and habitats and comply with ABAG guidelines for habitat preservation;
   - Must create more park/open space area than existed prior.
8. **Arts & Culture**
   - Must include African Cultural Cues & International African Marketplace;
   - Must preserve the existing arts community and create a new arts district;
   - Must include historical references focused on Native American, Samoan, & Naval activities.

84-22

84-22 cont'd.

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AFS 7C: Comparison of AFS Alternatives with DEIR Alternatives

These scenarios were developed after gaining feedback in four AFS community workshops held at the Bayview Opera House and Arc Ecology's offices. In addition, meetings with the City, Redevelopment Agency, Lennar, members of both the PAC and CAC, members of the India Basin Neighborhood Association, labor, other neighborhood groups, employment development organizations, as well as Potrero Hill and Visitation Valley based organizations, and City-wide/regional environmental organizations helped inform these alternatives. The scenarios presented include a new Arc Ecology variant of a southern R&D campus instead of a large retail development on Candlestick Point and housing on Parcels D and E. Both scenarios call for a heavy industrial port activity centered around Dry Dock #4.

84-23

AFS 7C.1: DEIR "Alternative 2: CP-HPS Phase II Development Plan; No Yosemite Slough Bridge"

Alternative 2 would have the same land use program proposed with the Project, including the State Parks agreement. Alternative 2 would not include the Yosemite Slough bridge. The main roadway connection between Candlestick Point and HPS Phase II would be via Ingalls Street. A bus rapid transit (BRT) route would be constructed along an abandoned railroad right-of-way to provide access between Candlestick Point and HPS Phase II. This alternative assumes that the 49ers Stadium is relocated to HPS Phase II and the Agency enters into an agreement with CPSRA to reconfigure CPSRA land in the same way as for the Project.

Summary of Impacts: This alternative was selected to avoid impacts to biological resources associated with bridge construction and operation. Significant traffic, noise, and air quality impacts would not be reduced." **CP/HPS DEIR 11-09**

AFS 7C.1a: Comparison with DEIR Alternative 2

The AFS Stadium Alternative keeps the Stadium on Candlestick Point, creates additional housing on the Hunters Point Shipyard, and includes a heavy industrial port-related application on Shipyard Parcel C as an additional layer of economic activity to supplement "green research and development" and other commercial enterprises proposed for the property. Because the stadium would remain on Candlestick, no bridge would be needed, reducing the overall cost of the project and eliminating the threatened impact on efforts to restore Yosemite Slough and adjacent habitats. Proximity to the Harney Way Highway 101 on-ramp would remain as it is currently, thereby eliminating one mile of additional driving to reach the Shipyard and providing the associated reduction in carbon. The AFS proposed BRT route around Yosemite Slough via the railroad right of way would be enhanced by a neighborhood oriented transit loop connecting the new development with the existing neighborhood, Third Street T line, other bus routes, and the Oakdale CAL Train Station. As a result, traffic, noise and air quality impacts would be less than that considered in this alternative. The current footprint of Candlestick Point would be adjusted away from the SB 792 boundary on the South Basin side to comply with ABAG minimum habitat width Guidelines. The AFS Alternative is superior to CP-HPS Alternative 2 because it eliminates the impacts of that Alternative, while enhancing open space connectivity, housing opportunity, and diversifying the types of industries located on the Shipyard. Air pollution impacts on Candlestick Point would resemble the no-project alternative.

84-23 cont'd.

AFS 7C.2: DEIR "Alternative 3: Reduced CP-HPS Phase II Development; San Francisco 49ers Stay at Existing Candlestick Park Stadium; Limited State Parks Agreement; Yosemite Slough Bridge Serving Only Transit, Bicycles, and Pedestrians"

Alternative 3 would be a reduced development alternative. Total housing with this alternative would be 5,210 units, about half of the units proposed with the Project. At Candlestick Point residential development would be decreased and retail and arena uses would not be developed. Replacement of the Alice Griffith Public Housing site would occur and consist of 1,210 housing units. Minor improvements would be made to the CPSRA under the

84-24

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Limited State Parks Agreement. At HPS Phase II, housing would be increased; other uses at HPS Phase II would be similar to the Project. A new Yosemite Slough bridge serving only transit, bike and pedestrian traffic would extend Arelious Walker Drive from Candlestick Point to HPS Phase II. This alternative assumes that the 49ers football team would continue to use the existing Candlestick Park stadium. At HPS Phase II, the alternative would not include a new 49ers Stadium. This alternative would result in greater transportation-related impacts on game days because vehicular ingress and egress to and from the stadium would be delayed and traffic levels would be increased on local streets, including Innes Avenue, Evans Avenue, and Ingalls Street.

This alternative was selected to provide an alternative to the Project that reduces construction related impacts generally and operational impacts associated with traffic, air quality, noise, demand for public services, biological resources, and other growth-related impacts. The development program of this alternative would be reduced compared to the Project and would generate fewer vehicle trips and reduce the area subject to development. This alternative would reduce traffic and noise impacts associated with an increase in vehicle trips and air quality impacts associated with Project construction and operation. This alternative would reduce impacts to biological resources associated with bridge construction and operation as a result of the narrower bridge footprint and reduced bridge traffic. Construction and/or operational impacts related to the amount of development and the development footprint, such as soil erosion and storm water runoff, as well as operational impacts related to population and employment growth, such as police and fire services, would also be reduced by this alternative. **CP/HPS DEIR 11-09**

AFS 7C.2a: Comparison with Alternative 3

84-24 cont'd.

Alternative 3 is the closest comparison to the AFS Stadium Alternative. It comports with a developing perspective that a more limited approach to the project would constrain project costs and impacts making the entire development more affordable over a shorter period of time. The AFS Alternative differs from the DEIR alternative in the alignment of Stadium parking, the inclusion of the heavy industrial port activity on the Shipyard side, a larger housing configuration on the Shipyard site, the more integrative approach to park and open space systems – particularly as it regards to Bayview Hill, the focus on neighborhood=oriented loop transit to make trunk line connections, and the absence of a bridge across Yosemite Slough.

AFS does not find credible the assessment that this alternative, and particularly the lack of a bridge, would create an equivalent or greater impact of game day traffic on the Shipyard North-Side India Basin located streets of Evans and Innes. This route does not currently and is probably the least likely to suffer major impacts from a Candlestick Point located stadium as it poses the greatest challenges to easily accessing the site. Southbound traffic from either Highways 101 or 280 would select the closer more practical freeway exits of Silver, Paul, and Tunnel Road over the respective Caesar Chavez exits and a route that is essentially 5 miles longer. Northbound freeway traffic is also unlikely to forgo the current Harney Way and Third Street exits in favor of traveling another mile north to return southbound three miles through the India Basin neighborhood over Middle Point Road to the Bayside industrial flatlands along Ingalls. As a simple test of this theory, Arc Ecology asked Mapquest, Google, and Yahoo to provide routes to Monster Stadium; none identified this route. San Francisco residents would use such familiar main thoroughfare access strategies as Carrol, Gillman, Jamestown, and Geneva to Tunnel Road to Harney Way.

Impacts on Harney Way into Visitation Valley, Jamestown, Paul and Gillman would remain the same as in the no-project alternative, although a DPT controlled preferred routing alternative of Third Street to Carrol Street could channel traffic through the industrial Bayside as opposed adjacent neighborhood streets. The uncontrolled strategy incorporated

84-24 cont'd.

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into the DEIR's Alternative 3 seems likely to ensure that neighborhood streets would continue to be heavily impacted by game day traffic and the pursuit of free on–street parking. One community benefit offset would be to provide Bayview Hill community residents with a limited number of free parking permits per residence to enable DPT to ticket and, therefore, discourage game day nonresident parkers.

84-24 cont'd.

AFS 7C.3: DEIR Alternative 4: Reduced CP-HPS Phase II Development; Historic Preservation; No HPS Phase II Stadium, Marina, or Yosemite Slough Bridge"

—Alternative 4 would also be a reduced development alternative. Total housing with this alternative would be 7,350 units, about 30 percent less than proposed with the Project. The proposed floor areas for most uses would be approximately 30 percent smaller at full build-out in comparison to build-out of the Project. No improvements would be made in the CPSRA. This alternative includes preservation of three potentially historic structures at HPS Phase II. This alternative does not include construction of a bridge over Yosemite Slough.

This alternative was selected to provide a reduced development alternative to the Project. This alternative would reduce the area subject to development and would avoid significant impacts to historic resources at HPS Phase II. Reduced development would result in fewer vehicle trips. This alternative would reduce traffic and noise impacts associated with the increase in vehicle trips and air quality impacts associated with Project operation and construction. This alternative would also avoid impacts to biological resources associated with bridge construction and operation. Construction and/or operational impacts related to the amount of development and the development footprint, such as soil erosion and storm water runoff, as well as operational impacts related to population and employment growth, such as police and fire services, would also be reduced by this alternative. **CP/HPS DEIR 11-09**

84-25

AFS 7C.3a: Comparison with Alternative 4

The AFS No Stadium Alternative builds upon some of the concepts presented in the DEIR while doing a superior job of maximizing employment, economic development, transit access, park and open space preservation and enhancement, and housing distribution. In the AFS No Stadium Alternative all of the same Shipyard assets discussed above are carried over. As such, heavy industrial activities, a research & development campus, the historic, arts and cultural district, parks and housing strategy remain the same. The AFS No Stadium Alternative also retains the marina. As such, the Shipyard side of the AFS Alternative remains an economically, socially, and environmental diverse project consistent with the Project objectives.

On the Candlestick side, the AFS No Stadium Alternative presents a different mix than Alternative 4 as well. In this scenario the total number of housing units on this property would be reduced, and a southern research and development campus would take the place of the retail mall proposed for the site. The AFS alternative favors increased research and development over expanded retail opportunity because of its potential for higher paying career-oriented job development. By combining a second R&D campus with the heavy industry proposal, destination parks, and art, culture and historical attractions, it is the AFS position that this strategy hews closer to the intent the voters endorsed in the Jobs, Housing, and Parks slogan of Prop G than the DEIR proposed project.

84-25 cont'd.

AFS 7C.4: DEIR "Alternative 5: Reduced CP-HPS Phase II Development; No HPS Phase II Stadium, State Parks Agreement, or Yosemite Slough Bridge"

84-26

Alternative 5 would have the same land use program proposed with the Project, except that the new stadium at HPS Phase II and the Yosemite Slough bridge would not be constructed. The total number of housing units would be the same as the Project; however, because this alternative would not include the CPSRA boundary reconfiguration, the land area available for development would be smaller. Approximately 1,350 units would be shifted

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from Candlestick Point to HPS Phase II. This alternative assumes a State Parks agreement does not occur and there is no agreement with the 49ers for a stadium at the Project site.

This alternative was selected to reduce construction impacts generally and to avoid impacts to biological resources associated with bridge construction and operation. Significant traffic, noise, and air quality impacts would not be reduced. Construction impacts that relate to the size of the development footprint would also be reduced by this alternative. **CP/HPS DEIR 11-09**

AFS 7C.4a: Comparison with Alternative 5

Alternative 5 could be configured to provide the benefits outlined in the AFS Stadium Alternative.

AFS Comment 8: Early Transfer & Implications for CEQA Review and Proposition P

84-27

It is our view that Early Transfer or the acceptance of a portion of the Federal Superfund cleanup responsibility in exchange for faster development brings that portion of the cleanup undertaken in this process under the umbrella of CEQA review for San Francisco and the Redevelopment Agency as an arm of the State. While exemptions apply within CEQA for jurisdictional changes with cleanup requirements, the acceptance of Early Transfer responsibility brings the City and Redevelopment Agency directly into the chain of responsible parties for cleanup liabilities. Furthermore, the strategies implementing early transfer requirements will have implications for the project's land use options. Given the City's possible responsibilities for implementing Early Transfer activities, it is also likely that the City's response in that regard is now covered by the terms of Proposition P, which was adopted by unanimous acclimation by the San Francisco Board of Supervisors under the sponsorship of Supervisor Maxwell and then Supervisor Newsom. These issues should be addressed in the DEIR.

84-26 cont'd.

AFS Comment 9: Summary of Comparisons of DEIR and AFS Project Alternatives

84-28

Activity	DEIR Alternatives	AFS Alternatives
Jobs & Economic Development		
• R & D	2 campuses	1 campus
• Retail	Concentrated in mall on Candlestick with neighborhood serving on the Shipyard	First floor and neighborhood serving retail similar to other SF neighborhoods on both CP and HPS
• Commercial	Yes	Yes
• Heavy Industrial	No	Yes
• Port/ Waterfront	No	Yes
• Hospitality & Food	Yes	Yes
Waterfront or Shorefront Stadium	Yes	Yes
Neighborhood Serving Mass Transit	Limited to extending inter-district bus lines & Bus Rapid Transit line connection with BART and CALTRAIN	Yes, includes BRT & focuses on providing smaller neighborhood loop-oriented mass transit methods making transfer connections with to City and regional trunk line e.g. T line, and CALTRAIN
Housing: Providing between 5,000 and 10,500 units	Yes	Yes
Parks & Open Space	Less than 300 acres of new and replacement parks	More than 300 acres of new and existing parkland including integration with Yosemite Slough & Neighborhood
Bridge	Yes	No
Prop P Compliant Cleanup	No	Yes

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84-29

AFS Comment 10: Attainment of Project Objectives

ATTAINMENT OF PROJECT OBJECTIVES – AFS STADIUM ALTERNATIVE		
Objective	*Meets Project Objective?*	**Analysis:** AFS Stadium Alternative would include some of the same development program and uses as the Project, ***however it is superior to the Project in meeting the attainment objectives:***
1. The integrated development should produce tangible community benefits for the Bayview and the City.	Y+	The addition of a heavy industrial seaport component would create more job and economic development opportunities than those presented in the DEIR Project Alternatives. This proposal takes advantage of changes in federal orientation toward ship recycling and utilizes existing assets such as Dry Dock 4, the largest graven dry dock on the west coast, to attract work. This scenario is likely to produce more work for a broader spectrum of workers earlier in the redevelopment process than those activities proposed in the DEIR. The exclusion of this use from the DEIR will prevent this opportunity from being exploited. The AFS Alternative would include the renovation and replacement of the artist studios at HPS Phase II and create a permanent space for artists. However it would expand the reach of the arts community to include performance, culinary and other formats providing space for these activities within the area of the proposed arts, cultural and historic district. The AFS Alternative would promote an Afro Centric Cultural District on the shipyard to create greater context for the International African Market Place. The AFS Alternative would also include an Ohlone oriented cultural use on the site. The AFS Alternative would include the same shoreline improvements and open space network, including a Bay Trail extension along the shoreline, and the same improvements to the CPSRA as the Project. However, unlike the proposed project it would promote the removal of the industrial dump on Parcel E2 by proposing its replacement with wetlands that would also treat street contaminants from rain run-off prior to reaching the bay. Ongoing studies of this location as compared to alternative sites on Parcel E are ongoing and funded by San Francisco International Airport under an order from the Regional Water Quality Control Board. The FEIR should incorporate this study within its discussion of developing plans around parks, storm water, water treatment and wetlands. The wetlands described would enhance State Parks efforts to create protected rookeries for water fowl. There would be no Yosemite Slough bridge, therefore the water quality of Yosemite Slough would not be potentially undermined by the facilitation of siltation by the bridge pilings. The lack of a bridge would prevent the blocking of the ever improving Yosemite Slough view shed, would not impede the migration of animals along the shoreline and its absence would also prevent its use as a perch for predatory birds and wildlife that could negatively impact the planned rookeries.. Contrary to the assertion in the DEIR, the lack of a bridge would enhance rather than undermine the natural shoreline connection between the Shipyard and Candlestick Point. In place of the bridge and in combination with the extended MUNI lines, the AFS Alternative would focus on neighborhood-serving, smaller scale mass transit designed to link to district trunk lines, such as the T, and regional rail, such as the planned Oakdale CALTRAIN station, therefore providing greater transit use incentives for community residents.

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ATTAINMENT OF PROJECT OBJECTIVES – AFS STADIUM ALTERNATIVE			
Objective	*Meets Project Objective?*	**Analysis:** AFS Stadium Alternative would include some of the same development program and uses as the Project, ***however it is superior to the Project in meeting the attainment objectives***:	
2. The integrated development should reconnect Candlestick Point and the Hunters Point Shipyard site with the larger Bayview neighborhood and should maintain the character of the Bayview for its existing residents.	Y+	Aside from continuing the street grid on the Candlestick Point side of the project, the Proposed Project and all of its alternatives and variants do a poor job of integrating with the larger Bayview neighborhood. Although the Proposed Project states that alternatives that do not include the Yosemite Slough bridge "preclude a direct connection between CP and HPS, particularly for transit", the Yosemite Slough Bridge creates the appearance of a community divided as does the proposed entryway adjacent to Parcel B. The AFS Stadium Alternative, while attempting to work within the design framework proposed by the City and Lennar, attempts to address this weakness by incorporating a different transit and traffic strategy focused on bringing the BRT closer to non-project residences and businesses, proposing a neighborhood connecting transit loop to serve both the project and surrounding neighborhoods, and boulevard access to Third Street though the South Basin Industrial Area. The AFS Alternative attempts to better integrate Alice Griffith with the adjacent State Park by reorienting the configuration of the development's park, creating a similar wedge configuration to the one proposed for Candlestick South. While the DEIR Proposed Project and its alternatives claim "the mix of uses and urban design concepts would provide a direct physical, visual, and architectural connection to the Bayview Neighborhood and City", clearly its visual references are more deeply connected to South of Market and Oyster Point than it is to Bayview Hunters Point where there are no towers and no buildings taller than 5 stories currently in use. Therefore, while the Proposed Project and its alternatives would meet this Project objective, it would not meet it to as great an extent as the AFS Proposed Alternatives.	84-30
3. The integrated development should include substantial new housing in a mix of rental and for-sale units, both affordable and market-rate, and encourage the rebuilding of Alice Griffith Public Housing.	Y+	As with the Lennar/ City Proposed Project and its alternatives, the AFS proposed alternatives "would include a variety of unit types, sizes, and structures, and a wide range of affordability levels." The AFS Alternative "would also include the redevelopment of the Alice Griffith Public Housing site." Therefore, the AFS Alternative would meet this Project objective.	84-31
4. The integrated development should incorporate environmental sustainability concepts and practices.	Y+	The DEIR does not present a sustainability plan, but rather concepts that appear to mitigate impacts rather than address the fundamental concepts of sustainability. The AFS Alternatives do a better job of integrating parks and open space with the new and existing communities, providing community oriented transit, promoting walking between the two projects, incorporating storm water treatment wetlands, supporting the implementation of Prop P levels of toxic cleanup on the Shipyard and promoting the cleanup of the South Basin industrial neighborhood. Therefore, the AFS Alternatives do a superior job of incorporating sustainability concepts.	84-32
5. The integrated development should encourage the 49ers—an important source of civic pride—to remain in San Francisco by providing a world-class site for a new waterfront stadium and necessary infrastructure.	Y-	In the Santa Clara DEIR, the 49ers specifically reject the Project's Proposed Stadium Alternative as being unworkable. In a recent press statement, the 49ers stated a preference for Oakland over San Francisco for precisely the same reasons AFS found problematic with the proposed plan. It is hard to see how ignoring the 49ers' criteria makes them more likely to want to work with San Francisco. While the AFS Candlestick Point stadium alternative is closer to the freeway by a mile than the DEIR proposed project, and is therefore closer to what the 49ers want, we will readily concede that this site is not as well situated as the Brisbane Baylands site, which we continue to believe is a vastly superior site to Santa Clara, Oakland and San Francisco.	84-33
6. The integrated development should be fiscally prudent, with or without a new stadium.	Y-	None of the DEIR proposed alternatives appear particularly fiscally prudent. This problem is evidenced by the extremely long time Lennar has reported it will take for them to break even, let alone reach their IRR. By eliminating the costly bridge, proposing a smaller and more integrated retail environment, and proposing a second industrial campus, AFS does a better job of being fiscally prudent than the proposed project & its alternatives.	84-34

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AFS Comment 11

ALTERNATIVES FOR STUDY – PROPOSED ALTERNATIVE: STADIUM

Stadium Rebuilt on Candlestick, Housing on D/E, Heavy Industry on C

1. Areas unchanged from DEIR/ Project Plan
2. Alice Griffith – Slight modification in park size & orientation to improve neighborhood orientation to recreational open space
3. Historic Shipyard District including International African Marketplace
4. Arts & Cultural District
5. R&D/ Green Tech Districts
6. New – Proposed port-oriented heavy industrial
7. Parcel D/E Housing – Slight modification from DEIR, assuming Prop P compliance
8. Expanded Parcel E park & living shoreline
9. New – Proposed wetlands, assuming E2 removal or major remedial excavation
10. New – Palou – Innes – 3rd Street Transit Loop
11. No bridge, habitat enhancement
12. CPSRA area unchanged
13. Stadium rebuilt on site with adjacent arena – green parking to perimeter of State Park
14. New Harney Way Alignment
15. Park connection to Bayview Hill
16. HWY 101 + Game Day BART BRT Route
17. New – Gilman / Carrol / 3rd St Transit Loop

84-35

This proposed final alternative is based upon **Alternative 2 in CPHPS DEIR as Variant 2.** This Alternative to that studied within the EIR presents a greater number of economic and park and open space options while keeping the stadium closer to Highway 101, thereby eliminating the bridge concept for game day traffic. Instead of a bridge, two transit loops are proposed (Palou to Innes on the north side, Gilman to Armstrong on the south) to connect both parts of the project to Third Street and the T street car line. This proposed Alternative features less housing overall due to limiting the height of structures on the Shipyard to 10 stories on Parcel D/ E development. On the other hand, the project is also less expensive to construct because of reduced requirements for infrastructure. Other changes include the incorporation of a heavy maritime industrial activity around Dry Dock 4, an arena adjacent to the stadium, a new alignment for Harney Way, a Parcel E2 wetlands, a living shoreline on Parcel E and an expansion of the Park and Open Space area.

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AFS Comment 12

ALTERNATIVES FOR STUDY – PROPOSED ALTERNATIVE: NO STADIUM
Commercial & Housing on Candlestick, & D/E, Heavy Industry on C

NO STADIUM ALTERNATIVE

The land uses described above remain consistent in this alternative except there is no stadium. In this proposed alternative the following changes have been made:

18 An additional housing component is added, bringing the total number of Phase 2 units to above 11,000, but within a 5-10 story limit.

19 A modified version of the retail and arena node in the Candlestick Point Center proposal. This alteration of the plan would add a second research & development complex to the proposed retail/ commercial, 10,000-seat arena, and structured parking. A portion of the Shipyard R&D campus has been relocated to Candlestick to offset the addition of the heavy industrial port activity around Dry Dock 4 so there is no loss in R&D space. The total for R&D square footage between the campuses is increased to 3.5 million.

20 The large sports field complex lost in the City/ Lennar non-stadium alternative is retained and integrated into a larger City/ State regional park system.

This proposed final alternative is based upon **Alternative 5 in the CPHPS DEIR**. This Alternative is the No Stadium variant to the one shown above. This Alternative reduces the area of the Lennar/ City proposed project known as Candlestick Point North and expands the State Park perimeter to a distance of 400 feet from the shoreline of South Basin from the SB 792 perimeter of 200 feet. This alternative still provides Lennar with an intrusion of some 150 feet into the current park boundary for housing development as a concession to their development strategy. It does however eliminate all of the proposed Candlestick Point South development in favor of creating a combined active and passive recreational opportunity similar to those available through regional park systems. The area of the project indentified as Candlestick Point Center is modified to combine a second Research & Development campus with the possibility of an arena and smaller community and CPS/ HPS, Executive Park, and BVHP project area serving retail and commercial development versus the current strategy of creating a regional retail center. CP South housing is relocated to Parcels D&E on the Shipyard assuming Prop P compliant cleanup levels. Total project housing development is increased by 500 units, R&D space is increased to 3.5 million square feet, heavy industrial port land is revived, and park and open space is increased by 40 acres over the Arc Ecology Alternative 2 – AE.afs.v1 concept presented on the prior page.

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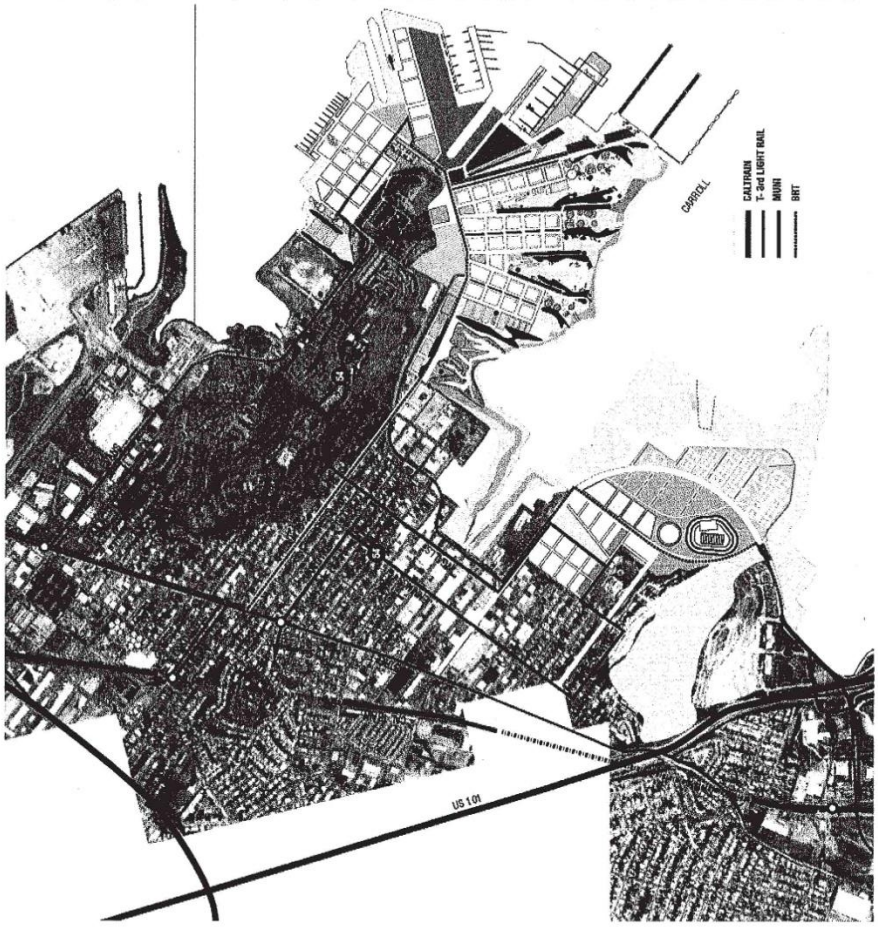
AFS Comment 13

ALTERNATIVES FOR STUDY –

Transit Routing Alternative

This alternate routing proposal attempts to address the negative environmental impacts of the Yosemite Slough Bridge by routing BRT, traffic, bicycle and pedestrian activity around the slough. The route around utilizes the Rail Road right of way and proposes to preserve the rail road bed for train transport to serve the revitalized port activity. This route is superior to the proposed Yosemite Slough Bridge because it limits the need for pilings, can be built by expanding the right of way, preserves an industrial asset, and still connects both sides of the project. According to LSA Associates the route around Yosemite Slough increases transit time by less than two minutes.

The BRT route pictured here combines with the extended 54 Bus line to create a neighborhood serving bus loop connecting Bayview Hill, the South Basin Industrial Flats, and Hunters Point Hill with the Third Street Transit Trunk, CALTRAIN at Oakdale and continues the 54 route west. This proposed route responds to comments made during the AFS Transportation Workshop for a system that connected the eastern BVHP neighborhoods.



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AFS Comment 10: Supplemental Commentary

Comment: The accuracy and completeness of the following statements is questionable:

III.N-94
Consequently, as the Project would not interfere substantially with the movement of native resident or migratory wildlife species, established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, impacts would be less than significant. No mitigation is required. 84-38

But the development could impede the inland migration of tidal marsh habitat.

III.N-95
Although the bridge and the road crossing it would impede movement of terrestrial species from one side of the bridge to the other, sufficient terrestrial space would be present above the high tide line at the abutments to allow terrestrial wildlife to pass under the bridge. Consequently, Project activities within HPS Phase II and Yosemite Slough would not substantially interfere with the movement of any native resident or migratory terrestrial species. 84-39

Will this be true under all the projected seal level rise scenarios?

III.N-115
Impact BI-24 Implementation of the Project would not have a substantial adverse effect on federally protected wetlands and other waters as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. (Less than Significant with Mitigation) [Criterion N.c] 84-40

The development could have negative impacts on the wetlands in the locations where they will need to be in the future.

As sea level rises, the tidal wetland resources within the project and immediately bayward of it will become inundated and will be lost unless provisions are made now to allow for the inland **migration** of the saltmarsh habitat. It is not sufficient to mitigate impacts on the wetlands in their existing locations and configurations. The topography should be designed and engineered to create a gradual change in elevation adjacent to the existing tidal marshes so that their inward movement and reestablishment will not be impeded and they will not shrink in size or value as the water level rises. Specific attention should be paid to two marshes on the north shore of Candlestick Point State Recreation Area – one located in the area of the failed boat launch facility and the other to the west of it, commonly called "Double Rock Marsh." These two wetland areas are adjacent to steep slopes, a problem exacerbated several years ago when the temporary overflow parking area was graded and the spoils pushed into a berm along the wetland edge. The berm needs to be removed or relocated many yards inland, and the shoreline slope needs to be reconfigured. 84-41

If the ill-advised bridge were to be included in the selected alternative, how would the "sufficient terrestrial space" above the high tide line at the abutments continue to allow terrestrial wildlife to pass under the bridge as sea level rises? 84-42

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While the DEIR appears to deal adequately with the impacts of future sea level rise on the proposed developed areas, it fails to address the impacts on tidal wetlands, and the wildlife that depends on them, and the need for adaptive measures. 84-43

Comment: The draft EIR is inadequate because it uses a lower standard for evaluating an element of the plan than it should -- a standard that, if held to, could result in less park space per 1000 residents in this Bayview Hunters Point redevelopment project, than that currently enjoyed by the residents of other, more affluent San Francisco neighborhoods. 84-44

Stating that "the City does not have an adopted parkland-to-population ratio standard" (III.P, p. 11), the decision is made to use 5.5 acres of parkland per 1000 population as an adequate measure of parkland supply within the project area. This ratio was apparently chosen because that was "...the per capita supply of public open space within the City... at the time of the General Plan's adoption [in] 1986" (III.P, p. 11).

Yet on page 1 of III.P, we find that on Jan. 1, 2008, the ratio of acres of publicly-accessible parks and recreational facilities per 1000 residents for the city of San Francisco as a whole was 7.1. I would argue that this is the standard that should have been used. Why use a lower standard for this project?

Comment: The draft EIR is inadequate because it fails to provide sufficient neighborhood park space in the Candlestick Point part of the Project area. 84-45

The benchmark ratio chosen underlies the analysis pertaining to Impact RE-2 (Deterioration or Degradation of Existing Parks and Recreational Facilities), the heart of section III.P.

The main question is whether or not the Project would cause the deterioration of existing parks and recreational facilities through overuse, or result in the need for new parks and facilities. In attempting to answer the question, we find the following:

"Overall, the Project would provide approximately 336 acres of new and/or improved park land and recreational facilities to accommodate the estimated build-out population of approximately 24,465 residents within the Projecct site..." This would yield "a ratio of about 13.7 acres of parkland per 1000 residents within the Project site". Including 10,730 expected daily employees in the population yields a ratio of "9.5 acres per 1000 employees/residents." (All quotes from III.P, p. 29).

Both ratios are greater than the benchmark 5.5 acres/1000 population; therefore, the report concludes its discussion of Impact RE2 as follows: "Overall, the increase in the resident and daytime population of the Project site would not lead to substantial physical deterioration or degradation of existing facilities, nor would it result in the need for new or expanded facilities. The Project would, therefore, not cause a significant impact and no mitigation is required." Stated in plain English: there would be a sufficient supply of parkland.

Since the ratios noted above (13.7 and 9.5) are also both higher than 7.1, the benchmark I think should have been used, changing the benchmark would not by itself affect the adequacy of the EIR. HOWEVER, consider what happens if one separates the two pieces of the Project, and calculates acres of parkland per 1000 population for each part.

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84-45 cont'd.

HPS Phase II -- Planned Acres of parkland: 231.6
Projected Population at Build-out: 6,175
Acres per 1000 population: 37.5
Candlestick Point -- Planned Acres of parkland: 104.8
Projected Population at Build-out: 18,290
Acres per 1000 population: 5.7

First, there is quite a discrepancy! Second, although each of these ratios is greater than 5.5, the ratio for Candlestick Point alone is less than 7.1, the ratio I think should have been used. Furthermore, note that only 8.1 acres of the 104.8 at Candlestick Point represents true neighborhood parkland. The rest is the reconfigured Candlestick Point State Recreation Area. As wonderful as that resource will be, I do not see that it will function well as a place where neighborhood children can play. Therefore, I believe there needs to be mitigation in the form of increased neighborhood parkland in the Candlestick Point area.

84-46

Comment: Section III.P of this EIR is inadequate because it does not consider construction impacts on Biological Resources.

In the analysis of Impact RE-1 (Construction of Parks, Recreational Uses, and Open Space) on p. 12, reference is made to several other sections of the EIR which contain "discussion of project-related construction impacts". There is no reference to section III.N (Biological Resources). Surely, there would be construction related impacts to plants and animals, some of which could be significant?

Much of this project is admirably designed, and the redevelopment is certainly badly needed. I hope these comments will help make the project even better than it already is.

84-47

Comment: Air quality impact on future residents

In reference to Section III.H. Air Quality, the EIR talks about Toxic Air Contaminants.

According to various studies, the BVHP community is currently host to a number of causes of air contaminants including the power plant, the city of San Francisco's largest wastewater treatment facility, both federal and state Superfund sites, hazardous waste storage facilities, and 280 "hot spots" containing toxic substances. Bayview Hunters Point is also home to the second largest concentration of leaking underground storage tanks in the city with 53.

This has led to an array of health problems including unusually high breast cancer rates, asthma and bronchitis that impacts current residents and would impact future residents of BVHP. The EIR does not take in to account the number of air pollutants that could adversely affect the over 20,000 new residents who would be affected by the toxic air. Specific emphasis has also not taken in to account the industrial processes, such as petroleum refining, auto painting, chemical manufacturing, electric utilities, chrome plating; commercial operations, such as gasoline stations, dry cleaners and the fact that the Bayview community has the high amount of diesel truck traffic in the area.

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84-48

In 1999, Bayview Hunters Point Health and Environmental Assessment Task Force researchers conducted a community health survey (in collaboration with the University of California San Francisco and the San Francisco Department of Public Health). In the study, adults were asked how many people in their households had asthma. Overall, 10 percent of Bayview Hunters Point residents said they have asthma, compared to 5.6 percent nationally. *(Lenfant, C and Khaltaev, N. (1995) "Global Initiative for Asthma (GINA), Global Strategy for Asthma Management and Prevention: NHLBI/WHO Workshop Report" National Institutes for Health, National Heart, Lung and Blood Institute, Publication Number 95-3659, 1995, in Mann, Jennifer, San Francisco Department of Public Health. Community Health Epidemiology and Disease Control. "Asthma in San Francisco." November 2000.)*

The asthma rate for children in Bayview Hunters Point was one in six (15.5 percent). *(Bayview Hunters Point Health and Environmental Task Force Community Survey, Draft Presentation, presented at "The Landscape of Out Dreams Environmental Health Symposium," Oct. 9, 1999.)*

From 1994-96 the asthma hospitalization rate of Bayview Hunters Point residents was the highest in San Francisco (491 per 100,000 compared to 355 per 100,000 overall). The hospitalization rate for Bayview Hunters Point children was 781 per 100,000. 3 *Mann, Jennifer, San Francisco Department of Public Health. Community Health Epidemiology and Disease Control. "Asthma in San Francisco." November 2000.*

III.B.20

84-49

Proposition P should be included in this section, particularly as the City is considering utilizing the Early Transfer process and undertaking aspects of cleanup responsibility. Prop P established the community acceptance criteria for HPS cleanup under the NCP. Prop P was adopted by the City as its policy in 2000 with 87% of the electorate voting in favor, a much higher level of voter support than Prop G. A resolution presented by Supervisors Maxwell and Newsom in 2001 was enacted unanimously by the Board of Supervisors and compliance with its objectives should establish City policy as to the level of cleanup acceptable in property transfer and thus it is an appropriate CEQA/ DEIR issue and should be incorporated here.

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Letter 84: Arc Ecology (1/12/10)

Response to Comment 84-1

This comment contains introductory or general background information and is not a direct comment on environmental issues or the content or adequacy of the Draft EIR. No response is required. However, page VI-160 of the Draft EIR affirms the receipt of the alternatives study mentioned in this comment, stating:

> A number of alternatives were proposed during the planning and public scoping process for the Project. Several of these alternatives were identified by Arc Ecology, a local community organization. In January 2009, Arc Ecology published a report titled *Alternatives for Study, Draft Outline of Issues, Positions, and Alternatives for Public Comment and Further Study* (Arc Ecology Report).[1350]

As stated on page VI-165 of the Draft EIR:

> Five alternative land use plans were proposed by Arc Ecology and studied in concept for this document. They include proposals to locate the stadium on Parcels B, C, and G of HPS Phase II; one proposal with no stadium at HPS Phase II; and one alternative land use plan for Candlestick Point. …

Each of these alternatives has been analyzed on pages VI-165 through VI-172 of the Draft EIR.

Response to Comment 84-2

A Sustainability Plan has been developed for the Project. The Sustainability Plan sets forth the vision, goals, and strategies for achieving this standard and for transforming the Project site into a local, regional, and international model for sustainable living. The Sustainability Plan integrates overarching goals for seven focus areas spanning the economic, social, and environmental aspects of sustainability, which include, but are not limited to economic vitality and affordability, community identity and cohesion, public well-being, safety and quality of life, accessibility and transportation, resource efficiency, ecology, information and communications technology. Numerous elements of the Sustainability Plan have been incorporated into other Project documents and plans including the Infrastructure Plan, Transportation Plan, and MMRP. The Project has set an energy efficiency performance target of 15 percent below the energy efficiency standards set forth in California law and Vertical Developers will be required to implement measures such as high-performance glazing, efficient lighting, daylighting, shading, envelope optimization, reflective roofs, and natural ventilation in the design of vertical improvements. Additionally, ENERGY STAR appliances are proposed for all new residential units. Strategies to conserve water include the potential use of recycled water for non-potable water uses, the use of drought tolerant plant species, and the use of efficient irrigation systems such as drip irrigation, moisture sensors, and weather data-based controllers; and progressive stormwater management to retain and treat stormwater on site and/or in adjacent areas. The Sustainability Plan will be a part of the DDA to be submitted for approval by the Board of Supervisors.

Response to Comment 84-3

Area C (which is referred to in the Draft EIR as India Basin Shoreline) was evaluated in the Draft EIR as part of the cumulative impact analysis, along with numerous other adjacent projects. As stated on page III.A-6 and -7 of the Draft EIR:

> For the purposes of this EIR, the analysis of the potential for the Project's incremental effects to be cumulatively considerable is based upon a list of related projects identified by the City and neighboring jurisdictions and/or on full implementation of the City's General Plan and/or other planning documents, depending upon the specific impact being analyzed. For example, the cumulative analysis for the Traffic Study (which is the basis for many of the cumulative analyses in this document) uses the San Francisco County Transportation Authority (SFCTA) travel demand forecasting model, which projects general background growth based on Association of Bay Area Governments (ABAG) projections and is consistent with build-out of the City's General Plan. The Traffic Study specifically updated the background growth assumptions based on information regarding a number of major related projects, including (Figure III.A-1 [Cumulative Development in the Project Vicinity]):
>
> - Yosemite Slough Restoration Project
> - India Baseline Shoreline
> - Hunters Point Shipyard Phase I
> - Hunters View
> - Jamestown
> - Executive Park
> - Brisbane Baylands
> - Cow Palace
> - Visitacion Valley/Schlage Lock

The purpose of the cumulative impact analysis is to determine whether or to what extent impacts from individual projects, when considered together, could result in a significant environmental impact, which eliminates the potential for "piecemealing."

Response to Comment 84-4

The Draft EIR presents 111 mitigation measures that have been designed for the express purpose of avoiding or reducing environmental impacts, including those associated with stadium, and the document, in total, provides nearly 4,400 pages of data and analysis, all of which collectively provides substantial evidence for the conclusions made in the document. While the commenter expresses an opinion that the Draft EIR "fails to present reasonable justification and/or mitigations for the impacts of locating the proposed stadium on the Shipyard," no specific comment is provided.

Response to Comment 84-5

Refer to Response to Comment 48-3 regarding the selection and evaluation of alternatives.

The alternative the commenter suggests (port-related heavy industrial uses) is not compatible with the City's vision or the redevelopment plans adopted for the area. Further, this alternative would not achieve the Project's objectives and would not provide any benefit not achieved by the Project. In addition, industrial activities would be expected to result in far greater environmental impacts than those of the Project's proposed land uses. Table VI-11, page VI-170, of the Draft EIR states with regard to maritime

industrial uses: "Maritime industrial uses are not proposed under the Project. Construction and operation of such uses at HPS Phase II could result in new impacts including, but not necessarily limited to, impacts on air quality, noise, hydrology and water quality, and biological resources."

Response to Comment 84-6

The Draft EIR does analyze an alternative with no bridge and in which the proposed BRT route would travel in the route around Yosemite Slough proposed by the commenter. Refer to Section VI.C (Analysis of Project Alternatives) in the Draft EIR, and refer to Subsection VI.C.2 (Alternative 2 [CP-HPS Phase II Development Plan; No Yosemite Slough Bridge]).

Response to Comment 84-7

Chapter II (Project Description) of the Draft EIR identifies the total amount of area (in gross square feet) associated with each land use type (and for the residential areas, the density per acre), the height limits associated with specific areas of the Project site, and within Section III.E (Aesthetics) provides visual simulations of the Project site. This information provides the reader with an understanding of the massing, scale, and density of the Project.

Table II-2, page II-8, provides the net change in development as a result of the Project. Table II-3, page II-9, provides the total development area (in gross square feet) by land use type and by location on either Candlestick Point or HPS. Residential development is identified by density range. Figure II-5, page II-12, identifies the maximum building heights. Pages II-13 through II-23 provide a description of each land use type followed by a description of each district and the uses within each district.

Section III.E (Aesthetics), pages III.E-49 to III.E.50, of the Draft EIR states that:

> To demonstrate the changes in visual character that would result with implementation of the Project, visual simulations of the Project from each of the viewpoints identified in Section III.E.2 (Setting) in Figure III.E-10 through Figure III.E-30 as well as other photographs contained in this section were used to evaluate changes in both views and visual character based on height, bulk, massing, and type of development when compared to existing conditions. Where appropriate, the simulations also include views of the approved HPS Phase I development, currently under construction, and the approved Visitacion Valley Redevelopment Plan. For the purpose of analyzing cumulative impacts, the simulations also include potential development under the proposed India Basin Shoreline Plan and the Executive Park Sub Area Plan.
>
> The visual simulations are distinguished as long-range views (Figure III.E-11 through Figure III.E-18), and short- and mid-range (Figure III.E-19 through Figure III.E-30) depictions. The visual simulations include development with the Project and with other development noted, above. The analysis determines whether the Project would result in substantial blockage of or other substantial negative changes to existing views from the public viewpoints identified in Figure III.E-11 through Figure III.E-18, particularly to views of scenic open space and water, as well as whether the Project would result in degradation of the visual character or quality of the setting (refer to Figure III.E-19 through Figure III.E-30). The simulations are taken from fixed viewpoints and do not show all possible views of the Project site. For example, they do not provide the dynamic views that would be experienced while driving, walking, or cycling in the Project vicinity. In addition, the simulations depict the overall location, height, and dimension of development, with general exterior features or materials, window patterns, landscaping, or other details. The new buildings shown in views of Candlestick Point and HPS Phase II represent building types, heights, and dimensions that would reflect the Project land use plan and urban

> design guidelines. The simulations do not represent final architectural design that would occur with the Project. However, the simulations are sufficient for an adequate analysis of changes in scenic vistas, scenic resources, and visual character."

Refer to Section B (Project Refinements) of this EIR for discussion regarding the description of Variant 2A and Variant 3: Tower Variant D, as well as Alternative 2 and Subalternative 4A.

Response to Comment 84-8

Because the Project would not have any significant, unavoidable impacts related to recreation, CEQA does not require the analysis of alternatives focused on reducing or avoiding such impacts.

Response to Comment 84-9

Refer to Response to Comment 84-27 acknowledging that early transfer brings the portion of the hazardous materials cleanup to be performed by the Agency or Project Applicant under the umbrella of CEQA.

Refer to Master Response 15 (Proposition P and the Precautionary Principle) for a discussion of how Proposition P and the Precautionary Principal relate to the remediation program and the project.

Response to Comment 84-10

The comment states that the assessment of impacts to wildlife is inadequate. While the commenter expresses an opinion, no specific comment is made that can be responded to. The EIR contains an extensive analysis of setting, impacts, and mitigation measures related to biological resources on pages III.N-1 through III.N-141. Specifically, an analysis of wildlife impacts is provided in Impacts BI-2 through BI-13b, BI-15a through BI-20b, and BI-22 through BI-25 of Section III.N (Biological Resources) of the Draft EIR. The Lead Agencies believe the EIR more than adequately addresses these issues for the public and for decision-makers to make informed decisions with respect to these issues.

Response to Comment 84-11

Refer to Response to Comment 1-1 for a discussion of the adequacy of the public comment period, including the many opportunities for providing comments on the Draft EIR.

In terms of accessing the documents referenced in the Draft EIR, as stated on page I-10 of the Draft EIR:

> The documents referenced in this Draft EIR are available for public review by appointment at the San Francisco Redevelopment Agency, One South Van Ness Avenue, Fifth Floor, San Francisco, CA, 94103, or at the City Planning Department, 1650 Mission Street, Fourth Floor, San Francisco, CA, 94103. The EIR will be posted for public review at http://www.sfplanning.org and www.sfgov.org/sfra.

Therefore, the reference documents were available. With respect to the assertion that the reference documents were difficult to obtain because City and Agency offices were closed during the public review period, they were only closed on four business days during the entire 60-day public review period: November 26 and 27 (Thanksgiving), December 25 (Christmas), and January 1 (New Year's Day).

Further, in the event of staff vacations, another staff member was available to provide the requested materials.

Response to Comment 84-12

Refer to Master Response 1 (SB 18) for a discussion of consultation with the Native American community under Senate Bill 18 (SB 18).

Refer to Response to Comment 73-16, with regard to archaeological information for Parcel A at Hunters Point Shipyard Phase I. The comments states "required archeological core samples may not have been taken" at Parcel A in Phase I. Response 73-16 notes that the Mitigation Monitoring and Reporting Plan (MMRP) for Hunters Point Shipyard Phase I required that, for any project disturbance below the layer of historic fill within four identified archaeological sensitivity zones, that archaeological consultants prepare an archaeological treatment plan and monitoring plan. Zone 1 in Phase 1 specifically related to Native American sites. No Phase I activity has occurred in the four identified archaeological sensitivity zones that would trigger the preparation of an archaeological treatment and monitoring plan as required in the MMRP. The MMRP did not require archaeological core sampling or other investigation in the absence of activities in the sensitivity zones. No other disturbance of archaeological resources has been identified during Phase I development.

Response to Comment 84-13

Refer to Response to Comment 48-3 regarding the selection of alternatives. The AFS Alternatives are specifically addressed in Response to Comment 84-23.

Response to Comment 84-14

The Brisbane Baylands alternative sites for Candlestick Stadium were analyzed on Draft EIR pages VI-161 through -163, concluding that:

> The Brisbane Baylands locations are not considered feasible sites for the 49ers stadium for the following reasons:
>
> - The Baylands Specific Plan, although not yet formally adopted, does not include a stadium as an allowed use in either the northern or southern portions of the site. Both sites are designated for commercial, office institutional, and industrial uses. While planning considerations in a particular jurisdiction can evolve over time, it is expected that the range of uses identified in the Phase I Specific Plan reflect Brisbane's long-term planning goals for the Brisbane Baylands, which plans do not include developing a professional football stadium.
> - The Brisbane sites are outside of the City and County of San Francisco. Planning review, and approval of a stadium in Brisbane Baylands would be subject to City of Brisbane jurisdiction. Neither the San Francisco Redevelopment Agency (Agency), the City and County of San Francisco, nor Lennar Urban would reasonably be able to acquire, control, or otherwise have access to a Brisbane site for the purpose of pursuing such alternative locations. Thus, the Brisbane Baylands sites were determined to be infeasible for development of the stadium, and were rejected from further consideration in the EIR.

While the ability to acquire, control, or otherwise have access to a Brisbane site for the purpose of pursuing an alternative stadium location was one factor that contributed to rejecting the site as infeasible,

perhaps the more important factor is that the City of Brisbane does not envision a stadium at that location. Therefore, even if Lennar Urban were able to acquire the site from Universal Paragon Corporation, the Baylands Specific Plan, which would guide land use development at the site, would not allow a stadium.

Response to Comment 84-15

Refer to Response to Comment 84-5 regarding the inability of the suggested alternative (port-related heavy industrial uses) to achieve the Project's objectives or to offer any benefit beyond that provided by the Project, and its incompatibility with the City's vision or the redevelopment plans adopted for the area. This comment expresses an opinion as to what the goals of the Project should be. Refer to Pages II-5 to II-7 of the Draft EIR outline the Project objectives.

Response to Comment 84-16

Refer to Response to Comment 84-5 and 85-15 for a discussion of why such uses would not achieve the Project's objectives nor offer any benefit beyond that provided by the Project, and the incompatibility of such uses with the City's vision or the redevelopment plans adopted for the area.

Response to Comment 84-17

The Project offers a substantial mixed-use development, much of which is oriented to the waterfront. The alternatives analyzed explore different combinations of land uses that could also achieve the Project's objectives. The EIR comprehensively analyzed traffic, waste, and "related issues" of the shoreline improvements that are part of the Project. Refer to Response to Comment 84-5 regarding the inability of the suggested alternative (port-related heavy industrial uses) to achieve the Project's objectives or to offer any benefit beyond that provided by the Project, and its incompatibility with the City's vision or the redevelopment plans adopted for the area.

Response to Comment 84-18

The predicted transit usage is based on a statistical regression analysis developed from travel patterns currently made by travelers within other neighborhoods of San Francisco that have similar transit service to what is proposed by the Project. The forecasting model accounts for type of trip (work vs. non-work), destination parking costs, and travel times as influential predictors of transit use. Other variables were considered but found to not be statistically significant (i.e., they were not useful predictors of transit use).

Response to Comment 84-19

This comment contains opinion, anecdotal, or general information and is not a direct comment on environmental issues or the content or adequacy of the Draft EIR. No response required.

Response to Comment 84-20

Refer to Response to Comment 17-1 for a discussion of the process that would be required for the bridge to be open for public use.

Refer to Master Response 4 (Purpose and Benefits of the Yosemite Slough Bridge) for a discussion of travel time and reliability improvements, as well as a reduction of mixed-traffic congestion, arising from the use of the Yosemite Slough bridge for bus rapid transit. Also refer to Response to Comment 43-2, which describes the relationship of this Draft EIR with the BTIP Draft EIR, which is at yet unpublished.

Response to Comment 84-21

The CEQA Guidelines, Section 15151 provide that "an EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." The EIR presents the environmental impacts of the Project, variants, and alternatives so that decision-makers are fully informed as they deliberate on what to ultimately approve.

Refer to Response to Comment 48-3 regarding the selection of alternatives.

Response to Comment 84-22

These comments outline criteria for alternatives development. Refer to Response to Comment 48-3 for the discussion of the CEQA criteria for alternatives development, as well as the process that was employed to identify alternatives in the Draft EIR.

Response to Comment 84-23

The commenter is proposing a comparison of two alternate alternatives to the Alternatives identified in the Draft EIR. As stated in Response to Comment 48-3, all possible alternatives need not be analyzed, just a reasonable range of alternatives. Further, many of the concepts in these two new alternate alternatives were previously addressed in the Draft EIR. As these new alternate proposals include some portions of the Project, some portions of the Alternatives, and some portions of the Variants identified in the Draft EIR, it is difficult to try to compare these alternate scenarios to any one proposal (Project, variant, or alternative) in the Draft EIR. (Also refer to Responses to Comments 84-24 to 84-28 for additional discussion of these alternatives.) However, the key concepts in those scenarios can be addressed. The key components of the AFS Stadium Alternative identify several aspects: retaining Candlestick, additional housing on HPS Phase II, heavy industrial port-related uses on Parcel C, and a neighborhood-oriented transit loop. This alternative could supposedly eliminate one mile of driving to the HPS Phase II, reduce traffic/air/noise with a new transit loop, and comply with ABAG minimum habitat guidelines.

Retaining Candlestick stadium is addressed in Alternative 3 and Alternative 5, which both include this possibility. Alternative 3 reduces seven significant unavoidable impacts identified for the Project in traffic, air quality, and noise. Alternative 5 reduces five significant unavoidable impacts identified for the Project in traffic and noise. Additional housing on HPS Phase II is addressed in Alternative 5, which also retains Candlestick stadium. Alternative 5 reduces five significant unavoidable impacts identified for the Project in traffic and noise. As these alternatives have already been evaluated in some form within the Draft EIR, no new analysis involving such alternatives is necessary.

Heavy industrial port-related uses were not identified for the Project. As identified on page VI-170, these uses could "result in new impacts, including, but not necessarily limited to, impacts on air quality, noise, hydrology and water quality, and biological resources." Refer to Response to Comment 84-5 for more discussion of Port heavy industrial uses.

A neighborhood-oriented transit loop was not identified for the Project. The Project would provide enhanced transit services, as described on page II-39 of the Draft EIR:

> ***Transit Services***
>
> Supported by Project revenues and infrastructure, the San Francisco Municipal Transportation Agency proposes the following transit services:
>
> - Extending existing Muni bus routes to better serve the Project site
> - Increasing frequencies on existing routes to provide more capacity
> - Complementing existing routes with new transit facilities and routes that would serve the Project's proposed land use program and transit demand
> - Connecting to regional transit with BRT
>
> The Transportation Plan would propose new direct transit service to serve employment trips to and from downtown San Francisco. Connections to the regional transit network (BART and Caltrain) would serve employment centers in the South Bay. The proposed transit improvements are illustrated in Figure II-13 (Proposed Transit Improvements) and described below:
>
> A. **Extended bus routes and new bus routes.** Existing Muni routes 24-Divisadero, 44-O-Shaughnessy, and 48-Quintara-24th Street would be extended to HPS Phase II; route 29 would terminate at Candlestick Point. Service frequencies on these lines would be increased. New Downtown Express routes would connect both Candlestick Point and HPS Phase II with the Financial District.
>
> B. **Harney/Geneva BRT/Transit Preferential Street.** The Harney Way/Geneva Avenue corridor would have exclusive bus and BRT lanes between Hunters Point Transit Center and Bayshore Boulevard, through Candlestick Point and the Bayshore Caltrain Station.
>
> C. **Hunters Point Transit Center.** Hunters Point Transit Center would serve HPS North and Hunters Point Village Center districts. The transit center would have approximately ten bus bays. Most bus lines serving HPS Phase II would terminate at the transit center.
>
> D. **Bus Rapid Transit Stops.** BRT stops would be at Hunters Point Shipyard Transit Center, at three locations within Candlestick Point, and at two intermediate locations.
>
> E. **Palou Avenue Transit Preferential Street.** One Muni line (24-Divisadero) would be extended along Palou Avenue to serve Hunters Point Shipyard Transit Center. Transit-priority technology would be installed on Palou Avenue including installation of new traffic signals. This would improve transit travel times and reliability on the 24-Divisadero and also the 23-Monterey and 54-Felton, which would continue to operate on Palou Avenue but would not be extended into the Project.
>
> Many of the proposed transit lines would include transit priority systems, with roadway sensors that would detect approaching transit vehicles and would alter signal timing to improve transit efficiency."

It is not clear that a neighborhood-oriented transit loop would provide benefits beyond those identified for the Project transit improvements. Development of a neighborhood-oriented transit loop would require consultation with the SFMTA, and is speculative at this time.

The reduction in any one element of the Project would not necessarily reduce the cost of the Project, or eliminate Project impacts as asserted by the commenter, since other elements or features would be introduced. As can be seen with the Yosemite Slough bridge, alternatives without the bridge encounter Project impacts in other resource areas, either from elimination of that access point or from construction of new elements to replace the bridge. The tradeoffs among alternatives are rarely simple numeric calculations but involve a trading and weighting of desirable and often mutually excluding objectives.

Response to Comment 84-24

The commenter states that the Draft EIR describes Alternative 3, as compared to the Project, as having greater transportation-related impacts on game days because vehicular ingress and egress to and from the stadium would be delayed and traffic would be increased on located streets, including Innes Avenue, Evans Avenue, and Ingalls Street, and the commenter states that this assessment is not credible. The commenter is incorrect in characterization of the Alternative 3 game day traffic impacts. Both the Transportation Study (pages 342 through 343) and the Draft EIR discussion of Alternative 3 impacts (page VI-65) state that game-day impacts would be similar to the No Project conditions. No further response is necessary.

Response to Comment 84-25

Refer to Response to Comment 48-3 regarding the selection of alternatives. As addressed in 48-3, a reasonable range of alternatives is presented in Chapter VI of the Draft EIR.

With respect to the "port-related heavy industrial uses" portion of the suggested alternative, refer to Response to Comment 84-5 for a discussion of why such uses would not achieve the Project's objectives nor offer any benefit beyond that provided by the Project, and the incompatibility of such uses with the City's vision or the redevelopment plans adopted for the area. The other aspects of the AFS No-Stadium Alternative (research and development, historic, arts and cultural, parks, and housing) have been addressed in the analysis of the Project contained in Chapter III of the Draft EIR. Table VI-11, pages VI-170 to VI-172, of the Draft EIR identifies specific proposals and identifies why they could result in greater impacts than those outlined by the Project or Alternatives.

Response to Comment 84-26

Refer to Response to Comment 84-5 for a discussion of why the "port-related heavy industrial uses" portion of the suggested alternative would not offer any benefit beyond that provided by the Project; therefore, reconfiguration of Alternative 5 is not warranted.

Response to Comment 84-27

The comment that early transfer brings the portion of the cleanup to be performed by the Agency or Project Applicant under the umbrella of CEQA is acknowledged. The Draft EIR evaluates the potential environmental activities undertaken by the Agency or Project Applicant in the case of early transfer. Impact HZ-12 analyzes the potential impacts of such remediation, and characterizes the impact as less than significant with mitigation. Under mitigation measure MM HZ-12, the Agency, Project Applicant, or contractor, shall comply with all requirements incorporated into remedial design documents, work

plans, health and safety plans, dust control plans, and any other document or plan required under the Administrative Order on Consent. Under the agreements, the Agency and Project Applicant would be responsible for remediating previously unidentified hazardous material releases to the extent agreed to with the Navy; the Navy would pay the Agency for completing the specified work and would pay for the costs of environmental insurance for the work. The Navy will remain liable for costs not covered by the agreement or insurance, and in particular for any radiological material releases that need to be addressed. Refer to Impact HZ-12 and mitigation measure MM HZ-12 for further detail.

Refer to Master Response 15 (Proposition P and the Precautionary Principle) for a discussion of for the applicability of Proposition P to early transfer.

Response to Comment 84-28

Refer to Response to Comment 48-3 regarding the selection of alternatives.

Response to Comment 84-29

Refer to Response to Comment 84-5 regarding the inability of the suggested alternative (port-related heavy industrial uses) to achieve the Project's objectives or to offer any benefit beyond that provided by the Project, and its incompatibility with the City's vision or the redevelopment plans adopted for the area.

Response to Comment 84-30

Page VI-59 of the Draft EIR describes how a direct crossing of Yosemite Slough would provide benefits that would not accrue without a direct bridge connection. The visual and physical connection at the mouth of the slough, the utility and ease of access that a bridge at the mouth of the slough would provide for multiple modes of transit (pedestrians, bicyclists, and transit riders), would each encourage travel that would not otherwise occur.

With regard to the compatibility of high-rise towers with the existing five story, and fewer, buildings of the Bayview neighborhood, less than significant impacts were identified. Page III.B-39 of the Draft EIR states regarding Candlestick Point:

> The Project would result in a substantially different built environment compared to the existing character of the site and vicinity. The scale of development would contrast with existing patterns; Candlestick Point would include residential towers ranging from 220 feet to 420 feet in height, and regional retail and arena uses. The mixed-use pattern with the Project at Candlestick Point would transition from lower-density residential uses near existing neighborhoods to higher density residential and commercial uses. Development at Candlestick Point would have similar land uses as existing and proposed uses in Executive Park immediately to the west. With the transition in scale and uses, the extension of the existing street grid, and with the connectivity of new open space with existing shoreline open space, the Project would be compatible with surrounding land uses. The Project would not result in a substantial adverse change in the existing land use character at Candlestick Point or adjacent areas. The impact would be less than significant.

Further, page III.B-40 of the Draft EIR states regarding HPS Phase II:

> The Project would result in a substantially different built environment compared to the existing character of the site and vicinity. The scale of development would contrast with existing patterns;

> HPS Phase II would include two residential towers ranging from 270 feet to 370 feet in height. The football stadium would be a large-scale public facility, with related parking and dual-use open space areas. While this would be a new land use element at HPS Phase II, it would replace the similar-scale use at Candlestick Point. The mixed-use pattern with the Project at HPS Phase II would transition from lower-density residential uses near existing neighborhoods to higher density residential and R&D uses. With the transition in scale and uses, the extension of the existing street grid, and with the connectivity of new open space with existing shoreline open space, the Project would be compatible with surrounding land uses. The Project would not result in a substantial adverse change in the existing land use character at HPS Phase II or adjacent areas. The impact would be less than significant.

Therefore, towers would be located away from existing low-scale residential uses, and would not be incompatible with existing uses.

Response to Comment 84-31

The comment makes an affirmative statement, and proposes that the AFS alternatives are superior to the Project without stating any reasons. No response is required.

Response to Comment 84-32

As described on pages II-49 and II-50 of the Draft EIR:

II.E.6 Green Building Concepts

> The Project would comply with all applicable provisions of the City's Green Building Ordinance, which is contained in Chapter 13c of the San Francisco Building Code, and would provide recycling, composting, and trash facilities as required by the City's specifications. The Project has set an energy efficiency performance target of 15 percent below the energy efficiency standards articulated in Title 24, Part 6 of the 2008 California *Code of Regulations* (CCR). Lennar Urban would include measures such as high performance glazing, efficient lighting, daylighting, shading, envelope optimization, reflective roofs, and natural ventilation in the Project design. ENERGY STAR appliances are proposed for all new residential units. In addition, Lennar Urban could also implement renewable energy strategies, such as the use of photovoltaic cells to provide electricity; the use of solar thermal energy to provide space cooling with the use of absorption systems; and/or water for space heating and domestic water systems.
>
> Lennar Urban has also voluntarily committed to constructing all Project buildings to the LEED® for Neighborhood Development Gold standard based on the Pilot Version of the rating system released in June 2007.[29] Following the 2007 LEED® ND Pilot Program rating system, preliminary analysis indicates the Project could achieve approximately 63 points, which is in the LEED® ND Gold range, through strategies including but not limited to the following:
>
> - Compact, infill development (including 90 percent of the new buildings fronting on public streets or open space)
> - Enhanced habitat values
> - Brownfield remediation and urban reuse
> - Close proximity to transit and bicycle networks (75 percent of all development would be within ¼-mile walk to a transit stop and Class I, II, and III bikeways provide connections throughout the site and to the greater Bayview community)
> - Urban design that promotes walking and discourages driving
> - Diversity of land uses and housing types
> - Affordable housing that supports a community of mixed ages and income

- Community participation in the community planning and design
- Compliance with the San Francisco Green Building Ordinance
- ENERGY STAR compliance to be documented by a Home Energy Rating System (HERS)
- Unbundled parking
- Drought tolerant plant species and the use of efficient irrigation systems such as drip irrigation, moisture sensors, and weather data-based controllers
- Tree-lined streets throughout the development and streetscape improvements extending from the Project Site to Third Avenue along Gilman and Palou
- Access to public space and recreational amenities through the creation of parks and playfields
- Efficient use of water and the potential use of recycled water for non-potable water uses such as irrigation, toilets, vehicle washing
- Progressive stormwater management to retain and treat stormwater on site and/or in adjacent areas

Essentially, a sustainability plan that identifies each of the strategies that the Project would employ would be adopted as part of the Project. This would address parks and open space, transit, pedestrian connections, storm water treatment wetlands, and hazardous remediation and cleanup. There is no evidence provided that the AFS Alternatives would meet the Project objectives to a greater degree than the Project.

Response to Comment 84-33

A discussion of the Brisbane Baylands site as a proposed 49ers stadium site is discussed in the Draft EIR on pages VI-161 through VI-163. Page VI-163 states:

> The Brisbane Baylands locations are not considered feasible sites for the 49ers stadium for the following reasons:
>
> - The Baylands Specific Plan, although not yet formally adopted, does not include a stadium as an allowed use in either the northern or southern portions of the site. Both sites are designated for commercial, office, institutional, and industrial uses. While planning considerations in a particular jurisdiction can evolve over time, it is expected that the range of uses identified in the Phase I Specific Plan reflect Brisbane's long-term planning goals for the Brisbane Baylands, which plans do not include developing a professional football stadium.
> - The Brisbane sites are outside of the City and County of San Francisco. Planning review, and approval of a stadium in Brisbane Baylands would be subject to City of Brisbane jurisdiction. Neither the San Francisco Redevelopment Agency (Agency), the City and County of San Francisco, nor Lennar Urban would reasonably be able to acquire, control, or otherwise have access to a Brisbane site for the purpose of pursuing such alternative locations. Thus, the Brisbane Baylands sites were determined to be infeasible for development of the stadium, and were rejected from further consideration in the EIR.

In conclusion, the Brisbane Baylands site is not a feasible alternative.

Response to Comment 84-34

The AFS Alternative is likely to have a similar "fiscal prudence" to Alternatives 2, 4, and 5, since those alternatives similarly do not include a bridge. Refer to Response to Comment 48-3 about the selection of

alternatives. Alternatives are selected to reduce identified significant impacts, and also to attain most of the basic objectives of the Project.

Response to Comment 84-35

Refer to Response to Comment 84-23 about the key concepts in the AFS alternatives and how they have already been evaluated in some form within the Draft EIR; therefore, no new analysis involving such alternatives is necessary. In addition, these ideas were addressed in Chapter VI Alternatives (pages VI-160 through VI-173). Page VI-167 states:

> Overall, the Arc Ecology land use alternatives are rejected because they do not reduce or avoid environmental effects of the Project in ways different from the Alternatives examined above. …

Response to Comment 84-36

The commenter is proposing a comparison of two alternate alternatives to the Alternatives identified in the Draft EIR. The alternate proposals include some portions of the Project, some portions of the Alternatives, and some portions of the Variants identified in the Draft EIR and so are not directly comparable to any one proposal (Project, variant, or alternative) in the Draft EIR. However, the key concepts in these alternate scenarios can be addressed. The key components of the AFS No-Stadium Alternative include several aspects (aside from the key concepts in common with the AFS Stadium Alternative which are addressed in Response to Comment 84-23): housing is increased to 11,000 units; a second research and development campus on Candlestick Point, with total of 3.5 million of R&D; more parks instead of a new stadium. This alternative would increase housing, R&D, and parks and open space.

Increasing housing in lieu of developing a stadium was evaluated in the Housing Variant (Variant 2) (in Chapter IV (Project Variants). The Housing Variant (Variant 2) included analysis of 10,500 units, which is within 5 percent of the AFS No Stadium Alternative housing. The Draft EIR analysis shows that the Housing Variant (Variant 2) would likely have fewer impacts compared to the Project in traffic, aesthetics, shadows, wind, noise, hydrology and water quality, and public services.

Increasing R&D in lieu of developing a stadium was evaluated in the R&D Variant (Variant 1) in Chapter IV (Project Variants). The R&D Variant (Variant 1) included analysis of 5 million gsf of R&D, which is more than that proposed in the AFS No Stadium Alternative. The Draft EIR analysis shows that the R&D Variant (Variant 1) would likely have fewer impacts compared to the Project in shadows and wind; and greater impacts compared to the Project in traffic, noise, hydrology and water quality, public services, and greenhouse gas emissions.

Increasing parks in lieu of developing a stadium was evaluated in Alternatives 3 and 5. Alternative 3 proposes less development all around and is not a good comparison to the AFS No Stadium Alternative. Alternative 5 was developed to reduce construction impacts generally and to avoid impacts to biological resources associated with bridge construction and operation. Significant traffic, noise, and air quality impacts would not be reduced. Construction impacts that relate to the size of the development footprint would be reduced by this alternative.

As with the analysis of the AFS Stadium Alternative, the reduction in any one element of the Project would not necessarily reduce the cost of the Project, or eliminate Project impacts as asserted by the commenter, since other elements or features would be introduced. The tradeoffs among alternatives are rarely simple numeric calculations but involve a trading and weighting of desirable and often mutually excluding objectives.

Response to Comment 84-37

The Draft EIR does analyze an alternative with no bridge and in which the proposed BRT route travels in the route around Yosemite Slough proposed by the commenter. Refer to Section VI.C (Analysis of Project Alternatives) in the Draft EIR, and refer to subsection VI.C.2 Alternative 2 (CP-HPS Phase II Development Plan; No Yosemite Slough Bridge).

Response to Comment 84-38

The commenter suggests that the Project could impede the inland migration of tidal marsh habitat, presumably as sea level rises. In a few areas that are gradually sloped from the bay shoreline inland, small patches of tidal salt marsh could gradually migrate inland as sea level rises. In most area, however, in the absence of the proposed shoreline improvements, shoreline habitat would be lost to sea level rise, and high waters of the Bay may encroach into developed areas that do not provide suitable conditions for tidal marsh. However, the proposed shoreline improvements will allow for shoreline conditions to be adapted as sea level rises. Furthermore, sediment accretion on the outboard sides of these shoreline treatments may keep pace with sea level rise so that at least some mud flat, and possibly some tidal marsh, could be maintained in areas that currently provide such habitat (i.e., in more sheltered areas such as South Basin that are not subject to heavy erosion).

Response to Comment 84-39

In reference to the comment that sea level rise may inhibit the movement of wildlife under the Yosemite Slough bridge in the future, refer to Response to Comment 75-7.

Response to Comment 84-40

In reference to the comment that the Project could impede the inland migration of tidal marsh habitat, refer to Response to Comment 84-38. The commenter's suggestions regarding the potential locations of areas on CPSRA where planning for marsh progression as sea level rises may have merit, but restoration of marshes on CPSRA would be subject to the master planning effort being performed by State Parks rather than being something that can be planned by the CP/HPS applicant.

Refer to Response to Comment 101-34 for a discussion of how the Project ensures no net loss of wetlands or jurisdictional/regulated waters.

Response to Comment 84-41

Refer to Responses to Comments 84-38 and 84-40 for a discussion of potential effects of the Project on the locations of tidal wetlands as sea level rises

Response to Comment 84-42

In reference to the comment that sea level rise may inhibit the movement of wildlife under the Yosemite Slough bridge in the future, refer to Response to Comment 75-7.

Response to Comment 84-43

In reference to the comment that the Draft EIR does not adequately address the impacts of sea level to tidal wetlands and the wildlife that depends on them, refer to Response to Comment 57-3.

Response to Comment 84-44

Refer to Response to Comment 47-29 for a discussion of how the EIR arrived at an appropriate standard of significance for evaluating impacts to recreational facilities, and how parkland ratios at the Project site would be well above this significance standard at all phases of the Project.

Response to Comment 84-45

Candlestick Point and HPS Phase II will provide a continuous set of parks that will allow, and invite, residents and others to view and use them as a single, integrated open space. Pedestrian, bicycle, and transit travel between the two sections of the site will be facilitated by the proposed bridge over Yosemite Slough, which would connect two key pieces of open space with its proposed green roadway. Thus, it is reasonable to consider the parkland ratio for the Project site as a whole.

As the commenter notes, the parkland ratios for both Candlestick Point and HPS Phase II exceed the ratio that the EIR uses as a standard of significance standard of significance—there is sufficient parkland in both sub-areas to avoid a significant adverse impact. Even if the two subareas of the Project are considered separately, each subarea has sufficient parkland to serve its population without causing substantial physical degradation.

Moreover, the commenter's calculation includes employment figures as part of the population using parkland. The "benchmark" figure that the commenter proposes, however, the 7.1 parkland acres per 1,000 population ratio in the City as a whole in 2008 does not include employees. Adding employees to this ratio would reduce it substantially, and the Project's parkland ratios would be much closer to the proposed "benchmark."

Moreover, including employees in the parkland ratio, the approach that is also used by the Draft EIR, is quite conservative. Many people employed on the Project site will also live here; these population figures count such residents twice, and therefore overstate the service population. Further, it is very likely that people employed on the site would use local parks at a significantly lower frequency than residents. To accurately account for the use caused by people working on the site (and the accompanying degradation of the facilities), an analysis would likely count each such user as some fraction of a resident, because they use parks less than residents. Thus, the effective population served by the Project's parkland likely will be smaller than reported in the EIR and the parkland ratios likely will be higher. The Draft EIR, by taking a conservative approach and counting every person employed on the site as a part of the service population, overstates the use of parks. The calculations in the Draft EIR demonstrate that there will be

sufficient parkland on site to meet residents' and employees' needs without causing overuse and deterioration of parks.

Response to Comment 84-46

In reference to the question regarding whether construction-related impacts to biological resources were assessed in the Draft EIR, refer to the "Construction Impacts" section of Section III.N (Biological Resources) on pages III.N-50 through III.N-100 of the Draft EIR.

Response to Comment 84-47

Refer to Response to Comment 83-3 for a discussion of environmental health concerns associated with Project operation. Further, the Project evaluated potential health effects due to potential exposure to diesel particulate matter during construction activities in Impact AQ-2 and proposed MM AQ-2.1 and MM AQ-2.2 to address these issues. TACs from construction activities were addressed in Impact AQ-3. Refer to Master Response 19 (Proposed BAAQMD Guidelines), which provides updated community-scale analyses based on the most recent guidance, and Master Response 5 (Health of the Bayview Hunters Point Community) for a discussion of health outcomes in the Bayview community.

Response to Comment 84-48

Refer to Response to Comment 84-47.

Response to Comment 84-49

Refer to Master Response 15 (Proposition P and the Precautionary Principle) for a discussion of Proposition P.

Letter 85: Arc Ecology (1/12/10)

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Letter 85

Arc Ecology

Environment, Economy, Society, & Peace

12 January 2010

Mr. Stanley Muraoka
Environmental Review Officer
San Francisco Redevelopment Agency
One South Van Ness Avenue, Fifth Floor
San Francisco, California 94103

RE: Public Comment on Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project *(formerly the "Bayview Waterfront Project")* Draft EIR [DEIR]

Dear Sirs:

Arc Ecology is re-submitting our document ALTERNATIVES FOR STUDY as formal commentary on Candlestick Point-Hunters Point Shipyard Phase II Development Plan Project *(formerly the "Bayview Waterfront Project")* Draft EIR [DEIR].

We believe the authors of this DEIR did not fully understand or appreciate the spectrum of issues and problems ALTERNATIVES FOR STUDY addresses.

85-1

Sincerely,

Saul Bloom
Executive Director
Arc Ecology

Enclosures: ALTERNATIVES FOR STUDY, draft January 2009

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DRAFT
HUNTERS POINT SHIPYARD + CANDLESTICK POINT | SAN FRANCISCO, CA
ALTERNATIVES FOR STUDY
DRAFT OUTLINE OF ISSUES, POSITIONS, AND ALTERNATIVES FOR PUBLIC COMMENT AND FURTHER STUDY
JANUARY 2009
Arc Ecology
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PREPARED BY
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HUNTERS POINT SHIPYARD + CANDLESTICK POINT | SAN FRANCISCO, CA

ALTERNATIVES FOR STUDY

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DRAFT

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THE NEED FOR A STUDY OF ALTERNATIVES

If community residents are to influence redevelopment decisions that will bring big changes to their lives, they must understand their options for addressing long-standing needs: economic, social and transportation, remediation of pollution, and recreation and open space amenities. Evaluating realistic alternatives helps the community to prioritize objectives, clarify trade-offs, and lay the foundation for agreement about the future. "Candlestick Point and Hunters Point Shipyard Phase II" (CP/HPS) is a joint effort by Lennar Urban and the SF Mayor's Office of Economic and Workforce Development. 85-2

Lennar and the City of San Francisco have proposed a development plan for the 750-acre site encompassing Hunters Point Shipyard, Candlestick Point State Recreation Area, Monster Stadium, and Alice Griffith Housing. It is time for residents of the Bayview–Hunters Point Community, and the whole City, to ask whether this proposal will fully meets their needs. As currently proposed, it calls for:

- a 60% increase in the neighborhood's population;
- a new football stadium that would attract 10,000 cars on each of 8–10 game days;
- about 10,000 new apartments and condominiums; and
- 80 acres of commercial space and green industry, promising to generate 7,500 jobs.

The project is proposed as a public-private partnership in which the City will give the land to Lennar at no cost, and Lennar will be responsible for preparing the land for development. Lennar will do this using its own funds and City tax revenues that the development will ultimately generate. **Lennar's current design plan consists of a single land use concept with two variations: one with a football stadium, the other without.**

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The goals of Lennar's proposal match the community's goals: new jobs, affordable housing, environmental sustainability, Bay access, recreational opportunities, and preservation of natural habitat. **The challenge now before the Bayview–Hunters Point community and the City as a whole is to determine whether the Lennar proposal would be effective in achieving these goals.** Comparing the Lennar proposal with other design alternatives that have the same goals can reveal whether changes to the Lennar project would improve its effectiveness and provide a better return on the investment of public resources. **Unfortunately, the City's planning process so far has omitted such a comparative analysis.**

85-2 cont'd.

The purpose of this report is to address this shortcoming in the process. Based on a detailed understanding of the site's natural and socio-economic-cultural context, **we have created a set of alternatives that explore changes to the Lennar proposal** that would strengthen its economic, social, and environmental benefits, while avoiding and reducing some significant impacts. **Even small changes to the plan offer significant new economic, social, and environmental vistas for the Bayview and San Francisco that are not revealed in the Lennar proposal.** The alternatives follow a development program similar to Lennar's, while offering a number of improvements, as discussed below. The report also identifies and evaluates a number of options for locating a football stadium, in the event that the San Francisco 49ers decide to continue to play in this area.

The driving force behind our alternative concepts is a commitment to support active and informed participation by the Bayview–Hunters Point community and fellow San Franciscans in an urgently needed public discussion to improve the Lennar proposal. We have already begun the conversation by consulting with organizations, community leaders, and interested members of the community during development of the alternative concepts that we are now presenting.

In addition, we are requesting that the City analyze our alternatives as part of the Environmental Impact Report now in preparation. **It is our intent to strengthen environmental review of the proposed project by offering alternative concepts** that share its goals and avoid or reduce its environmental impacts.

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85-2 cont'd.

BACKGROUND

Arc Ecology's alternatives for the CP/HPS redevelopment site evolved from a careful study of the natural and social ecology of the site itself, its surroundings, and previous planning efforts leading up to the Lennar proposal.

THE PROJECT SITE

Ownership

The CP/HPS redevelopment site belongs to the public: the US Navy owns the former Hunters Point Naval Shipyard; the California Department of Parks and Recreation (CA DPR) owns Candlestick Point State Recreation Area; the San Francisco Recreation and Park Department (SFRPD) owns Monster Park stadium and parking lot; and the San Francisco Housing Authority owns Alice Griffith Public Housing.

Existing Environment

The enormous potential of the CP/HPS site as a community and city resource is strongly related to its location on San Francisco Bay. It offers spectacular views, good weather, water access, recreational opportunities and wildlife habitat. Many San Franciscans are aware that the Shipyard and nearby Yosemite Slough are badly polluted. Fewer realize that these properties are even now the site of tremendous biodiversity providing a habitat and home for over 180 wildlife species—some of them species of concern—and a great variety of native vegetation. Redevelopment of the CP/HPS site has the potential either to degrade and destroy this habitat or to protect and improve it as a precious resource.

Eastern Waterfront

The CP/HPS project is one of 15 major developments, in either the concept, planning, or implementation stage, along the City's eastern waterfront. In aggregate, they will substantially impact the City's transportation and utilities infrastructure, as well as public services such as schools and emergency services. Land use and transportation planning and phasing strategies for CP/HPS must take the larger development picture into account.

4 EXECUTIVE SUMMARY

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Bayview–Hunters Point Community Context

The CP/HPS site is part of Bayview–Hunters Point, a historically African-American community since World War II. It is a community of modest homes, with a higher rate of home ownership (52%) than San Francisco as a whole (32%). Despite the many industrial jobs found there, the Bayview–Hunters Point community suffers high unemployment. In good times and bad, the neighborhood's unemployment rate has been about double San Francisco's. Generating more jobs in Bayview–Hunters Point will not by itself address the neighborhood's high rate of unemployment. Ensuring that new jobs on the redeveloped site will be accessible to existing residents will require businesses that are committed to hiring from the neighborhood as well as employment programs to provide them with training and support. The businesses that have been the most successful in providing jobs for Bayview–Hunters Point residents in the past have been those owned by neighborhood residents.

85-2 cont'd.

Earlier Plans for the Properties

Although the Lennar proposal is the first to plan for Hunters Point Shipyard, Candlestick State Recreation Area, Alice Griffith Housing, and Monster Park as a single combined site, it follows earlier efforts to plan separately for the Shipyard and the state park. The existing redevelopment plan for the Shipyard, adopted in 1997, and the Candlestick State Recreation Area Master Plan were both developed with extensive public participation. Lennar's proposal for the CP/HPS site will replace these plans.

EXECUTIVE SUMMARY 5

THE STADIUM QUESTION

Despite the fact that the San Francisco 49ers have made no commitment to continue to play in San Francisco, the Lennar proposal assumes that a new football stadium and 90-acre dual-use parking lot will be constructed at Hunters Point. Whether or not a stadium is a good idea for the community or the City, an evaluation of alternative locations, both within and outside the CP/HPS project site is needed.

Potential locations for the stadium off the Shipyard

Without a stadium on the project site, the redevelopment of CP/HPS has far greater potential to meet the economic and social needs of the community. All four of the following options would create minimal traffic impacts to residential neighborhoods:

- Brisbane Baylands South: a large site with access to Highway 101 (via the proposed Geneva interchange), with the potential for a convenient game-day Caltrain stop;
- Brisbane Baylands North: a large site with future easy access to Highway 101, close to the Sunnydale T-Third stop and the existing Bayshore Caltrain station, with the potential for an adjacent game-day stop;
- Pier 90-96 Backlands: owned by the Port of San Francisco, approximately a mile from I-280 access, ten-minute walk to Marin Street light rail stop; and
- Pier 80: owned by the Port of San Francisco, approximately ½ mile from I-280 access, 7.5-minute walk to Marin Street light rail stop, walk or take T-Third to the 22nd Street Caltrain station.

85-2 cont'd.

Potential stadium locations within the Shipyard

The Lennar proposal places the stadium in the center of the Shipyard (a portion called Parcel G). If there is to be a football stadium within the project site, it is essential to examine other locations as well, and the resulting possibilities to prevent it and its associated parking from dominating sites better used for housing and jobs. The report provides detailed analysis of alternative land use configurations for five stadium scenarios—Lennar's proposal on parcel G, a new alternative for parcel G, and alternatives for parcels B, C, and no stadium on the Shipyard.

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THE ALTERNATIVE PLANNING CONCEPTS – COMMON ELEMENTS

The alternative concepts presented for discussion are based on the CP/HPS Citizen Advisory Committee's (CAC) and Project Area Committee's (PAC) objectives for the project, the CA DPR's mission statement, and criteria and approaches developed in consultation with numerous stakeholders. The alternatives share many characteristics, including:

- Economic development that provides jobs that more effectively match the qualifications and needs of the Bayview–Hunters Point community;
- Expansion of the African Marketplace into an African-American Cultural District that fosters cultural identity and promotes community-based economic development;
- Remediation of the polluted industrial landfill site (Parcel E2) instead of capping;
- Creation of storm water treatment wetlands;
- Protection and enhancement of existing wildlife habitat at Candlestick Point State Recreation Area;
- A diversity of habitat types to enhance biodiversity throughout the project;
- An improved parkland configuration that addresses the open space inequity in the Southeast community and maintains the width of the shoreline open space for wildlife habitat and human enjoyment;
- Linking the new development to the existing Bayview neighborhood with a linear park, possibly including various water systems, that extends the Yosemite Slough open space to the Third Street commercial district;
- Modification of existing streets to provide improved access to the site instead of constructing a bridge and roadway that would degrade valuable aquatic, wetland and upland habitat;
- Creation of a public access and wildlife corridor to the Bayview Hill natural area;
- Management of sewage and storm water with a watershed-based approach that treats water as a valuable resource;
- Incorporation of low-impact design storm water management features into the open space system
- A spectrum of park sizes (from pocket parks to major open spaces) and character (active to passive), with rich and diverse programming and facilities; and
- Rotation of the proposed Alice Griffith Park by 90 degrees to create a contiguous open space connecting Bayview Hill and Gilman Park to CPSRA and the shoreline.

85-2 cont'd.

EXECUTIVE SUMMARY 7

ALTERNATIVES – LAND USE AND PROGRAMMING VARIATIONS

Jobs and Economic Development

All the alternatives focus on job training, employment, and business opportunities for the community. Although it is early in the planning process to assess the viability of specific economic development opportunities, it is necessary at this time to ensure that all the land use options provide sites for economic development clusters that are potentially the most responsive to the needs of the existing community. There are a number of promising economic sectors to explore in the context of each project alternatives, including:

- sports and entertainment,
- maritime (boat yard, small craft repair, small ship breaking),
- academic/institutional,
- research and development,
- light industry,
- digital arts, and
- "green collar" (solar installation, etc.).

85-2 cont'd.

Arts District

Arts and culture will play an important role in integrating the new development with the existing community. An Arts District (potentially including studio space, an arts park, theaters, etc.) could have a number of different locations, configurations, and themes. It could be integrated with the African-American Cultural Plaza, for example, or with the historic waterfront.

Sports Fields

The redevelopment of CP/HPS has the potential to help the City meet its need for additional sports fields, but it is also important to locate these amenities within walking distance of the community. The report evaluates several optional locations and configurations.

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85-2 cont'd.

Transportation

The Lennar proposal calls for a roadway through state park property and an 80-90 foot wide bridge over the mouth of the tidal inlet known as Yosemite Slough. This bridge would be used by cars only 8 to 10 days a year and would decrease driving time by only three minutes. The bridge would be an impediment to birds moving between the Bay and the slough's wetlands and would seriously reduce the worth of the State Parks Foundation's ecological restoration project now in progress, including new islands for nesting. Arc Ecology's report lays out alternative routes for the Bus Rapid Transit (BRT), auto and truck traffic, and pedestrian and bicycle access that eliminate any reason to construct an expensive and environmentally damaging bridge.

POSSIBILITIES BEYOND THE PROJECT BOUNDARIES

The alternatives create the potential for future projects beyond the boundaries of the current planning site. This study explores ways to strengthen connections between CP/HPS redevelopment and the existing Bayview neighborhood with a linear park and to create a new connection of the Yosemite Slough open space to the Third Street commercial district.

NEXT STEPS

The report will be available in hardcopy and on Arc Ecology's website (www. arcecology.org/afs). Arc Ecology will present these alternative concepts at a number of workshops and will encourage as many people as possible to contribute their ideas and opinions. Based on the feedback received, we will revise the report by March 2009 to further inform the City's ongoing planning process—including the efforts of the Hunters Point Shipyard Citizens Advisory Committee (CAC) and Project Area Committee (PAC) in their challenging task of recommending a redevelopment plan that maximizes return to the community on the public and private resources that will be invested in this site.

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INTRODUCTION

If people are to influence redevelopment decisions that will bring big changes to their community, they must understand their options. What are the opportunities to address long-standing economic and social needs? To repair a degraded and polluted environment? To ensure connection between the people who will live and work in the new development and the existing community?

Do proposed redevelopment plans address these opportunities adequately? Can the plans be improved to better meet community needs?

To answer these questions and achieve a plan that reflects the community's needs and desires the redevelopment planning process must include a comparison of realistic alternatives. In evaluating alternative planning concepts, communities focus their priorities, clarify trade-offs, and lay the foundation for agreement about their future. Alternatives are essential when a redevelopment proposal would bring deep and lasting change to the lives of people in the affected community. CEQA, the state law that requires all proposed projects undergo analysis of their potential environmental impacts, also requires that alternative ways to achieve a project's goal be analyzed in order to ensure that better options are not overlooked or ignored.

The redevelopment of the 750-acre Candlestick Point/Hunters Point Shipyard (CP/HPS) site, proposed by the Lennar Corporation, is a project that will forever change life in the surrounding Bayview-Hunters Point neighborhood due to its scale and its socio-economic and environmental impacts. As currently proposed, the Lennar proposal calls for a 60% increase in the neighborhood's population; more than 20,000 new residents would join the 33,000 people who currently live in the neighborhood (roughly defined as ZIP Code

California Environmental Quality Act (CEQA)

Alternatives are a central feature of this law. It was passed to ensure that public officials and the general public know about options to protect the environment when they are considering decisions that could cause harm to the environment.

The law requires review of the environmental impacts of a proposed project to include an analysis of alternatives that would avoid or reduce those impacts. The National Environmental Policy Act also requires analysis of such alternatives.

85-3

85-4

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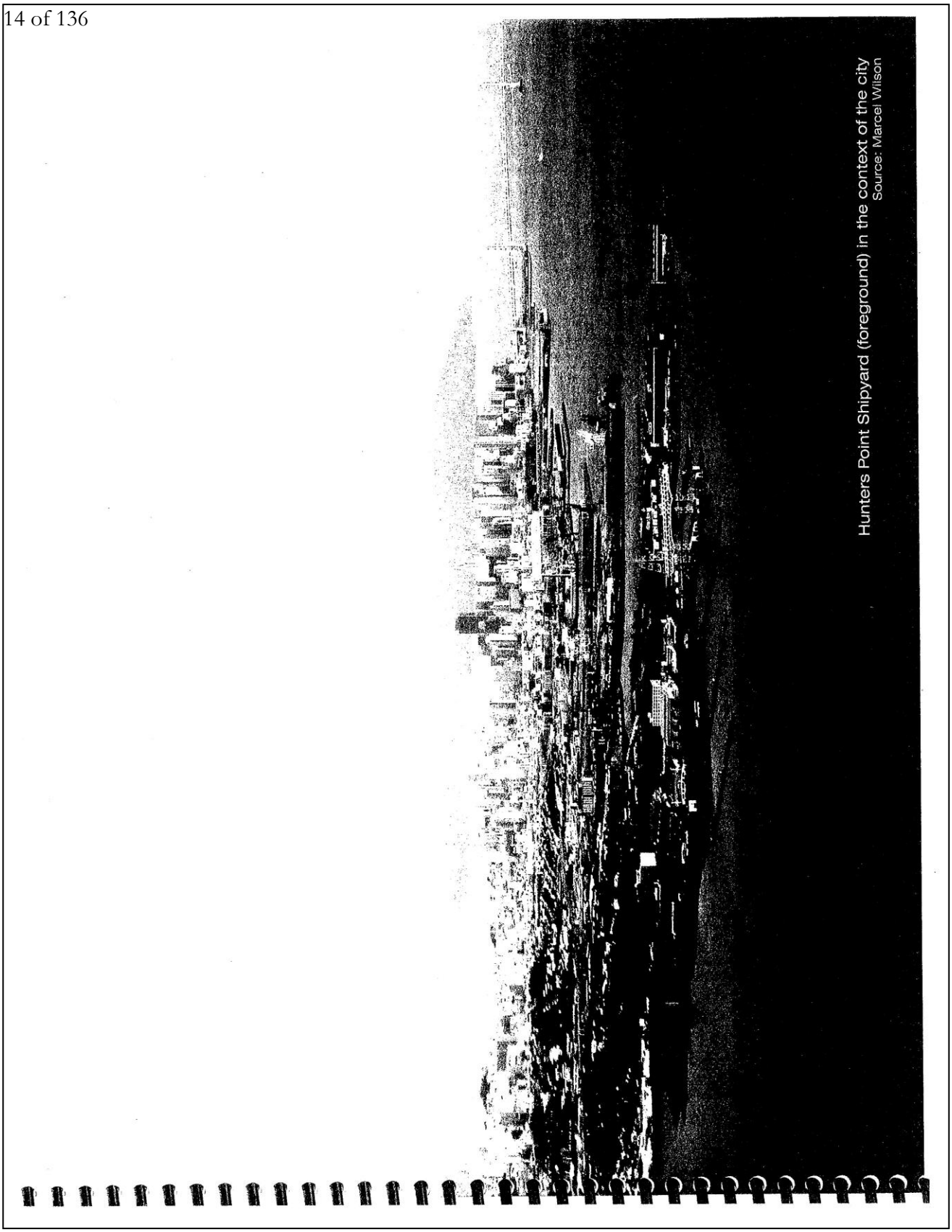
Hunters Point Shipyard (foreground) in the context of the city
Source: Marcel Wilson

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94124). A new football stadium would attract 10,000 cars on 8–10 game days. The proposal would add about 10,000 new apartments and condominiums, and 80 acres of commercial and green industry, promising to generate 7,500 jobs.

The Candlestick Point/Hunters Point Shipyard Phase II Urban Design Plan (9/25/2008) is proposed as a public-private partnership. The City will give the land to Lennar at no cost and Lennar will be responsible for preparing the land for development. Lennar will do this using its own funds and City tax revenues that the development will ultimately generate. The Lennar Urban Design Plan consists of a single land use concept with two variations: one with a football stadium, the other without.

85-4 cont'd.

Lennar proposal—Land Use Plan
Source: Candlestick Point/Hunters Point Shipyard Urban Design Plan Lennar Urban, 9/25/08.

85-5

The goals of Lennar's proposal match the community's goals: new jobs, affordable housing, environmental sustainability, Bay access, recreational opportunities, and preservation of natural habitat.

The challenge now before the Bayview–Hunters Point community and the City as a whole is to determine whether the Lennar proposal would be effective in achieving these goals. Comparing the Lennar proposal with other design alternatives that have the same goals can reveal whether changes to the Lennar project would improve its effectiveness and provide a better return on the investment of public resources. That is the reason why redevelopment projects of this size and level of public funding normally go through a planning process that compares several possible alternatives.

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PROPOSITION G VOTER HANDBOOK: SF DEPARTMENT OF ELECTIONS SYNOPSIS

THE PROPOSAL: Proposition G would make it City policy to encourage, subject to public input and the environmental review process, the timely development of Candlestick Point and Hunters Point Shipyard with a mixed-use project including:

- over 300 acres of public park and open space improvements;
- between 8,500 and 10,000 homes for sale or rent;
- about 700,000 square feet of retail uses;
- about 2,150,000 square feet of green office, science and technology, research and development, and industrial uses;
- a possible arena or other public performance site;
- a site in Hunters Point Shipyard for a new stadium if the 49ers and the City determine in a timely manner that the stadium is feasible;
- additional green office, science and technology, research and development, and industrial space, and/or additional housing if a new stadium is not built.

The measure would further make it City policy that the project be consistent with these objectives:

- producing tangible community benefits for the Bayview and the City;
- reconnecting the Hunters Point Shipyard and Candlestick Point with the Bayview and protecting the Bayview's character for existing residents;
- producing substantial new housing in a mix of rental and for-sale units, both affordable and market-rate, and encouraging the rebuilding of the Alice Griffith Housing Development;
- incorporating environmental sustainability;
- encouraging the 49ers to remain in San Francisco by providing a new stadium site and supporting infrastructure; and
- requiring the project to be financially sound, with or without a new stadium.

Proposition G also would authorize the City to sell, convey or lease park land in Candlestick Point under the Recreation and Park Department's jurisdiction and allow non-recreational uses on this land. The City must ensure that the project creates new public parks or open space of at least equal size in the project site. The Board of Supervisors must find that the transfer of land is consistent with the measure's objectives.

Proposition G would repeal Propositions D and F, approved by the voters in June 1997.

A "YES" VOTE MEANS: If you vote yes, you want City policy to encourage timely development of a mixed-use project in the Bayview on Candlestick Point and Hunters Point Shipyard. This project would include a new 49ers stadium or a non-stadium alternative. You also want to authorize the City to transfer park land in Candlestick Point for non-recreational use if the land is replaced with new public parks or open spaces of at least equal size and the transfer meets the measure's objectives. You also want to repeal Propositions D and F, approved by the voters in June 1997.

Unfortunately, the City's planning process has so far omitted this crucial step. Consistent with Proposition G's commitment to public input and environmental review, this report is an effort by Arc Ecology to address this shortcoming in the process. We have put together a set of alternatives that explore changes to the Lennar proposal that would strengthen its economic, social, and environmental benefits, while avoiding and reducing some significant impacts. The specifics of these alternatives are the result of a design process based on ecological principles and a detailed understanding of the site's natural and socio-economic-cultural context. 85-5 cont'd.

These alternatives also respect and build on the City's on-going planning process. In June 2008, San Francisco voters endorsed Proposition G, which recommends policies consistent with Lennar's proposed development program. The Board of Supervisors and Redevelopment Commission have accepted Lennar's proposal as the preferred alternative for the site, and the Mayor's Office has been actively promoting it. For these reasons, we based our alternative concepts on a development program similar to Lennar's, while exploring changes in land use arrangements, specifying additional programs, and avoiding environmental impacts. 85-6

Our alternative concepts would suggest ways to change the Lennar proposal in a number of important ways, by:

- Exploring locations both on and off the Shipyard for a football stadium and its parking to prevent it from dominating sites better used for housing and jobs;
- Providing for economic development that targets jobs that match the qualifications and needs of the Bayview-Hunters Point community;
- Planning park lands to protect existing wildlife and preserve and improve the quality of habitat currently found at CPSRA;
- Cleaning up the polluted industrial land fill site known as Site E2 instead of capping it;
- Expanding the African Marketplace into an African-American Cultural District that promotes community-based economic development; and
- Modifying existing streets to provide good access to the site instead of constructing a bridge that would endanger valuable habitat.

The driving force behind our alternative concepts is a commitment to support active and informed participation by the Bayview-Hunters Point community and fellow San Franciscans in an urgently needed public dialogue to improve the Lennar proposal. We have already begun the conversation by consulting with organizations, community leaders, and interested members of the community during development of the alternative concepts that we are now presenting.

14 INTRODUCTION

MEETINGS TO DATE:

85-7

Arc Ecology would like to thank the organizations & individuals who took time in their busy schedules to meet with us in preparation of this document (listing does not imply endorsement).

- Hunters Point Citizens Advisory Committee
- Bayview Hunters Point Project Area Committee
- San Planning and Urban Research Association (SPUR)
- Sierra Club
- San Francisco Tomorrow
- Lennar
- San Francisco Redevelopment Agency
- Literacy for Environmental Justice
- Port of San Francisco
- Neighborhood Parks Council
- Bayview Hunters Point Community Advocates
- Visitation Valley Neighborhood Planning Association
- India Basin Neighborhood Association
- Universal Paragon Corporation
- City of Brisbane Planning Department
- City of Brisbane City Manager's Office
- Supervisor Sophie Maxwell
- San Francisco DPW Bayview Transportation Improvement Project
- Pastor Walker-True Hope Baptist Church
- Pastor Jones-Providence Baptist Church
- Aboriginal Black Men Unlimited
- Cedric Jackson- One Stop Employment
- ACORN
- Shipyard Trust for the Arts
- Urban Strategies Council
- South East Neighborhood Jobs Initiative Roundtable
- California Department of Toxic Substances Control
- Alfred Williams Consultancy
- Golden Gate Audubon Society
- California Native Plant Society
- Nature in the City
- Mark Kasky former Executive Director Fort Mason Center
- Clean Water Fund
- Alex Lantzberg
- SF League of Conservation Voters
- SWALE
- Oscar James-HPS Restoration Advisory Board
- Heidi Hardin-Children's Mural Project
- Claude Everhart-Young Community Developers

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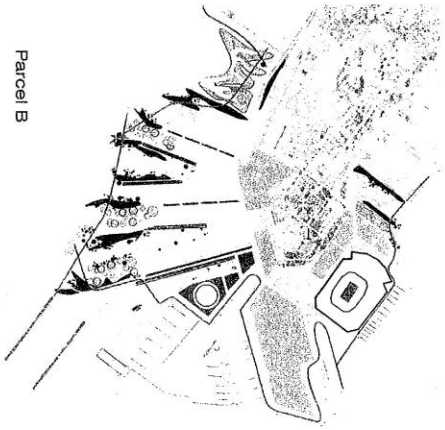
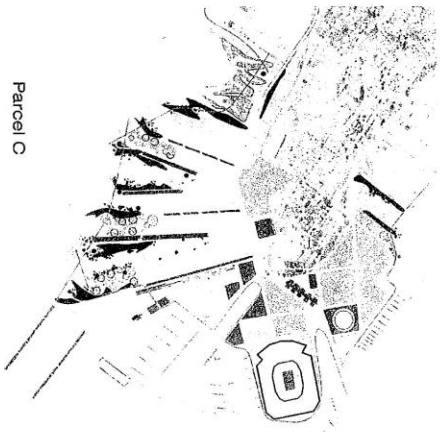
Candlestick Alternative
See pages 82-91 for more detail.

Parcel G



Parcel B

No Stadium



Parcel C

Alternative Locations for the Stadium on the Shipyard
See pages 78-89 for more detail.

The publication of this report marks the second step of our efforts to engage the public in planning the future of the CP/HPS. It presents the alternatives we have crafted and also explains the site analysis used to develop them. This report is available for wide distribution, both in hard copy and on the Arc Ecology website. We are making presentations to interested organizations, and are holding workshops in Bayview–Hunters Point to encourage as many people as possible to contribute their ideas and opinions..

85-7 cont'd.

Based on the feedback received during this outreach process, we will revise our report by March, 2009 to further inform the City's on-going planning process. Our purpose is to assist and support the Citizens Advisory Committee (CAC) and Project Area Committee (PAC) in their challenging task of recommending a redevelopment plan to the City that has broad support, minimizes environmental impacts, and maximizes return to the community on the public and private resources that will be invested in this site.

In addition, we will be requesting that the City analyze an alternative that we will propose based on this feedback—as part of the Environmental Impact Report now in preparation. It is our intention to strengthen environmental review of the Lennar proposal by offering alternative concepts that share its goals and avoid or reduce its envi-ronmental impacts.

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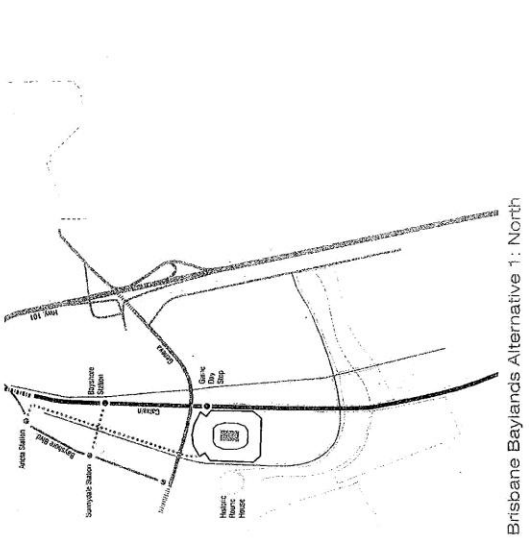
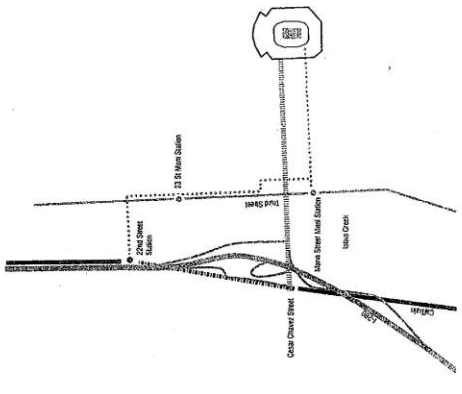


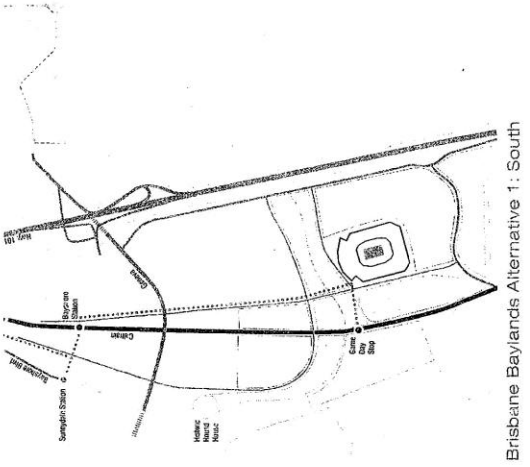
Brisbane Baylands Alternative 1: North



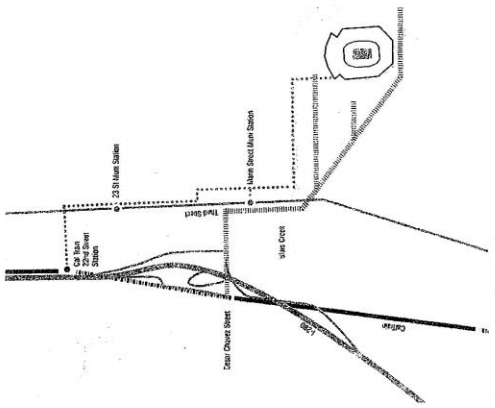
Pier 80

Stadium Location Alternatives off the Shipyard
See pages 69-77 for more detail.

INTRODUCTION 17



Brisbane Baylands Alternative 1: South



Backlands: Piers 90-94

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BACKGROUND

Arc Ecology's alternatives for the CP/HPS redevelopment site evolved from a careful study of the site itself, its surroundings, and previous planning efforts leading up to the Lennar proposal.

THE CANDLESTICK POINT/HUNTERS POINT SHIPYARD SITE

Four Public Properties

The CP/NPS site belongs to the public. The US Navy owns the former Hunters Point Naval Shipyard; California Department of Parks and Recreation (CA DPR) owns Candlestick Point State Recreation Area (CPSRA); the San Francisco Recreation and Park Department (SFRPD) owns Candlestick Park; and the San Francisco Housing Authority owns the Alice Griffith Public Housing. The fundamental opportunities for redevelopment of this site grow out of the physical characteristics of the four sites and their past and current use.

- Hunters Point Naval Shipyard was an industrial installation developed during World War II. Navy operations mostly ended in the 1970's, replaced by private industry operated for several years. These uses seriously contaminated much of the site. The federal government finally closed the base in 1994. Today the Shipyard provides studio space to over 250 artists and other small businesses.
- CPSRA was created in 1977 by the Legislature as the first California state park to bring state park values into an urban setting. It consists of 170 acres that offer trails, picnicking, fishing and wildlife habitat.
- Candlestick Park is host to Monster Park, seating 70,000 San Francisco 49er fans. The 49ers no longer wish to play at Monster Park, and have expressed intent to move to Santa Clara. Some city leaders support a new stadium at HPS in case the Santa Clara deal falls through.
- Alice Griffith Public Housing provides apartments to over 250 low income families. Built in 1962, the housing is in poor condition and needs to be replaced without displacing current residents or causing them to pay more rent.

Hunters Point Shipyard Parcel Map

Hunters Point Dry Dock, 1949

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Site Ownership
The Candlestick Point/Hunters Point Shipyard site is currently owned by four public agencies.
INTRODUCTION
U.S. Navy
Project Boundary

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85-8
cont'd.

Existing Environment

The enormous potential of the CP/HPS site as a community resource is directly related to its location near the Bay. It offers spectacular views, good weather, access to the water, and a variety of natural sceneries and habitats, such as coastal uplands, wetlands, and beaches.

Many San Franciscans are aware that the Shipyard and nearby Yosemite Slough are badly polluted. Fewer realize that these properties even now the site of tremendous biodiversity providing a habitat and home for over 180 species of wildlife and a great variety of native plants. Redevelopment of the CP/HPS site has the potential either to degrade and destroy this habitat or to protect and improve it as a precious resource. Streams, runoff, and underground water from the hills to the northwest flow through the site on their way to the Bay.

Historic Watershed Map
Source: Oakland Museum, Guide to San Francisco Bay Creeks

Partial list of wildlife species observed at CPSRA
Source: Final Report: Yosemite Creek Watershed Wildlife Survey, 2003-2004, LSA, 2004.

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Mew Gull
Ring-billed Gull
California Gull
Herring Gull
Western Gull
Glaucous-winged Gull
Caspian Tern
Elegant Tern
Forster's Tern
Black-bellied Plover
Semipalmated Plove
Killdeer
Black Oystercatcher
Greater Yellowlegs
Willet
Wandering Tattler
Long-billed Curlew
Whimbrel
Marbled Godwit
Ruddy Turnstone
Black Turnstone
Calidris sp.
Sanderling
Western Sandpiper
Least Sandpiper
Dunlin
Dowitcher sp.
Red-necked Phalarope
Canada Goose
Duck sp.
Mallard
Canvasback
Scaup sp.
Greater Scaup
Skipper sp.

White-winged Scoter
Bufflehead
Common Goldeneye
Red-breasted Merganser
Ruddy Duck
Red-throated Loon
Pied-billed Grebe
echmophorus sp.
Western Grebe
Clark's Grebe
Common Loon
Podiceps sp.
Horned Grebe
Red-necked Grebe
Eared Grebe
Brown Pelican
Cormorant sp.
Brandt's Cormorant
Double-crested Cormorant
Pelagic Cormorant
Great Blue Heron
Great Egret
Snowy Egret
Black-crowned Night-Heron
Rock Dove
Mourning Dove
Rufous Hummingbird
Downy Woodpecker
Northern Flicker
Black Phoebe
Say's Phoebe
Monarch
Common Checkered Skipper

Common Raven
Northern Rough-winged Swallow
Bank Swallow
Barn Swallow
Chestnut-backed Chickadee
Bushtit
White-breasted Nuthatch
Ruby-crowned Kinglet
Hermit Thrush
Northern Mockingbird
European Starling
Orange-crowned Warbler
Yellow Warbler
Yellow-rumped Warbler
Common Yellowthroat
Wilson's Warbler
Western Tanager
Spotted Towhee
California Towhee
Sparrow sp.
Chipping Sparrow
Savannah Sparrow
Fox Sparrow
Song Sparrow
Zonotrichia sp.
Lincoln's Sparrow
White-crowned Sparrow
Golden-crowned Sparrow
Red-winged Blackbird
Western Meadowlark
Brewer's Blackbird
Brown-headed Cowbird
House Finch
Lesser Goldfinch
House Sparrow

Cooper's Hawk
Red-shouldered Hawk
Red-tailed Hawk
Merlin
California Slender Salamander
Lizard sp.
Southern Alligator Lizard
Western Fence Lizard
Gopher Snake
Ring-necked Snake
Western Garter Snake
Feral Domestic Cat
Feral Domestic Dog
Raccoon
Striped Skunk
Harbor Seal
Black-tailed Jackrabbit
Botta's Pocket Gopher
California Ground Squirrel
California Vole
Norway Rat
Butterfly sp.
Swallowtail sp.
Cabbage White
Mustard White
Orange Sulphur
California Hairstreak
Gray Hairstreak
Blue sp.
Western Pygmy-Blue
Spring Azure
West Coast Lady
Red Admiral
Common Buckeye
Common Ringlet

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Bayview–Hunters Point Community Context

The CP/HPS site is part of Bayview–Hunters Point, a historically African-American community since World War II. It is a community of modest homes, with a higher rate of home ownership (52%) than San Francisco as a whole (32%).

Despite the fact that Bayview–Hunters Point is an area that has many industrial jobs, it also suffers high unemployment. In good times and bad, the neighborhood's unemployment rate has been about double San Francisco's. There are 1.8 filled jobs within the neighborhood for every BVHP resident working or seeking work. This is significantly higher than the comparable ratio for San Francisco—1.2 jobs for every person in the city's labor force—or the region, where the ratio was 1.4. This mismatch between neighborhood jobs and neigborhood unemployment exists even though many of the jobs are in traditional industries, not those that require high skills or education levels. These numbers suggest that generating more jobs in Bayview–Hunters Point will not by itself address the neighborhood's high rate of unemployment. Ensuring that new jobs on the redeveloped site will be accessible to existing residents will require businesses that are committed to hiring from the neighborhood as well as employment programs to provide them with training and support. The businesses that have been the most successful in providing jobs for Bayview–Hunters Point residents have been those owned by neighborhood residents.

85-10

RATIO OF BVHP FILLED JOBS TO BVHP LABOR FORCE IN 2000

	BVHP (Zip Code 94124)	San Francisco	SF-Oak-Fremont SMSA
Residents in labor force	12,677	448,432	745,466
Number of filled jobs in BVHP	23,339	534,015	1,034,830
Filled jobs per labor force participant	**1.84**	**1.19**	**1.39**

Source: County Business Patterns

85-11

EARLIER PLANS FOR THE PROPERTIES

Although the Lennar proposal is the first to plan for Hunters Point Shipyard, CPSRA, Alice Griffith, and Candlestick Park as a single combined site, it follows earlier efforts to plan separately for the Shipyard and the state park. There is an existing redevelopment plan for the Shipyard that was adopted in 1997, and a State Park Master Plan.

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Excerpts from the 1997 Citizens Advisory Committee Planning Meeting
Guidelines/ Statement of General Principles for Redevelopment of Hunters Point Shipyard

1. Create Jobs for Economic Vitality
"South Bayshore residents and businesses should be given priority."

2. Support Existing Businesses and Artists' Community
"New uses should be compatible with existing South Bayshore businesses, Shipyard businesses and artists, and other sectors of San Francisco's economy."

3. Create Appropriate Mix of New Businesses
"Encourage diversity with a mix of large, medium and small businesses to generate revenues for the City's general fund and stimulate the economy of the South Bayshore community. Diversity San Francisco's economic base by restoring its industrial sector with uses based on futuristic technologies tied to regional, national and international markets and economies."

4. Balance Development and Environmental Conservation
"Balance development with reclamation of the natural ecology of the southeast waterfront with targeted uses that are environmentally appropriate for the San Francisco Bay."

5. Facilitate Appropriate Immediate Access
"Incorporate an action program to enable immediate access to existing Shipyard facilities, giving preference to South Bayshore businesses and organizations."

6. Integrate Land Uses
"Integrate new uses at the Shipyard into current plans for the Bayview area. Plan for the integration of passive and active open space, affordable housing, transportation and traffic circulation, while minimizing land use conflicts between housing and industry."

7. Acknowledge History
"Include uses that acknowledge the history of the original Native American inhabitants of the Hunters Point area and historic relationship of Bayview Hunters Point's African-American community to the Shipyard."

Source: Hunters Point Shipyard Reuse
Final Environmental Impact Report, Vol. I

Plans for Hunters Point Shipyard

Many hours of public participation produced the following plans for the Shipyard during the 1990's:

- the Proposed Draft Plan (January 1995) was based on evaluation of three preliminary alternatives, which in turn had been developed as variations of concepts developed during the preceding year;
- the Proposed Area Plan (April 1997) reformatted and revised the Proposed Draft Plan as an area plan that was intended to become part of the San Francisco General Plan;
- the Shipyard Redevelopment Plan (July 1997) reframed the policies at a more general, schematic level to enable the San Francisco Redevelopment Agency to apply the powers of state law to implement the Proposed Area Plan. It is supported by the Hunters Point Shipyard Reuse Final Environmental Impact Report;
- the Design for Development (March 1997) spells out development standards—e.g., limits on density, bulk and heights—and design guidelines; and
- Lennar's Preliminary Design Concept (December 1999), which was approved by the Redevelopment Agency, provided the basis for negotiations over the terms of agreements between selected master developer Lennar and the Redevelopment Agency. The first phase of development, occupying most of Parcel A, is currently in construction.

Lennar's proposal for the CP/HPS site will replace these plans. However, community goals for the Shipyard articulated by Citizens Advisory Committee (see sidebar, this page) and attached to the 1997 Redevelopment Plan continue to be relevant.

85-11 cont'd.

BACKGROUND 23

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LOCATING A NEW STADIUM IN SAN FRANCISCO

WHY WE NEED TO STUDY ALTERNATIVE STADIUM SITES NOW

The decision to locate a new San Francisco 49ers Stadium was made in the wake of a sudden announcement by the team that they were planning to move to Santa Clara. While the Shipyard is a potential site, it is not the only site. Highway access, transit, area for surface parking, visibility, adjacent land uses, economic advantages, and environmental quality are all considerations for locating a stadium. There are several sites in the southeast corner of the city that could accommodate a new stadium.

Other locations for the stadium on or off the Shipyard create different sets of possibilities for land uses, infrastructure, and open space on the Shipyard and at Candlestick Point. They affect economics, surface parking, views, traffic, build-out timelines, and programming. Time for a public dialogue regarding the positives and negatives, trade-offs, unknowns, and assumptions for each should surely be a part of finding the site that is truly best for the city.

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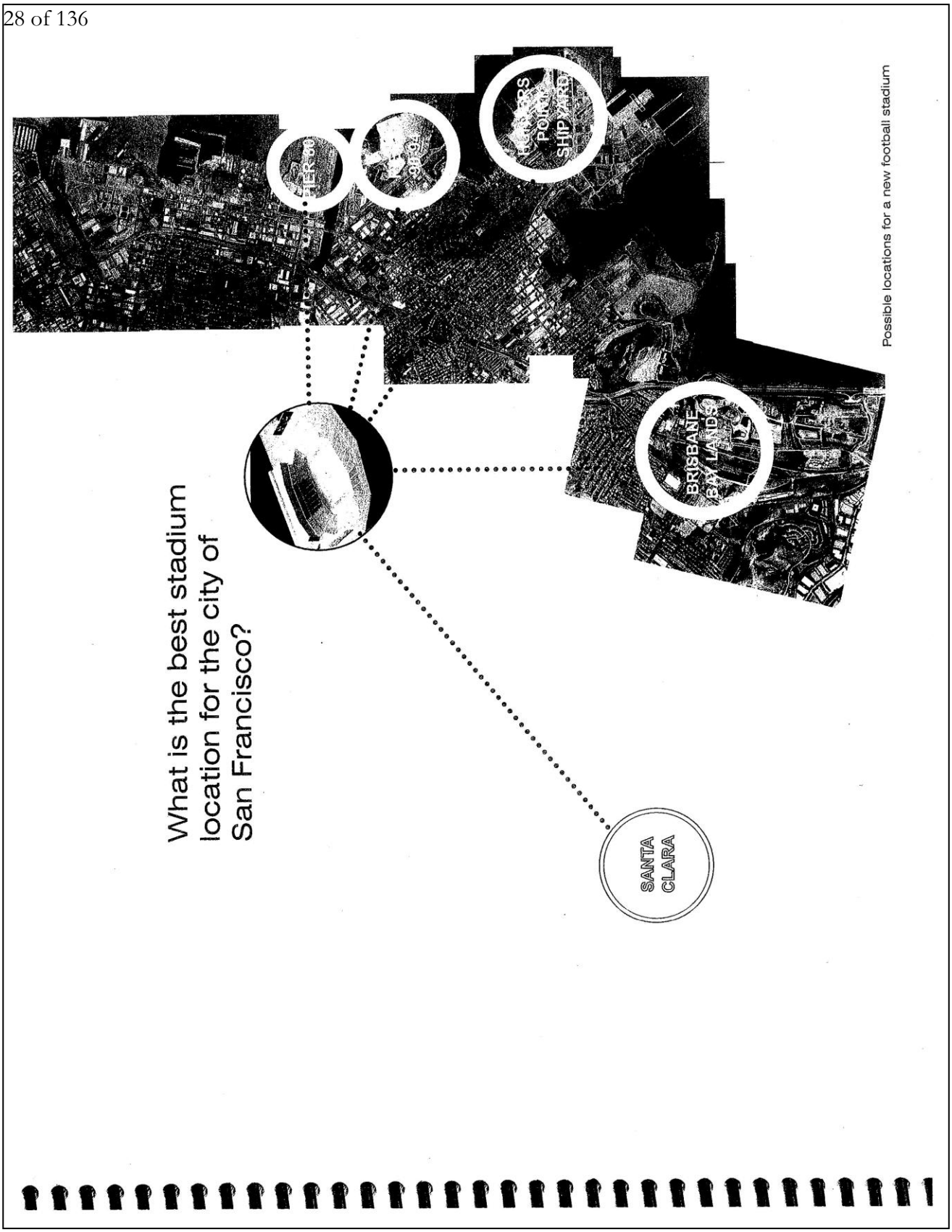
What is the best stadium location for the city of San Francisco?
Possible locations for a new football stadium
SANTA CLARA
BRISBANE BAY LANDS

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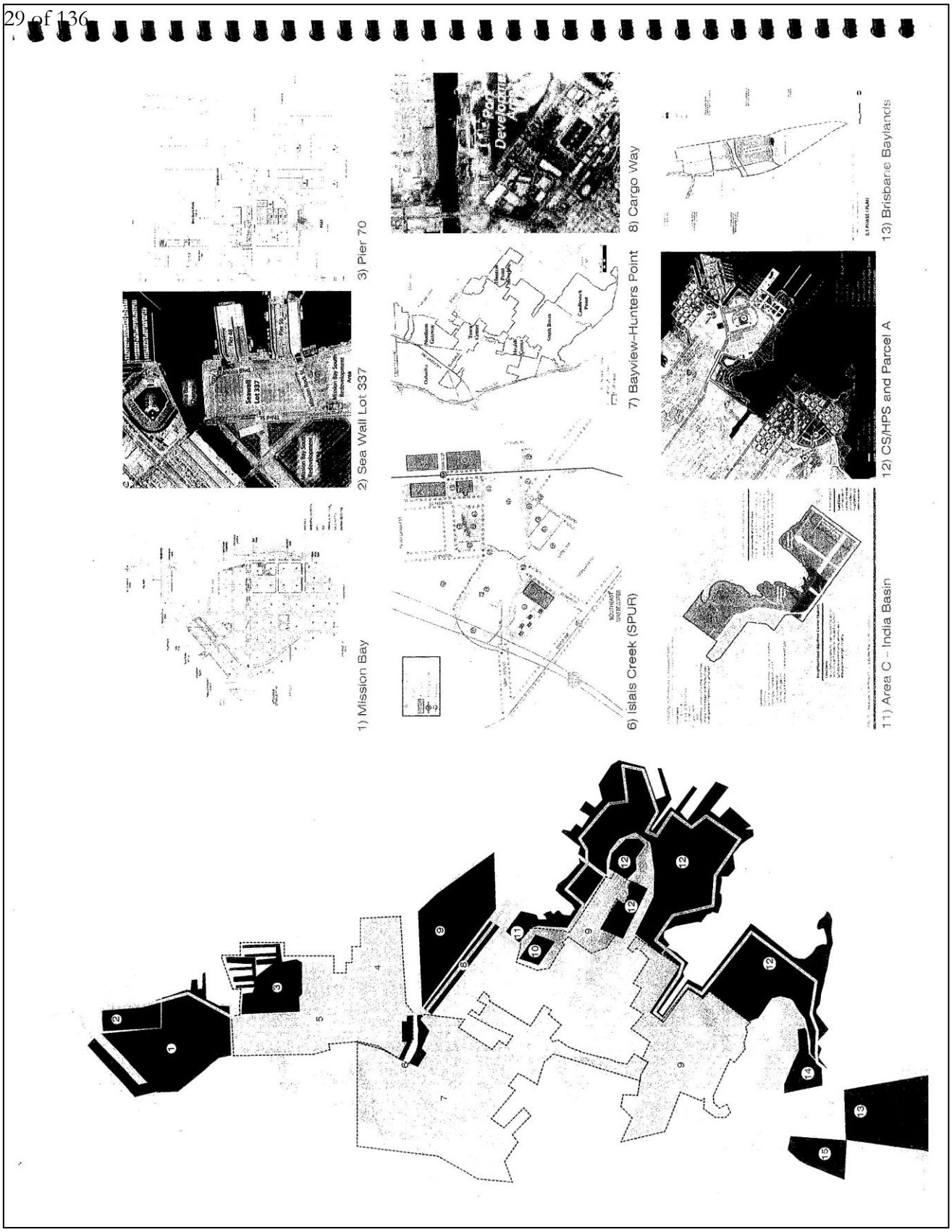
1) Mission Bay
2) Sea Wall Lot 337
3) Pier 70
6) Islais Creek (SPUR)
7) Bayview–Hunters Point
8) Cargo Way
11) Area C – India Basin
12) CS/HPS and Parcel A
13) Brisbane Baylands

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PLANNING IN THE CONTEXT OF THE EASTERN WATERFRONT

The redevelopment of the Hunters Point Shipyard and Candlestick Point is one of 15 projects proposed for the east waterfront of San Francisco. Throughout the planning and design process, each of the projects has been treated separately, although in aggregate they will substantially impact the city's communities and infrastructure.

The practice of "island" development prevents the city from conceiving a cohesive vision for the east waterfront. Moreover, the piecemeal approach cannot adequately address the practical consequences of the addition of 50,000 new residences to the area. Infrastructural systems, such as sanitary sewer, storm water management, power supply and distribution, roads, transportation, will need improvement. Additional public services, such as schools, police, fire, social services, and healthcare, will be required. At the larger scale, the additional traffic and development will lead to increased carbon emissions, loss of habitat, and a decline in air and water quality.

Understanding the larger context of development will allow the creation of effective land use and phasing strategies for the Shipyard and other projects that will address the changing demands on public infrastructure and the needs of surrounding communities over the coming years.

85-13

4) Eastern Neighborhoods

5) Blue Green Way

9) Piers 90-94 Backlands

10) Hunters View

14) Executive Park

15) Visitacion Valley/ Schlage Lock

27

SUMMARY OF DEFICIENCIES IN THE LENNAR PROPOSAL

85-14

As a continuous observer and participant in the CP/HPS planning process since 1997, Arc Ecology has tracked the evolution of decisions that have led to the plan as it exists today. While the Lennar proposal (Phase II Urban Design Plan - September 25, 2008) has attempted to accommodate many of the considerations for a project of this scale, significant planning and policy issues remain that need to be resolved through an equitable, public and intelligent process. In addition,the Lennar proposal includes some elements that have received clear opposition from the immediate and city-wide community. Following are 10 areas in which we see ways to improve the project:

1. Ecological objectives
2. Economic opportunity
3. Locating the stadium
4. Land use on the Shipyard
5. Open space type and proportion
6. Health
7. Cultural identity
8. State park lands
9. Yosemite Slough and Creek
10. Transportation

28

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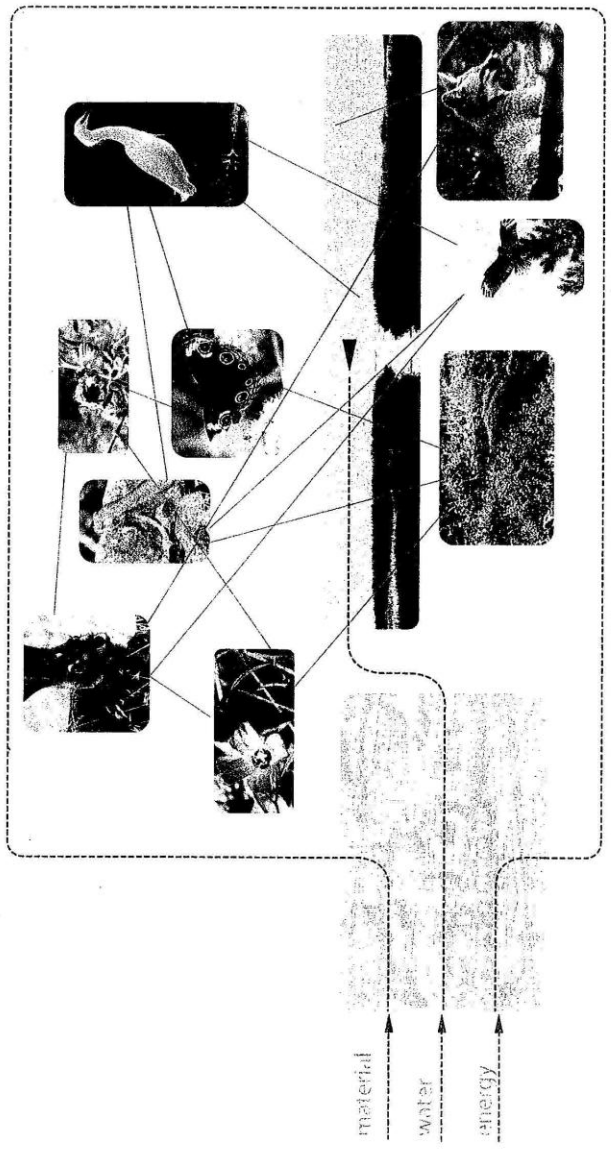
85-15

1) ECOLOGICAL OBJECTIVES

The Lennar proposal does not define ecological objectives or the integration of urban and ecological systems. This project is an opportunity to do "bottom- up" ecological planning that can enhance biodiversity, the integration of urban and ecological systems, the creation of habitats, the design of building systems, and construction sequencing.



DEFICIENCIES IN THE LENNAR PROPOSAL 29

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2) ECONOMIC OPPORTUNITY

The stadium would be a civic amenity, but locating it on the Shipyard may come at a cost. Proposals for the Shipyard without a stadium offer more economic development opportunities because there is more developable land for job and ownership producing uses. This is a specific concern to the Bayview community. Stadium and non-stadium alternatives should evaluate the issues of economic diversity, ownership opportunities, jobs-per-acre analysis, and equity ladders.

85-16

30 DEFICIENCIES IN THE LENNAR PROPOSAL

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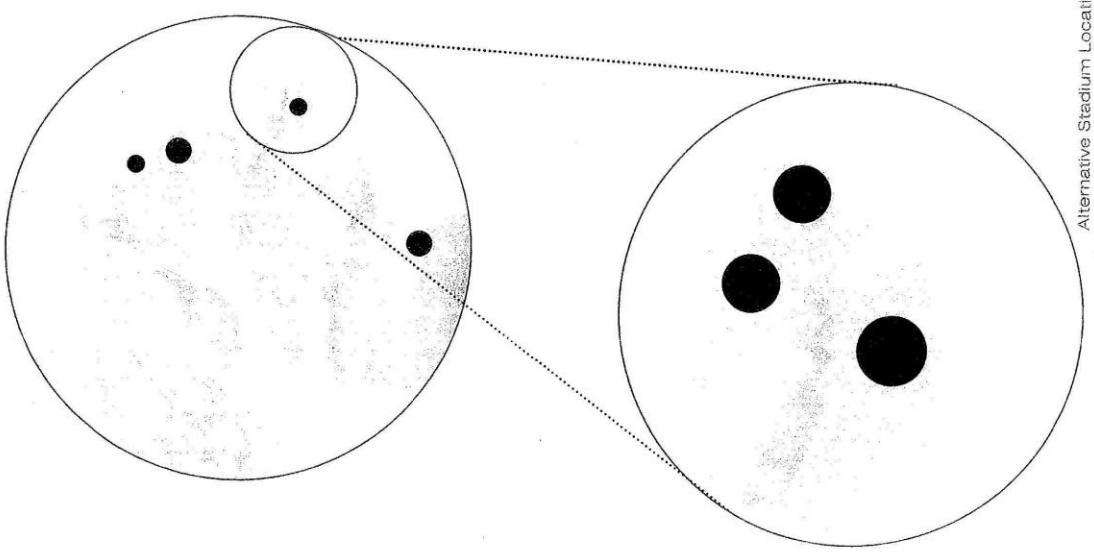
85-17

3) LOCATING THE STADIUM

Lennar's decision to locate the stadium on the Shipyard does not appear to have considered other sites, and has not had the benefit of community input. If a new stadium is built in San Francisco, it must be located on the site that is best for the city. If the stadium is to be located on the Shipyard, there are other possible sites in addition to Parcel G.

4) LAND USE ON THE SHIPYARD

Planning of the CP/HPS site needs to investigate the relationships between a wide range of possible land uses, whether include or exclude a stadium.



Alternative Stadium Locations
See pages 69-99 for more detail.

DEFICIENCIES IN LENNAR PROPOSAL 31

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5) OPEN SPACE TYPE AND PROPORTION
TO DEVELOPMENT FOOTPRINT

People in the southeast sector of the city cannot easily use the large landscapes of San Francisco. Access to Twin Peaks, Crissy Field, Ocean Beach, Golden Gate Park, and even McLaren Park is discouraged by distance and steep hills. Such places contain the wild and native ecologies of the city. In the southeast sector where most wild places have been replaced by urbanization and industry, this becomes an environmental justice issue as well. The CP/HPS project is the only foreseeable opportunity to establish a large-scale landscape of significant habitat value. This will require thoughtful ecological planning balanced with other land uses and open space needs.

85-18

CP/HPS parks system as suggested in alternatives

Golden Gate Park

The CP/HPS project provides the opportunity to create a large contiguous open space in the southeast sector of the city. The potential overall size of such an open space is comparable to that of Golden Gate Park.

6) HEALTH

The local community and city supported Proposition P in 2000 for cleaning up the Shipyard to the highest possible standard. While this directive is being carried out in most of the Shipyard, Parcel E2 remains a capped landfill. The Lennar proposal design proposes to keep the landfill, incorporating it into the design of a park without further cleanup or treatment. Many in the Bayview–Hunters Point community and city-wide would like this toxic dump removed.

85-19

Parcel E landfill fire

32 DEFICIENCIES IN THE LENNAR PROPOSAL

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85-20

7) CULTURAL IDENTITY

It has been a long-standing desire to develop and invest in the the cultural identity of the African-American community in San Francisco. Project Area Committee member Cedric Jackson's Ta-Merri Bay proposal is emblematic of this desire.

Cultural identities evolve in San Francisco's urban districts. The African-American community should be distinctly represented through urban form to culture a distinct district that celebrates arts, entertainment, music, and cuisine. Other cultures with historic ties to the area, such as Asian fishing villages and Native American settlements, should also have opportunity for significant representation.

The 1990's saw a proposal for the creation of Ta-Merri Bay—a center for African/African-American culture located at Candlestick Point.

The city has the ability to encourage the evolution of cultural districts through urban planning.

DEFICIENCIES IN LENNAR PROPOSAL 33

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8) STATE PARK LANDS

This project should be mutually beneficial for state park lands and the CP/HPS development. The current plan proposes significant land exchanges, a bridge and new roadway passing through sensitive habitat on state park lands, and new territory added to CPSRA. This will affect the park in two significant ways. This will affect wildlife corridors and planned adjacent habitat improvements (top) and significantly reduce the size of the parkland available for habitat and recreational uses (bottom). New lands proposed to be added to the State Park along the Hunters Point shoreline will be so narrow that they will provide neither wildlife habitat nor recreational opportunities other than a pathway along the shoreline.

The CP/HPS development should enable the state park lands to better fulfill the mission of the CA DPR. As it stands, the Lennar proposal compromises the potential of the state park by reducing its size, fragmenting habitat, and building a bridge that would threaten habitat value.

85-21

The Lennar proposal shows a bridge over Yosemite Slough and adjacent habitat improvements.

Source (plan only): Candlestick Point/Hunters Point Shipyard Urban Design Plan Lennar Urban, 9.25.08.

The Lennar proposal will reduce the size fo the state park on candlestick point and limit the parks mandate for biodiversity. This figure shows the current park boundary (in red) overlaid on the Lennar proposal.

Source (plan only): Candlestick Point/Hunters Point Shipyard Urban Design Plan 9.25.08.

34 DEFICIENCIES IN THE LENNAR PROPOSAL

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85-22

9) YOSEMITE SLOUGH

Although it is not with in the project boundaries, the scale of the CP/HPS project warrants a larger study of its surrounding area that includes expanding the Yosemite Slough as an open space and creating connections to Third Street and its MUNI stops. It is a project that should happen in time, if not concurrently with the CP/HPS project.

View from the South Basin to Yosemite Slough

Source: Arc Ecology

10) TRANSPORTATION

Lennar's proposal reflects the intent to build a bridge over the most ecologically productive areas of Yosemite Slough. Existing street routes should be studied for their ability to carry traffic in both stadium and non-stadium alternatives. According to the Bayview Transportation Improvement Plan, constructing a bridge could reduce car travel time by only three minutes. The extension of the Yosemite Slough open space corridor can also offer transportation alternatives for consideration.

Lennar Proposed Bridge Rendering
The proposed approximately 80-90-foot wide bridge would degrade sensitive habitat for the uncertain benefit of football fans driving to the stadium on game days—8-10 days/year.

Illustration source: Candlestick Point/Hunters Point Shipyard Urban Design Plan Lennar Urban, 9/26/08.

DEFICIENCIES IN LENNAR PROPOSAL 35

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ADDRESSING THE DEFICIENCIES OF THE LENNAR PROPOSAL

operating assumptions and positions for creating alternatives

85-23

The 9/25/2008 Lennar proposal reflected great strides in the development of the plan and revealed the thinking behind many of the decisions made to date. This study does not seek to duplicate this work. It is intended to be constructive and add to the rigor of study in this complex process.

The advances in the plan and the release of new information have revealed a set of fundamental issues and deficiencies that warrant alternative approaches for consideration and further study. As discussed in previous section, these issues center around the scale of the project, long-standing inequalities, and the evolution of the project over time. This study has formulated a set of assumptions, positions, inquiries, and objectives to address these issues and to inform the development of alternative concepts. They represent an array of voices and concerns collected by Arc Ecology from the community, planners, scientists, economists, and environmentalists. This collective is a tremendous resource for positively affecting the project and its evolution. Their views are not driven solely by the beat of progress and profit, but the nuanced questions of how the project will perform in the fullness of time, and what kind of legacy we are planning for all things living here long after the construction is complete.

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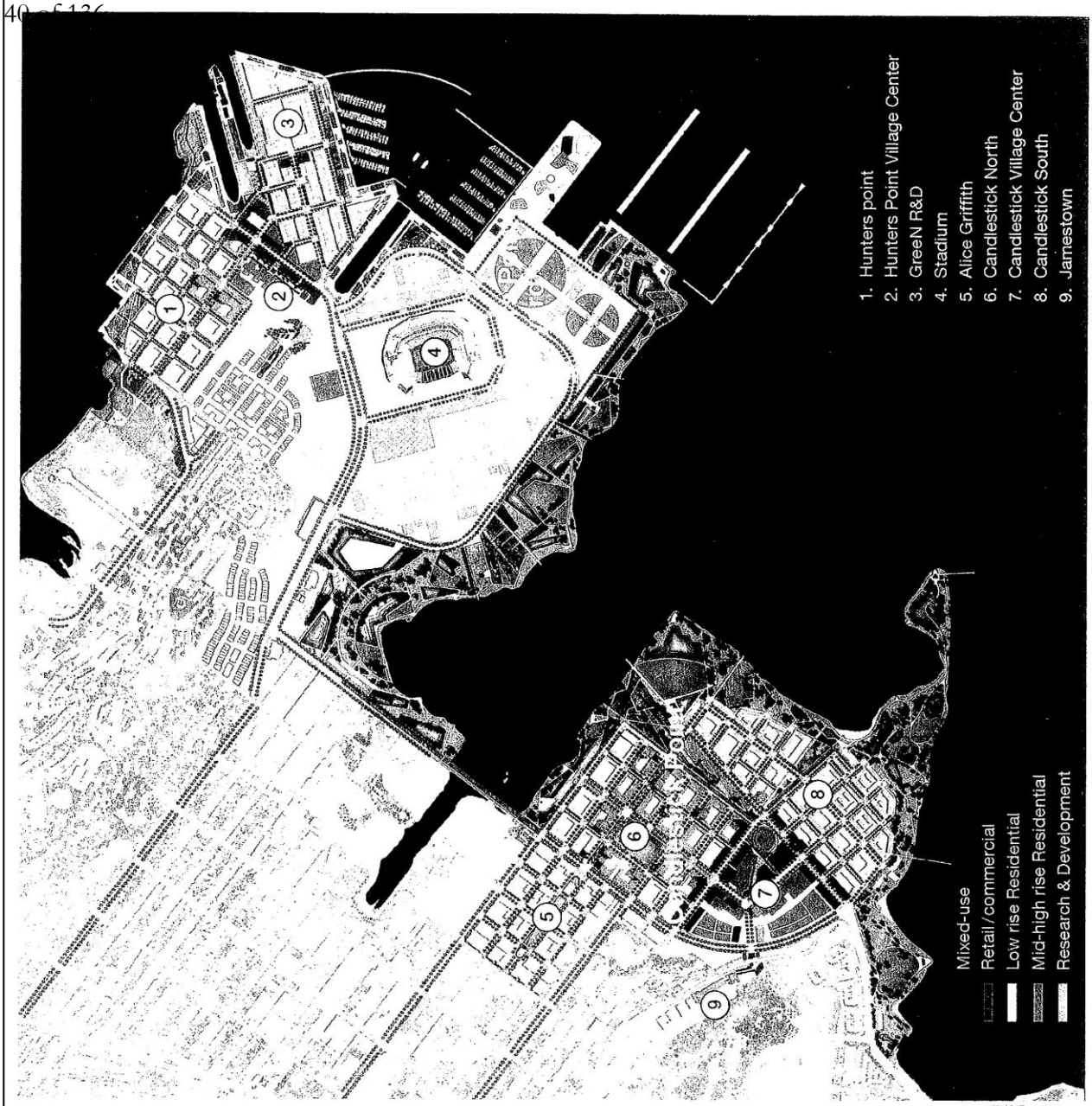

Lennar Proposed Land Use Plan
Source: Candlestick Point/Hunters Point Shipyard Urban Design Plan Lennar Urban, 9/25/08.

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GENERAL POSITIONS & ASSUMPTIONS

Based on previous studies and community support, the planning alternatives reflect the following positions and assumptions on selected topics:

Landfill on E2

The landfill on parcel E2 is to be removed. A constructed treatment wetland will occupy the parcel.

Yosemite Slough

All alternatives assume that the Yosemite Slough open space is to be expanded, and incorporated into the urban design, connectivity, transportation, programming, and ecological planning.

Bridge

Alternatives assume that transportation will utilize existing city streets and not a bridge over Yosemite Creek as proposed in the Lennar proposal.

Stadium Design

For the purposes of this study, the same stadium footprint was used in each alternative. Each site will have its own opportunities and constraints that would call for appropriate and individual architectural responses.

Water Systems

Water systems shown in alternatives represent area dedicated for this use, not a specific technology.

LAND USE AND PROGRAM

Different land use scenarios make way for new land uses and programs to be considered, and suggest different locations for land uses that are already part of the plan. The following list of land uses has been collected by Arc Ecology from advisors to this effort, community comments, and public meetings. When appropriate, they have been incorporated into the different planning scenarios.

Art Museum and Cultural Institutions
Afro-Centric Cultural Plaza
Miwok Indian Cultural Program
interpretive loop, trail, monument, skills center
Asian Fishing Cultural Program
interpretive loop, trail, monument, skills center
Shipyard and WWII Memorial Pier

20,000 seat sports and performance arena
High-rise Hotel
Outdoor Performance venue on regunning pier
Digital arts and media campus

Observation deck on regunning crane
Driving range as adaptive reuse for pier on Parcel C
Ship breaking and repair in former dry docks
Technical or academic campus
Solar arrays on finger piers

85-24

85-25

85-26

85-26 cont'd.

38 ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL

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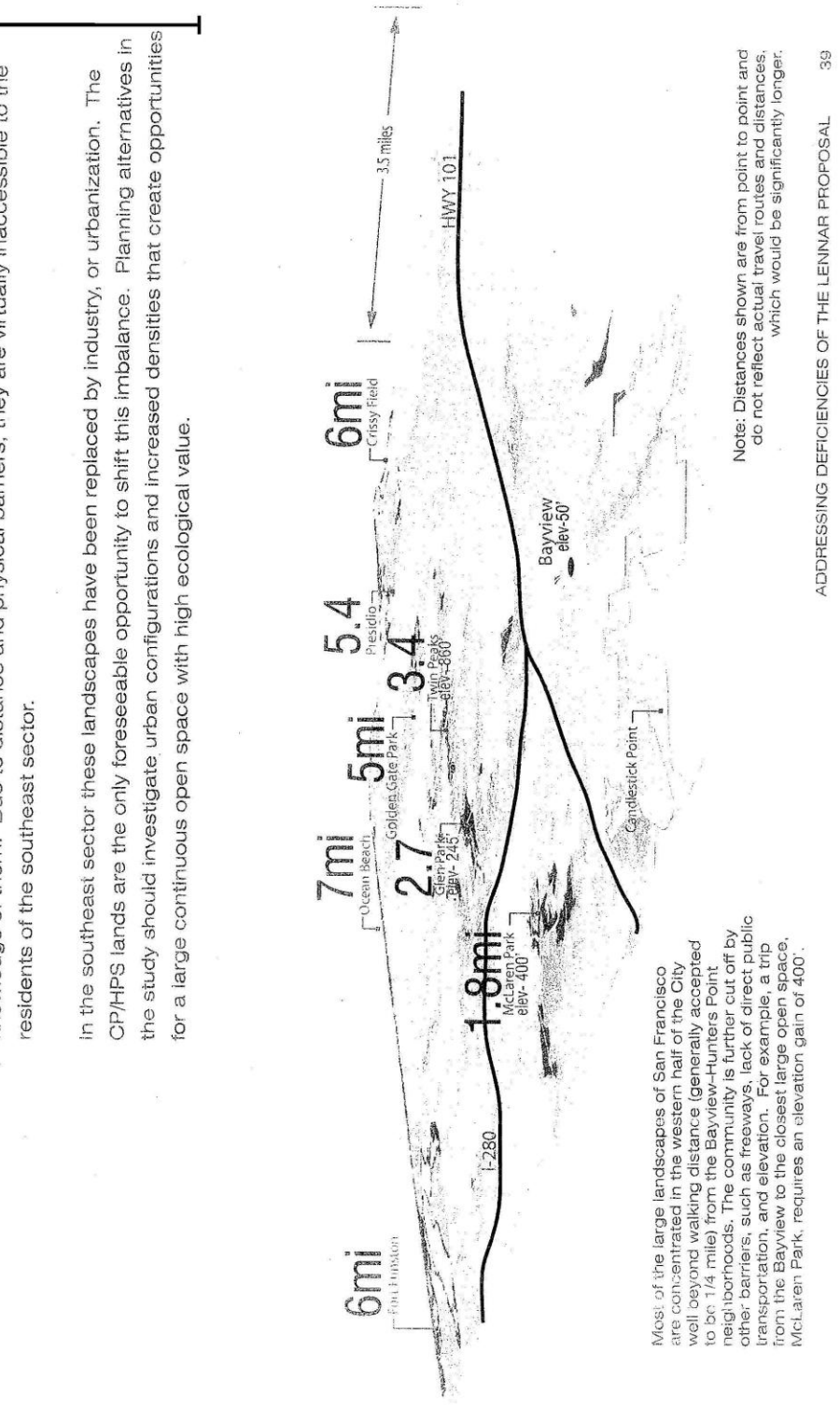
85-27

OPEN SPACE TYPE AND PROPORTION TO DEVELOPMENT FOOTPRINT

The proportions of the open space should be scaled to create a substantial ecological resource for the southeast quadrant of the city. The other large landscapes and parks of San Francisco should be used as a comparison—Crissy Field, Golden Gate Park, The Presidio, and Twin Peaks. These places to the northeast, or on the hilltops are comprised of the 7 basic flora and fauna communities of the city. We all benefit from exposure, experience, living in proximity, or even knowledge of them. Due to distance and physical barriers, they are virtually inaccessible to the residents of the southeast sector.

In the southeast sector these landscapes have been replaced by industry, or urbanization. The CP/HPS lands are the only foreseeable opportunity to shift this imbalance. Planning alternatives in the study should investigate urban configurations and increased densities that create opportunities for a large continuous open space with high ecological value.



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85-28

To provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

California State Parks Mission Statement
CA DPR

CPSRA's greatest asset is its large size with areas of significant distance between bayshore and urban development. It provides a healthy and thriving variety of wildlife habitats, as is demonstrated by the 180 wildlife species found in CPSRA, and a wealth of biodiversity. Its size is critical to the biodiversity mandate of the CA DPR mission and also allows for a wide array of recreation offerings within the urban context of San Francisco. This is one of a kind within the state parks system. However, failure to fully implement its Master Plan has left some of CPSRA relatively inaccessible for public access. CPSRA thus offers a great opportunity for habitat creation and improved pubic access and amenities such as a nature interpretive center envisioned in its Master Plan.

STATE PARK LANDS POSITION

In 1973 the State legislature set aside $10 million to acquire CPSRA and in 1977 CPSRA was established as the first California state park unit in an urban area, bringing state park benefits to people who cannot travel to distant wilderness areas.

Over 200 community meetings were held in developing the General Plan for this new state park. From the very beginning the community made it clear that it wanted CPSRA to provide a natural experience in this urban environment, with hiking trails, picnic areas, community gardens, an amphitheater, a cultural and natural history center, group camping site, fishing piers, windsurfing amenities and wildlife habitat. All these were incorporated into the General Plan and a later Plan Amendment.

While only some of the goals of the General Plan have been implemented—for example, a very popular picnic area, a fishing pier, a community garden and some hiking trails—CPSRA was very successful from its beginning in supporting a surprisingly large number of wildlife species. Over 180 species of birds, reptiles, amphibians, butterflies and mammals have been documented using the park's wide variety of habitats from wetlands and sandy beaches to grasslands and coastal scrub.

The quality and configuration of the state parks' lands for upholding the state parks mission statement can be greatly improved by the CP/HPS project. New programs and facilities can be added, habitats can be created and restored, relationships with the development and adjacent park lands can be leveraged for the greatest mutual benefit.

40 ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL

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85-28 cont'd.

STATE PARK HABITAT OPPORTUNITIES, CONSTRAINTS, AND RECOMMENDATIONS

This diagram evaluates the existing configurations of Candlestick Point and provides recommendations for the integration of the state park open space with new urban development.

1. **Narrow Corridors** Widen narrow corridors to support habitat, hydrological function, and recreational needs. Study required to determine appropriate width.
2. **Large Patch** Existing large contiguous patch conributes to overall biodiversity potential and resilience.
3. **Potential Large Patch Size** Expand existing park land to capitalize on potentially large patch.
4. **Existing Open Space** Provide flora/ fauna/ pedestrian connection to Bayview Hill. Create connections with existing open spaces.
5. **Connectivity** Provide connection from CPSRA to existing open space.

CPSRA

Existing Adjacent Open Space

Existing Developed Areas

Narrow Areas (<300')

ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL 41

85-28 cont'd.

Almost all of the Candlestick Point state park lands are on "man-made" land. They are the constructed result of the endeavors, waste, and earthquake remains of previous generations. As a construction (like a building, bridge, or monument), they are of unique cultural value to the city and the state as an artifact of a different era. This is both a resource to preserve and interpret through the mission statement mandates, as well as a reality about the kind of ecology that is possible and appropriate for such a place.

A range of plant communities and hydrologic conditions and the connectivity between them are key characteristics of biologically diverse places. Large-scale spaces are inherently necessary to maintain this diversity and the concept of habitat connectivity. While the state park lands at Candlestick Point possess the necessary cumulative scale that currently supports a wide array of wildlife species, their configuration has severe limitations. Narrow strips, hard water edges, poor soils, and poor connections to habitats outside its boundaries are all factors that limit the potential for increasing the biological diversity of the park. Planning and design that transcends boundaries can remedy those flaws while addressing the projected recreation needs that a state park can and should provide.

This figure shows the current park boundary (in red) overlaid on the Urban Design Plan in the Lennar proposal.The Lennar proposal shows development on a significant portion of state park land.

Image Source:: Candlestick Point/Hunters Point Shipyard Urban Design Plan, Lennar Urban, 9/25/08

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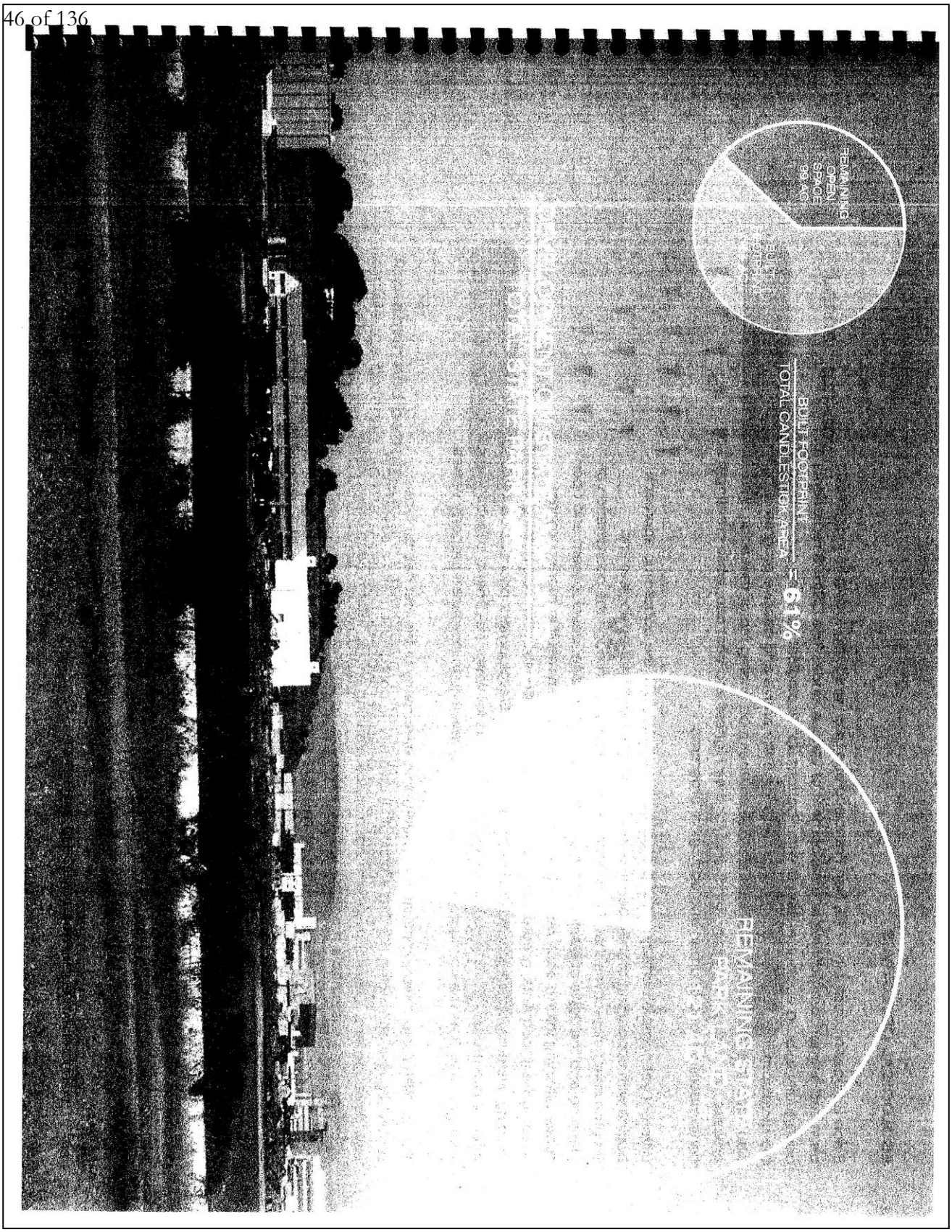
REMAINING OPEN SPACE 99 AC
BUILT FOOTPRINT
TOTAL CANDLESTICK AREA
61%
REMAINING PARKING AREA

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85-29

ECOLOGICAL OBJECTIVES

Since European contact in 1775, San Francisco has been gradually losing its indigenous plant and animal communities to development of various kinds. The CS/HPS represents an opportunity to build ecological assets with "bottom up" ecological planning coordinated with the development. This approach does not replace the active and passive programs that also need to accompany urban densities. It is rather a balancing factor that adds rigor to the process, and aids in organizing land uses for their highest and best use, while creating a rich contemporary blend of urban and ecological programs.

Different yet complementary to the project sustainability plan, the bottom-up approach begins with conceiving of the open space as a "single park" with ecological and programmatic objectives that the development can support through the coordination of planning and the flows of waste, water, and energy. In this case, development and open space planning inform each other. Open space priorities can result in more compact development footprints, greater density, and innovation in construction sequencing as well as building systems, with features such as dual plumbing. Development priorities can influence open space programs such as the creation of wetlands for water treatment, irrigation, and storage, as well as the configuration of open space, resulting in increased property values.

The CP/HPS project represents an opportunity to create many of the lost habitat types, protecting and enhancing the City's biological diversity, in coordination with a sustainable new development. Development and open space planning should inform each other, jointly addressing the sustainable management of resources, water and energy.

The following ecological objectives have been identified and are discussed in further detail in this section:

- leverage existing assets
- overcome ecological limitations
- create conditions for biodiversity
- intergrate flows of resources, water, and energy with open space systems
- coordinated park program
- change over time and dynamics.

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Lennar: top-down
urban development
vs
Alternative: bottom-up
urban development
85-29 cont'd.
Top-down and bottom-up are strategies of information processing and knowledge ordering...In many cases top-down is used as a synonym of analysis or decomposition, and bottom-up of synthesis.
A top-down approach is essentially breaking down a system to gain insight into its compositional sub-systems.
A bottom-up approach pieces together systems to give rise to a broader organization...This strategy often resembles a "seed" model, whereby the beginnings are small but able to grow in complexity and completeness...
Source: Wikipedia
ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL
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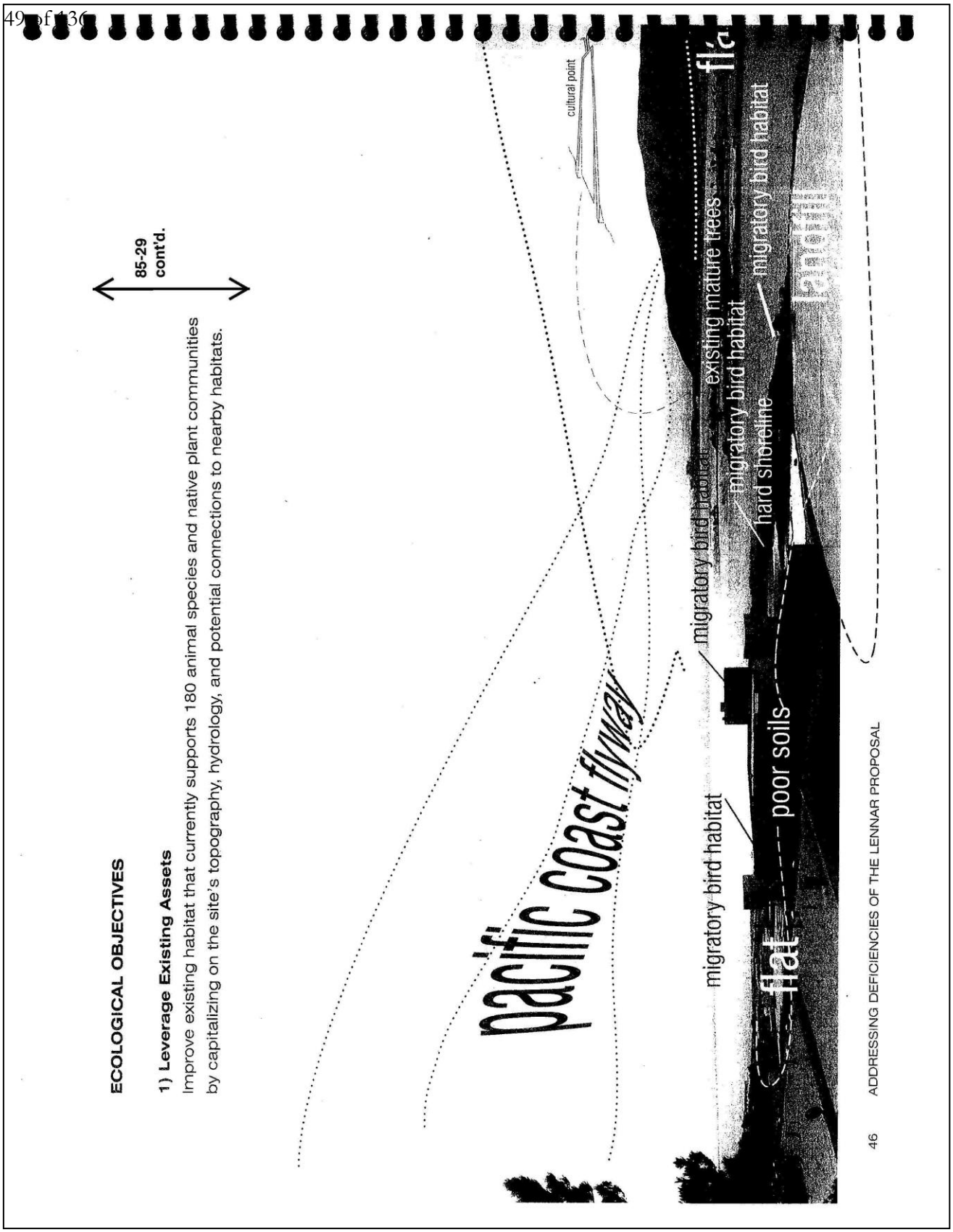
85-29 cont'd.
ECOLOGICAL OBJECTIVES
1) Leverage Existing Assets
Improve existing habitat that currently supports 180 animal species and native plant communities by capitalizing on the site's topography, hydrology, and potential connections to nearby habitats.
pacific coast flyway
cultural point
existing mature trees
migratory bird habitat
hard shoreline
migratory bird habitat
poor soils
migratory bird habitat
flat
46 ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL

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2) Overcome Ecological Limitations

The post-industrial conditions of the CP/HPS site present challenges to establishing productive ecological conditions. Limitations can be overcome through resourceful design, technology, landscape processes, and landscape succession strategies.

85-29 cont'd.

Example limitations—hardened shoreline, poor soils, fragmented habitats, non-native soils, limited resident fauna

Example agents for transformation—constructed wetlands, industrial composting, demolition, introduction of native flora/fauna species, maintenance regimes for landscapes

View from Parcel A, looking south to Candlestick Point

ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL 47

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3) Create Conditions for Biodiversity

Creating a biologically diverse mix of aquatic and terrestrial species requires flows and movement of species in continuous habitats with a range of hydrologic and flora conditions. The open space of the CP/HPS will require creating the following relationships:

Connect habitat patches—Remove barriers, create corridors, enhance existing corridors.

Create a range of plant communities—Create or enhance the plant communities of San Francisco based on soil, elevation, and hydrologic conditions.

Create a range of hydrological conditions—Use natural and constructed water sources to create a range of hydrological conditions and support new ecologies.

Target habitats for species of concern—San Francisco is home to many species threatened by loss of habitat. Prioritize the creation of habitats and corridors for species of concern and their reintroduction.

85-29 cont'd.

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Plant and wildlife species of San Francisco
Most of these species are already found at CPSRA. Enhancing and creating a diversity of habitats at CP/HPS will increase the biodiversity of the state park and open space system.
Source: Nature in the City

ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL 49

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85-29 cont'd.

4) Integrate Flows of Resources, Water, and Energy with Open Space Systems

The open space will require inputs of energy, water, and nutrients for its establishment and long-term function. With early planning and guidelines for development, the buildings, streets, and infrastructure can provide these inputs creating a synthetic and sustainable relationship with the active, passive, and habitat systems of the open space.

Examples—Dual plumbing in buildings to generate consistent irrigation water resources, treatment wetlands for black water, irrigation storage ponds for recycled water, surplus solar energy for water movement and park energy needs, compost of wetland plants and household waste for soil building operations.

Solar panels integrated with irrigation storage

Constructed treatment wetland

Industrial composting

50 ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL

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5) Coordinated Park Program

Engage the urban and recreation programs that are essential to a successful and healthy city with the wild landscapes and their natural processes. Create and coordinate a diverse and contemporary blend of ecological, recreation, and cultural uses that builds health, knowledge, pride, and stewardship.

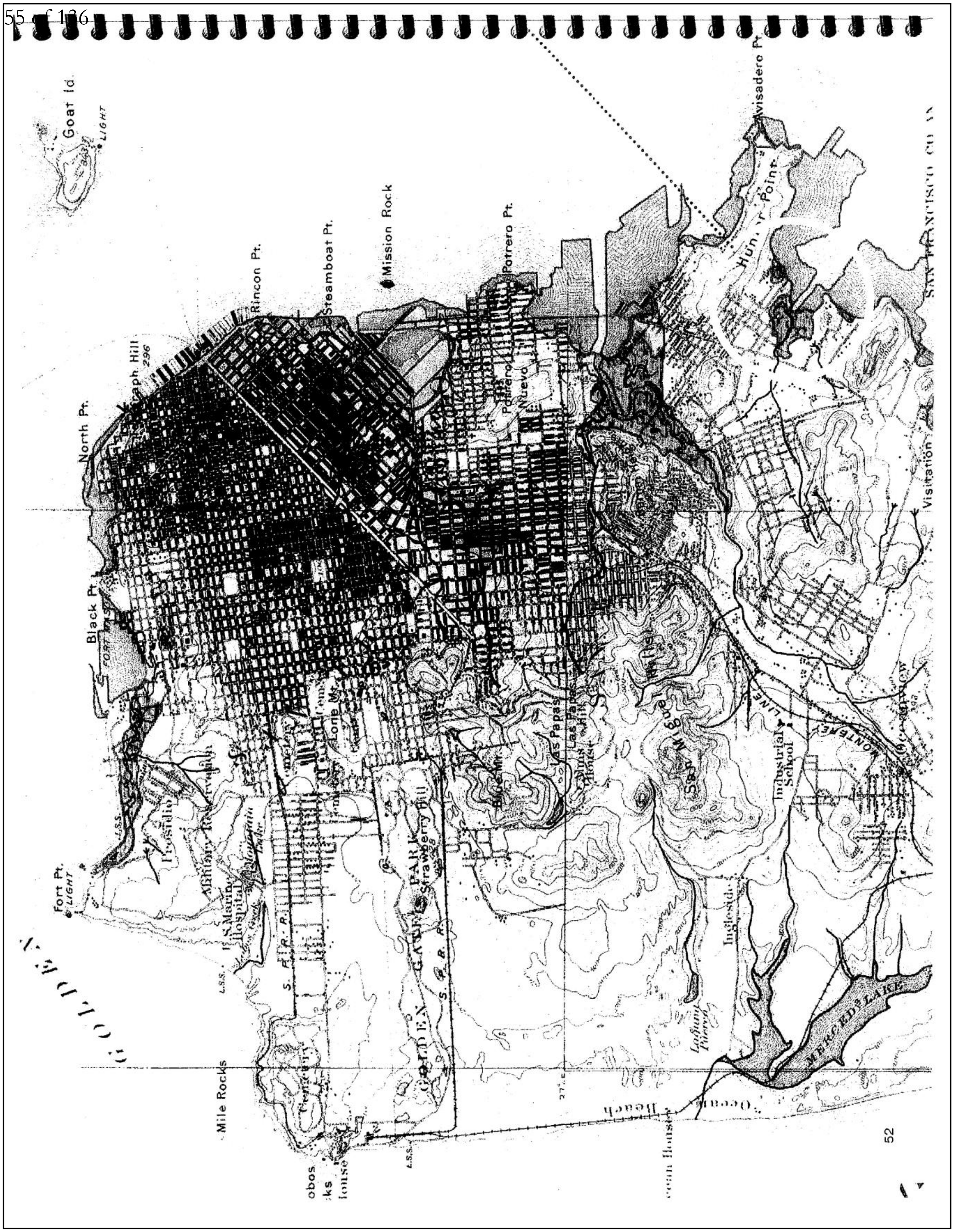
6) Change over Time and Dynamics

"Grow the park"- Building ecologies takes time. Begin the biodiversity and transformation objectives early: connect patches, build soils, plant trees, establish hydrological conditions. Executing low-cost/ long-timeline steps early will set ecological processes in motion as the park offers immediate change to the community, builds stewardship, and adds value to the development before it comes on line.

The open space should be enabled with design, technology, and programming that engage the dynamics of large-scale landscapes, such as wind, rain, tides, movement of species, seasonality, temperature. Dynamic processes allow landscapes to evolve, and be more self regulating, productive, and healthy.

ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL 51

85-29 cont'd.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Goat Id
LIGHT
Mission Rock
Rincon Pt.
Steamboat Pt.
Potrero Pt.
Potrero Nuevo
North Pt.
Black Pt.
Fort Pt.
LIGHT
Avisadero Pt.
Hunters Point
Visitation
Industrial School
Ingleside
San Miguel
Las Papas
Strawberry Hill
GOLDEN GATE PARK
MERCED LAKE
Ocean Beach
Mile Rocks
Presidio
U.S. Marine Hospital
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85-29 cont'd.

YOSEMITE SLOUGH AND CREEK POSITION AND PLANNING

Yosemite Creek was a natural waterway that no longer exists as a creek. As with most of San Francisco's creeks, it was buried in a culvert years ago, and incorporated into the City's combined sewage and storm water runoff collection system. The creek's headwaters were found in what is now McLaren Park, where a few small water features still evoke its memory. It flowed through what is now the Portola District and into a rich tidal marsh system at about where Third Street lies. The mouth of the creek was near where Yosemite and Wallace Avenues meet Ingalls Street today. Bayward of the historic creek mouth is a tidal inlet (formed by the filling in of much of South Basin around it) commonly called Yosemite Slough. Although "the slough" is sometimes called Yosemite Creek, there never in fact was a creek in that location.

Yosemite Creek is gone, but not forgotten. It is part of the natural and cultural heritage of the area, and it still defines a significant watershed, an important part of the CP/HPS project's context. Although it is not with in the project boundaries, the scale of the CP/HPS project warrants a larger planning study of the surrounding area that includes expanding the Yosemite Slough as an open space and creating connections to Third Street and its MUNI stops. It is a project that should happen in time, if not concurrently with the CP/HPS project.

Planning for expanding the Slough as an open space should study both natural and infrastructural water systems. Alternatives could incorporate the creek's historic tidal and riparian wetlands, opportunities to restore some of the creek's historic freshwater flows, and the improvement of urban storm water systems that deliver water to the bay. These options should be explored and introduced into the public's imagination for consideration, inspiration, and research. In the meantime, it is urgent that we protect Yosemite Slough and its environs.

Bay Fill
Historic Creek
Historic Wetlands

San Francisco historic watershed map

ADDRESSING DEFICIENCIES OF THE LENNAR PROPOSAL 53