



SAN FRANCISCO PLANNING DEPARTMENT

Planning Commission Draft Motion

HEARING DATE: August 14, 2014

Hearing Date: August 14, 2014
Case No.: **2013.0154E**
Project Name: **MOSCONE CENTER EXPANSION PROJECT**
Project Address: 747 Howard Street
Zoning: Downtown Commercial Support C-3-S
340-I Height and Bulk District
Block/Lot: 3723/115 and 3734/91
Project Sponsor: John Noguchi
Director of Convention Facilities Department
City and County of San Francisco
747 Howard Street, 5th Floor
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ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED MOSCONE CENTER EXPANSION PROJECT, AT 747 HOWARD STREET WITHIN THE C-3-S (DOWNTOWN SUPPORT) DISTRICT AND THE 340-I HEIGHT AND BULK DISTRICT.

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as Case No. 2103.0154E, 747 Howard Street (the Moscone Center Expansion Project) (hereinafter "Project"), based upon the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 *et seq.*, hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").
 - A. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on January 22, 2014.
 - B. On April 30, 2014, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

- C. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site and posting was confirmed by Department staff on April 30, 2014.
 - D. On April 30, 2014, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.
 - E. A Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on May 1, 2014.
2. The Commission held a duly advertised public hearing on said DEIR on June 5, 2014 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on June 16, 2014.
 3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 45-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Draft Comments and Responses document, published on July 30, 2014, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.
 4. A Final Environmental Impact Report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Comments and Responses document all as required by law.
 5. Project EIR files have been made available for review by the Commission and the public. These files are available for public review at the Department at 1650 Mission Street, Suite 400, and are part of the record before the Commission.
 6. On August 14, 2014, the Commission reviewed and considered the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.
 7. The Planning Commission hereby does find that the FEIR concerning File No. 2013.0154E, 747 Howard Street (Moscone Center) reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Comments and Responses document contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA and the CEQA Guidelines.
 8. The Commission, in certifying the completion of said FEIR, hereby does find that the project described in the FEIR will have no significant project-specific or cumulative effects on the environment that cannot be mitigated to a level of insignificance.

9. The Planning Commission reviewed and considered the information contained in the FEIR prior to approving the Project.

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of August 14, 2014.

Jonas Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED: [Date]



RESPONSES TO COMMENTS

Moscone Center Expansion Project

CITY AND COUNTY OF SAN FRANCISCO
 PLANNING DEPARTMENT
 CASE NO. **2013.0154E**

STATE CLEARINGHOUSE NO. 2014012050

Draft EIR Publication Date:	APRIL 30, 2014
Draft EIR Public Hearing Date:	JUNE 5, 2014
Draft EIR Public Comment Period:	MAY 1, 2014, THROUGH JUNE 16, 2014
Final EIR Certification Hearing Date:	August 14, 2014



SAN FRANCISCO
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ENVIRONMENTAL PLANNING DIVISION | SAN FRANCISCO PLANNING DEPARTMENT



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: July 30, 2014
TO: Members of the Planning Commission and Interested Parties
FROM: Sarah Jones, Environmental Review Officer
RE: **Attached Responses to Comments on Draft Environmental Impact Report Case No. 2013.0154E for the Moscone Center Expansion Project**

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Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on August 14, 2014.** The Planning Commission will receive public testimony on the Final EIR certification at the August 14, 2014 hearing. Please note that the public review period for the Draft EIR ended on June 16, 2014; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Responses to Comments document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Elizabeth Purl at (415) 575-9028 or elizabeth.purl@sfgov.org.

Thank you for your interest in this project and your consideration of this matter.

MOSCONE CENTER EXPANSION PROJECT

Responses to Comments

Planning Department Case No. 2013.0154E
State Clearinghouse No. 2014012050

July 2014

City and County of San Francisco
San Francisco Planning Department

Important Dates:

DEIR Publication Date:	April 30, 2014
DEIR Public Comment Period:	May 1, 2014 to June 16, 2014
DEIR Public Hearing Dates:	June 5, 2014
FEIR Certification Meeting Date:	August 14, 2014

This report is printed on recycled paper.

CHAPTER VIII

Responses to Comments

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A. Introduction

Purpose of the Responses to Comments Document

The purpose of this Response to Comments (RTC) document is to present comments on the Draft Environmental Impact Report (Draft EIR) for the proposed Moscone Center Expansion Project, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) Public Resource Code Section 21091(d)(2)(A) and (B), the City and County of San Francisco (CCSF) has considered the comments received on the Draft EIR, evaluated the issues raised and is providing written responses that address each substantive environmental issue that has been raised by the commenters. In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. These issues include physical impacts or changes attributable to the project rather than any social or financial implications of the project. Therefore, this document provides limited responses to comments received during the public review period that were not relevant to the proposed project or its physical environmental effects.

The Draft EIR together with this Responses to Comments document constitutes the Final EIR for the proposed project in fulfillment of CEQA requirements and consistent with CEQA Guidelines Section 15132. The Final EIR has been prepared in compliance with CEQA, including the CEQA Guidelines¹ and the San Francisco Administrative Code, Chapter 31. It is an informational document for use by: (1) governmental agencies (in addition to the CCSF) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts; and (2) the CCSF and Planning Commission prior to their decision to approve, disapprove, or modify the proposed project. If the Planning Commission approves the proposed project, it would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP) to ensure that mitigation measures identified in the Final EIR are implemented. See Section VIII.A below, for further description of the environmental review process.

Environmental Review Process

Notice of Preparation and Public Scoping

The San Francisco Planning Department, as lead agency responsible for administering the environmental review of projects within the City and County of San Francisco under CEQA prepared a Notice of Preparation (NOP) of an EIR, including an Initial Study, on January 22, 2014. As described in the Draft EIR, the San Francisco Planning Department sent the NOP to governmental agencies, organizations, and persons interested in the proposed project (see Appendix A in the EIR). During the approximately 30-day public scoping period that ended on

¹ Title 14, California Code of Regulations, Chapter 3, Guidelines for Implementation of the California Environmental Quality Act.

February, 21, 2014, the Planning Department accepted comments from agencies and interested parties identifying environmental issues that should be addressed in the EIR.

Draft EIR Public Review

The San Francisco Planning Department published a Draft EIR² for the proposed project on April 30, 2014, and circulated the Draft EIR to local, State, and federal agencies and to interested organizations and individuals for a 45-day public review period. Paper copies of the Draft EIR were made available for public review at the following locations: (1) San Francisco Planning Department, 1650 Mission Street and Planning Information Counter, 1660 Mission Street; (2) San Francisco Main Library, 100 Larkin Street; (3) San Francisco State University Library, 1630 Holloway Avenue; and (4) Hastings College of the Law-Library, 200 McAllister Street.³ On April 30, 2014, the Planning Department also distributed notices of availability of the Draft EIR; published notification of its availability in a newspaper of general circulation in San Francisco; posted the notice of availability at the San Francisco County Clerk's office; and posted notices at locations within the project area.

During the Draft EIR public review period, the Planning Department received comments from two public agencies, six non-governmental organizations, and five individuals (or groups of individuals). Attachment 1 of this RTC document includes copies of the comment letters submitted during the Draft EIR public review period.

During the 45-day public review period, the San Francisco Planning Department conducted a public hearing to receive oral comments on the Draft EIR. The public hearing was held before the San Francisco Planning Commission on June 5, 2014, at San Francisco City Hall. A court reporter present at the public hearing transcribed the oral comments verbatim and prepared written transcripts (see Attachment 2).

Responses to Comments Document and Final EIR

After the public hearing, the Planning Department prepared and published this "Responses to Comments," document. The San Francisco Planning Department distributed this Responses to Comments document for review to the San Francisco Planning Commission as well as to the agencies, organizations, and individuals that commented on the Draft EIR. The Planning Commission will consider the adequacy of the Final EIR – consisting of the Draft EIR and the Responses to Comments document – in an advertised public meeting. If the Planning Commission finds that the Final EIR complies with CEQA requirements, it will certify the Final EIR.

After certification, the Planning Department will edit the Draft EIR as specified by the Responses to Comments document and print both documents in a single publication called the Final Environmental Impact Report. The Final EIR will add no new information to the combination of

² State Clearinghouse No. 2014012050 and San Francisco Planning Department Case No. 2013.0154E.

³ Electronic copies of the EIR could be accessed through the internet at the following address: <http://tinyurl.com/sfceqadocs>.

the two documents except to reproduce the certification resolution. It will simply provide the information in one, rather than two documents.

Following certification of the Final EIR, the Planning Commission will review and consider the certified Final EIR and the associated MMRP before making a decision and taking an approval action on the proposed project. Consistent with CEQA Guidelines Section 15097, the MMRP is a program designed to ensure that the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the project's significant environmental effects are implemented. CEQA also requires the adoption of findings prior to project approval in cases where the certified EIR identifies significant environmental effects (CEQA Guidelines Sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels and the project is approved, the findings must include a statement of overriding considerations for those impacts (CEQA Guidelines Section 15093[b]). The project sponsor is required to adopt CEQA findings and the MMRP as conditions of project approval.

Document Organization

This Responses to Comments document (EIR Chapter VIII) consists of the following sections, plus supplemental attachments, as described below:

- A. **Introduction** – This section discusses the purpose of the RTC document, the environmental review process, and the organization of the RTC document.
- B. **Project Description Revisions** – This section describes project description revisions made subsequent to the publication of the Draft EIR and explains how these changes affect the analysis and conclusions of the Draft EIR regarding the project's impacts.
- C. **List of Persons Commenting** – This section presents the names of persons who provided comments on the Draft EIR. The list is organized into the following groups: federal, state, regional, and local agencies, boards and commissions; organizations; and individuals.
- D. **Comments and Responses** – This section presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. Similar comments are grouped together by topic area. Following each comment or group of comments on a topic are the City's responses.
- E. **DEIR Revisions** – This section includes all of the changes to the DEIR text and graphics.

Attachment 1 – DEIR Comment Letters

Attachment 2 – DEIR Hearing Transcript

B. Project Description Revisions

Project Description Revisions

The project sponsor has refined the project design since publication of the Draft EIR, which includes modifications to the proposed configuration of the Moscone South expansion and western pedestrian bridge previously described and analyzed in the Draft EIR. These changes are described below, and updates to the project description are included as part of the revisions provided in Section VIII.E, DEIR Revisions. The description of project changes is followed by an evaluation of the environmental effects of implementing these project description revisions. The evaluation considers whether incorporating the project description revisions would alter the impact analysis or conclusions presented in the Draft EIR; it also describes how the project updates are accounted for in the Draft EIR and indicates any appropriate adjustments to the Draft EIR analysis.

In general, and as detailed below, the project description revisions would not substantially change the construction and operations impacts identified in the Draft EIR. In some instances the project description revisions would result in small reductions in the type of, or duration of, construction activities required; however, these revisions would not affect the impact conclusions presented in the Draft EIR. Finally, the project description revisions would not require any changes to the No Project Alternative or the range of alternatives already addressed in the Draft EIR. No significant new information has been added to the EIR.

The Draft EIR analyzed effects related to the Moscone South Expansion and western pedestrian bridge based on project design information available as of spring 2014, described in Draft EIR pages II-12 and II-16. Since publication of the Draft EIR, the project sponsor has made changes to the design of these project elements. Accordingly, the EIR has been revised to reflect these changes to proposed facilities. For each change, new language is double underlined, while deleted text is shown in ~~strikethrough~~.

EIR page S-3 has been revised as follows:

The proposed above-grade Moscone South improvements would consist of two elements: the Moscone Esplanade Expansion and the Moscone South Expansion. These two elements would be built in successive construction phases, and upon project completion, they would exist as one connected building. Above grade, Moscone South and the Esplanade functional space would expand by a combined 277 percent, from 71,100 square feet to 267,700 square feet. The completed building would be approximately 95 feet in height above Howard Street. At level 1 (street level), the lobby, with an approximately 25-foot clear ceiling height, would contain a mix of registration space, meeting rooms, offices, circulation space, retail space, back-of-house space, and multi-purpose space (flexible space to be used based on the needs of certain events).

EIR page II-12 and II-16 have been revised as follows:

The proposed above-grade Moscone South would consist of two elements: the Moscone Esplanade Expansion and the Moscone South Expansion. These two elements would be built in successive construction phases, and upon project completion, they would exist as one connected building. In the description below, they are described as one building.

Above grade, Moscone South and the Esplanade functional space would expand by a combined 277 percent, from 71,100 square feet to 267,700 square feet. The completed building would be approximately 95 feet in height above Howard Street. At level 1 (street level), the lobby, with an approximately 25-foot clear ceiling height, would contain a mix of registration space, meeting rooms, offices, circulation space, retail space, back-of-house space, and multi-purpose space (flexible space to be used based on the needs of certain events).

The lobbies of the South Expansion and Esplanade Expansion would be aligned to each other at the same street-level elevation, and their connection could be opened to create one large space, or separated, depending on the needs of client groups. Refer to Figure II-5 for the plan and Table II-2 for a detailed accounting of specific functional areas.

A mezzanine level would be located approximately 12 feet above the lobby level, occupying space across the southern portion of the lobby. The mezzanine primarily would contain circulation space, with office and support space located along its southern edges. This mezzanine level would connect south to the existing Esplanade Ballroom Building, whose ballroom would remain (and would not be altered by the proposed project). Escalators would connect from the mezzanine level up to levels 2 and 3 (see **Figure II-6**).

At level 2, the south building would include a new column-free ballroom with a 27-foot clear ceiling height. This ballroom could also be used as several smaller meeting rooms or for other multi-purpose functions. A circulation area would run along the edges of the ballroom. Support space would occupy the remainder of the floor (see **Figure II-7**).

Also on level 2, two pedestrian bridges would span Howard Street, connecting the two proposed expansions between Moscone North and Moscone South and framing the main public arrival space at grade between the two new buildings (discussed further below). The eastern bridge would be fully enclosed to provide enhanced circulation for Moscone convention attendees while the western bridge would contain an uncovered public walkway intended for use by pedestrians moving between the Yerba Buena blocks. This public walkway would replace the existing pedestrian bridge located north of the Carousel (see Figure II-7). The replacement western bridge would touch down in the Children's Garden directly across from the existing amphitheater, leaving an area between the bridge and the western façade of Moscone South for landscaping.

Draft EIR page II-28 has been revised as follows:

Height, Massing, and Design

The proposed project would include extensions of Moscone North and South building facades toward Howard Street, as well as vertical extensions of all three building components (North, South, and the Esplanade). The Moscone North expansion would be primarily an expansion to the existing lobby, with a two-story vertical circulation lobby at the east, providing access to Moscone South via the proposed level 2 bridge over Howard Street.~~The Moscone North expansion would add one level above a renovated and expanded lobby along Howard Street, for a total height of approximately 54 feet. This building would be approximately 10 feet taller than the existing Moscone North lobby and restaurant structure. The remainder of the roof of the Moscone North expansion would be a new public terrace, adding 8,000 square feet of new public open space to the Sister Cities Gardens.~~

The Moscone South Expansion would add two levels above a renovated and expanded lobby along Howard Street, for a total height of approximately 95 feet. The top level of the South Expansion would be set back approximately ~~70~~³⁵ feet from its southern edge for a roof terrace, which would result in a 57-foot-high roofline relative to the Children's Garden. The Esplanade Expansion would add an enlarged lobby/~~multi-purpose space~~, a mezzanine level, and two full stories, for a total height of approximately 95 feet, with a mechanical penthouse above topping out at 110 feet. For both the South and Esplanade Expansion, a terrace would run along Howard Street with a 25-foot setback. ~~The top level of the Esplanade Expansion would be set back approximately 35 feet from its northern edge along Howard Street, also for a roof terrace.~~ As noted previously, at project completion, the South Expansion and Esplanade Expansion would function and appear as one building. In addition, at project completion, the second story of the Moscone South Howard Street façade would extend over the ground level lobby by approximately 23 feet, creating an overhang above the pedestrian space below. The south façade of the proposed expansion would be constructed of a light metal screen over plaster walls, which would include a south-facing planted green wall directly north of the Children's Garden.~~stories of both North and South facades would extend over the ground level lobbies by approximately 15 feet in the North building and 15 feet in the South building, creating overhangs above the pedestrian space below (see Figure II-9).~~

The ground level areas facing Howard and Third Streets, which would include the two lobbies and retail uses, are anticipated to be enclosed with a glass curtain wall. The levels above would be clad in a mixture of metal panels, glass curtain wall, and stone panels. In general, the architectural style would be of a contemporary design intended to coordinate with the existing aesthetic of the surrounding structures, as described above and shown in **Figure II-14** through **Figure II-18**, below. All glazing would be consistent with the City's Bird-Safe Building Ordinance (Section 139 of the *Planning Code*).

Figure II-14 presents a map of viewpoints that are presented in this Project Description. Figures II-15 through II-18 present a series of photographs from vantage points surrounding and near the project site, showing the existing Moscone Convention Center and surrounding

buildings. Each figure includes a second image depicting a photomontage of the proposed project within the surrounding built environment. These photosimulations were prepared by Square One Productions and reviewed by the San Francisco Planning Department, the environmental consultant (ESA), the project sponsor team, and the project architect (SOM). Figure II-17 presents a photosimulation of the proposed project as described in the DEIR that incorporated a 35-foot-wide setback on the top floor of the Moscone South building, facing the Children's Garden. Figure II-17a presents the deeper, 70-foot setback on the building's top floor facing the Children's Garden, incorporation of a green wall, and other design changes since publication of the Draft EIR. Figure II-17a was prepared by the project architect, SOM.

Figures II-3 through II-11 have been revised, and Figure II-17a has been inserted into the document, to reflect the changes to the project description and clarify the location of the proposed project relative to existing conditions, as follows:

- Figure II-3 shows the revised rooftop of the Moscone South and Esplanade, the modified western pedestrian bridge, and the modified flexible open space around the carousel.
- Figure II-4 now includes the footprint of the project blocks, as well as the lower level's relation to the Metreon building to the west, to better orient the lower level plan within the existing project blocks. The figure now also includes a legend.
- Figure II-5 shows the revised floor plan for the Moscone South/Esplanade, Level 1.
- Figure II-6 shows the revised floor plan for the Moscone South/Esplanade, Mezzanine Level, as well as revisions to the flexible open space at the western pedestrian bridge landing in the Children's Garden.
- Figure II-7 presents the modified western pedestrian bridge and landing in the Children's Garden.
- Figure II-8 shows the revised floor plan for the Moscone South/Esplanade, Level 3, specifically presenting the larger terrace adjacent to the Children's Garden.
- Figure II-9 shows the revised cross-section of the project, which includes the larger Level 3 terrace facing the Children's Garden.
- Figure II-10a presents revisions to the improvements proposed for the Children's Garden.
- Figure II-10b shows revisions to the proposed landscaping plan, including in the area of the western pedestrian bridge landing and the flexible space east of the carousel, as well as the modified western pedestrian bridge, as well as the updated plans for the flexible open space in the Children's Garden.
- Figure II-11 shows the modified Howard Street conditions reflecting revisions to Moscone South/Esplanade, Level 1.
- Figure II-17a presents a rendering of the revised project, which can be compared to Figure II-17, a rendering of the project as included in the Draft EIR. As shown in Figure II-17a, the third floor is set farther back, and a green wall has been incorporated into the building's southern façade.

These figures are presented at the end of Section VIII.E, DEIR Revisions.

Environmental Effects of the Project Description Revisions

The text changes that incorporate the proposed project updates into the individual impact analyses from EIR Chapter IV are summarized below and are presented in Section VIII.E, DEIR Revisions:

- **Transportation and Circulation.** The change in building massing and westward relocation of the western pedestrian bridge would not affect the transportation impact analyses presented in the Draft EIR. These revisions would not affect the 140,000-square-foot increase in exhibition space that would result from the proposed project. This increase in exhibition space was used to determine the proposed project's trip generation for transportation impact analysis.
- **Shadow.** The change in the Moscone South Expansion building massing was revised in EIR Section IV.B. Shadows cast on the Children's Garden during the late spring and early summer months would be reduced as compared to those described in the Draft EIR. The expanded 70-foot setback on the Moscone South building and the mechanical penthouse rising to 110 feet above Howard Street on the Esplanade building would cast additional shadow onto the Children's Playground, but not to such an extent that its use would be significantly affected. The shadow effects of the revised massing would be similar to those of the Modified Massing Alternative analyzed in Chapter VI. The revised project massing is determined to have a less than significant project-level shadow impact (Impact WS-2) and cumulative-level shadow impact (Impact C-WS-2).
- **Topics Considered in the Initial Study.** The change in building massing and westward relocation of the western pedestrian bridge would not affect the analysis of any impact topic presented in the Initial Study. The same footprint of the project site would be developed, and the same portions of the existing building would be demolished. Therefore, site-specific impacts related to cultural resources, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, agricultural and forestry resources minerals and energy would be the same. The minor modifications to building design would not change the intensity of use of the building or displace existing uses, and thus impacts related to population and housing, public services, and utilities and service systems would be the same as those presented in the Initial Study. Construction duration and equipment, as well as overall operation of the project, would be almost identical to the project analyzed in the Initial Study, and would therefore result in almost identical noise, air quality, and greenhouse gas impacts.

Wind impacts would continue to be less-than-significant. Although the taller mechanical penthouse on the eastern portion of the Moscone South/Esplanade building could redirect additional wind downward to street level, the building would not be of a height that would result in new wind hazards, and it would not be expected to increase wind speeds such that substantial new exceedances of pedestrian comfort would occur. A wind analysis was conducted for the Modified Massing Alternative, which analyzed a building with a height of up to 119 feet. This analysis concluded that wind impacts from such a 119-foot-tall building would be substantially similar to those of the project analyzed in the EIR.⁴

⁴ Environmental Science Associates, Memorandum: Potential Section 148 Wind Impacts, Proposed Expansion of Moscone Center, Modified Massing Alternative, San Francisco, California, May 9, 2014.

Therefore, the proposed project revisions to include a mechanical penthouse up to 110 feet high would also result in wind impacts similar to those of the proposed project. In addition, the deeper terrace on the building's southeastern side would decrease winds traveling down that façade toward ground level. Recreation impacts would continue to be less-than-significant because the relocation of the western pedestrian bridge would not substantially affect the Children's Garden, where the children's play area would increase in size as a result of the proposed project.

The revisions to the Moscone Center Expansion project analyzed in the Draft EIR would result in similar impacts or impacts of a slightly decreased magnitude. In no case would these updates result in new or substantially more severe impacts than those previously disclosed in the Draft EIR. These updates would change two impact conclusions the Draft EIR: Impact WS-2 (project-level shadow impact) and Impact C-WS-2 (cumulative-level shadow impact) would be reduced to a less-than-significant level. These changes would not require new or modified mitigation measures. Thus, inclusion of the project description revisions into the EIR as part of Section VIII.E, DEIR Revisions, does not require recirculation of the EIR pursuant to CEQA Guidelines Section 15088.5.

C. List of Persons Commenting

This Responses to Comments document responds to all comments received on the Draft EIR, including written comments submitted by letter, fax, or email as well as oral comments presented at the public hearing. This section lists all individuals and organizations that submitted comments on the Draft EIR. Commenters are grouped according to whether they commented as individuals or represented a public agency or non-governmental organization. The complete set of written and oral comments received on the Draft EIR is provided in Attachment 1, DEIR Comment Letters, and Attachment 2, DEIR Hearing Transcript.

Federal, State, Regional, and Local Agencies, Boards, and Commissions

- California Department of Transportation; letter, June 13, 2014
- San Francisco Planning Commissioner Michael J. Antonini; public hearing, June 5, 2014
- San Francisco Planning Commissioner Kathrin Moore; public hearing, June 5, 2014
- San Francisco Planning Commissioner Cindy Wu; public hearing, June 5, 2014

Organizations

- Alliance for Better District 6; email, June 13, 2014
- Hotel Council of San Francisco; public hearing, June 5, 2014
- San Francisco Beautiful; email, June 16, 2014
- San Francisco Chamber of Commerce; public hearing, June 5, 2014
- TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated (received June 6, 2014)
- TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated (received June 9, 2014)

- TODCO Group/Yerba Buena Neighborhood Consortium; letter, June 13, 2014
- John Elberling, TODCO Group/Yerba Buena Neighborhood Consortium; public hearing, June 5, 2014
- Sonja Kos, TODCO Group/Yerba Buena Neighborhood Consortium; public hearing, June 5, 2014
- Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; public hearing, June 5, 2014
- Yerba Buena Alliance, letter, June 16, 2014

Individuals

- Jimmy Carlos; email, June 2, 2014
- Sue C. Hestor; letter, June 16, 2014
- Dennis Hong; email, June 16, 2014
- Rick Smith; email, June 16, 2014
- Rick Smith; public hearing, June 5, 2014
- Judy V. Wang; letter, undated (received May 8, 2014)

D. Comments and Responses

This section presents summaries of the substantive comments received on the Draft EIR and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the Draft EIR, with general comments on the EIR or proposed project elements grouped together at the beginning of the section. Comments on Chapter 1, Summary, or specific mitigation measures are included under the relevant topical section of the Draft EIR. The order of the comments and responses in this section is shown below, along with the prefix to the topic codes (indicated in square brackets):

General Comments [GC]	Air Quality [AQ]
Project Description [PD]	Wind and Shadow [WS]
Land Use / Plans & Policies [LU]	Hydrology and Water Quality [HY]
Transportation and Circulation [TR]	

Within each subsection under each topic area, similar comments are grouped together and identified using the topic code prefix and sequential numbering for each subtopic. For example, General Comments [GC] are listed as GC-1, GC-2, GC-3, and so on. Each topic code has a corresponding heading that introduces the comment subject; these subsections present quotes of comments and include the commenter's name. However, the reader is referred to Attachments 1 and 2 for the full text and context of each comment.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment and to clarify or augment information in the Draft EIR as appropriate. Response numbers correspond to the topic code; for example, the response to comment GC-1 is presented under Response GC-1. The responses may clarify the Draft EIR text

or revise or add text to the EIR. Revisions to the Draft EIR are shown as indented text. New or revised text is double underlined; deleted material is shown in ~~striketrough~~.

General Comments

Comment GC-1: Comments against proposed project, but not regarding the Draft EIR or specific environmental issues.

"I am disagree your project of Third & Fourth St. in Howard St. near Yerba Buena Gardens. We don't need expansion project to increase gross square footage of the Moscone Center Facility by 20 percent from approximately 1.2 million square feet to 1.5 million square feet." (Judy V. Wang; letter, undated, received May 8, 2014)

Response GC-1

The commenter states that the proposed project is unneeded. The comment does not relate to the accuracy or adequacy of the Draft EIR. The comments are noted and the merits of the proposed project will be considered by decision-makers when considering project approval or disapproval.

Comment GC-2: Comments supporting the proposed project, but not regarding the Draft EIR or specific environmental issues.

"The EIR speaks, as it speaks to the design of the project, seems very complete. The project is a good one to move forward in moving the project into more noticeable, recognizable buildings is a good idea." (San Francisco Planning Commissioner Kathrin Moore; transcript, June 5, 2014)

"On June 10, 2014, Adam Vandewater, from the Mayor's Office of Economic and Workforce Development, did a presentation at the Alliance for a Better District 6 monthly meeting on the expansion plans for Moscone Center.

The ABD6 Land Use Committee chair has reviewed the draft EIR and combined with the presentation, is supporting the project.

Also at the meeting, the Board of Directors voted to support the expansion project for Moscone Center, so we can stay competitive with other cities for convention business. We are also excited that the children's area will be enhanced. This will be a benefit for the City's children and their parents. This unique design will move our convention and related services into the 21st century. Again, the ABD6 Board of Directors supports the expansion plans proposed for Moscone Center and asks for your support." (Marvis Phillips, Alliance for a Better District 6; email, June 13, 2014)

“One of the things that I wanted to remind the Commission, too, is the amount of jobs that are related to this. And the hotels employ 24,000 individuals.

And our workforce is made up of 57 percent San Franciscans. So this project actually helps San Francisco not only from the employment but also the economic benefits coming out of it as well.

And our employees -- 77 percent of our employees identify themselves as either Asian, Hispanic, or African America. So the project itself, as it grows in the expansion, will help a very vital part of San Francisco's industry, which is tourism.

Obviously, it will help with work with the hotels, that the hotels will ultimately be hiring more and be able to work more with the citizens of San Francisco.

So, again, we fully believe that this Draft EIR addresses the issues that are related to it, and thank you for your support.” (Kevin Carroll, Hotel Council of San Francisco; transcript, June 5, 2014)

“San Francisco's economy is robust today because we have targeted knowledge-based industry. Economy is key to growth of jobs. San Francisco went three, four years ago from 10 percent unemployment now to just over 4 percent, almost full employment, the envy of the country. And part of that is because of the fine work of the City and its private partners in developing San Francisco as visitor and convention destination.” (Jim Lazarus, San Francisco Chamber of Commerce; transcript, June 5, 2014)

“The Alliance is very much aware of the importance of the Moscone and has consistently supported its presence and we want to see it thrive.” (Virginia Grandi, Yerba Buena Alliance; letter, June 16, 2014)

“We strongly support the project. We urge you to take all the steps necessary to approve the environmental review and to approve the development of this project with the City and County San Francisco.” (Jim Lazarus, San Francisco Chamber of Commerce; transcript, June 5, 2014)

“As some suggest, it would be a tru shame to expand or build the additional convention space else where in the City. With the Cities new transportation Plan in place, the new expansion is ideally located and the Transit Effectiveness Project (TEP) address this site.” (Dennis Hong, email, June 16, 2014)

Response GC-2

Commenters express support for the proposed project. The commenters state that the existing convention center currently generates economic activity and employment for the City. They state that the proposed project would continue to provide those benefits in a more noticeable and recognizable building that could compete with other convention centers, and that the convention center is located in an ideal location. Commenters also support the proposed renovations of the Children's Garden.

For comments related to the general accuracy or adequacy of the Draft EIR, please see response to comment GC-3. The comments are noted and the merits of the proposed project will be considered by decision-makers when considering project approval or disapproval.

Comment GC-3: Comments endorsing the analysis in the Draft EIR.

"That would be the only comments. Otherwise, I think the EIR addresses all major aspects of the project." (San Francisco Planning Commissioner Kathrin Moore; transcript, June 5, 2014)

"We strongly support the project, and we believe that the Draft EIR accurately and adequately addresses the environmental impacts from this expansion project." (Jim Lazarus, San Francisco Chamber of Commerce; transcript, June 5, 2014)

"We fully support the project and believe that the Draft EIR sufficiently examines the impacts that are related to the program itself." (Kevin Carroll, Hotel Council of San Francisco; transcript, June 5, 2014)

"In Conclusion: Based on my comments and evaluation of the DEIR I have concluded there is sufficient information and I fully support this Project and this DEIR. I only wished we were able to add much more convention space than planned. I request that my comments be included in the Final EIR and place the Project on Fast Track." (Dennis Hong, email, June 16, 2014)

Response GC-3

The comments state that the Draft EIR adequately and accurately addresses the environmental impacts of the proposed project, but do not relate to specific environmental issues. The comments are noted and will be taken into account by the Planning Commission and other decision-makers in their consideration of project approval.

Project Description

Comment PD-1: The proposed project should be modified to include a revised massing of the Moscone South building, renovations to the Children’s Garden, a green wall, and other project modifications.

“In order to mitigate these negative impacts on the gardens, and maintain the commitment to balance of all uses in Yerba Buena, there must be real and substantial improvements to the public areas in the South Block at the time of construction. We respectfully request that the Commission require the project team to commit to the following:

- Adopt the May 2014 Project Design, most similar to Alternative 3, which resolved issues that were not part of the design in the Draft EIR and incorporated community input.
- The following improvements must be funded, coordinated, and built at the same time with the Moscone Expansion: the new Tot Lot; the relocated and improved Learning Garden; the removal of at least the southernmost span of the existing Howard Street pedestrian bridge, which has created unusable space underneath; and the expansion of the carousel café and accompanying improved seating area. The environmental analysis of these Children’s Garden Improvements must be also analyzed and incorporated within the Moscone Expansion Project EIR so that these improvements can be completed as part of the Expansion project.
- The proposed ‘Green Wall’ on the building facing the Children’s Play area must be of the highest landscaping quality. More of the cheap, rat-infested ivy like the current Moscone South landscaping cannot be considered a mitigation for the loss of iconic city skyline views and building Convention uses above ground.” (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 9, 2014)

“The proposed ‘Green Wall’ on the building facing the Children’s Play area must be of the high quality landscaping. Specifically, the first ten to fifteen feet from the ground up should be a truly special display of vegetation, like that seen in the images below. At this lower level, pedestrians, children in the Learning Garden, and users of the Playground, will readily enjoy vegetation details.

Above that pedestrian level, landscaping can be as proposed. That would make the upper 75–80% of the wall of lower maintenance landscaping materials.” (TODCO Group/Yerba Buena Neighborhood Consortium; letter, June 13, 2014)

“Another is that convention center circulation and fire exits actually take some of the space that is currently the children's play area.” (Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

“So in order to mitigate these negative impacts, we would like to see the project team commit to making any improvements to the project at the time of construction. We would like to see the new design that was mentioned at the introduction adopted.

This is something we saw most recently in May, and it incorporates a lot of changes from the community. The massing is set back. And it's very important to us that this be the project that moves forward.

And any improvements to the playground area must be, as I said, funded and included in this project.

In order to do that, the environmental analysis of these changes needs to be considered. So we'd like to see those added to the EIR. That includes a new tot lot, the relocated and expanded learning garden, the removal of the southernmost span of the bridge, the Howard Street pedestrian bridge, as well as the expansion and improvement of the Carrousel Café area." (Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

"And then, finally, there's the wall that is -- that faces the garden area is -- has been proposed to be a green wall. And we -- we really need that to be a wonderful landscaping green wall. It can't be the rat-infested ivy that we see in some of the other areas in Moscone South currently. So we'd like to see that required." (Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

"The Alliance is very much aware of the importance of the Moscone and has consistently supported its presence and we want to see it thrive.

However our membership does have concerns regarding the expansion.

These concerns are broad in that they range from the impact of the expansion on the community, the children that use the Yerba Buena Gardens, concerns over children's safety, traffic impacts and pedestrian foot circulation, shadowing and changes to the bridge that provides connections to the two Gardens Blocks.

The Moscone team has been meeting with various groups on these issues for the last 18 months. These have been sometimes difficult for all parties but we would like to acknowledge the hard work listening to the Gardens stakeholders and the community engagement of the expansion team. We have seen the input and feedback be reflected in their plans that have continued to evolve.

Recently the meetings have become much more productive. The team has reduced some of the above ground square footage and shifted the new building mass and worked on the other issues in a collaborative manner that give us hope that the environmental/intrusive issues may be worked out in a satisfactory manner.

The Alliance and its members are reviewing the EIR to ensure that all of the issues are addressed and appreciate the work of the team in addressing community concerns." (Virginia Grandi, Yerba Buena Alliance; letter, June 16, 2014)

“In the final EIR can more information be included as to what exactly is happening with the Yerba Buena Garden and the Children’s Playground, (back to the graphics issue), it does not show the fountain in the proposed plan Figure II-3, page II-10, but does a good job in page VI-13 / Figure VI-1. We need to do as much as possible to keep these existing gardens intact.” (Dennis Hong, email, June 16, 2014)

“What provisions are being made to keep the Yerba Buena Garden in tack? The Proposed plan is a bit different than what the existing plan shows. The proposed plan shows some different details near the fountain. There has been a lot of work in the past in developing these wonderful gardens and we must retain them as it currently exists. We must also retain preserve the children’s playground as best as possible, especially the carousel.” (Dennis Hong, email, June 16, 2014)

Response PD-1

Some commenters request a variety of features be included in the proposed project. Other commenters acknowledge that some of these features are included in the project. These features include a revised design for the Moscone South Expansion building that further sets back the third floor from the southern façade, a “green wall” on the southern façade of the Moscone South Expansion, a renovated and expanded Children’s Garden, the expansion of the area near the Carousel Café, and removal of the existing pedestrian bridge across Howard Street.

As discussed in Section VIII.B of this RTC document, the project sponsor has refined the project design since publication of the Draft EIR and, as a result, has updated the Moscone South Expansion and western pedestrian bridge previously described and analyzed in the Draft EIR. These changes are described in Section VIII.B and include setting back the top level of the Moscone South Expansion an additional 35 feet, for a total of 70 feet, from the southern façade of the building facing the Children’s Garden. This façade would consist of a light metal screen over plaster walls, which would facilitate planting of a green wall directly north of the Children’s Garden. The inclusion of a metal screen allows for air and light circulation, as well as water drainage from the green wall, supporting the health of landscape materials growing on the wall. The comments regarding the specific materials and characteristics of the proposed green wall are noted and have been forwarded to the project sponsor for consideration. The addition to the proposed project of a green wall, as well as other proposed changes to project design, was made in part in response to community input. As discussed further in Response PD-2 below, the aesthetic impacts of urban infill projects, including effects on views, are no longer analyzed under CEQA and no aesthetic impacts were identified in the EIR. Therefore, no mitigation for such impacts is required.

Proposed renovations to the Children’s Garden are described on Draft EIR pages II-16 and II-19 and are shown in Figure II-10a on page II-20. It is acknowledged that some of the existing Children’s Garden would be converted to convention center circulation and

fire exits under the proposed project. However, as stated on page II-19, the overall area dedicated to the Children's Garden would increase under the proposed project. As stated on the bottom of page II-16, a new plaza would be located between the Carousel and proposed pedestrian bridge, as requested by a commenter. These renovations are part of the proposed project, and the environmental impacts of their construction and operation are analyzed in this EIR.

Regarding the commenter's request to remove the existing pedestrian bridge over Howard Street, as stated on Draft EIR page II-16, at the end of the first paragraph, the proposed public walkway across Howard Street on the project's second level would replace the existing pedestrian bridge north of the Carousel.

The Martin Luther King Memorial Fountain is shown in Figure II-3 on page II-10. Please see the revised Figure II-3, which also shows the fountain, in Section V.III.E of this document. No changes to the fountain are proposed.

The comments reproduced above also mention concerns related to other topics addressed in this RTC document. Please see Comment and Response WS-1 regarding the proposed project's shadow impacts on the Children's Garden. Please see Draft EIR Section IV.A, as well as Comments and Responses TR-1 through TR-8, regarding transportation and pedestrian impacts. Please see Comment and Response PD-6 regarding safety.

Comment PD-2: The proposed project would affect views.

"Another question I have is about the view. from the south upper lobby a good slice of the San Francisco skyline is being presented to conventioners and when they get covered with fog it tells people what kind of city San Francisco is. Will those views be gone and be replaced with a single building facade which is that of the future Moscone North?" (Jimmy Carlos; email, June 2, 2014)

"And third is that the wonderful view from the play area they now get of the city skyline will actually be blocked by the back side of the ballroom and meeting room structure." (Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

Response PD-2

The commenters state concerns that the proposed project would affect publicly and privately accessible views. EIR figures II-15 through II-18 provide conceptual views of the proposed project. Figure II-14 presents a map of viewpoints that are presented in the Project Description. Figures II-15 through II-18 (including Figure II-17a, included in Section VIII.B of this Response to Comments document) present a series of photographs from vantage points surrounding and near the project site, showing the existing Moscone Convention Center and surrounding buildings. Each figure includes a second image

depicting a photomontage of the proposed project within the surrounding built environment. The photographs show that views of the skyline from Howard Street would not be substantially changed. The view from the Children's Garden looking north would be different upon completion of the proposed project. However, as stated in the Draft EIR on pages IV-4 to IV-6, the proposed project is considered an urban infill project. Pursuant to SB 743, which amended Public Resources Code Section 21099, the aesthetic impacts of urban infill projects are no longer analyzed under CEQA and the Lead Agency maintains the authority to consider aesthetic impacts under its local design review or other discretionary powers.

Comment PD-3: A proposed project objective is to preserve existing convention business.

"My first comment is one that deals with the scope of the expansion. It's an expansion of approximately 300,000 square feet, if I'm reading correctly.

And I would assume that an analysis has been done that we don't need an even larger expansion because I've heard that we lose a lot of conventions to places like Las Vegas, San Diego, Chicago because of not having adequately sized facilities. While I just heard Mr. Lazarus speak about the fact we want to keep what we've got, also we should be striving to attract even more conventions to San Francisco.

So my comment in regards to the EIR would be is the amount being analyzed big enough, or should we do an analysis or have done an analysis that includes a larger square footage?" (San Francisco Planning Commissioner Michael J. Antonini; transcript, June 5, 2014)

"The impacts of this expansion are minimal, and the impacts really don't grow the convention business as much as preserve and maintain our convention business by allowing Moscone to better serve customers we've always attracted to San Francisco. I think the total number of people coming to a particular convention is really not what's at stake in this project. It's making the building competitive in the 21st century to accommodate the exhibitors and the breadth of uses for a modern convention center." (Jim Lazarus, San Francisco Chamber of Commerce; transcript, June 5, 2014)

"I am writing in support/adoption of the expansion of the Moscone Center. In the past I had the opportunity to co-chair several venues at this wonderful Conference Center. Only regrets; the center as planned is still too small." (Dennis Hong, email, June 16, 2014)

Response PD-3

The comments concern the objectives of the proposed project and do not relate to specific environmental issues. One commenter states that an objective of the project is to retain existing conventions, and another commenter asks whether an objective of the project should be to increase the expansion more than proposed to attract additional new and larger conventions.

The project sponsor objectives are described on Draft EIR pages II-3 and II-4 and include an objective to maximize the economic value of Moscone Center by attracting new clients and maintaining existing clients. It is intended that, following project implementation, Moscone Center could more efficiently hold two or more events simultaneously and reduce the time required to set up or break down events, allowing the center to schedule additional events. In addition, the total number of events in a given year could increase as a result of the proposed project. However, a larger expansion than proposed is not under consideration at this time.

Comment PD-4: The project has a long construction period.

“So those are my main comments. And I assume the reason it takes four years to complete this, this is projected time; it’s -- we have ongoing conventions and everything, so we have to phase it over a period of time.” (San Francisco Planning Commissioner Michael J. Antonini; transcript, June 5, 2014)

Response PD-4

The commenter states that the construction period length may be due to the objective to continue holding conventions at the project site throughout the construction period. As indicated Draft EIR pages II-3 and II-4, one of the project sponsor’s objectives is to maintain continuous operations and revenue during improvement and expansion. Thus, the phasing plan for project construction (shown in Draft EIR Table II-3 on page II-36) allows portions of the convention center to remain open for business during construction. This phasing requires a lengthier construction period, up to 44 months, than a construction approach that includes full closure of the convention center during construction.

Comment PD-5: The EIR should use “Yerba Buena” as the name of the neighborhood.

“Chapter II, page II-1, first paragraph, consider replacing South of Market with Yerba Buena as the name of the neighborhood.” (Rick Smith; email, June 16, 2014)

Response PD-5

The commenter states that the Draft EIR Project Description should refer to the neighborhood around the project site as “Yerba Buena.” Currently, the Draft EIR, on page II-1, refers to the surrounding neighborhood as “South of Market.”

The Draft EIR references neighborhood boundary lines as defined by the San Francisco Planning Department, which are shown in map format and available for review online: <http://www.sf-planning.org/index.aspx?page=1654>. The neighborhoods are broadly defined, and some small areas or sub-neighborhoods are not separately delineated. The boundaries of the 'Yerba Buena' neighborhood are not officially identified by the Planning Department on its map of neighborhood boundaries, and thus it is not referred to in the EIR.

Comment PD-6: The project would result in unsafe conditions due to a new access from Third Street to the Children's Playground.

"The DEIR does not take into account the pedestrian routes within the public spaces of the project, including the alley or the public routes within the nearby blocks. The analysis of the proposed alleyway will reveal low pedestrian counts rendering the walkway inactive and less safe." (Rick Smith; email, June 16, 2014)

Response PD-6

The commenter states that the proposed project would include an unsafe pedestrian alleyway. The existing garden has access points at the north, south, and west. The proposed project would add a connection between the existing Children's Garden and Third Street to the east. This connection would be subject to the same security controls currently in place on the entirety of the Children's Garden. Although security is not specifically a CEQA issue, the comment has been forwarded to the project sponsor for consideration.

Comment PD-7: Figure clarifications.

"Pages II-22, fig II-11 shows some of the graphic symbols which I assume are used mostly thru out this Document. For example, the light blue dashed line represents a bike route. Be that the case, does this mean that there will still be a bike route (Page II-7, figure II-2) shows an existing Bike Route, I did not realize bikes were allowed in the garden area. This is shown on page II-10, figure II-3 shows a proposed (existing) Bike Route, I would have a concern for the safety of the pedestrians in the Garden." (Dennis Hong, email, June 16, 2014)

"On page II-20, figure II-10a – what is a CCM (upper left corner of the Amphitheater represent-to the lower right of the Carousel)?

How will the proposed taxi stand on page II-22, figure II-11 and the Loading Ramp Entry as shown on page II-25, figure II-12 work? Is there enough room for all this?" (Dennis Hong, email, June 16, 2014)"

"There is no photo for view #13 – page II-29 Figure II-14.

- A similar photo viewed (Photosimulation) from 4th and Howard – Moscone West looking towards the Children’s Playground would be nice.” (Dennis Hong, email, June 16, 2014)

Response PD-7

The commenters request clarifications for figures in the project description, question whether the figures accurately represent with-project operations, seek clarification on the figures presented in the Draft EIR, and request an additional figure. Note that the colors are not used consistently throughout the EIR figures. The legend for each individual figure shows the use for each color on that particular figure.

Figure II-2 presents the existing conditions of the Moscone Convention Center. As shown in the legend at the lower-left corner of the page, the blue line represents truck circulation rather than bicycle circulation, as suggested by the commenter. Trucks enter the Moscone Center at Third Street, traverse the lower level of Moscone Center below grade, and then exit at Fourth Street. The dashed blue line shows this subgrade path of travel and does not represent a surface path or roadway within the Children’s Gardens.

Figure II-11 on page II-22 presents the proposed Howard Street Conditions. As shown in the lower-left corner, blue is used to indicate bicycle travel on this figure. Please also see the revised Figure II-11 in Section VIII.E of this document. This figure was revised to show modifications to the Moscone South/Esplanade first floor building design and program, but the configuration of Howard Street is identical to that in the original Figure II-11 and that analyzed in the Draft EIR. **Figure II-12** on page II-25 shows the proposed relocation of the Third Street truck ramp entry. As stated above and shown in Figure II-2, the existing Moscone Convention Center includes a truck ramp entry at Third Street. The proposed project would relocate that entry 186 feet southward, closer to intersection of Third and Folsom streets.

Regarding the commenter’s question as to whether the proposed freight loading would function as shown, as stated on page IV.A-75, the proposed project would result in significant impacts related to freight loading and passenger loading/unloading activities, and secondary impacts to bicyclists and motor vehicle traffic. **Mitigation Measure M-TR-6a, Moscone Center Transportation Operations Master Plan**, has been included in the EIR and includes monitoring of loading activities by staff, restriction of queuing on public streets, identification of overflow loading zones, and other measures that would reduce the impact to a less-than-significant level. This plan is included in Draft EIR Appendix C.

As stated on Draft EIR page II-28, **Figure II-14** presents a map of viewpoints that are presented in the Project Description. The encircled “13” at the lower-left corner is within the map legend, and as shown next to the encircled “13,” this symbol (a circled number) is used to indicate each “Figure Number,” and the key does not correspond to any actual figure. **Figures II-15, -16, -17, and -18** present photo-simulations, and the location of their viewpoints are shown in Figure II-14. The commenter’s request for an additional photo-

simulation viewpoint is noted. The viewpoints were selected to provide adequate and accurate depictions of the proposed project from locations where the project's visual characteristics would be most apparent. The interior of the Children's Garden would not be visible from the requested location at Fourth Street and Howard Street due to intervening structures and grade changes. Also, interior views from Moscone West are not considered to be public view points to be presented in the Project Description.

The acronym "CCM" on Figure II-10a on page II-20 of the Draft EIR stands for "Children's Creativity Museum," which would not be modified by the proposed project.

Land Use / Plans & Policies

Comment LU-1: Yerba Buena Gardens and the Moscone Convention Center were built under a land use compromise to balance uses.

"Yerba Buena Gardens is a San Francisco Treasure, a wonderful amenity enjoyed by people of all ages and all walks of life. The current Yerba Buena Gardens are the result of a "grand compromise" to build the Convention Center underground and maintain the beautiful, beloved gardens above, with public, recreational, and cultural facilities. There was a commitment that no one use would dominate the space." (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 9,2014)

"There's a simple point at the bottom of this. If the mitigations we need and we identified are not part of the project, we will litigate this EIR. That's not a threat; that's a promise, no matter the consequences.

I would very much, despite this impact, actually support the project. It's part of the -- Moscone Center is part of the grand compromise of Yerba Buena that we have worked hard for the City for 30 years to make work and often with great success.

But this is the end of the pedestrian game with the City. Either they mitigate, or we will litigate." (John Elberling, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

"Yerba Buena Gardens is a very special place in the City. It is the result of the grand compromise that has been mentioned before. And there was a commitment at the time that convention center activities stay below ground and public recreation and cultural activities be above ground. There was also a commitment that no one use predominate the space." (Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

Response LU-1

The commenters state that the project site should have a balance of land uses, pursuant to a compromise reached when the Moscone Convention Center and Yerba Buena Gardens were first constructed.

In 1976, San Francisco voters approved “Proposition S,” which was a policy declaration allowing for the use of hotel taxes to build the Moscone South exhibition hall. Proposition S raised the hotel tax from 6 percent to 8 percent and dedicated 4 percent to construction of the facility, with the intent that a park would be constructed atop the facility. However, Proposition S provided the flexibility for the City to construct Moscone South above-ground if the limited funds were not sufficient to pay for underground construction. The passage of Proposition S did not contain binding obligations on future development of the Moscone Convention Center project site and applied to the original Moscone South exhibition hall development specifically. Further, the City maintained the flexibility to construct above-ground if limited funds could not cover the 44 percent additional cost of underground construction. Absent a specific limitation in a voter-enacted initiative or in a written bilateral agreement, a past conceptual agreement could not forever bind future decision-makers.

Past or existing agreements and voter propositions, in and of themselves, are not analyzed under CEQA. However, the City of San Francisco’s CEQA analysis does analyze whether a proposed project would conflict with plans or policies adopted for the purpose of avoiding or mitigating a physical environmental effect. This analysis is provided in the EIR Initial Study (Appendix A), page 44, and the project’s compatibility with existing zoning and plans is presented in the Initial Study (Appendix A), pages 34 – 37. Impacts were determined to be less than significant.

The physical environmental effects of the proposed project on land use character are presented in the land use analysis under Impact LU-3 (Initial Study, pages 44 – 46). As stated there, the area’s mixed-use character includes a variety of uses, as well as a number of very large structures. Implementation of the proposed project would not be considered a significant impact because the uses already exist on the project site and would be compatible with the existing uses on adjacent and surrounding properties. The project uses are principally permitted in the C-S-3 (Downtown Support) zoning district. Although the intensity of indoor convention use would increase compared to existing conditions, the project would maintain the balance of land uses at the project site and would be one of a variety of uses in the Yerba Buena Gardens area and in the larger South of Market neighborhood.

The comments note the need to maintain gardens, recreation, and cultural uses in the project area. Impacts on recreation are presented in the Recreation analysis (Initial Study pages 113 – 115), Wind analysis (Initial Study pages 108 – 112), and Shadow analysis (EIR Section IV.B). As stated in these sections, the proposed project would result in less-than-significant impacts to recreation and wind. As discussed in Section VIII.B above and

Response WS-2 below, the revised project would result in less-than-significant shadow impacts.

The comments regarding mitigation and litigation are noted. Please see the transportation comments and responses (designated "TR," below) regarding existing conditions, pedestrian impacts, mitigation measures, and some suggested additional improvement measures.

Comment LU-2: The project conflicts with urban design policies of the General Plan.

"Over Street Pedestrian Bridge- Not only is the over street pedestrian bridge contrary to the Urban Design element of the General Plan, it also fails to give a number of visitors from all over the world the experience of being on San Francisco's streets. An enclosed experience is parallel to the airport like design that Moscone Center should move away from and offer visitors unique San Francisco experience." (Komal Panjwani, San Francisco Beautiful; email, June 16, 2014)

Response LU-2

The commenter states that the bridges proposed over Howard Street as part of the project conflict with the Urban Design Element of the *San Francisco General Plan*. The commenter also states that the enclosed pedestrian bridge reserved for convention attendees is like an airport in design and would not offer visitors a unique experience.

The Draft EIR Initial Study (Appendix A), page 35, explains that the San Francisco General Plan Urban Design Element states that the City shall maintain a strong presumption against giving up street areas for private ownership or use for construction of public buildings (policy 2.8), and that streets should not be given up if doing so would result in obstruction of views (policy 2.9). However, the Urban Design Element also states that large buildings and developments should consider separation of vehicular and pedestrian circulation levels where possible (policy 3.4), and that street areas may be given up for public use if doing so would benefit public assembly (policy 2.9). As stated under Impact LU-2, on page 44 of the Initial Study (Appendix A of the EIR), the proposed project would not be inconsistent with the Urban Design Element, nor would it require that street areas be given up.

Regarding the aesthetic impacts of the enclosed pedestrian bridge, as stated in the Draft EIR on pages IV-4 to IV-6, the proposed project is considered an urban infill project. Pursuant to SB 743, which amended Public Resources Code Section 21099, aesthetic impacts of urban infill projects are no longer analyzed under CEQA. The Lead Agency maintains the authority to consider aesthetic impacts under local design review or other discretionary powers. Please see Figure II-18 on EIR page II-33, which shows that although the eastern pedestrian bridge would be enclosed, the bridge walls facing Howard Street would be made of glass, permitting views eastward and northward to Downtown.

The compatibility of the proposed project with the General Plan goals, policies, and objectives that do not relate to physical and environmental issues will be considered by decision-makers as part of their assessment whether to approve or disapprove the proposed project. Any potential conflicts identified as part of that process would not alter the physical environmental effects of the project.

Transportation

Comment TR-1: Provision of accident data under existing conditions

“We would like to provide you with the actual accident rates for the state highway facilities (e.g. off-ramps and on-ramps, freeway segments) affected by this development, along with the average accident rates for similar facilities statewide. These are listed in the attached Table B’s. Please confirm that you approve of these findings in the next circulation.” (California Department of Transportation; letter, June 13, 2014)

Response TR-1

The comment provides information from Caltrans on existing accident data on I-80 and I-280 in the proposed project vicinity for documentation.

The information provided by Caltrans is noted and acknowledged. Based on this data, the accident rate per million vehicles for I-280 is similar to the average for similar facilities in the state (actual accident rate of 1.5 per million vehicles for I-280, and 1.45 average accident rate per million vehicles for similar facilities in the state). However, the accident rate per million vehicles for I-80 is higher than the average for the state for similar facilities (actual accident rate of 2.57 per million vehicles for I-80, and 0.27 average accident rate per million for similar facilities in the state).

As presented on Table IV.A-10 on EIR page IV.A-44, the proposed project would generate 78 net new vehicle trips during the weekday p.m. peak hour, of which only a portion would use the two regional facilities, as well as U.S. 101, to travel to and from the project area (i.e., about 24 of the 78 p.m. peak hour vehicles). Because the 24 additional p.m. peak hour vehicle trips distributed between the regional facilities would represent less than 1 percent of the p.m. peak hour volumes on these facilities, these additional vehicle trips would not substantially affect the operation of either I-280 or I-80, or result in an increase in the accident rate on these facilities.

Comment TR-2: The Project Travel Demand methodology is flawed or not clearly explained.

“I am also looking forward to reading your comments and responses. And I think these questions about the assumptions of the number of attendees -- I look forward to seeing what the work

behind these assumptions is.” (San Francisco Planning Commissioner Cindy Wu; transcript, June 5, 2014)

“The DEIR Uses Every Math Trick In the Book To Low-Ball Project Convention Attendance Projections, And Thus Greatly Understates Future Project Impacts, Especially Pedestrian Impacts

- a. The DEIR starting point for all Transportation analyses is the average annual Moscone Center total attendance of 856,600 for 2010-12 of – a period of a national economic recession that indisputably and significantly depressed attendance – rather than the peak attendance of 1,279,000 achieved in 2007-08, during a period of national economic expansion, which indisputably represents the true capacity of the existing Moscone Center and thus a proven future likelihood but is nonetheless totally omitted from DEIR analysis. This Math Trick alone results in understating future foreseeable Project impacts by 33% - they should be 23% higher across the board. This arbitrary methodology is an abuse of the EIR authors’ discretion, is clearly deceptive, violates CEQA, and is litigable.

It is indisputable that total Moscone Center convention attendance in any given year is directly impacted by the state of the national economy, as depicted on the attached chart. Yet the DEIR authors blatantly “cherry picked” three particular years during which the national economy was in severe recession followed by a very slow recovery – clearly resulting in a very sharp drop off in total attendance from the much higher levels during the years of national economic expansion between the previous dramatic Post 9/11 national economic/tourism slump and the “Great Recession” which began in 2008-09. The DEIR authors then used only that depressed three year period as the “base” for all the DEIR’s impact analyses. Thus, ignoring all its other methodological flaws, this DEIR analyses could only possibly be valid for future comparable years of economic recession, but plainly not times of economic growth.

- b. The DEIR starting point for all Transportation analyses is only the Project’s 140,000 ft – 32% - increase in Moscone Center Exhibit Space, from 440,000 to 580,000 ft, instead of the total 262,284 ft increase in event useable “functional space” (excluding logistical Support/Other Space), from 625,600 ft to 888,284 ft – 42%. This Math Trick alone results in understating future foreseeable Project impacts by 31%! This arbitrary methodology is an abuse of the EIR authors’ discretion, is clearly deceptive, violates CEQA, and is litigable.
- c. The combined impact of these two Math Tricks is to Low-Ball the future projected Project attendance upon which all DEIR Impact analyses are based by 58%! The Project’s increase in Transportation Impacts will actually be almost 75% higher during busy years of economic expansion than the DEIR assumes for its analyses. The increase in average daily attendance used to determine future Project attendance and Impacts, from 22,000 now to about 29,000 as under-stated by the DEIR, should actually be from 27,000 now (based on the current proven annual capacity) to over 38,000. This is clearly a reasonable projection because in 2013 there were actually 24 Moscone Center event days with 30,000 or more attendance already, 16 exceeding 40,000, and the stated intent of the Project Sponsors is to maximize Convention attendance in the future for the economic benefit of the City and its Visitor Industry! More very large events will be accommodated than are now possible because of Center’s current size limits, and especially as a result of the Project, for the first time simultaneous mid-sized

conventions can be accommodated on the same day. Thus the event days of conventions smaller than 10,000 will be significantly reduced in number as they are supplanted by these larger conventions. All these factors are the driving forces behind the significant increase in Moscone Center attendance that will result. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive, violates CEQA, and is litigable.

- d. The DEIR's Transportation Impact modal split analysis posits that 30% of all convention attendees walk to events. Thus the very possible average 38,000 attendance event day after the Expansion Project will add almost 5,000 more average daily pedestrians than now to Yerba Buena Neighborhood sidewalks." (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 6, 2014)

"Now, the letter goes into the long legal issues about how the City is low-balling convention attendance blatantly in the Draft EIR." (John Elberling, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

"My comments follow up on the excellent comments already submitted by TODCO on the DEIR. They restate TODCO's objections to the gross understatement of use and impacts – particularly transportation and pedestrian impacts for the expansion of the Moscone Center.

I have had my office at Market and Powell/Ellis since 1980 - since before and during YBC construction, during early Moscone operations to current operations. I have seen first hand the wide ranging impacts of convention operations of the Moscone Center. The CURRENT operations are already out of control. As to pedestrian and vehicular traffic. Adding any new capacity means increased DEMAND. That can only be accommodated if impacts of EXISTING operations are factored into those for the expansion." (Sue C. Hestor; letter, June 16, 2014)

Response TR-2

The comments express interest in further explanation of, or disagree with, the development assumptions used for the baseline attendance level in the transportation analysis, and the use of exhibition space as the appropriate metric to quantify the increase in attendance demand. The comments state that the future event attendance estimates have been improperly reduced by arbitrarily selecting periods with lower historical demand and using the smaller growth in exhibition space instead of functional space.

The comment states that the transportation analysis is based on the average annual event attendance for 2010-12 (a 3-year period which had a lower annual attendance than previous years, such as 2007-08); this statement is incorrect. The travel demand analysis and the transportation analysis evaluates daily, as well as AM, midday and PM peak hour conditions, and as such, was conducted for a design event day, which is not directly based on the total annual attendance at Moscone Center.

Project travel demand is presented on EIR pages IV.A-37 through IV.A-44. As indicated on EIR page IV.A-38, the project sponsor has indicated that the proposed project would not be expected to increase the existing daily attendance, which is based on the number of members who are part of an association or corporation hosting the event, with the exception of the number of exhibitors that would increase with the additional exhibit space that would be provided. Nonetheless, the travel demand analysis is based on the conservative assumption that the number of daily attendees and freight demand associated with the event would also grow proportionately with the amount of additional exhibit space. This proportional increase in attendance represents a worst-case scenario in the event that total attendance increases as a result of the proposed project. As indicated on EIR page IV.A-37, the detailed methodology and information used to calculate the project travel demand is described in a technical memorandum that is included in Appendix C of the EIR. Table 1 on page C-6 in Appendix C of the EIR provides information on total annual registered attendance from 2000/01 through 2010/11. As shown in the table, total Moscone Center attendance fluctuates from year to year, driven by economic changes along with the schedule rotations of the Moscone Center's largest group booking events.

Table 1 (page C-6 in Appendix C of the EIR) shows that the total attendance in 2006/07 was 1,279,000 attendees. Table 1 also shows that 2006/07 had the highest number of events in a year (120 events), resulting in an average 10,658 attendees per event, as presented in the same table. By contrast, Table 2 (page C-10 in Appendix C of the EIR) shows that the 2010-12 period with an average annual attendance of 856,600 registered attendees had an average attendance per event of 14,900, which is higher than the 10,700 average attendance per event for 2006/07.

That is, the most recent 3-year period for which detail event data was available, and which was used as the basis for the transportation analysis, had a 40 percent higher average attendance per event than 2006/07. Furthermore, as explained in more detail on pages C-32 through C-35 in Appendix C of the EIR, the transportation analysis is based on the expected attendance during a design event day, which was estimated to be 22,000 attendees for existing conditions, more than twice the average attendance for 2006/07 and about 150 percent higher than the average attendance for 2010-2012.

The comment also disagrees with the use of the expected increase in exhibition space at Moscone Center as the correct metric to establish future growth in attendance due to the project, and recommends that the increase in functional space be used instead. Exhibition space is the area where convention exhibits, booths, displays, etc., are set up and which is visited by event attendees, while functional space defines, in addition to exhibition space, other areas directly used by event attendees such as lobby, pre-function, circulation, meeting, and ballroom areas.

Exhibition space is directly related to the size of an event as it defines how and how many large event booths/displays can be set up, and how many exhibitor personnel would be needed at an event. Although not directly linked to the number of attendees (having more or larger exhibitor booths does not necessarily mean a higher daily

attendance, as attendees visit multiple exhibits on any given day), an increase in exhibit space could represent an increase in event attendance as there would be a higher probability for an individual event attendee to want to visit an specific exhibitor. As stated on EIR page IV.A-38 and described on pages C-35 and C-36 in Appendix C of the EIR, the transportation analysis takes a conservative approach and assumes that an increase in future attendance would be directly proportional to an increase in exhibit space.

To this end, a rate to represent the number of daily attendees per 1,000 square feet of exhibit space was developed, based on daily attendance data from the Moscone Center, resulting in an average rate of 30 daily attendees per 1,000 square feet per event. This rate was developed using the exhibit space square feet for the various locations of Moscone Center (see Table 11, page C-35 in Appendix C of the EIR) as a descriptive variable.

The amount of space directly used by event attendees besides the exhibit area itself (functional space minus exhibition space) is related to the size of the exhibition space, as these areas (lobby, pre-function, circulation, meeting, and ballroom areas) can be used to support some parts of an event (meetings, dinners, presentations, etc.). Table II-2 on EIR page II-9 shows that the existing support space directly used by event attendees represents about 64 percent of the total functional space (770,800 square feet over 1,210,800 square feet) at Moscone Center North and South, which would change to 62 percent (936,675 square feet over 1,516,675 square feet) in the future. That is, the proposed project would reduce the amount of support areas directly used by event attendees in proportion to the amount of total functional space.

Thus, although only the amount of exhibit space is used as an independent variable to establish the future travel demand at Moscone Center with the proposed expansion, it also includes the amount of functional space as a dependent variable, since both of them are related. As described above the current relationship between event space and functional space would continue in the future with the proposed expansion, with a slight reduction in the amount of support areas directly available to event attendees.

As previously noted, and described on EIR page IV.A-40 (as well as in more detail on pages C-32 through C-35 in Appendix C of the EIR), the current design event day attendance has been estimated at 22,000 attendees per day, which would increase to 26,200 attendees per day as part of the proposed project. The Moscone Center classifies an event with more than 20,000 attendees as a large event. The attendance for the design event day was developed using a probabilistic approach; that is, it represents a daily event attendance that would be exceeded only a limited number of times during the analysis period. This is a standard methodology for transportation impact analyses that is used in the analysis of other aspects of traffic engineering such as traffic queue lengths, as well as in other fields such as flood control and earthquake predictions. In the case of the proposed project, the design event day was established using an 85th percentile standard; that is, the actual daily attendance at the Moscone Center North and South (sometimes in combination with Moscone West) would be higher than the design day

attendance only during 15 percent of all the event days. This currently occurs on fewer than 30 days per year.

The comment provides year 2013 attendance data for the Moscone Center to indicate that 42 days had a daily attendance higher than 20,000 visitors per day, of which 24 days had a daily attendance higher than 30,000 visitors per day. However this data does not properly represent daily attendance at Moscone Center; rather, it represents the *registered* attendance for each event. As described on EIR page IV.A-39 and pages C-32 and C-33 in Appendix C of the EIR, the total daily attendance differs from the registered event attendance since the daily attendance is the number of attendees onsite on a given event day for a given event and not all registered event attendees are typically present on a given day. Table 10 on page C-33 of Appendix C of the EIR presents a series of registered attendance to total daily attendance factors that were developed as part of the transportation analysis based on the type and duration of an event. These factors take into account that not all of the registered attendees for a given event visit Moscone Center each day, and that the public generally attends consumer shows, such as the San Francisco International Automobile Show and WonderCon, on one day only. As a result, it was found that the total annual daily attendance at Moscone Center for 2010-2012 represents about two-thirds of the total annual registered attendance for the same period. Applying this average factor to the data presented in the comment results in about 24 days in 2013 having a daily attendance higher than 20,000 attendees (24 days with 30,000 registered attendees; $30,000 \text{ registered attendees} \times 2/3 = 19,800 \text{ daily attendees}$), which is in line with the data presented and used in the transportation analysis (page C-35 of Appendix C of the EIR, first paragraph: about 26 days a year, approximately 7 percent of the 365 days, have a total daily attendance above 22,000 attendees).

In summary, the use of 2010-2012 event data, the development of event attendance ratios based on exhibition space, and the definition of a design event day based on the 85th percentile for the analysis of potential transportation impacts of the proposed project are appropriate and methodologically correct, and additional analysis is not required.

A comment states that, assuming a 30 percent walk mode share, there would be almost 5,000 more average daily pedestrians in the Yerba Buena neighborhood as a result of the proposed project. This number is inaccurate for two reasons. First, it is inconsistent with the commenter's own calculations of 11,000 new daily attendees (from 27,000 existing attendees to 38,000 future attendees as a result of the proposed project as stated in the comment), which would result at most in 3,300 new daily pedestrians (30% of 11,000 attendees) not the 5,000 suggested in the comment. Second, and more importantly, as presented in Table IV.A-6 on EIR page IV.A-41, the increase in daily attendance at the Moscone Center due to the proposed project would be 4,200 attendees, not 11,000 as suggested in the comment. The discrepancy between the two values is due to the incorrect methodology in which the daily attendance is calculated in the comment, which has been addressed in the previous paragraphs in this response. The 4,200 additional attendees plus the 28 new employees due to the proposed expansion project would result

in almost 3,790 additional daily walk trips, as shown on page C-70 in Appendix C of the EIR. As noted on EIR page IV.A-61, in addition to the 3,700 walk-only pedestrian trips to and from the nearby hotels, commercial uses, and residences, the pedestrian impact analysis includes walk trips to and from the local and regional transit stops and nearby parking facilities. Also please see Response TR-3: Pedestrian Impact Analysis for discussion of pedestrian impacts.

Comment TR-3: The Pedestrian Impact Analysis should conclude that impacts are significant and unavoidable.

“2. The DEIR cynically ignores the overwhelming pedestrian impacts of large conventions/events.

- a. Despite decades of readily observable actual Moscone Center real-world operating experience that indisputably prove that event days over 20,000 attendees – especially those of 30,000 or more – completely fill Fourth Street sidewalks during their peak to/from hours (which can vary somewhat), resulting in a readily observable “level of service” of E or even F, the DEIR simply ignores all such larger events as irrelevant to all EIR Impact analysis (except as they contribute to the overall average attendance) because they are not “typical”! There were 42 event days in 2013 of 20,000+, 24 of which were 30,000+ (chart attached). This is equivalent to ignoring routine wet weather floods as an Impact in a river system EIR because they only happen several days a year. That’s absurd! What happens now 7-12% of days per year is very consequential. What will happen as an Impact of the Expansion Project 13-21% of the days of the year is even more consequential. Even if the impacts of the smaller (but not limited) number of truly “worst case” mega conventions such as Oracle World are not taken into account, the whole purpose of the Moscone Expansion Project is to physically accommodate many more very large conventions, such as the annual Semicon, in the future. Because that is the Sponsors’ stated objective that is the size of convention that should be the “base” utilized to project future Project impacts. One Project Sponsor itself projects a 2014 Semicon total attendance of 31,000! This arbitrary methodology is an abuse of the EIR authors’ discretion, is clearly deceptive by omission, violates CEQA, and is litigable.
- b. Except for a brief mention of the 2,000+ seniors/persons with disabilities Yerba Buena Neighborhood population that MUST use Fourth Street sidewalks in particular on a daily basis, including Moscone event days, the DEIR completely and callously ignores their severe safety vulnerability that occurs when local sidewalks are very congested. While falling on a sidewalk is bad for anyone, it is extremely dangerous for the aged due to the greatly increased statistical likelihood of resulting serious fractures and other grave injuries, and their much higher risk of further grave complications after such injuries. This danger is so real that many Neighborhood elders are now trapped in their apartments during larger Moscone Center events because they are afraid to risk walking on Fourth Street. While exacerbating these justifiable fears and the resulting isolation of many elders may not be a quantifiable environmental impact, their risk potential for increased pedestrian injuries during larger events at sidewalk congestion levels of E and F must be addressed as a matter of Public Safety, just as any potential release of hazardous materials would be in any EIR. This arbitrary methodology is an abuse of the EIR authors’ discretion, is clearly deceptive by its omission, violates CEQA, and is litigable.

- c. The DEIR notes the annual occurrence of, but totally ignores in all its analyses, the extreme pedestrian impacts of the largest class of Moscone conventions of 60,000+ attendees that currently occur two weeks a year, 8 total event days (Oracle World and DreamForce). It simply posits that is unlikely that there will be more such events in the future and so their beyond-level F pedestrian impacts on Neighborhood sidewalks need not be assessed. This is preposterous! There is no factual basis for such a DEIR assumption. Nothing in current City law, contract, or regulation limits such Moscone Center events to only two per year, and there could very well be a lot more of them in the future. And none of these events has ever been subject to specific environmental review themselves because individually they last just four days. But they must be evaluated now as part of any cumulative impact scenario unless there is in fact a binding limit on their occurrence proposed as part of the Expansion Project. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive by its omission, violates CEQA, and is litigable.
- d. As a result of all of the above combined, the DEIR concludes that only 2 of the 12 Neighborhood sidewalk segments it evaluates will experience a Project+cumulative impact E level of service at any time, and none an F level, while 7 of the 16 identified corner locations will have peak period Project+cumulative impacts of E or F. While this commenter cannot readily crunch the numbers without access to the authors' transportation model, it is highly likely that correction of the Low-Balled average event attendance projections would result in many more sidewalks and more corners reaching the E or F level of service. And given the real-world observable fact – which the DEIR totally ignores - that actual E and F local sidewalk and corner conditions now occur several dozen days a year as a result of large Moscone events at peak times, the cumulative E and F impact frequency would be even greater if accurately evaluated. A DEIR that ignores in its calculations the serious impacts of common events that are actually observed occurring in real life by the Math Trick of “averaging them out” is a cynical joke. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive by its omission, violates CEQA, and is litigable.”
3. As a Result of All Of The Above The DEIR Falsely Concludes That The Project's Pedestrian Impacts Are “Not Significant.”

In fact, as detailed herein, the Project's Pedestrian Impacts are indeed “Significant” – and dangerous to Public Safety – per CEQA, and therefore require mandatory feasible Mitigation Measures to be implemented by its Sponsor, the City of San Francisco, as part of the Project itself. This arbitrary conclusion is an abuse of the EIR authors' discretion, is clearly based on a very incomplete and seriously flawed methodology, violates CEQA, and is litigable.” (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 6, 2014)

“I'm going to start at the end. What do we want? For 30 years, the number one issue of our Yerba Buena neighborhood and its 2,000-plus elders and persons with disability has been pedestrian safety due to the dangerous conditions and impossibly crowded conditions that often result from Moscone Center now.

Of course, the whole purpose of this expansion project is to allow even larger conventions and even more frequent multiple conventions at the same time that could only dramatically increase the current situation.

I'm sure any of you that have been there during one of the large event, not just the Oracle or the mega events but the big once like Semicon, have experienced for yourself how difficult it is to travel those sidewalks at the peak time of movement of the conventioners. This is obvious to all concerned." (John Elberling, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

"There are (a) Moscone Center operations VERY LOCALIZED on CB3 - aptly addressed by TODCO. (b) Impacts on the adjacent blocks of the Moscone Center, including 3rd, 4th Mission, Howard, Folsom. (c) Impacts on nearby blocks, e.g. Ellis, Market, Powell, Grant, Kearny, New Montgomery. (d) Impacts on areas and streets even further away." (Sue C. Hestor; letter, June 16, 2014)

"So I'll limit my comments now to Item TR-4 in the EIR relating to pedestrian impacts, which were deemed to be less than significant.

That does not match my experience because I realized, while this is an incremental impact being analyzed, it's an incremental as something that's already in need of mitigation with nothing going on.

I didn't see any -- some points. I didn't see in the analysis any points talking about convention days that were also on Giants days. And it significantly impacts the pedestrian load on Third and Fourth on the days of Giants baseball games." (Rick Smith; transcript, June 5, 2014)

"Two, the sidewalk widths should be a continual passing lane, excluding tree grates, restaurant seating, and any other obstacles. Some of the sidewalks which were talked about being 15 feet are more like five feet." (Rick Smith; transcript, June 5, 2014)

"Three, the traffic, counting the number of cars able to turn at peak pedestrian times. So what happens is pedestrians use up all of the time for right turners, and only one or two cars can go. And also count the number of frustrated drivers who enter the crosswalk while pedestrians are still there because they can't go otherwise." (Rick Smith; transcript, June 5, 2014)

"My main concern with EIR is with the analysis of pedestrian impact, TR-4, as current conditions can be unsafe.

While the study did do counting in the peak time of evening, I didn't see which events were included in analyzing the pedestrian load. There are times when Giants fans, Caltrain pedestrians, conventions, and events in Yerba Buena Gardens stack up. The count done in the EIR might reflect that, but I could not find references about those conditions in the analysis." (Rick Smith; email, June 16, 2014)

"In addition to pedestrian counts, please consider including number of times the pedestrian walkway was blocked by a vehicle. This happens especially in the evening on the north cross walk across 3rd at Mission, and from buses stacking up on the south side of Mission at 3rd, blocking the east crosswalk." (Rick Smith; email, June 16, 2014)

"PEDESTRIAN TRAFFIC IN SURROUNDING AREA

I have had my office in the broad area affected by Moscone operations over 30 years. Dealing with average assumptions of traffic - particularly when they are intentionally underestimated (TODCO comments) fails to adequately address the impacts CEQA requires. You must address and effectively describe PEAK demand. I can tell when large, even middle-size conventions are at Moscone at Powell and Ellis (the rear door to the Flood Building), Sidewalks are clogged with pedestrians with badges walking in groups down Ellis to get to hotels, restaurants and other places north of Market. It is difficult to walk, particularly against the flow. At times people are hauling roll-on cases. Side walk traffic SEVERAL BLOCKS AWAY bear the traffic.

The situation at Powell and Ellis is nowhere near as intense as that faced by people directly adjacent to YBC as described by TODCO. You must listen to their serious comments about the situation faced by elderly seniors trying to negotiate the area near their homes. And children trying to use the children's facilities on C133,

There needs to be SYSTEMATIC evaluation of the effective width of pedestrian routes. Sidewalks. Crosswalks. ENFORCEMENT of pedestrian crossing of streets. Impediments and widths that have difficulty accommodating CURRENT pedestrian flow are NOT going to be able to deal with additional demand. EVERY street intersection where traffic is inadequately managed puts pedestrians at risk and must have effective mitigation.

The pedestrian analysis needs a major overhaul. Sidewalks need widening and obstructions removed wherever possible. Diversion of traffic when Howard is closed causes chaos. TCOs are not deployed in anywhere near the numbers needed. AND THEY NEED TO TAKE CONTROL OF THE INTERSECTIONS AND BE ASSERTIVE ABOUT IT.

The City should be the leader in using technology to monitor the flow of buses and traffic. AND INTERCEDE IN REAL TIME to keep pedestrians safe and the Muni flowing.

We need to do a LOT better." (Sue C. Hestor; letter, June 16, 2014)

Response TR-3

The comments question the attendance levels used for the impact analysis, including the lack of analysis of the largest (or “mega”) events, and assert that if different attendance levels were used for the analysis that there would be more locations in the vicinity of the project site where pedestrian conditions would be LOS E or LOS F, and thus the conclusion that pedestrian impacts are less than significant is erroneous and the impacts are instead significant and dangerous to public safety and therefore require mitigation measures. Some comments request clarification on the conditions when the pedestrian counts were conducted and how the effective width of the sidewalk affects pedestrian travel, and request considering counting the number of times the crosswalks are blocked by vehicles. Comments also raise concerns regarding seniors, pedestrians with disabilities, and children in the area, enforcement of pedestrians crossing the street, and the use of technology and traffic control officers to keep pedestrians safe and Muni flowing when events close Howard Street.

The pedestrian impact analysis presented in the EIR was based on a design day attendance of 26,200 daily event attendees, which represents a large event. This consists of the existing 85th percentile of 22,000 daily attendees plus a project-generated increase of 4,200 daily attendees. (For comparison, the very large or “mega” events, Oracle’s Open World and Salesforce’s Dreamforce, have 40,000 or more daily attendees. Only two such events typically occur each year.) As indicated in Response TR-2, and presented on EIR page IV.A-40, the analysis of the 85th percentile day is methodologically correct, and represents 94 events out of 110 for the 2010-2012 period that would have 22,000 daily attendees or fewer on a daily basis.⁵ Because the transportation analysis appropriately estimated the travel demand associated with the proposed expansion, the pedestrian impact analysis presented in Impact TR-4 on EIR pages IV.A-61 to IV.A-70 for Existing plus Project conditions, and in Impact C-TR-4 on EIR pages IV.A-84 to IV.A-87 for 2040 Cumulative conditions, is correct and additional analysis is not required.

In response to the comment that stated that the proposed expansion would accommodate more conventions the size of the Semicon West event with a total attendance of 31,000, it should be noted that while the Semicon West total attendance is about 31,000 attendees (about 32,000 in 2010, 31,000 in 2011, and 29,300 in 2012), as stated in Appendix B of the travel demand technical memorandum (EIR Appendix C), the average daily attendance is 26,100 (average of 27,200 in 2010, 26,300 in 2011, and 24,900 in 2012), which is similar in size to the impact analysis of 26,200 daily attendees with the proposed project. Also please see Response TR-2: Project Travel Demand for additional clarification on the methodology used to determine the additional travel demand used in the impact analysis, and why it is valid for use in the CEQA analysis.

⁵ The 16 events with larger daily attendance than 22,000 during the three-year period analyzed include Moscone Center’s largest repeating events—the International Auto Show, MacWorld, Salesforce’s Dreamforce, Oracle’s OpenWorld, and Semicon West—along with two individual conventions (of orthopedic surgeons and dentists), a Charles Schwab corporate event, and a Green Building Council event.

The comment that states that the purpose of the project is to accommodate “many more very large conventions” is not an accurate representation of the project sponsor’s objectives, which are presented on EIR pages II-3 and II-4, and include:

- Maximizing the economic value of Moscone Center by attracting new clients and maintaining existing clients by creating contiguous exhibition space of up to 580,000 square feet and increasing the quantity of flexible meeting and ballroom spaces.
- Increasing the amount of efficient, contiguous exhibition space and providing more functional, flexible meeting space.
- Maintaining continuous operations and revenue during improvement and expansion.
- Capitalizing on Moscone Center’s unique location in the city by improving its connections and relations to the city’s fabric.

Thus, it is not necessarily the case, nor is it anticipated, that the proposed project would result in an increase in the size or number of the largest events that are held at Moscone Center (such as Oracle’s Open World or Salesforce’s Dreamforce, with 40,000 or more daily attendees, and which include closing Howard Street between Third and Fourth streets) because additional large events (with 20,000 to 35,000 daily attendees) would provide greater economic value for the Moscone Center, as opposed to very large “mega” events. These very large events use all three Moscone facilities (i.e., Moscone North, Moscone South, and Moscone West), require closure of Howard Street to accommodate event operations, and require more days to set up and take down than other large events. The longer duration of the set-up and take-down period limits the number of nights that hotel rooms in San Francisco are booked for such conventions, which results in reduced economic benefits compared to other large events. Therefore, additional large events, as opposed to very large or “mega” events, would maximize the economic value of the Moscone Center. In addition, the project sponsor’s experience and market analysis indicate that there is little or no demand for additional “mega” events that could be filled by the proposed expansion, as only a small fraction of current or potential Moscone booking groups have the membership or financial means to support such events.⁶ Rather, what is more likely, and what is analyzed in the EIR, is that “large” events (22,000 daily attendance and larger) could attract more exhibitors and visitors. The number of such events could increase, as well, which could increase annual attendance at Moscone Center. However, as explained in the response to Comment TR-2, the EIR’s analysis focuses on daily attendance patterns because the number of daily attendees is what affects the peak hours of traffic, transit, and pedestrian and bicycle activity. Because the EIR finds that an increase in attendance at these 85th percentile “large” events would not result in significant pedestrian effects on any given day, no significant effect would ensue should the number of such events increase. The determination of significance is not based on the number of events, but on the pedestrian impacts associated with the net-new additional trips occurring during a large event at the Moscone Center.

⁶ Farzaroli, L., personal communication. Email from San Francisco Travel TID Program Director, Moscone RTC Questions. July 23, 2014.

See also the response to Comment TR-2 for a discussion of how the changes in exhibition space relate to increased attendance.

Commenters raise concerns about pedestrian impacts near the convention center. (Note that CB3 is a block nomenclature that refers to the southern block of the convention center, while CB2 refers to the northern block.) The discussion of existing pedestrian conditions adjacent to and in the vicinity of the Moscone Center is presented on EIR pages IV.A-13 through IV.A-19, and include a discussion of pedestrians that are seniors and pedestrians with disabilities. The section also identifies a number of improvements that have been implemented over the years by the San Francisco Municipal Transportation Agency (SFMTA) and Moscone Center to reduce pedestrian-vehicle conflicts and reduce vehicle speeds within the South of Market neighborhood, including an all-pedestrian signal, corner bulbouts, and sidewalk widenings. The proposed project would improve pedestrian circulation adjacent to the project site (e.g., reconfiguring the Howard Street sidewalk adjacent to Moscone North and Moscone South; providing special tactile paving, bollards, and streetscape elements along Howard Street; and widening the sidewalk on Third Street adjacent to Moscone South between Third Street and the truck entry ramp). These features would improve pedestrian conditions for pedestrians walking in this area, including for seniors and persons with disabilities, by facilitating safe pedestrian circulation and crossings, by providing safe spaces for pedestrians, and by increasing pedestrian visibility to drivers. Impact TR-4, on EIR pages IV.A-61 through IV.A-70, acknowledges that because the number of pedestrians in the area would increase with the proposed project, particularly during large events, senior pedestrians and pedestrians with disabilities may be further challenged as they travel on crosswalks, sidewalks, and corners adjacent to the project site and on nearby streets. However, because the sidewalks, crosswalks, and pedestrian signal timing meet the required design standards within the *California Manual of Uniform Traffic Control Devices*⁷ and the *Americans with Disabilities Act Accessibility Guidelines*,⁸ and because with the addition of the net-new pedestrian trips, the overall pedestrian conditions at the analysis locations would continue to be LOS D or better (with the exception of the midblock crosswalk on Mission Street at Yerba Buena Lane, where the project's contribution to the LOS E conditions would not be considerable), the proposed project's pedestrian impacts would be less than significant.

As noted above, the proposed project's pedestrian impacts were determined to be less than significant as presented in Impact TR-4 of the EIR. The impact analysis included a qualitative discussion of pedestrian issues in the project vicinity, as well as a quantitative LOS analysis of weekday midday and p.m. peak hours for both Existing plus Project and 2040 Cumulative plus Project conditions at crosswalks at four intersections, at three

⁷ California Manual of Uniform Traffic Control Devices. Can be reviewed on California Department of Transportation (Caltrans) website California MUTCD 2012 http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/ca_mutcd2012.htm

⁸ ADA Accessibility Guidelines (ADAAG) <http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/background/adaag>. Accessed on July 21, 2014.

midblock crosswalk locations, on both sides of the street at six sidewalk locations, and at the four corners at four intersections (see EIR page IV.A-14). As noted on EIR page IV.A-15, the sidewalk analysis considers the effective width of the sidewalk, which accounts for reduction in the amount of sidewalk available for travel due to street furniture and buildings. Pedestrian LOS conditions were calculated at the most restrictive sidewalk location (i.e., at the “pinch point”) along a given block face. For example, the width of the Howard Street sidewalk adjacent to Moscone North (between Third Street and the Moscone Center Entrance) is 16 feet, and an effective sidewalk width of 11 feet was used in the pedestrian analysis to account for about five feet of sidewalk width not available to pedestrians due to street furniture and buildings. The determination that pedestrian impacts would be less than significant therefore took these conditions into account. Also please see Response TR-6 regarding comments requesting mitigation measures.

The pedestrian counts used in the quantitative analysis include all pedestrians, including children (e.g., those traveling to and from the Children’s Creativity Museum), and take into account any events that were under way when the counts were conducted. The primary pedestrian access routes to AT&T park are along The Embarcadero, Second, Third and Fourth streets. Pedestrian counts were conducted on multiple days in April and May 2013, and all count days coincided with away games (i.e., when the Giants were not the hosts at AT&T park and instead traveled to another venue). However, most weekday games at the ballpark start at 7:15 p.m., and the majority of people attending the game typically arrive after the 5 to 6 p.m. peak hour used in the pedestrian analysis.

Regarding conditions farther from the convention center in the vicinity of hotels and restaurants, CEQA does not require analysis of existing activities unrelated to the proposed project that would continue to occur (i.e., the hotels and restaurants would continue to exist and serve the visitors to San Francisco including those traveling to and from the Moscone Center), and mitigation of the existing transportation problems is also not required. As noted above, the quantitative pedestrian analysis was conducted for crosswalks at four intersections, at three midblock crosswalk locations, on both sides of the street at six sidewalk locations, and at four corners at four intersections adjacent to and north of the project site, and these locations were selected for analysis as they would be most likely affected by the proposed project. Pedestrians traveling further afield would disperse among numerous streets north of Market Street, along Market Street, and to streets to the east and west of the project site (e.g., to Ellis, Powell, Grant, Kearny, and New Montgomery streets), and any increase in activity on the part of Moscone Center attendees that would occur at locations more distant than the convention center vicinity would be substantially less than at the analysis locations, given that traffic and pedestrian activity would be spread over a much greater area.

Regarding conditions when Howard Street is closed for two events each year, please see Response TR-4. Traffic control officers are and would continue to be present for these events to manage vehicle, pedestrian, and bicycle flows on streets, maintain safe travel conditions for all uses, and reduce the potential for gridlock.

Comment TR-4: Traffic control measures should be implemented during closure of Howard Street for conventions.

“EVENTS WHICH BLOCK OFF HOWARD STREET

IV.A-37 implies that there would be no increase in the number of very large events such as Oracle Open World, Salesforce Dreamforce and similar events. These events, and any others which involve closure of Howard Street - from hours to days on end - already have a drastic impact on the surrounding area and often bring circulation to an anemic crawl. Since so many streets have one-way traffic, and may themselves have construction and diversions going on (e.g. Salesforce at 350 Mission and the Transit Center), there are forced traffic diversions that cover a substantial area. Even if there are no Giants games, and no subway construction.

There must be mandatory and substantial requirement that traffic control officers be dispersed around a LARGE area controlling traffic and if necessary overriding traffic signals to prioritize Muni operations.

This MUST be a cost imposed on/charged to those who close off Howard Street traffic. Unlike many current TCOs, the traffic controllers MUST BE TRAINED AND EXPECTED TO DO THEIR JOB. Assertiveness training might be considered. It is critical to pedestrian safety and safe movement of traffic/Muni that TCOs CONTROL pedestrians and vehicles that impede traffic diverted into turn movements. That they be required to intensively watch all traffic - no cell phones or conversations - and TAKE CHARGE. MUNI operations must be their priority so that transit can move riders and maintain their schedule.

TCOs MUST be deployed blocks down stream - not just immediate to Yerba Buena - wherever the traffic diversions start. MOBILE SIGNS SHOULD BE DEPLOYED FAR UPSTREAM WARNING OF A TRAFFIC DIVERSION. This means BLOCKS east of even 1st Street because Howard is the only solely west bound street between the Central Freeway and Market. The mitigation of TRAFFIC CONTROL BY TCO deployment should be imposed not solely by the whim of the entity booking the Moscone Center - who have the incentive to book the Center.

Muni has monitoring ability to understand in REAL TIME the movement of buses and where there are bottle-necks. THEY should have the ability to require traffic control in REAL TIME as bottle-necks develop. Whatever electronic monitoring of buses and traffic must be used to allow real time control of major disruptive events at the Convention Center.” (Sue C. Hestor; letter, June 16, 2014)

Response TR-4

The comment raises concerns over existing transportation conditions in the vicinity of Moscone Center during very large events that involve closure of Howard Street, and states that the traffic control officers should be well-trained and positioned beyond as well as in the immediate vicinity of Moscone Center.

A description of the existing closure of Howard Street between Third and Fourth streets to vehicular traffic during two very large (or “mega”) annual events at the Moscone Center (during Oracle’s Open World and Salesforce’s Dreamforce) is presented on EIR pages IV.A-32 to IV.A-34. As indicated on EIR page IV.A-33, to facilitate the traffic detours, the SFMTA

manages an area well beyond the one block of street closure. The SFMTA re-times or otherwise modifies nine intersection signals, installs temporary striping at six intersections on two blocks, installs more than 30 temporary signs, deploys 13 changeable message signs on city streets as well as various additional Caltrans-operated signs, and deploys 20 San Francisco Police Department officers or SFMTA traffic control officers at various locations to maintain safety and direct traffic. SFMTA traffic control officers are posted at the following intersections during event road closures: Market/Fourth, Mission/Third, Mission/Fourth, Howard/Hawthorne, Howard/Third, Howard/Fourth, Folsom/Second, Folsom/Fourth, Harrison/ Second, and Harrison/Hawthorne.⁹

As indicated in the comment and on EIR page IV.A-37, and discussed above in Response TR-3, there is no expected increase in the number of very large events, such as Oracle's Open World and Salesforce's Dreamforce, with a daily attendance of 40,000 or more attendees, and which include closing Howard Street between Third and Fourth streets because an increase in such very large events, as compared to an increase in large events (events with 20,000 to 35,000 daily attendance), would not maximize the economic benefit of events at the Moscone Center and there is little or no demand for additional very large events. As indicated on EIR IV.A-38, the proposed project could result in an increase of about seven large events per year that would not involve closing Howard Street between Third and Fourth streets. Further, approval of events that request street closure are authorized by the San Francisco Interdepartmental Staff Committee on Traffic and Transportation and are permitted for each event by SFMTA and DPW, and a transportation management plan is developed to address vehicular and non-vehicular access, detours, etc. associated with any street closures, as well as the need for and number of traffic control officers, if appropriate. The number of traffic control officers required for an event and their assignment are determined by SFMTA in association with the Moscone Center (and not by the entity booking the Moscone Center as stated in the comment). Traffic control officers are trained by SFMTA and deployed based on SFMTA's assessment of conditions prior to and during the events.

Comment TR-5: Construction-related transportation impacts should be mitigated.

"John Elberling kind of stole any thunder that I may have had. But I'm here for pedestrian safety for our seniors in our buildings right across from Moscone Center. The seniors use the gardens, and they need to consider with building -- during building and construction, how pedestrians are to circulate around the building.

⁹ In addition, as stated on EIR page IV.A-33, the Moscone Center hires traffic control officers for all major non-closure events as well (events of approximately 20,000 attendees or more). The number of officers and the location of their postings depend on the event size and the building in which the event is held. For the largest events with heavy shuttle bus service levels, Moscone Center covers all of its post positions, including the intersection of Howard/Fourth to direct vehicle traffic and pedestrian crossings, the exits of the north and south driveways to help buses merge into westbound traffic on Howard Street, and both sides of the midblock crosswalk on Howard Street between Third and Fourth streets to ensure safe pedestrian movement between the north and south buildings.

It's very -- it's filled with residences. And Moscone developer project sponsors need to consider pedestrian safety and sidewalks and how the disabled and the seniors get along and walk along these areas.

Thank you very much. And remember what John Elberling said and what you've been given in writing. Thank you." (Sonja Kos, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

“ACTIONS INCLUDING CONSTRUCTION WHICH TAKE OVER THE STREET

Example - Construction of subway up 4th St and Stockton Street. All construction which blocks off the street for anything but a minor time must be REQUIRED to PAY for traffic control on important intersections. All the way up to Market Street at the very least. 4th/Stockton/Ellis has been blocked for well over a year - leading to out of control pedestrians, which includes a lot of people attending events at Moscone Center. 4th Street has also been ground zero for construction. This leads to major problems with out-of-control pedestrians who lack the VISUAL clues that they may NOT walk at will through an intersection (Stockton / Ellis / Market), ignoring traffic that has already restricted lanes.

ALL construction, including by public entities, must have EFFECTIVE TCOs to manage the flow of pedestrians (instructing them to NOT cross when they are impeding movement by Muni or those required to turn. In the case of the diversion of Muni off 4th and onto 5th and streets north of Market, the TCO requirement should follow the diversion if necessary.

Monitoring REAL TIME movement of buses and bottlenecks should be required and IMPOSED as a mitigation." (Sue C. Hestor; letter, June 16, 2014)

“With the exception for the SOMA Museum and 222 2nd Street, it looks like all major adjacent projects that may or may not have an impact on either projects have been covered. Any new/added Projects in this area should be updated and considered during the life of this Project construction.” (Dennis Hong, e-mail, June 16, 2014)

“Page IV-A.48, one other recent project that may impact the construction of this work is 222 2nd Street, I assume the Museum of Modern Art on 3rd Street will be completed by the time this project starts.” (Dennis Hong, e-mail, June 16, 2014)

“Construction Phase, request that the Final EIR provide the following analysis and or address the following:

- a. Provide the following for the pedestrians and traffic during the construction; traffic control office, signs, control barriers, etc. especially if there is an event at the Moscone West and the Holidays. This item all too often is overlooked. This is a critical issue and should be addressed

in depth in the EIR. directly impacts emergency access and public safety as well as City liability.

- b. Communicate with the local merchants, residences in the area of the dates, construction schedules. Especially if certain streets will be closed.
- c. Provide provisions to protect for the playground and the gardens, i.e., dust controls, safety barriers and control signs.
- d. A process for planned events during the Construction and the Moscone West. These needs more controls.
- e. Protect the current playground from dust and debris from getting in to the play area. I was too glad to see this was put back in to the Project, this includes the Gardens.
- f. Provide a number to call for the residences, merchants to call for help, coordination and etc.” (Dennis Hong, e-mail, June 16, 2014)

“New construction will block the sidewalk of passengers, cars . . .” (Judy V. Wang; letter, undated, received May 8, 2014)

Response TR-5

The comments raise concerns regarding impacts related to construction activities on the transportation network, including construction taking over streets (such as the Central Subway construction along Fourth and Stockton streets), construction activities blocking sidewalks, pedestrian circulation and safety, particularly for seniors, the need for effective traffic control officers to manage pedestrians, and real time monitoring of buses and bottlenecks as mitigation during construction of the proposed project.

Construction-related transportation impacts are described in Impact TR-8 on EIR pages IV.A-77 to IV.A-80, and determined to be less than significant. The construction impact assessment was based on preliminary information provided by the project sponsor on the construction program and the City’s understanding of similar construction projects throughout the City. Prior to project construction, as part of the construction application phase, the project sponsor and the construction contractors would meet with staff from DPW and SFMTA to develop and review the truck routing plans for the proposed demolition, disposal of excavated materials, materials delivery and storage, and staging for construction vehicles. Construction contractors would be required to meet the *City of San Francisco’s Regulations for Working in San Francisco Streets*, including those regarding sidewalk and lane closures, and would meet with SFMTA staff to determine if any special traffic permits would be required. In addition to the *Regulations for Working in San Francisco Streets*, the contractor would be responsible for complying with all City, state, and federal codes, rules, and regulations. Construction activities that require use of any portion of the adjacent sidewalk are required to

maintain pedestrian access for all users, including seniors and pedestrians with disabilities, via a protected walkway within the remaining sidewalk or within an adjacent travel lane. Where complete sidewalk closures are required (e.g., to reconstruct a sidewalk), alternate pedestrian access routes and detours are required to be implemented.

Because construction-related transportation impacts were determined to be less than significant, mitigation measures described in the comments, such as traffic control officers to manage pedestrians, are not required.

Discussion of cumulative construction impacts is included in Impact TR-8 on EIR pages IV.A-78 and IV.A-79 and Impact C-TR-8 on EIR pages IV.A-88 to IV.A-89. The EIR states that the construction of the proposed project may overlap with the construction of other projects proposed nearby, notably the expansion of the SFMOMA, the 706 Mission Street project, the 250 Fourth Street project, the ongoing construction of the Central Subway on Fourth Street, and the Central Subway Moscone Station on Fourth Street between Clementina Street and Folsom Street. This list of projects was selected as a representative sample of nearby projects that could be under construction at the same time as the proposed project. Although the 222 Second Street project was not included in this sample list, the cumulative impacts of construction of the 222 Second Street project was considered in the cumulative analysis.

In addition, as stated on EIR page IV.A-78, construction of the proposed project would occur using a coordinated schedule that would preserve the Moscone Center's event operations during the construction period. In order to achieve maximum contiguous exhibition space within the existing Moscone Center below-grade footprint, the project would include a three-phased construction schedule coordinated with the current Moscone Center event calendar.

Construction associated with these projects would affect traffic, transit, and pedestrians in the project vicinity. As noted above, prior to project construction, as part of the construction application phase, the project sponsor and the construction contractors would meet with staff from DPW and SFMTA to develop a detailed and coordinated plan that would address construction vehicle routing, traffic control, and pedestrian movement adjacent to the construction area for the duration of any overlap in construction activities for projects being constructed at the same time as the proposed project. As appropriate, real time information on bus operations and traffic conditions would be used by SFMTA to manage conditions in the project vicinity.

The construction-related transportation impacts of multiple construction projects in proximity to each other would not be significant, as the construction would be of temporary duration, and the project sponsor and its construction contractor would be required to coordinate with various City departments such as the SFMTA and DPW through the Transportation Advisory Staff Committee (TASC) to develop coordinated plans to address construction-related vehicle routing and pedestrian movements adjacent

to the construction area for the duration of any construction overlap of cumulative projects. Therefore, the cumulative impact would be less than significant, and no mitigation measures are necessary.

For comments regarding air- and vibration-related effects, please see Comment and Response AQ-1.

Comment TR-6: Requests for specific improvement measures.

“The second part is I certainly would be in agreement with adding, as part of the Final EIR, to an analysis that would allow the types of things that were suggested by Mr. Elberling, which sounds like a win-win situation, the widening of the sidewalks, signaled crosswalks in various parts. Even though we're building the bridges over Howard Street, we still need to allow for some additional pedestrian crossings in various places along Howard and other streets to not force everyone to cross at the intersections as they now have to.” (San Francisco Planning Commissioner Michael J. Antonini; transcript, June 5, 2014)

“And I thought it's very wise, no turns on red. And the other thing that has to be part of the analysis is we have a lot of intersections downtown which are signaled in a way that pedestrians all go at one time, and then traffic moves at different intervals. And that's much safer because the frustration of drivers waiting to make a right turn is not there because, when they have the arrow to go right or they have the ability to turn right, there are no pedestrians.

And an area like this is very similar to our densest downtown areas. And we certainly should implement that sort of signal controls. And again I think this can be done fairly easily, to make sure the EIR includes impacts from that -- those sorts of changes to allow those to be part of the project when it's finished.” (San Francisco Planning Commissioner Michael J. Antonini; transcript, June 5, 2014)

“4. The DEIR’s Few Identified Pedestrian Impact Mitigations Are Hopelessly Inadequate To Deal With Even Today’s Moscone Center Impacts, Let Alone The Expansion Project’s.

Only one block of Fourth Street sidewalk, adjacent to the Metreon, is identified for possible - but not committed - widening as a Project Mitigation Measure to create any necessary additional pedestrian capacity for the Project’s Impacts. The even narrower sidewalk on the next block north adjacent to the Marriott Hotel/Ross Store which is a continuation of the very same route to Market Street and the Union Square hotels– an obvious bottleneck – is ignored because the authors assert with no supporting rationale whatsoever that it is somehow too far away from the Project (about 600 ft)! This Pedestrian Impact Mitigation discussion of the DEIR can only be described as utterly, pathetically, and shamefully inadequate.” (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 6, 2014)

“5. A Genuinely Effective Pedestrian Capacity/Safety Mitigation Program Must Be Identified by the Project EIR and Required To Be Implemented As Part of the Project Itself, Not Just For the Sake of Legal Compliance With CEQA But Most Of All To Protect the Lives and Physical and Emotional Well-Being of Our Yerba Buena Neighborhood’s Residents, Especially Its 2000+ Elders and Persons With Disabilities.

Attached is a diagram showing the needed street and sidewalk Significant Pedestrian Impact Mitigation Measures that need to be funded and implemented by the City as part of the Expansion Project itself, not deferred for later uncertain funding or subject to further study. Failure to identify and implement as part of the Project such Mitigation Measures will violate CEQA and is litigable. It includes:

- Widening sidewalks on the east side of Fourth Street from Howard Street to Market Street.
- Adding several signalized crosswalks at key locations to increase pedestrian capacity and/or provide pedestrian safety at dangerous locations.
- Adding “red arrows” to the traffic lights at the intersections where “No Turns On Red” are allowed to improve pedestrian safety at those dangerous locations.
- Implementing a Sidewalk Management Plan (to be drafted by DCP/DPW in the coming year) that will optimize the location of all sidewalk street furniture, cafe tables, advertising signs, etc. to maximize Neighborhood sidewalks’ pedestrian capacity and safety while also satisfying urban design and amenity goals.” (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 6, 2014)

“What we want and what we’ve been trying to get for 30 years is the conclusive mitigation of improvements to the sidewalks and neighborhood streets that will solve the problem today. We have been unsuccessful, largely, over these three decades to get that done in this city.

Our mitigations we are seeking are on the diagram map on the very last page of the comments. They’re very straightforward: wider sidewalks on two blocks of Fourth Street at the obvious places where needed; new mid-block signalized crossings in three locations that are particularly crucial or hazardous in the surrounding neighborhood; the mere installation of red light arrows on the -- at the intersections where in fact no turns are permitted on red so that auto drivers can actually see them; and finally, implementing a sidewalk management plan that organizes all the stuff on the sidewalks -- all kinds, restaurant tables, advertising signs, whatever, you name it -- logically so that the open throughway for pedestrians is optimized, unlike today, which is a mess.

That’s what we want. And we want that to be done as a mitigation prior to the Moscone Expansion Project and built at the same time that expansion project is built.” (John Elberling, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

Response TR-6

The comments raise concerns that too few pedestrian mitigation measures are included in the EIR, propose mitigation measures for incorporation into the EIR, and request additional analysis of the proposed mitigation measures.

Because pedestrian impacts were determined to be less than significant (as discussed in response to Comment TR-3), mitigation measures provided in the comments, including the widening of the east sidewalk of Fourth Street between Market and Howard streets, adding new signalized crosswalks, adding red arrows to traffic signals where vehicles have a “No Turn on Red” restriction, and development and implementation of a Sidewalk Management Plan listed in the comments, are not required. The EIR thus does not include any pedestrian mitigation measures.

As indicated on EIR page IV.A-84, the Central SoMa Plan proposes to upgrade sidewalks to meet the standards in the Better Streets Plan, provide corner sidewalk extensions, provide additional (midblock) crosswalks across major streets, and widen and upgrade crosswalks throughout the Central SoMa Plan area, including on Third, Fourth, Mission, Howard, and Folsom streets. The widening of sidewalks on Fourth Street between Market and Howard streets is included in the Central SoMa Plan. The City has indicated its intent to widen sidewalks on the east side of Fourth Street between Market and Howard streets, consistent with Improvement Measure IM-TR-4A, and is currently considering the design of sidewalk widening in this location. Also, separate from the proposed project, DPW is considering sidewalk widening on the west side of Fourth Street between Jessie and Mission streets, to meet the Central SoMa Plan and Better Streets Plan recommendations in time for implementation of these improvements upon certification of the Central SoMa Plan and coincident with the proposed Moscone Center Expansion project. DPW has indicated their intent to fund installation of red arrows at the intersections of Fourth/Howard and Fourth/Folsom, consistent with Improvement Measure IM-TR-4C.

The SFMTA and DPW already have standards for placement of landscaping and street furniture (documented within the *Better Streets Plan*), as well as permitting requirements for placing restaurant tables and chairs within the sidewalk right-of-way to ensure that adequate walkway area is available for pedestrians. Minimum sidewalk widths are currently required to be maintained. Pursuant to the Americans with Disabilities Act (ADA) requirements, the minimum width for ADA-compliant sidewalk is 36 inches (3 feet).¹⁰ As noted in Response TR-4, the effective widths of the sidewalk locations were used in the pedestrian analysis, thereby accounting for any sidewalk obstructions. Therefore, an additional mitigation measure to develop and implement a Sidewalk Management Plan is not required.

The project sponsor has also indicated its intent to develop and implement measures to further reduce the proposed project’s less-than-significant transportation-related

¹⁰ Ibid.

construction impacts, including a traffic control plan for project construction activities. These measures are identified in the EIR as Improvement Measure IM-TR-8.

CEQA does not require or authorize “improvement measures” where impacts are not determined to be significant. Nevertheless, the Planning Department identified some proposals that could improve the pedestrian experience in the area. The City, various users and property owners in the area, or the project sponsor could elect to implement these improvement measures, but they are not required to do so under CEQA. The EIR identified some transportation improvement measures that could be implemented, including:

- Improvement Measure IM-TR-1A: Transportation Demand Management on EIR page IV.A-58.
- Improvement Measure IM-TR-1B: Improved Fifth & Mission/Yerba Buena Center Garage Signage on EIR page IV.A-59.
- Improvement Measure IM-TR-4A: Fund the Design and Construction of Sidewalk Widening along Sidewalks Adjacent to Moscone Center on EIR page IV.A-69.
- Improvement Measure IM-TR-4B: Fund the Design and Implementation of Upgraded Crosswalks at Intersections Adjacent to Moscone Center on EIR page IV.A-70.
- Improvement Measure IM-TR-4C: Fund the Design and Implementation of Red Turn Arrow Signals at the Intersections of Fourth/Howard and Fourth/Folsom streets.
- Improvement Measure IM-TR-8: Construction Measures on EIR page IV.A-79.

In response to the comments, additional improvement measures have been identified for the neighborhood, and the text on EIR pages IV.A-69 and IV.A-70 is revised as follows (new text is underlined, deleted text is shown as ~~striketrough~~):

Improvement Measure IM-TR-4A: Fund the Design and Construction of Sidewalk Widening along Sidewalks Adjacent to Moscone Center

Consistent with the requirements of the *Better Streets Plan* and *Planning Code* Section 138.1, ~~the project sponsor could fund the widening of~~ the following sidewalk segments could be widened adjacent to the Moscone Center, consistent with ongoing planning efforts. Once the relevant planning effort has concluded and the relevant EIR has been certified and the project is approved, the project sponsor, or other users or the City could fund the design and implementation of the sidewalk widening projects listed below, if approved, totaling ~~three~~ four block faces:

- Fourth Street east sidewalk between Mission Market and Howard streets ~~to 15 by five to seven feet, resulting in sidewalk widths of between 15 and 25 feet~~ (upon certification of the Central SoMa Plan EIR and if the Plan is approved): ~~one block face~~ two block faces.
- Third Street west sidewalk between Mission and Howard streets to 15 feet (upon certification of the Central SoMa Plan EIR and if the Plan is approved): one block face.

- Mission Street south sidewalk between Third and Fourth streets to 15 feet (upon certification of the Better Market Street EIR and if the project is approved): one block face.

Improvement Measure IM-TR-4A would further reduce the proposed project's less-than-significant impacts related to pedestrians, and would not result in any secondary transportation-related impacts.

The City has indicated its intent to fund the design and implementation of widening of the east sidewalk of Fourth Street between Market and Howard streets, consistent with this improvement measure.

Improvement Measure IM-TR-4B: Fund the Design and Implementation of Upgraded Crosswalks at Intersections Adjacent to Moscone Center

Crosswalks could be widened and should be restriped to the Continental design, consistent with the *Better Streets Plan*. The project sponsor or other users or the City could reimburse SFMTA for costs associated with the design and implementation of upgrading all crosswalks at the following intersections:

- | | |
|------------------|----------------------------|
| • Fourth/Mission | • Fourth/Folsom |
| • Third/Mission | • Third/Folsom |
| • Fourth/Howard | • Fourth/Minna |
| • Third/Howard | • Yerba Buena Lane/Mission |

It should be noted that the project already includes an enhanced midblock crosswalk across Howard Street between Fourth and Third streets.

Improvement Measure IM-TR-4B would further reduce the proposed project's less-than-significant impacts related to pedestrians, and would not result in any secondary transportation-related impacts.

DPW has indicated their intent to fund the design and implementation of upgraded crosswalks, consistent with this improvement measure.

Improvement Measure IM-TR-4C: Fund the Design and Implementation of Red Turn Arrow Signals at the Intersections of Fourth/Howard and Fourth/Folsom.

At the intersection of Fourth Street/Howard Street, red arrow traffic signal aspects could be installed for both the southbound Fourth Street approach to Howard Street, and also for the westbound Howard Street approach to Fourth Street, which both currently have No Right/Left Turn on Red restrictions. At the intersection of Fourth Street/Folsom Street, red arrow traffic signal aspects could be installed for both the southbound Fourth Street approach to Folsom Street and for the eastbound Folsom Street approach to Fourth Street, which both currently have No Right/Left Turn on Red restrictions. The project sponsor, other users, or the City could reimburse SFMTA for costs associated with the design and implementation of the additional signal.

Improvement Measure IM-TR-4C would further reduce the proposed project's less-than-significant impacts related to pedestrians, and would not result in any secondary transportation-related impacts.

DPW has indicated their intent to reimburse SFMTA for costs associated with the design and implementation of the additional signals, consistent with this improvement measure.

These revisions would not change the conclusions presented in the EIR.

Comment TR-7: The EIR should analyze cumulative pedestrian impacts.

"What I'm concerned about is that the EIR addresses the transformation of an entire district.

Pedestrian circulation is a major part of it. It is not just the building which adds growth, but as the location becomes more successful, the pedestrian flow as it extends up to Market Street going through the mid block of Yerba Buena, recognizes what the expansion will yield as one of the destinations in the larger district, as it looks at the revitalized Metreon with Target and the new retail on Fourth Street.

I think it creates a much more intensified pedestrian circulation which, in addition to accommodating the residents who are already there, needs to be comfortable and gracious, I would say. It needs to be like promenading rather than shoulder to shoulder, trying to get across the intersection or a new mid-block light.

We need to remember also that more and more people will or already are walking down to the Caltrain Station every day at about 4:30. It is very difficult to circulate in that area. If there is a ball game, it gets even worse.

So I think we are doing ourselves a favor in expanding or making sure that the EIR looks at the cumulative impacts of all these new additions together with the objective of creating an extremely comfortable, walkable public ground in the expanded Yerba Buena Center." (San Francisco Planning Commissioner Kathrin Moore; transcript, June 5, 2014)

Response TR-7

The commenter lists past, present, and reasonably foreseeable future development in the vicinity of the project site and states that the EIR should examine the cumulative impacts of these developments on pedestrian circulation.

Please see the cumulative pedestrian impact analysis, presented on Draft EIR pages IV.A-84 and IV.A-85. The renovated Metreon facility, which includes a Target store and ground floor retail/restaurant uses along Fourth and Mission streets, was re-opened in late 2012, and pedestrians associated with these uses are included within the pedestrian counts conducted in April and May 2013 for the Existing Conditions analysis. As stated on Draft EIR pages IV.A-84 and IV.A-85, as a conservative assumption, the 2040 cumulative pedestrian analysis assumed that sidewalk improvements to be implemented as part of the Central SoMa Plan would not be undertaken. With this assumption, 2040

cumulative conditions at crosswalks, sidewalks, and corners would result in significant cumulative pedestrian impacts. However, the proposed project would not considerably contribute to these impacts because in every case, the project's contribution would be less than 5 percent, which is the City's threshold for determining whether a project would make a considerable contribution to a cumulative impact.

As stated in the Initial Study (EIR Appendix A), page 40, the San Francisco Planning Department is in the process of developing an integrated community vision for the southern portion of the Central Subway rail corridor along Fourth Street—the proposed Central SoMa Plan. The Plan area is located generally between Market Street on the north and Townsend Street on the south, and between Second Street on the east and Sixth Street on the west. The Moscone Center is within the Plan area. The plan's goal is to integrate transportation and land uses by implementing changes to the allowed land uses and building heights. The Plan also includes a strategy for improving the pedestrian experience in this area. These changes are based on a synthesis of community input, past and current land use efforts, and analysis of long-range regional, citywide, and neighborhood needs.

The Central SoMa EIR analysis will address whether pedestrian impacts would be significant with implementation of the plan. Any such impacts, however, would not be attributable to the Moscone Expansion Project, for the reasons discussed above.

Comment TR-8: Define "screenlines."

"Page vii, please add 'screenline' to glossary. Example use is page S-12 Impact C-TR-2." (Rick Smith; email, June 16, 2014)

Response TR-8

The commenter requests that "screenline" be defined in the glossary. The term is defined on Draft EIR pages IV.A-7 and IV.A-10. However, as the result of Comment TR-8, EIR page vii is revised as follows:

Mitigation. One or all of the following: (1) Avoiding an impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of an action and its implementation; (3) rectifying an impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating an impact over time by preservation and maintenance operations during the life of an action; and (5) compensating for an impact by replacing or providing substitute resources or environments.

Screenline. For local and regional transit analysis purposes, the concept of screenlines is used to describe the magnitude of travel to or from the greater downtown area, and to compare estimated transit volumes to available capacities. Screenlines are hypothetical lines that would be crossed by persons traveling between downtown and its vicinity and other parts of San Francisco and the

region. Most Muni service into and out of downtown is grouped into one of four "screenlines" (Northeast, Northwest, Southeast, and Southwest) that transit vehicles cross when traveling between downtown and a quadrant of the City. In addition, three regional screenlines have been established around San Francisco to analyze potential impacts of projects on the regional transit carriers.

This revision would not change the analysis or conclusions presented in the Draft EIR.

Air Quality

Comment AQ-1: The project would cause air pollution.

"And long-time construction will create inconveniences & waste costing too much money, and cause air pollution!" (Judy V. Wang; letter, undated, received May 8, 2014)

"This includes protecting them during the construction period from dust, debris, vibrations and etc..." (Dennis Hong, e-mail, June 16, 2014)

Response AQ-1

A commenter states that the duration of construction would create inconveniences and that the project construction cost is wasteful and would result in air pollution. A commenter also states that construction would cause dust, debris, and vibration.

Construction of the proposed project would result in temporary, less-than-significant impacts on pedestrian and vehicular levels of service. Please see Comment and Response TR-5, which describes the less-than-significant construction-related transportation impacts. Please also see Comment and Response PD-4, which explains the duration of the construction period.

The proposed project would result in less-than-significant impacts to air quality. Please see the Initial Study (Appendix A of the EIR), Section E.6, beginning on page 72 for an analysis of the project's impacts on air quality and mitigation measures that would ensure impacts are reduced to a less-than-significant level. As described in the Draft EIR Initial Study (Appendix A, page 78), areas near the project site would be protected from construction dust pursuant to the requirements of the Dust Control Ordinance.

Regarding vibration, Initial Study Impact NO-2 (EIR Appendix A, pages 69-71) determined that groundborne vibration impacts from the proposed project would be less than significant because nearby utilities would be required to be protected by standard DPW contract specifications. Contractors would adhere to standard practices to protect users of nearby areas from debris, as well.

With regard to the cost of construction, this is not considered an environmental effect that is to be analyzed under CEQA.

Wind and Shadow

Comment WS-1: The proposed project would increase shade on the Children's Garden.

"The Proposed Moscone Expansion project has major impacts on Yerba Buena Gardens public space: a.) The 95-foot tall proposed meeting and ballroom structure on the South Block will cast shadows on the current Children's Garden; b.) Convention Center circulation and fire exits will remove land from the play area; c.) The north edge of the Children's Garden, which currently has views of the San Francisco downtown skyline, will be boxed in by a dominant, imposing building face – the back of the meeting and ballroom structure." (TODCO Group/Yerba Buena Neighborhood Consortium; letter, undated, received June 9,2014)

"This proposed Moscone Expansion Project most definitely has impacts on the public space. One of those is the 95-foot ballroom and meeting room structure casts shadows on the play area." (Alice Light, TODCO Group/Yerba Buena Neighborhood Consortium; transcript, June 5, 2014)

"Shadow Impacts on the Children's Park: The park is used extensively throughout the day, but more so during weekends and afternoon to evenings. The proposed project would create new shadow beyond existing shadow it receives from other buildings. This will affect the useable hours of the park. The times of the year (late spring and early summer months) and the hours of the day (mid-afternoon through evening hours) when the park is extensively used, the building will lay more shadows on the park, rendering it less useable during the short summer that SF gets. Design changes to the massing can help mitigate the issue of shadows." (Komal Panjwani, San Francisco Beautiful; email, June 16, 2014)

Response WS-1

The commenters state that the proposed project would result in increased shadow on the existing Children's Garden, which could affect the use of the open space. Some comments also state that the existing play area will be reduced in size. The comments do not address the methodology or conclusions of the EIR shadow analysis.

The proposed project would result in an increase in the area of the Children's Garden devoted to children's use, as explained in response to comment PD-1, above.

Draft EIR Section IV.B, Shadow, presents the shading impacts of the proposed project on the Children's Garden, as well as other public open spaces. As stated on Draft EIR

pages IV.B-17 to IV.B-18, under existing conditions the garden is generally sunny throughout the day throughout the year, with shade present in the early morning and late afternoon hours. The proposed project analyzed in the Draft EIR would include expansion of the Moscone South building to a height of 95 feet above Howard Street. This expansion would add shadow to the open space, adding 3.13 percent of shadow as a percentage of Theoretical Annual Available Sunlight. In the late spring and early summer months, this new shadow would have the greatest potential effect, from approximately 3:00 p.m. through the evening hours. Observation indicates that the Children's Garden is heavily used at this time of day. Net new shadow cast by the proposed project could substantially affect use of the play circle and surrounding features.

Draft EIR page IV.B-20 notes that mitigation of this net new shadow would require a redesign of the project and directs the reader to Chapter VI, Alternatives, which includes analysis of a Modified Massing Alternative that would reduce shadow impacts. The Modified Massing Alternative, described in Draft EIR pages VI-11 and VI-12, would reduce the Moscone South Expansion to a height of 74 feet above Howard Street. Although the 74-foot-tall building would increase shadow on the Children's Garden as compared to existing conditions, the majority of the features of the Children's Garden would remain unshaded until approximately 7:00 p.m., and the shadow impact would be less than significant.

As described in Section VIII.B and Comment and Response PD-1, above, the design of the proposed project has been modified since publication of the Draft EIR. The proposed Moscone South Expansion top floor would be set back 70 feet from the southern façade of the building, which is an additional 35 feet to the 35-foot-setback analyzed in the Draft EIR ($35 + 35 = 70$). This setback would reduce the length of shadow cast southward and southeastward in the late afternoon hours in the late spring and early summer months compared to the shadow cast by the building analyzed in the Draft EIR.

Please see Section VIII.E, DEIR Revisions, below. Figure IV.B-5 presents projections of the shadow that would cast by the revised project design on the Children's Garden during the late afternoon and early evening hours of the summer solstice, which is representative of the revised design's shadow during the late spring and early summer months. This is the time of year when net new shadow from the original project design was determined to affect use of the Children's Garden. The red outline represents the outer extent of the new shadow from the revised project design, and the black line represents the outer extent of the shadow from the original project design.

During these months of the year, shadow from the revised Moscone South building would be cast southeastward, onto the Children's Garden. At about 5:00 p.m., net new shadow would be limited to the area that currently encompasses the awareness garden, sundial garden, and Learning Garden immediately south of the proposed building, and the majority of the eastern portion of the Children's Garden would remain unshaded. By 6:00 p.m., shadow would extend farther southeastward, into the play circle and the monkey bars, sand box, and a portion of the area now occupied by the maze, although to

a lesser extent than the shadow cast by the original design. By 7:00, when the play circle closes, the net new shadow from the revised design would extend across more than half of the play circle. A portion of the play circle, and most of the area that currently includes the circular lawn, would remain unshaded. As shown in **Figure IV.B-5b**, this area would have been shaded under the original design. By sunset -1 hour (one hour before sunset), the entirety of the Children's Garden would be shaded, under both the revised design and the original project design.

As Described in Chapter II, the Children's Garden would be modified under the proposed project. Under the revised design, around 5:00 p.m. during the late spring and early summer months, new shadow would fall on the replaced nature walk/allée of trees and paseo. As the evening progresses, shadow would extend southeastward onto the play circle and flexible lawn space by 6:00 p.m. By 7:00 p.m., shadow would extend over the social seating, more than half of play circle, and a portion of the relocated learning garden, as well as onto the plaza adjacent to the Esplanade Ballroom. The relocated nature walk/fern dell, and a portion of the tot lot, would remain unshaded at 7:00 p.m.

In summary, under the revised project design, in the late afternoons and early evenings in the late spring and early summer months, the majority of the garden would remain unshaded until approximately 7:00 p.m., when the play circle officially closes. Even at that hour, a portion of the play circle, the new tot lot, and the relocated nature walk/fern dell would remain unshaded. Therefore, the net new shadow cast by the revised design could affect use of the garden, but not to a significant extent.

The revised project design also includes a mechanical penthouse on the Esplanade portion of the Moscone South and Esplanade building, at the corner of Howard Street and Third Street. This mechanical penthouse would be a mesh screen rising to a height of 110 feet. The net new shadow of this 110-foot-high structure would be slightly less than the net new shadow cast by the 119-foot-tall building in the same location analyzed in the Modified Massing Alternative on Draft EIR pages VI-11 to VI-19. As stated on page VI-18, the 119-foot-tall building would result in more shadow cast northward onto East Garden and Howard Street Plaza in the early morning hours in late fall and early winter months, but would not be expected to substantially affect their use. The 110-foot-high screen of the revised project design would cast less shadow than a 119-foot-building in the same location, and therefore it would not be expected to substantially affect the use of the East Garden or Howard Street Plaza.

The revised project would reduce shadow on the Children's Garden compared to that cast by the project analyzed in the Draft EIR. Although net new shadow would affect the garden, it would not be expected to substantially affect its use because, similar to the analysis and conclusions for the Modified Massing Alternative (Alternative 3), the majority of the garden would remain unshaded until approximately 7:00 p.m., when the play circle closes. Therefore, the Planning Department has revised the impact determination of the proposed project to conclude that the revised project design would

result in a *less than significant* shadow impact, under both project-level and cumulative conditions.

Therefore, Draft EIR, page S-3, beginning at the fifth full paragraph, is revised as follows:

The Initial Study identified resource topics that were determined not to apply to the proposed project and topics where the project would have no impact, less-than-significant impact, or less-than-significant with mitigation. For any impacts identified as significant in the Initial Study, corresponding mitigation measures are included that would reduce these impacts to a less-than-significant level. These topics, summarized in **Table S-2** (found at the end of this chapter), are not addressed in this EIR.

~~The proposed project would have significant and unavoidable project and cumulative level shadow impacts.~~

Draft EIR, pages S-4 to S-5, beginning second paragraph of S-4, are revised as follows:

Reduced Project Alternative

Under the Reduced Project Alternative, similar renovations to the Moscone Center would be implemented as compared to the proposed project as analyzed in the Draft EIR (with a 95-foot-tall Moscone South / Esplanade building incorporating a 35-foot setback on the top floor facing the Children's Garden). However, the Reduced Project Alternative would not create additional space by excavating areas under Howard Street to expand the existing below-grade area that connects the Moscone North and South buildings. This would reduce excavation activities proposed by approximately 14,400 cubic yards. Available exhibition space would be reduced by up to approximately 49,000 square feet compared to the proposed project. The Reduced Project Alternative would meet or partially meet most of the project objectives. However, the additional below-ground exhibition space would be limited to reconfiguring and repurposing existing below-ground areas, and would not be contiguous between the Moscone North and South buildings. The underground expansion area would be less than under the proposed project, which would reduce the intensity of construction-related impacts. In particular, significant impacts to archeological resources and human remains would be reduced in severity, as would the generation of fugitive dust, criteria air pollutants, and toxic air contaminants. It is likely that air quality and hazardous materials impacts would still be significant and would require implementation of mitigation measures. Reduced exhibition space as compared to the proposed project would reduce the significant-but-mitigable impacts to pedestrian and truck loading and unloading, although mitigation measures would still be required. Similar to the proposed project analyzed in the Draft EIR, significant and unavoidable shadow impacts at the project- and cumulative-level would result-

Modified Massing Alternative

Under the Modified Massing Alternative, similar renovations to the Moscone Center would be implemented as compared to the proposed project, including excavation of 14,400 cubic yards of material beneath Howard Street for the below-grade expansion. However, the above-grade expansion would be modified. The Moscone South expansion would be approximately 74 feet in height above Howard Street. The above-grade Moscone Esplanade expansion would be approximately 119 feet above Howard Street. The Modified Massing Alternative would meet or partially meet the project objectives, although it would result in a less efficient building.

The Modified Massing Alternative would result in all of the same construction-related impacts as the proposed project, including significant-but-mitigable impacts to archaeological resources, human remains, air quality, and hazardous materials. The alternative would also result in the same total exhibition space as the proposed project, which would result in the same increases in convention employment and attendance that would result in significant-but-mitigable impacts to passenger and truck loading/unloading. This alternative would cast less shadow on the Children's Garden than the project analyzed in the Draft EIR and a similar level of shadow on the Children's Garden as the revised project. The Modified Massing Alternative would result in less than significant project- and cumulative-level shadow impacts. ~~reduce the project's significant and unavoidable shadow impact on the Children's Garden to a less than significant level.~~

Environmentally Superior Alternative

Alternative 3: Modified Massing Alternative would be the Environmentally Superior Alternative. Alternative 3 would result in construction-related impacts on archeological resources, human remains, air quality, and hazardous materials, all of which would be less-than-significant with the implementation of mitigation measures. While less than significant, air quality impacts would be slightly less than those of the revised project because the revised project would include a third floor of the Moscone South Expansion, rising to approximately 95 feet above Howard Street, while the Moscone South building under the Modified Massing Alternative would only include two floors, rising to a height of 74 feet above Howard Street. Alternative 3 would also result in significant-but-mitigable truck and passenger loading transportation impacts during operations. The alternative would result in shadow impacts similar to those of the revised project, and shadow impacts under Alternative 3 would be less than significant at both a project and cumulative level. ~~less than significant project and cumulative level shadow impacts.~~

Draft EIR, Table S-1 on page S-13, is revised as shown on the following page:

TABLE S-1 (Continued)
SUMMARY OF IMPACTS OF THE PROPOSED PROJECT – DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Transportation and Circulation (cont.)			
Impact C-TR-6: The proposed project would result in less-than-significant cumulative loading impacts.	Less than Significant	None required	
Impact C-TR-7: The proposed project would result in less-than-significant cumulative emergency vehicle access impacts.	Less than Significant	None required	
Impact C-TR-8: The proposed project would result in less-than-significant cumulative construction-related transportation impacts.	Less than Significant	See Improvement Measure IM-TR-8	
Shadow			
Impact WS-2: The proposed project would not create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of, or designated for acquisition by, the Recreation and Park Department.	No Impact	None required	
Impact WS-3: The proposed <u>revised</u> project would create new shadow in a manner that could <u>would not substantially</u> affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.	Significant <u>Less than Significant</u>	None available <u>None required</u>	Significant <u>Significant and Unavoidable</u>
Impact C-WS-2: The proposed <u>revised</u> project, in combination with past, present, or reasonably foreseeable future projects, would not create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of the Recreation and Park Department, but it would <u>and it would not</u> create new shadow in a manner that could <u>substantially</u> affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.	Significant <u>Less than Significant</u>	None available <u>None required</u>	Significant <u>Significant and Unavoidable</u>

Draft EIR page IV.B-6, beginning at the second paragraph, is revised as follows:

The Moscone South expansion would be constructed above the renovated and expanded lobby along Howard Street, for a total height of approximately 95 feet, or about 68 feet taller than the existing lobby building. The top level of the Moscone South expansion would be set back approximately ~~70~~³⁵ feet from its southern edge for a roof terrace, which would result in a 57-foot-high roofline relative to the Children's Garden. The Esplanade expansion would also result in a building approximately 95 feet high, and would enclose mechanical equipment on the rooftop within a mesh screen that would rise to a height of approximately 110 feet. For both the South and Esplanade Expansion, a terrace would run along Howard Street with a 25-foot setback. ~~The top level of the Esplanade expansion would be set back approximately 35 feet from its northern edge along Howard Street, also for a roof terrace.~~ At project completion, the Moscone South expansion and Esplanade expansion would function and appear as one building. In addition, at project completion, the second story of the Moscone South Howard Street façade would extend over the ground level lobby by approximately 23 feet, creating an overhang above the pedestrian space below. ~~In addition, at project completion, the second stories of both the Moscone North and Moscone South facades along Howard Street would extend over the ground level lobbies by approximately 15 feet in the Moscone North building and 15 feet in the Moscone South building, creating overhangs above the pedestrian space below.~~

To evaluate the year-round impact from the Moscone Center Expansion project on public open spaces and nearby POPOS, a quantitative analysis of sunlight and shade was conducted for net new shadow using the 3-D project model. Although the applicable open spaces are not protected under Section 295 of the Planning Code, the approach used was consistent with the approach used by the Planning Department for Section 295 compliance, which is the standard approach for quantification of shadow impacts in San Francisco. The analysis consisted of calculating the amount of shadow coverage resulting from existing buildings at 15-minute intervals on one day per week, for six months of the year. The shadow coverage at the 15-minute intervals was averaged to calculate hourly shadow coverage (in shadow foot hours, or square foot hours of shadow; each shadow foot hour represents the equivalent of one square foot of shadow for a duration of one hour). The hourly figures for each day were added and resulting numbers extrapolated to weekly figures through averaging with the preceding week's total. Because the sun's path from January through June essentially mirrors its path from July through December, the six months' shadow foot hour totals were doubled to return a yearly figure.⁵

⁵ This is the same methodology used by the Planning Department to calculate shadow and establish the Section 295 (Proposition K) baseline shadow coverage for other San Francisco parks.

This quantitative analysis and associated images analyzed the proposed Moscone South expansion with a 95-foot-high top floor with a setback of 35 feet from the southern façade facing the Children’s Garden. However, a mechanical penthouse rising to 110 feet has been added to the eastern half of the building, and the setback has been increased to 70 feet as a result of project changes described on EIR page II-28. An analysis of these project changes is included in this Section.

Draft EIR page IV.B-13, Impact statement WS-3, has been revised as follows:

Impact WS-3: The ~~proposed~~ revised project would create new shadow in a manner that ~~could~~ would not substantially affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas. (~~Significant and Unavoidable~~ Less than Significant)

Draft EIR page IV.B-19 has been revised as follows. The new text would be inserted after the second paragraph:

Revised Project Design

The design of the proposed project has been modified since publication of the Draft EIR. The proposed Moscone South Expansion top floor would be set back 70 feet from the southern façade of the building, which is an additional 35 feet to the 35-foot-setback analyzed in the Draft EIR (35 + 35 = 70). In addition, a mechanical penthouse has been added to the eastern half of the building. This penthouse would rise to a height of 110 feet above Howard Street.

Figure IV.B-5 presents projections of the shadow that would be cast by the revised project design on the Children’s Garden during the late afternoon and early evening hours of the summer solstice, which is representative of the revised design’s shadow during the late spring and early summer months. This is the time of year when net new shadow from the original project design was determined to affect use of the Children’s Garden. The red outline represents the outer extent of the new shadow from the revised design, and the black line represents the outer extent of the shadow from the original design.

During these months of the year, shadow from the revised Moscone South building would be cast southeastward, onto the Children’s Garden. At about 5:00 p.m., net new shadow would be limited to the area that currently encompasses the awareness garden, sundial garden, and Learning Garden immediately south of the proposed building, and the majority of the eastern portion of the Children’s Garden would remain unshaded. By 6:00 p.m., shadow would extend farther southeastward, into the play circle and the monkey bars, sand box, and a portion of the area now occupied by the maze, although to a lesser extent than the shadow cast by the original design. By 7:00, when the play circle closes, the net new shadow from the revised design would extend across more than half of the play circle. A portion of the play circle, and most of the area

that currently includes the circular lawn, would remain unshaded. As shown in Figure IV.B-5b, this area would have been shaded under the original design. By sunset -1 hour (one hour before sunset), the entirety of the Children's Garden would be shaded, under both the revised design and the original project design.

As Described in Chapter II, the Children's Garden would be modified under the proposed project. Under the revised design, around 5:00 p.m. during the late spring and early summer months, new shadow would fall on the replaced nature walk/allée of trees and paseo. As the evening progresses, shadow would extend southeastward onto the tot lot and flexible lawn space by 6:00 p.m. By 7:00 p.m., shadow would extend over the social seating, more than half of play circle, and a portion of the relocated learning garden, as well as onto the plaza adjacent to the Esplanade Ballroom. The nature walk/fern dell, and most of the relocated learning garden, would remain unshaded at 7:00 p.m.

In summary, under the revised project design, in the late afternoons and early evenings in the late spring and early summer months, the majority of the garden would remain unshaded until approximately 7:00 p.m., when the play circle officially closes. Even at that hour, a portion of the play circle and learning garden would remain unshaded. Therefore, the net new shadow cast by the revised design could affect use of the garden, but not to a significant extent.

The revised project design also includes a mechanical penthouse on the Esplanade portion of the Moscone South and Esplanade building, at the corner of Howard Street and Third Street. This mechanical penthouse would be a mesh screen rising to a height of 110 feet. The 110-foot-high screen of the revised project design would cast less shadow than a 119-foot-building in the same location, and therefore it would not be expected to substantially affect the use of the East Garden or Howard Street Plaza.

Draft EIR pages IV.B-20 through IV.B-21 have been revised as follows:

As established in the analysis above, the project shadow analysis found that the Moscone Center Expansion project would shade the four distinct areas of Yerba Buena Gardens. For each of these open spaces (except for the Children's Garden), the project shadow would be limited in amount and/or duration, would typically fall on the open spaces at times of relatively limited use, or new shadow would not be expected to substantially affect the use of that space. With respect to the Esplanade, net new shadow would be evident primarily in the early morning, when the space has been observed to be less heavily used than during the midday period. ~~However, net~~Net new shadow would fall on the Children's Garden in the late afternoon and early evening hours in the late spring and early summer months, when the play circle is likely heavily used. Net new shadow on the Children's Garden could from the revised project would not substantially affect its use at that time.

This net new shadow would be cast by the 95-foot-tall Moscone South and Esplanade Building, which would be 68 feet taller than the existing building. The building would be located directly adjacent to the Children's Garden, a location that would result in the greatest increase in net shadow because there are no existing intervening structures that cast shadow under existing conditions. ~~Therefore, minor design changes or setbacks to the proposed project would result in only marginal improvement in project shadow conditions. Mitigation of this net new shadow would require redesign.~~ Modification of the proposed project has occurred since publication of the Draft EIR, reducing shadow effects compared to those originally analyzed. ~~to remove or downsize the new building.~~ Please see Chapter VI for an analysis of a Modified Massing Alternative that would incorporate more substantial design changes to reduce this impact as compared to the original project.

Net new shadow on the East Garden and on Howard Street Plaza would not be expected to substantially affect their use. Also, although net new shadow would be cast on sidewalks in the project site vicinity, it would not be anticipated to substantially affect their use.

The POPOS have been developed in an area with tall height limits, where nearby mid- and high-rise development already does (and may in the future) cast shadow on those spaces. At the times of greatest existing and new shadow, these open spaces are primarily traversed by pedestrians or used by workers. Given the limited shadow that would be cast by the proposed project buildings, as well as the nature of these open spaces already surrounded and partly shaded by existing buildings, it is reasonable to conclude that project shadow would not adversely affect the use of POPOS.

In conclusion, the net new shadow ~~could~~ from the revised project would not substantially affect the use of the Children's Garden or other public open space. ~~There is no available mitigation for shadow impacts other than substantial redesign of the proposed project (see Chapter VI, Alternatives). No feasible mitigation measures have been identified.~~ Therefore, the impact would be less than significant ~~significant and unavoidable.~~

Mitigation: None ~~required~~ available.

Cumulative Impacts

Impact C-WS-2: The ~~proposed~~ revised project, in combination with past, present, or reasonably foreseeable future projects, would not create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of the Recreation and Park Department, ~~but it would~~ and it would not create new shadow in a manner that could substantially affect the use of

other existing publicly accessible open space or outdoor recreation facilities or other public areas. (~~Significant and Unavoidable~~ Less than Significant)

Draft EIR page IV.B-22, second paragraph, is revised as follows:

Regarding the Children’s Garden, as stated above, the ~~proposed~~ revised project would result in a less-than-significant project-level ~~significant and unavoidable~~ shadow impact on the Children’s Garden. As indicated above, the shadow would be cast on relocated features under the proposed project, including the nature walk/allée, paseo, plaza, and flexible lawn. Another nearby project that would result in increased shadow on the Children’s Garden is the 250 Fourth Street hotel project. This project includes the demolition of a three-story education and office building and construction of an 11-story, 119-foot-tall hotel. The 250 Fourth Street project is located on the northwest corner of Fourth and Clementina Streets, west of the project site, and would also cast shadow on the Children’s Garden, although the maximum extent would be during the afternoon hours during the late fall and winter months.¹⁹

~~However, the~~ The project shadow, combined with the shadow from the 250 Fourth Street project, would not result in a cumulative impact on the Children’s Garden, These shadows would fall on the Children’s Garden at different times of year and at slightly different times of day. Given the temporary nature of these shadow effects, and their dispersal across opposite times of the year (late fall/early winter vs. late spring/early summer), they would not combine to substantially affect use of the Children’s Garden, and the cumulative impact would be less than significant, and the project would result in a considerable contribution to that cumulative impact.

Draft EIR page IV.B-23 is revised as follows:

Conclusion

The proposed project would not contribute considerably to cumulative shadow impacts on Section 295 parks or POPOS, ~~or but it would make a considerable contribution to cumulative shadow impacts~~ on other open spaces under public jurisdiction (the Children’s Garden). ~~As discussed above, there is no available mitigation for shadow impacts other than substantial redesign of the proposed project. Thus, no feasible mitigation measures have been identified.~~ Therefore, cumulative impacts on the use of existing publicly accessible open space or outdoor recreation facilities or other public areas would be less than significant ~~significant and unavoidable~~.

Mitigation: None ~~required~~ available.

¹⁹ San Francisco Planning Department, *Mitigated Negative Declaration: 250 Fourth Street Project, Case No. 2011.0038E*, December 12, 2012, amended January 4, 2013.

Draft EIR page V-2 under the heading “Significant Unavoidable Impacts” has been revised as follows:

~~In accordance with Section 21067 of the California Public Resources Code, and with Sections 15040, 15081, and 15082 of the CEQA Guidelines, an environmental impact report (EIR) must identify potential impacts that could not be eliminated or reduced to an insignificant level. As explained in Section IV.B, the project would result in the following significant and unavoidable impacts:~~

- ~~• Create new shadow in a manner that could affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.~~
- ~~• In combination with past, present, or reasonably foreseeable future projects, create new shadow in a manner that could affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.~~

With modifications to the project as described in this EIR, there are no significant and unavoidable impacts.

Draft EIR page V-3, fourth bullet has been revised as follows:

- **Wind and Shadow**—alter wind in a manner that substantially affects public areas; create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of, or designated for acquisition by, the Recreation and Park Department; create new shadow in a manner that would substantially affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.

Draft EIR page VI-3 under the heading “Significant and Unavoidable Impacts” has been revised as follows:

Significant and Unavoidable Impacts

~~**Shadow.** As stated in Section IV.B, under **Impact WS-3** and **Impact C-WS-2**, the project would result in significant and unavoidable project and cumulative level shadow impacts. The Moscone South Expansion would result in a net increase in shadow on the Children’s Garden during the late afternoon / early evening hours in the late spring and early summer months, which could substantially affect the use of the open space.~~

With modifications to the project as described in this EIR, there are no significant and unavoidable impacts.

Draft EIR Table VI-1 on page VI-7 is revised as shown on the following page:

TABLE VI-1 (Continued)
COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF THE CEQA ALTERNATIVES

Category of Significant Environmental Impact	Proposed Project	No Project Alternative	Alternative 2: Reduced Project Alternative	Alternative 3: Modified Massing Alternative
Shadow	<p>Significant and unavoidable impact: The project would create new shadow in a manner that could affect the use of the Children's Garden.</p> <p>Also, the project, combined with past, present, and reasonably foreseeable future development, would create new shadow in a manner that could affect the use of the Children's Garden. The project would considerably contribute to this impact.</p>	<p>No Impact</p> <p>Because there would be no new above ground structures under Alternative 1, there would be no potential to increase shadow.</p>	<p>Unchanged</p> <p>Because Alternative 2 would result in the same above ground Moscone South and Esplanade Expansion as the proposed project, it would cast net new shadow of the same duration and geographic extent on the Children's Garden.</p>	<p>Decreased</p> <p>Because the massing of new above-ground structures would be concentrated at the southwest corner of Third Street and Howard Street, net new shadow would be cast on the Children's Garden to a lesser extent and duration than under the proposed project.</p> <p>The increased building height at the corner of Third Mission would incrementally increase the extent and duration of shadow cast on Yerba Buena Gardens and other public open spaces.</p>

Draft EIR page VI-11, first paragraph, is revised as follows:

Alternative 2 would result in the same above-ground Moscone South and Esplanade Expansion as the proposed project as analyzed in the Draft EIR, with the same building massing. Therefore, it would cast net new shadow of the same duration and geographic extent on open spaces, including the Children's Garden, as the new shadow cast under the proposed project. Significant and unavoidable shadow impacts on the Children's Garden at the project and cumulative level would result.

In comparison to the proposed project, other topics that were addressed in the Initial Study (Appendix A) and found to have no impacts or less-than-significant impacts including land use, population and housing, historic architectural resources, noise, greenhouse gas emissions, wind, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agricultural and forest resources, would also have no impacts or similar less-than-significant impacts for the Reduced Project Alternative.

Alternative 2 – Conclusions

The Reduced Project Alternative would meet or partially meet most of the project objectives. However, the additional below-ground exhibition space would be limited to reconfiguring and repurposing existing below-ground areas, and would not be contiguous between the Moscone North and South buildings. Therefore, the first two objectives would not be fully met under the Reduced Project Alternative. This alternative would avoid or substantially reduce impacts to known archeological resources and human remains, and would reduce impacts associated with air quality and removal of hazardous building materials. All of the same mitigation measures applicable to the proposed project's construction activities would be applicable for this alternative's construction activities. The alternative would reduce total daily attendance and number of events, and therefore operational transportation impacts related to passenger and truck loading/unloading would be reduced, but not eliminated. The alternative would not reduce, relocate, or eliminate building massing; therefore, it would result in the same significant and unavoidable shadow impacts at the project and cumulative levels as the Proposed Project as analyzed in the Draft EIR.

Draft EIR page VI-18, second-to-last paragraph, is revised as follows:

Because the massing of new above-ground structures would be concentrated at the southwest corner of Third Street and Howard Street, net new shadow would be cast on the Children's Garden to a similar ~~lesser~~ extent and duration ~~as than~~ under the revised proposed project, resulting in a similar less-than-significant shadow impact.

Draft EIR page VI-19, third paragraph, is revised as follows:

Alternative 3 – Conclusions

The Modified Massing Alternative would meet or partially meet most of the project objectives. However, the alternative would result in less efficient meeting and ballroom space than the proposed project. The alternative would create an iconic and architecturally significant arrival experience, relocate vehicular and service functions to create uninterrupted pedestrian-favored sidewalks, and reinforce and improve connections among existing open spaces, but it would result in a less efficient building than would the proposed project. All of the same mitigation measures applicable to the proposed project's construction activities (Mitigation Measures CP-2a, CP-2b, AQ-1, and HZ-3) would be applicable for this alternative's construction activities. Impacts to passenger and truck loading/unloading would be the same as the proposed project, requiring implementation of Mitigation Measures M-TR-6a and M-TR-6b to reduce loading impacts to a less-than-significant level. Less-than-significant shadow impacts would occur. ~~Shadow impacts would be reduced to a less than significant level.~~

Draft EIR page VI-20, first paragraph, is revised as follows:

The Modified Massing Alternative (Alternative 3) would qualify as the environmentally superior alternative among the development alternatives. Alternative 3 would result in construction-related impacts on archeological resources, human remains, air quality, and hazardous materials, all of which would be less-than-significant with the implementation of mitigation measures. While less than significant, air quality impacts would be slightly less than those of the revised project because the revised project would include a third floor of the Moscone South Expansion, rising to approximately 95 feet above Howard Street, while the Moscone South building under the Modified Massing Alternative would only include two floors, rising to a height of 74 feet above Howard Street. Alternative 3 would also result in significant-but-mitigable truck and passenger loading transportation impacts during operations. The alternative would result in shadow impacts similar to those of the revised project and shadow impacts under Alternative 3 would be less than significant at both a project and cumulative level.

~~The Modified Massing Alternative would avoid the significant and unavoidable shadow impact on the Children's Garden. While this alternative would not reduce impacts to archeological resources, human remains, air quality, hazardous building materials, or transportation impacts, with incorporation of mitigation measures identified for the proposed project, impacts to these resource topics would be reduced to a less than significant level. Therefore, with implementation of mitigation measures, the Modified Massing Alternative would not result in any significant and unavoidable impacts and impacts to all resource topics would be reduced to a less than significant level.~~

Comment WS-2: The proposed project would increase ground-level winds in the project site vicinity.

“Dear Ma’am, I read about the public hearing for the Moscone Expansion and I have a question regarding wind circulation along the 700 block of Howard St. Will the expansion promote stronger wind circulation on Howard St.? If so, will stronger wind blow harm any concept when they close and use Howard St., as part of the Moscone Convention.” (Jimmy Carlos; email, June 2, 2014)

Response WS-2

The commenter asks whether the proposed project would result in stronger ground-level winds along Howard Street and whether those winds would affect use of the street when it is closed for specific larger conventions.

The wind impacts of the proposed project are analyzed in the Draft EIR Initial Study (Appendix A), Topic E.8, pages 108–113. Planning Code Section 148 indicates that a project would be considered to have a significant wind impact if it would cause winds to exceed 26 miles per hour (mph) for more than one hour per year. The Code also requires that buildings meet the pedestrian comfort criterion of 11 mph, unless an exception is granted, although exceedances of the comfort criterion alone are not considered to result in a significant impact under CEQA.

A scale model of the project site and vicinity, with and without the proposed project, was constructed to simulate wind conditions in the existing and future contexts. The results are presented on Initial Study pages 110 and 111. For the test points along Howard Street (test point numbers 1 through 15), the 11-mph comfort criterion would be exceeded at one location due to the project (test point 6). The project would result in an exceedance at the same location under cumulative conditions. The 26-mph wind hazard criterion would not be exceeded. Generally, the project would result in a reduction in wind speeds along Howard Street. The proposed project would result in a less-than-significant wind impact.

Hydrology and Water Quality

Comment HY-1: The project would result in an unsafe water supply.

“... and water pipe will be dug out, not safe for neighborhood residents’ drinking water supply!” (Judy V. Wang; letter, undated, received May 8, 2014)

Response HY-1

The commenter states that the proposed project will require excavation of a water pipe, which would result in an unsafe water supply.

The proposed project's impacts on water quality and water supply are addressed in the Draft EIR Initial Study (Appendix A), Topics E.14, Hydrology and Water Quality. Removal of existing water supply pipelines is not required during project construction. Construction-related impacts to water quality are analyzed under Impact HY-1, pages 138–139. The quality of the water supply would not be affected by project excavation. Impacts to water quality would be less than significant.

E. DEIR Revisions

The following changes to the text of the Draft EIR are made in response to comments on the Draft EIR or are included to clarify the Draft EIR text. For each change, new language is double underlined, while deleted text is shown in ~~striketrough~~. Staff-initiated changes to clarify information presented in the DEIR are identified by an asterisk (*) in the margin to distinguish them from text changes in response to comments. The changes are organized in the order of the DEIR table of contents.

Acronyms, Abbreviations, and Glossary

In response to Comment TR-8, page vii has been revised to include the following at the bottom of the page:

Screenline. For local and regional transit analysis purposes, the concept of screenlines is used to describe the magnitude of travel to or from the greater downtown area, and to compare estimated transit volumes to available capacities. Screenlines are hypothetical lines that would be crossed by persons traveling between downtown and its vicinity and other parts of San Francisco and the region. Most Muni service into and out of downtown is grouped into one of four "screenlines" (Northeast, Northwest, Southeast, and Southwest) that transit vehicles cross when traveling between downtown and a quadrant of the City. In addition, three regional screenlines have been established around San Francisco to analyze potential impacts of projects on the regional transit carriers.

Summary

City staff has revised EIR page S-3 as follows:

*

The proposed above-grade Moscone South improvements would consist of two elements: the Moscone Esplanade Expansion and the Moscone South Expansion. These two elements would be built in successive construction phases, and upon project completion, they would exist as one connected building. Above grade, Moscone South and the Esplanade functional space would expand by a combined 277 percent, from 71,100 square feet to 267,700 square feet. The completed building would be approximately 95 feet in height above Howard Street. At level 1 (street level), the lobby, with an approximately 25-foot clear ceiling height, would contain a mix of registration space, meeting rooms, offices, circulation space, retail space, back-of-house space, and multi-purpose space (flexible space to be used based on the needs of certain events).

In response to Comment WS-1 and/or City staff revisions, Draft EIR, page S-3, beginning at the fifth full paragraph, is revised as follows:

- * The Initial Study identified resource topics that were determined not to apply to the proposed project and topics where the project would have no impact, less-than-significant impact, or less-than-significant with mitigation. For any impacts identified as significant in the Initial Study, corresponding mitigation measures are included that would reduce these impacts to a less-than-significant level. These topics, summarized in **Table S-2** (found at the end of this chapter), are not addressed in this EIR.

~~The proposed project would have significant and unavoidable project- and cumulative-level shadow impacts.~~

In response to Comment WS-1 and/or City staff revisions, Draft EIR, pages S-4 to S-5, beginning second paragraph of S-4, are revised as follows:

- * **Reduced Project Alternative**

Under the Reduced Project Alternative, similar renovations to the Moscone Center would be implemented as compared to the proposed project as analyzed in the Draft EIR (with a 95-foot-tall Moscone South / Esplanade building incorporating a 35-foot setback on the top floor facing the Children’s Garden). However, the Reduced Project Alternative would not create additional space by excavating areas under Howard Street to expand the existing below-grade area that connects the Moscone North and South buildings. This would reduce excavation activities proposed by approximately 14,400 cubic yards. Available exhibition space would be reduced by up to approximately 49,000 square feet compared to the proposed project. The Reduced Project Alternative would meet or partially meet most of the project objectives. However, the additional below-ground exhibition space would be limited to reconfiguring and repurposing existing below-ground areas, and would not be contiguous between the Moscone North and South buildings. The underground expansion area would be less than under the proposed project, which would reduce the intensity of construction-related impacts. In particular, significant impacts to archeological resources and human remains would be reduced in severity, as would the generation of fugitive dust, criteria air pollutants, and toxic air contaminants. It is likely that air quality and hazardous materials impacts would still be significant and would require implementation of mitigation measures. Reduced exhibition space as compared to the proposed project would reduce the significant-but-mitigable impacts to pedestrian and truck loading and unloading, although mitigation measures would still be required. Similar to the proposed project analyzed in the Draft EIR, significant and unavoidable shadow impacts at the project- and cumulative-level would result.

Modified Massing Alternative

Under the Modified Massing Alternative, similar renovations to the Moscone Center would be implemented as compared to the proposed project, including excavation of

14,400 cubic yards of material beneath Howard Street for the below-grade expansion. However, the above-grade expansion would be modified. The Moscone South expansion would be approximately 74 feet in height above Howard Street. The above-grade Moscone Esplanade expansion would be approximately 119 feet above Howard Street. The Modified Massing Alternative would meet or partially meet the project objectives, although it would result in a less efficient building.

The Modified Massing Alternative would result in all of the same construction-related impacts as the proposed project, including significant-but-mitigable impacts to archaeological resources, human remains, air quality, and hazardous materials. The alternative would also result in the same total exhibition space as the proposed project, which would result in the same increases in convention employment and attendance that would result in significant-but-mitigable impacts to passenger and truck loading/unloading. This alternative would cast less shadow on the Children's Garden than the project analyzed in the Draft EIR and a similar level of shadow on the Children's Garden as the revised project. The Modified Massing Alternative would result in less than significant project- and cumulative-level shadow impacts.~~reduce the project's significant and unavoidable shadow impact on the Children's Garden to a less than significant level.~~

Environmentally Superior Alternative

Alternative 3: Modified Massing Alternative would be the Environmentally Superior Alternative. Alternative 3 would result in construction-related impacts on archeological resources, human remains, air quality, and hazardous materials, all of which would be less-than-significant with the implementation of mitigation measures. While less than significant, air quality impacts would be slightly less than those of the revised project because the revised project would include a third floor of the Moscone South Expansion, rising to approximately 95 feet above Howard Street, while the Moscone South building under the Modified Massing Alternative would only include two floors, rising to a height of 74 feet above Howard Street. Alternative 3 would also result in significant-but-mitigable truck and passenger loading transportation impacts during operations. The alternative would result in shadow impacts similar to those of the revised project, and shadow impacts under Alternative 3 would be less than significant at both a project and cumulative level.~~less than significant project- and cumulative-level shadow impacts.~~

In response to the Comment TR-6 and/or City staff revisions, the text on EIR pages S-7 and S-8, column 3 has been revised:

*

Improvement Measure IM-TR-4A: Fund the Design and Construction of Sidewalk Widening along Sidewalks Adjacent to Moscone Center

Consistent with the requirements of the *Better Streets Plan* and *Planning Code* Section 138.1, ~~the project sponsor could fund the widening of the following sidewalk segments~~ could be widened adjacent to the Moscone Center, consistent with ongoing planning efforts. Once the relevant planning effort has concluded and the relevant EIR has been

certified and the project is approved, the project sponsor, or other users or the City could fund the design and implementation of the sidewalk widening projects listed below, if approved, totaling ~~three~~four block faces:

- Fourth Street east sidewalk between ~~Mission~~Market and Howard streets ~~to 15 by five to seven~~ feet, resulting in sidewalk widths of between 15 and 25 feet (upon certification of the Central SoMa Plan EIR and if the Plan is approved): ~~one block face~~two block faces.
- Third Street west sidewalk between Mission and Howard streets to 15 feet (upon certification of the Central SoMa Plan EIR and if the Plan is approved): one block face.
- Mission Street south sidewalk between Third and Fourth streets to 15 feet (upon certification of the Better Market Street EIR and if the project is approved): one block face.

Improvement Measure IM-TR-4B: Fund the Design and Implementation of Upgraded Crosswalks at Intersections Adjacent to Moscone Center

Crosswalks could be widened and should be restriped to the Continental design, consistent with the *Better Streets Plan*. The project sponsor or other users or the City could reimburse SFMTA for costs associated with the design and implementation of upgrading all crosswalks at the following intersections:

- Fourth/Mission
- Third/Mission
- Fourth/Howard
- Third/Howard
- Fourth/Folsom
- Third/Folsom
- Fourth/Minna
- Yerba Buena Lane/Mission

Improvement Measure IM-TR-4C: Fund the Design and Implementation of Red Turn Arrow Signals at the Intersections of Fourth/Howard and Fourth/Folsom.

At the intersection of Fourth Street/Howard Street, red arrow traffic signal aspects could be installed for both the southbound Fourth Street approach to Howard Street, and also for the westbound Howard Street approach to Fourth Street, which both currently have No Right/Left Turn on Red restrictions. At the intersection of Fourth Street/Folsom Street, red arrow traffic signal aspects could be installed for both the southbound Fourth Street approach to Folsom Street and for the eastbound Folsom Street approach to Fourth Street, which both currently have No Right/Left Turn on Red restrictions. The project sponsor, other users, or the City could reimburse SFMTA for costs associated with the design and implementation of the additional signal.

In response to comment WS-1 and/or City staff revisions, Draft EIR, Table S-1 on page S-13, is revised as shown on the following page:

*

TABLE S-1 (Continued)
SUMMARY OF IMPACTS OF THE PROPOSED PROJECT – DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Transportation and Circulation (cont.)			
Impact C-TR-6: The proposed project would result in less-than-significant cumulative loading impacts.	Less than Significant	None required	
Impact C-TR-7: The proposed project would result in less-than-significant cumulative emergency vehicle access impacts.	Less than Significant	None required	
Impact C-TR-8: The proposed project would result in less-than-significant cumulative construction-related transportation impacts.	Less than Significant	See Improvement Measure IM-TR-8	
Shadow			
Impact WS-2: The proposed project would not create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of, or designated for acquisition by, the Recreation and Park Department.	No Impact	None required	
Impact WS-3: The proposed <u>revised</u> project would create new shadow in a manner that could <u>would not substantially</u> affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.	Significant <u>Less than Significant</u>	None available <u>None required</u>	Significant and Unavoidable
Impact C-WS-2: The proposed <u>revised</u> project, in combination with past, present, or reasonably foreseeable future projects, would not create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of the Recreation and Park Department, but it would <u>and it would not</u> create new shadow in a manner that could <u>substantially</u> affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.	Significant <u>Less than Significant</u>	None available <u>None required</u>	Significant and Unavoidable

Project Description

City staff has revised EIR page II-12, paragraph 3:

- * Above grade, Moscone South and the Esplanade functional space would expand by a combined 277 percent, from 71,100 square feet to 267,700 square feet. The completed building would be approximately 95 feet in height above Howard Street. At level 1 (street level), the lobby, with an approximately 25-foot clear ceiling height, would contain a mix of registration space, meeting rooms, offices, circulation space, retail space, back-of-house space, and multi-purpose space (flexible space to be used based on the needs of certain events).

City staff has revised EIR page II-16, paragraph 1:

- * Also on level 2, two pedestrian bridges would span Howard Street, connecting the two proposed expansions between Moscone North and Moscone South and framing the main public arrival space at grade between the two new buildings (discussed further below). The eastern bridge would be fully enclosed to provide enhanced circulation for Moscone convention attendees while the western bridge would contain an uncovered public walkway intended for use by pedestrians moving between the Yerba Buena blocks. This public walkway would replace the existing pedestrian bridge located north of the Carousel (see Figure II-7). The replacement western bridge would touch down in the Children's Garden directly across from the existing amphitheater, leaving an area between the bridge and the western façade of Moscone South for landscaping.

City staff has revised EIR page II-28, paragraphs 2 through 5:

- * ***Height, Massing, and Design***

The proposed project would include extensions of Moscone North and South building facades toward Howard Street, as well as vertical extensions of all three building components (North, South, and the Esplanade). The Moscone North expansion would be primarily an expansion to the existing lobby, with a two-story vertical circulation lobby at the east, providing access to Moscone South via the proposed level 2 bridge over Howard Street. ~~The Moscone North expansion would add one level above a renovated and expanded lobby along Howard Street,~~ for a total height of approximately 54 feet. This building would be approximately 10 feet taller than the existing Moscone North lobby and restaurant structure. The remainder of the roof of the Moscone North expansion would be a new public terrace, adding 8,000 square feet of new public open space to the Sister Cities Gardens.

The Moscone South Expansion would add two levels above a renovated and expanded lobby along Howard Street, for a total height of approximately 95 feet. The top level of the South Expansion would be set back approximately ~~70~~³⁵ feet from its southern edge for a roof terrace, which would result in a 57-foot-high roofline relative to the Children's Garden. The Esplanade Expansion would add an enlarged lobby/~~multi-purpose space~~, a

mezzanine level, and two full stories, for a total height of approximately 95 feet, with a mechanical penthouse above topping out at 110 feet. For both the South and Esplanade Expansion, a terrace would run along Howard Street with a 25-foot setback. The top level of the Esplanade Expansion would be set back approximately 35 feet from its northern edge along Howard Street, also for a roof terrace.As noted previously, at project completion, the South Expansion and Esplanade Expansion would function and appear as one building. In addition, at project completion, the second story of the Moscone South Howard Street façade would extend over the ground level lobby by approximately 23 feet, creating an overhang above the pedestrian space below. The south façade of the proposed expansion would be constructed of a light metal screen over plaster walls, which would include a south-facing planted green wall directly north of the Children's Gardenstories of both North and South facades would extend over the ground level lobbies by approximately 15 feet in the North building and 15 feet in the South building, ~~creating overhangs above the pedestrian space below~~ (see Figure II-9).

The ground level areas facing Howard and Third Streets, which would include the two lobbies and retail uses, are anticipated to be enclosed with a glass curtain wall. The levels above would be clad in a mixture of metal panels, glass curtain wall, and stone panels. In general, the architectural style would be of a contemporary design intended to coordinate with the existing aesthetic of the surrounding structures, as described above and shown in **Figure II-14** through **Figure II-18**, below. All glazing would be consistent with the City's Bird-Safe Building Ordinance (Section 139 of the *Planning Code*).

Figure II-14 presents a map of viewpoints that are presented in this Project Description. Figures II-15 through II-18 present a series of photographs from vantage points surrounding and near the project site, showing the existing Moscone Convention Center and surrounding buildings. Each figure includes a second image depicting a photomontage of the proposed project within the surrounding built environment. These photosimulations were prepared by Square One Productions and reviewed by the San Francisco Planning Department, the environmental consultant (ESA), the project sponsor team, and the project architect (SOM). Figure II-17 presents a photosimulation of the proposed project as described in the DEIR that incorporated a 35-foot-wide setback on the top floor of the Moscone South building, facing the Children's Garden. Figure II-17a presents the deeper, 70-foot setback on the building's top floor facing the Children's Garden, incorporation of a green wall, and other design changes since publication of the Draft EIR. Figure II-17a was prepared by the project architect, SOM.

Figures II-3 through II-11 have been revised, and Figure II-17a has been inserted into the document, to reflect the changes to the project description and clarify the location of the proposed project relative to existing conditions, as follows:

- Figure II-3 shows the revised rooftop of the Moscone South and Esplanade, the modified western pedestrian bridge, and the modified flexible open space around the carousel.

- Figure II-4 now includes the footprint of the project blocks, as well as the lower level's relation to the Metreon building to the west, to better orient the lower level plan within the existing project blocks. The figure now also includes a legend.
- Figure II-5 shows the revised floor plan for the Moscone South/Esplenade, Level 1.
- Figure II-6 shows the revised floor plan for the Moscone South/Esplenade, Mezzanine Level, as well as revisions to the flexible open space at the western pedestrian bridge landing in the Children's Garden.
- Figure II-7 presents the modified western pedestrian bridge and landing in the Children's Garden.
- Figure II-8 shows the revised floor plan for the Moscone South/Esplenade, Level 3, specifically presenting the larger terrace adjacent to the Children's Garden.
- Figure II-9 shows the revised cross-section of the project, which includes the larger Level 3 terrace facing the Children's Garden.
- Figure II-10a presents revisions to the improvements proposed for the Children's Garden.
- Figure II-10b shows revisions to the proposed landscaping plan, including in the area of the western pedestrian bridge landing and the flexible space east of the carousel, as well as the modified western pedestrian bridge, as well as the updated plans for the flexible open space in the Children's Garden.
- Figure II-11 shows the modified Howard Street conditions reflecting revisions to Moscone South/Esplenade, Level 1.
- Figure II-17a presents a rendering of the revised project, which can be compared to Figure II-17, a rendering of the project as included in the Draft EIR. As shown in Figure II-17a, the third floor is set farther back, and a green wall has been incorporated into the building's southern façade.

Environmental Setting, Impacts, and Mitigation Measures

City staff has revised EIR page IV-1, third paragraph:

- * Sections ~~B and CA and B~~ of Chapter IV contain the following elements, based on the requirements of California Environmental Quality Act (CEQA):

In response to the Comment TR-6 and/or City staff revisions, the text on EIR pages IV.A-69 and IV.A-70 has been revised:

- * **Improvement Measure IM-TR-4A: Fund the Design and Construction of Sidewalk Widening along Sidewalks Adjacent to Moscone Center**

Consistent with the requirements of the *Better Streets Plan* and *Planning Code* Section 138.1, ~~the project sponsor could fund the widening of~~ the following sidewalk segments could be widened adjacent to the Moscone Center, consistent with ongoing planning efforts. Once the relevant planning effort has concluded and the relevant EIR

has been certified and the project is approved, the project sponsor, or other users or the City could fund the design and implementation of the sidewalk widening projects listed below, if approved, totaling ~~three~~four block faces:

- Fourth Street east sidewalk between Mission Market and Howard streets ~~to 15 by five to seven~~ feet, resulting in sidewalk widths of between 15 and 25 feet (upon certification of the Central SoMa Plan EIR and if the Plan is approved): ~~one block face~~ two block faces.
- Third Street west sidewalk between Mission and Howard streets to 15 feet (upon certification of the Central SoMa Plan EIR and if the Plan is approved): one block face.
- Mission Street south sidewalk between Third and Fourth streets to 15 feet (upon certification of the Better Market Street EIR and if the project is approved): one block face.

Improvement Measure IM-TR-4A would further reduce the proposed project's less-than-significant impacts related to pedestrians, and would not result in any secondary transportation-related impacts.

The City has indicated its intent to fund the design and implementation of widening of the east sidewalk of Fourth Street between Market and Howard streets, consistent with this improvement measure.

Improvement Measure IM-TR-4B: Fund the Design and Implementation of Upgraded Crosswalks at Intersections Adjacent to Moscone Center

Crosswalks could be widened and should be restriped to the Continental design, consistent with the *Better Streets Plan*. The project sponsor or other users or the City could reimburse SFMTA for costs associated with the design and implementation of upgrading all crosswalks at the following intersections:

- | | |
|------------------|----------------------------|
| • Fourth/Mission | • Fourth/Folsom |
| • Third/Mission | • Third/Folsom |
| • Fourth/Howard | • Fourth/Minna |
| • Third/Howard | • Yerba Buena Lane/Mission |

It should be noted that the project already includes an enhanced midblock crosswalk across Howard Street between Fourth and Third streets.

Improvement Measure IM-TR-4B would further reduce the proposed project's less-than-significant impacts related to pedestrians, and would not result in any secondary transportation-related impacts.

DPW has indicated their intent to fund the design and implementation of upgraded crosswalks, consistent with this improvement measure.

Improvement Measure IM-TR-4C: Fund the Design and Implementation of Red Turn Arrow Signals at the Intersections of Fourth/Howard and Fourth/Folsom.

At the intersection of Fourth Street/Howard Street, red arrow traffic signal aspects could be installed for both the southbound Fourth Street approach to Howard Street, and also for the westbound Howard Street approach to Fourth Street, which both currently have No Right/Left Turn on Red restrictions. At the intersection of Fourth Street/Folsom Street, red arrow traffic signal aspects could be installed for both the southbound Fourth Street approach to Folsom Street and for the eastbound Folsom Street approach to Fourth Street, which both currently have No Right/Left Turn on Red restrictions. The project sponsor, other users, or the City could reimburse SFMTA for costs associated with the design and implementation of the additional signal.

Improvement Measure IM-TR-4C would further reduce the proposed project's less-than-significant impacts related to pedestrians, and would not result in any secondary transportation-related impacts.

DPW has indicated their intent to reimburse SFMTA for costs associated with the design and implementation of the additional signals, consistent with this improvement measure.

City staff has revised EIR page IV.A-80, to add a new paragraph 5:

- * DPW has indicated their intent to implement construction measures, consistent with this improvement measure.

In response to comment WS-1 and/or City staff, EIR page IV.B-6, beginning at the second paragraph, is revised as follows:

- * The Moscone South expansion would be constructed above the renovated and expanded lobby along Howard Street, for a total height of approximately 95 feet, or about 68 feet taller than the existing lobby building. The top level of the Moscone South expansion would be set back approximately ~~70~~³⁵ feet from its southern edge for a roof terrace, which would result in a 57-foot-high roofline relative to the Children's Garden. The Esplanade expansion would also result in a building approximately 95 feet high, and would enclose mechanical equipment on the rooftop within a mesh screen that would rise to a height of approximately 110 feet. For both the South and Esplanade Expansion, a terrace would run along Howard Street with a 25-foot setback. ~~The top level of the Esplanade expansion would be set back approximately 35 feet from its northern edge along Howard Street, also for a roof terrace.~~ At project completion, the Moscone South expansion and Esplanade expansion would function and appear as one building. In addition, at project completion, the second story of the Moscone South Howard Street façade would extend over the ground level lobby by approximately 23 feet, creating an overhang above the pedestrian space below. ~~In addition, at project completion, the second stories of both the Moscone North and Moscone South facades along Howard Street would extend over the ground level lobbies by approximately 15 feet in the Moscone North building and 15 feet in the Moscone South building, creating overhangs above the pedestrian space below.~~

To evaluate the year-round impact from the Moscone Center Expansion project on public open spaces and nearby POPOS, a quantitative analysis of sunlight and shade was conducted for net new shadow using the 3-D project model. Although the applicable open spaces are not protected under Section 295 of the Planning Code, the approach used was consistent with the approach used by the Planning Department for Section 295 compliance, which is the standard approach for quantification of shadow impacts in San Francisco. The analysis consisted of calculating the amount of shadow coverage resulting from existing buildings at 15-minute intervals on one day per week, for six months of the year. The shadow coverage at the 15-minute intervals was averaged to calculate hourly shadow coverage (in shadow foot hours, or square foot hours of shadow; each shadow foot hour represents the equivalent of one square foot of shadow for a duration of one hour). The hourly figures for each day were added and resulting numbers extrapolated to weekly figures through averaging with the preceding week's total. Because the sun's path from January through June essentially mirrors its path from July through December, the six months' shadow foot hour totals were doubled to return a yearly figure.⁵

This quantitative analysis and associated images analyzed the proposed Moscone South expansion with a 95-foot-high top floor with a setback of 35 feet from the southern façade facing the Children's Garden. However, a mechanical penthouse rising to 110 feet has been added to the eastern half of the building, and the setback has been increased to 70 feet as a result of project changes described on EIR page II-28. An analysis of these project changes is included in this Section.

In response to comment WS-1 and/or City staff, Draft EIR page IV.B-13, Impact statement WS-3, has been revised as follows:

- * **Impact WS-3: The ~~proposed~~revised project would create new shadow in a manner that ~~could~~would not substantially affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas. (~~Significant and Unavoidable~~ Less than Significant)**

In response to comment WS-1 and/or City staff, Draft EIR page IV.B-19 has been revised as follows. The new text would be inserted after the second paragraph:

- * **Revised Project Design**
The design of the proposed project has been modified since publication of the Draft EIR. The proposed Moscone South Expansion top floor would be set back 70 feet from the southern façade of the building, which is an additional 35 feet to the 35-foot-setback analyzed in the Draft EIR (35 + 35 = 70). In addition, a mechanical penthouse has been added to the eastern half of the building. This penthouse would rise to a height of 110 feet above Howard Street.

⁵ This is the same methodology used by the Planning Department to calculate shadow and establish the Section 295 (Proposition K) baseline shadow coverage for other San Francisco parks.

Figure IV.B-5 presents projections of the shadow that would be cast by the revised project design on the Children's Garden during the late afternoon and early evening hours of the summer solstice, which is representative of the revised design's shadow during the late spring and early summer months. This is the time of year when net new shadow from the original project design was determined to affect use of the Children's Garden. The red outline represents the outer extent of the new shadow from the revised design, and the black line represents the outer extent of the shadow from the original design.

During these months of the year, shadow from the revised Moscone South building would be cast southeastward, onto the Children's Garden. At about 5:00 p.m., net new shadow would be limited to the area that currently encompasses the awareness garden, sundial garden, and Learning Garden immediately south of the proposed building, and the majority of the eastern portion of the Children's Garden would remain unshaded. By 6:00 p.m., shadow would extend farther southeastward, into the play circle and the monkey bars, sand box, and a portion of the area now occupied by the maze, although to a lesser extent than the shadow cast by the original design. By 7:00, when the play circle closes, the net new shadow from the revised design would extend across more than half of the play circle. A portion of the play circle, and most of the area that currently includes the circular lawn, would remain unshaded. As shown in **Figure IV.B-5b**, this area would have been shaded under the original design. By sunset -1 hour (one hour before sunset), the entirety of the Children's Garden would be shaded, under both the revised design and the original project design.

As Described in Chapter II, the Children's Garden would be modified under the proposed project. Under the revised design, around 5:00 p.m. during the late spring and early summer months, new shadow would fall on the replaced nature walk/allée of trees and paseo. As the evening progresses, shadow would extend southeastward onto the tot lot and flexible lawn space by 6:00 p.m. By 7:00 p.m., shadow would extend over the social seating, more than half of play circle, and a portion of the relocated learning garden, as well as onto the plaza adjacent to the Esplanade Ballroom. The nature walk/fern dell, and most of the relocated learning garden, would remain unshaded at 7:00 p.m.

In summary, under the revised project design, in the late afternoons and early evenings in the late spring and early summer months, the majority of the garden would remain unshaded until approximately 7:00 p.m., when the play circle officially closes. Even at that hour, a portion of the play circle and learning garden would remain unshaded. Therefore, the net new shadow cast by the revised design could affect use of the garden, but not to a significant extent.

The revised project design also includes a mechanical penthouse on the Esplanade portion of the Moscone South and Esplanade building, at the corner of Howard Street and Third Street. This mechanical penthouse would be a mesh screen rising to a height of 110 feet. The 110-foot-high screen of the revised project design would cast less shadow than a 119-foot-building in the same location, and therefore it would not be expected to substantially affect the use of the East Garden or Howard Street Plaza.

In response to comment WS-1 and/or City staff, Draft EIR pages IV.B-20 through IV.B-21 have been revised as follows:

*

As established in the analysis above, the project shadow analysis found that the Moscone Center Expansion project would shade the four distinct areas of Yerba Buena Gardens. For each of these open spaces (except for the Children's Garden), the project shadow would be limited in amount and/or duration, would typically fall on the open spaces at times of relatively limited use, or new shadow would not be expected to substantially affect the use of that space. With respect to the Esplanade, net new shadow would be evident primarily in the early morning, when the space has been observed to be less heavily used than during the midday period. ~~However, net~~Net new shadow would fall on the Children's Garden in the late afternoon and early evening hours in the late spring and early summer months, when the play circle is likely heavily used. ~~Net new shadow on the Children's Garden could~~Net new shadow would not substantially affect its use at that time.

This net new shadow would be cast by the 95-foot-tall Moscone South and Esplanade Building, which would be 68 feet taller than the existing building. The building would be located directly adjacent to the Children's Garden, a location that would result in the greatest increase in net shadow because there are no existing intervening structures that cast shadow under existing conditions. ~~Therefore, minor design changes or setbacks to the proposed project would result in only marginal improvement in project shadow conditions. Mitigation of this net new shadow would require redesign.~~Modification of the proposed project has occurred since publication of the Draft EIR, reducing shadow effects compared to those originally analyzed to remove or downsize the new building. Please see Chapter VI for an analysis of a Modified Massing Alternative that would incorporate more substantial design changes to reduce this impact as compared to the original project.

Net new shadow on the East Garden and on Howard Street Plaza would not be expected to substantially affect their use. Also, although net new shadow would be cast on sidewalks in the project site vicinity, it would not be anticipated to substantially affect their use.

The POPOS have been developed in an area with tall height limits, where nearby mid- and high-rise development already does (and may in the future) cast shadow on those spaces. At the times of greatest existing and new shadow, these open spaces are primarily traversed by pedestrians or used by workers. Given the limited shadow that would be cast by the proposed project buildings, as well as the nature of these open spaces already surrounded and partly shaded by existing buildings, it is reasonable to conclude that project shadow would not adversely affect the use of POPOS.

In conclusion, the net new shadow ~~could~~could ~~from the revised project would not~~ substantially affect the use of the Children's Garden or other public open space. ~~There is no available mitigation for shadow impacts other than substantial redesign of the proposed project~~

(see Chapter VI, Alternatives). No feasible mitigation measures have been identified. Therefore, the impact would be less than significant. ~~significant and unavoidable.~~

Mitigation: None required ~~available~~.

*

Cumulative Impacts

Impact C-WS-2: The ~~proposed~~ revised project, in combination with past, present, or reasonably foreseeable future projects, would not create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of the Recreation and Park Department, ~~but it would~~ and it would not create new shadow in a manner that could substantially affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas. (~~Significant and Unavoidable~~ Less than Significant)

In response to comment WS-1 and/or City staff, Draft EIR page IV.B-22, second paragraph, is revised as follows:

*

Regarding the Children's Garden, as stated above, the ~~proposed~~ revised project would result in a less-than-significant project-level ~~significant and unavoidable~~ shadow impact on the Children's Garden. As indicated above, the shadow would be cast on relocated features under the proposed project, including the nature walk/allée, paseo, plaza, and flexible lawn. Another nearby project that would result in increased shadow on the Children's Garden is the 250 Fourth Street hotel project. This project includes the demolition of a three-story education and office building and construction of an 11-story, 119-foot-tall hotel. The 250 Fourth Street project is located on the northwest corner of Fourth and Clementina Streets, west of the project site, and would also cast shadow on the Children's Garden, although the maximum extent would be during the afternoon hours during the late fall and winter months.¹⁹

~~However, the~~ The project shadow, combined with the shadow from the 250 Fourth Street project, would not result in a cumulative impact on the Children's Garden; These shadows would fall on the Children's Garden at different times of year and at slightly different times of day. Given the temporary nature of these shadow effects, and their dispersal across opposite times of the year (late fall/early winter vs. late spring/early summer), they would not combine to substantially affect use of the Children's Garden, and the cumulative impact would be less than significant ~~and the project would result in a considerable contribution to that cumulative impact.~~

¹⁹ San Francisco Planning Department, *Mitigated Negative Declaration: 250 Fourth Street Project, Case No. 2011.0038E*, December 12, 2012, amended January 4, 2013.

In response to comment WS-1 and/or City staff, Draft EIR page IV.B-23 is revised as follows:

*

Conclusion

The proposed project would not contribute considerably to cumulative shadow impacts on Section 295 parks or POPOS, ~~or but it would make a considerable contribution to cumulative shadow impacts on other open spaces under public jurisdiction (the Children’s Garden). As discussed above, there is no available mitigation for shadow impacts other than substantial redesign of the proposed project. Thus, no feasible mitigation measures have been identified.~~ Therefore, cumulative impacts on the use of existing publicly accessible open space or outdoor recreation facilities or other public areas would be less than significant~~significant and unavoidable~~.

Mitigation: None ~~required~~available.

Figures IV.B-5a and -5b have been inserted into the document, to reflect the changes to the project description and clarify the shadow analysis. They are shown at the end of this section.

In response to comment WS-1 and/or City staff, Draft EIR page V-2 under the heading “Significant Unavoidable Impacts” has been revised as follows:

*

~~In accordance with Section 21067 of the California Public Resources Code, and with Sections 15040, 15081, and 15082 of the CEQA Guidelines, an environmental impact report (EIR) must identify potential impacts that could not be eliminated or reduced to an insignificant level. As explained in Section IV.B, the project would result in the following significant and unavoidable impacts:~~

- ~~• Create new shadow in a manner that could affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.~~
- ~~• In combination with past, present, or reasonably foreseeable future projects, create new shadow in a manner that could affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas.~~

With modifications to the project as described in this EIR, there are no significant and unavoidable impacts.

In response to comment WS-1 and/or City staff, Draft EIR page V-3, fourth bullet has been revised as follows:

*

Wind and Shadow—alter wind in a manner that substantially affects public areas; create new shadow in a manner that would affect the use of any park or open space under the jurisdiction of, or designated for acquisition by, the Recreation and Park Department; create new shadow in a manner that would substantially affect the use of other existing publicly accessible open space or outdoor recreation facilities or other public areas

In response to comment WS-1 and/or City staff, Draft EIR page VI-3 under the heading “Significant and Unavoidable Impacts” has been revised as follows:

* **Significant and Unavoidable Impacts**

~~**Shadow.** As stated in Section IV.B, under **Impact WS-3** and **Impact C-WS-2**, the project would result in significant and unavoidable project and cumulative level shadow impacts. The Moscone South Expansion would result in a net increase in shadow on the Children’s Garden during the late afternoon / early evening hours in the late spring and early summer months, which could substantially affect the use of the open space.~~

With modifications to the project as described in this EIR, there are no significant and unavoidable impacts.

In response to comment WS-1 and/or City staff, Draft EIR Table VI-1 on page VI-7 is revised as shown on the following page.

In response to comment WS-1 and/or City staff, Draft EIR page VI-11, first paragraph, is revised as follows:

* Alternative 2 would result in the same above-ground Moscone South and Esplanade Expansion as the proposed project as analyzed in the Draft EIR, with the same building massing. Therefore, it would cast net new shadow of the same duration and geographic extent on open spaces, including the Children’s Garden, as the new shadow cast under the proposed project. Significant and unavoidable shadow impacts on the Children’s Garden at the project and cumulative level would result.

In comparison to the proposed project, other topics that were addressed in the Initial Study (Appendix A) and found to have no impacts or less-than-significant impacts including land use, population and housing, historic architectural resources, noise, greenhouse gas emissions, wind, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, mineral and energy resources, and agricultural and forest resources, would also have no impacts or similar less-than-significant impacts for the Reduced Project Alternative.

Alternative 2 – Conclusions

The Reduced Project Alternative would meet or partially meet most of the project objectives. However, the additional below-ground exhibition space would be limited to reconfiguring and repurposing existing below-ground areas, and would not be contiguous between the Moscone North and South buildings. Therefore, the first two objectives would not be fully met under the Reduced Project Alternative. This alternative would avoid or substantially reduce impacts to known archeological resources and human remains, and would reduce impacts associated with air quality and removal of hazardous building materials. All of the same mitigation measures applicable to the proposed project’s construction activities would be applicable for this alternative’s

*

TABLE VI-1 (Continued)
COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF THE CEQA ALTERNATIVES

Category of Significant Environmental Impact	Proposed Project	No Project Alternative	Alternative 2: Reduced Project Alternative	Alternative 3: Modified Massing Alternative
Shadow	<p>Significant and unavoidable impact: The project would create new shadow in a manner that could affect the use of the Children's Garden.</p> <p>Also, the project, combined with past, present, and reasonably foreseeable future development, would create new shadow in a manner that could affect the use of the Children's Garden. The project would considerably contribute to this impact.</p>	<p>No Impact</p> <p>Because there would be no new above-ground structures under Alternative 1, there would be no potential to increase shadow.</p>	<p>Unchanged</p> <p>Because Alternative 2 would result in the same above-ground Moscone South and Esplanade Expansion as the proposed project, it would cast net new shadow of the same duration and geographic extent on the Children's Garden.</p>	<p>Decreased</p> <p>Because the massing of new above-ground structures would be concentrated at the southwest corner of Third Street and Howard Street, net new shadow would be cast on the Children's Garden to a lesser extent and duration than under the proposed project.</p> <p>The increased building height at the corner of Third Mission would incrementally increase the extent and duration of shadow cast on Yerba Buena Gardens and other public open spaces.</p>

construction activities. The alternative would reduce total daily attendance and number of events, and therefore operational transportation impacts related to passenger and truck loading/unloading would be reduced, but not eliminated. The alternative would not reduce, relocate, or eliminate building massing; therefore, it would result in the same significant and unavoidable shadow impacts at the project and cumulative levels as the Proposed Project as analyzed in the Draft EIR.

In response to comment WS-1 and/or City staff, Draft EIR page VI-18, second-to-last paragraph, is revised as follows:

- * Because the massing of new above-ground structures would be concentrated at the southwest corner of Third Street and Howard Street, net new shadow would be cast on the Children’s Garden to a similar ~~lesser~~ extent and duration as ~~than under the revised proposed~~ project, resulting in a similar less-than-significant shadow impact.

In response to comment WS-1 and/or City staff, Draft EIR page VI-19, third paragraph, is revised as follows:

- * ***Alternative 3 – Conclusions***

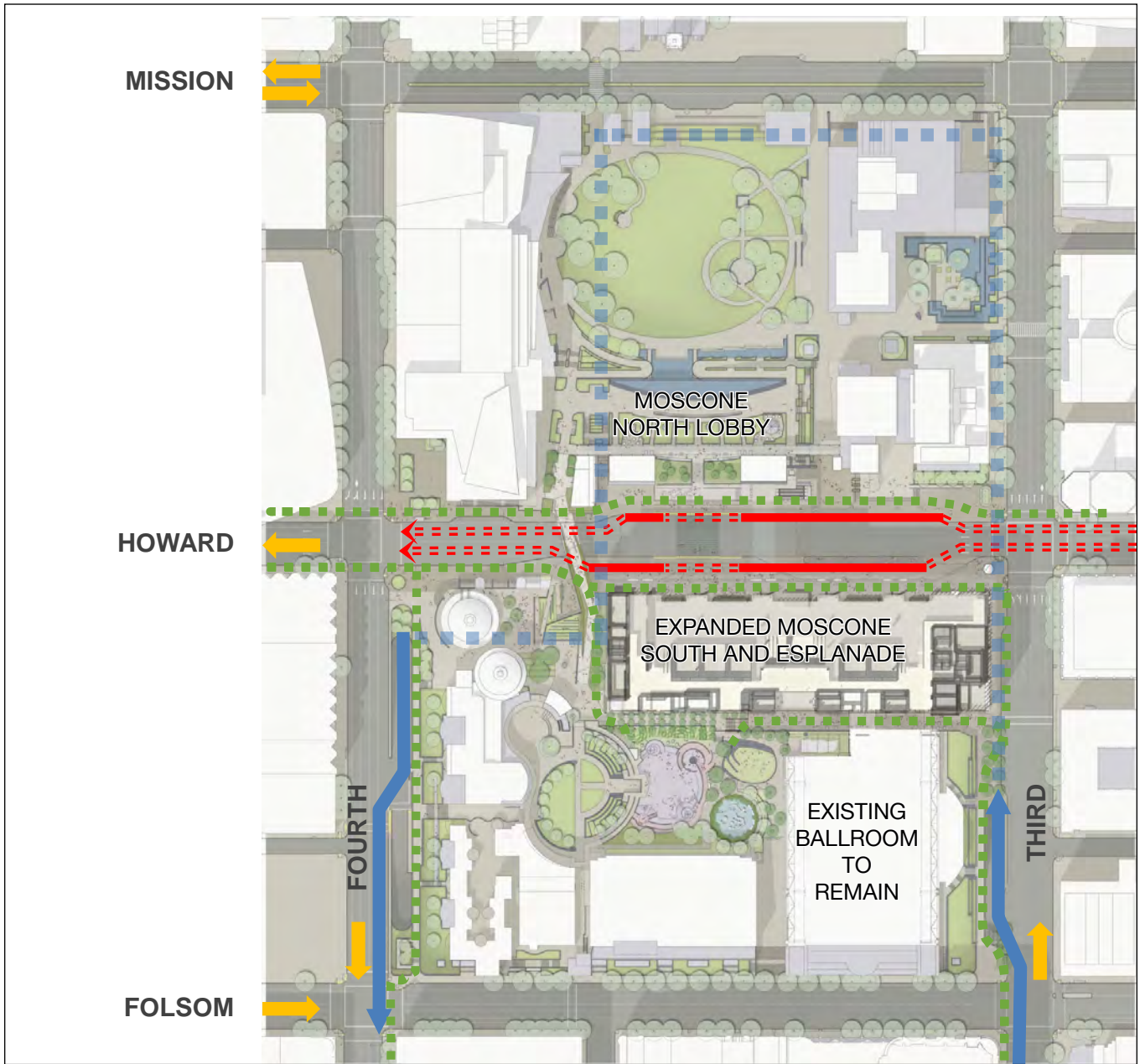
The Modified Massing Alternative would meet or partially meet most of the project objectives. However, the alternative would result in less efficient meeting and ballroom space than the proposed project. The alternative would create an iconic and architecturally significant arrival experience, relocate vehicular and service functions to create uninterrupted pedestrian-favored sidewalks, and reinforce and improve connections among existing open spaces, but it would result in a less efficient building than would the proposed project. All of the same mitigation measures applicable to the proposed project’s construction activities (Mitigation Measures CP-2a, CP-2b, AQ-1, and HZ-3) would be applicable for this alternative’s construction activities. Impacts to passenger and truck loading/unloading would be the same as the proposed project, requiring implementation of Mitigation Measures M-TR-6a and M-TR-6b to reduce loading impacts to a less-than-significant level. Less-than-significant shadow impacts would occur. Shadow impacts would be reduced to a less than significant level.

In response to comment WS-1 and/or City staff, Draft EIR page VI-20, first paragraph, is revised as follows:

- * The Modified Massing Alternative (Alternative 3) would qualify as the environmentally superior alternative among the development alternatives. Alternative 3 would result in construction-related impacts on archeological resources, human remains, air quality, and hazardous materials, all of which would be less-than-significant with the implementation of mitigation measures. While less than significant, air quality impacts would be slightly less than those of the revised project because the revised project would include a third floor of the Moscone South Expansion, rising to approximately 95 feet above Howard Street, while the Moscone South building under the Modified Massing Alternative would

only include two floors, rising to a height of 74 feet above Howard Street. Alternative 3 would also result in significant-but-mitigable truck and passenger loading transportation impacts during operations. The alternative would result in shadow impacts similar to those of the revised project and shadow impacts under Alternative 3 would be less than significant at both a project and cumulative level.

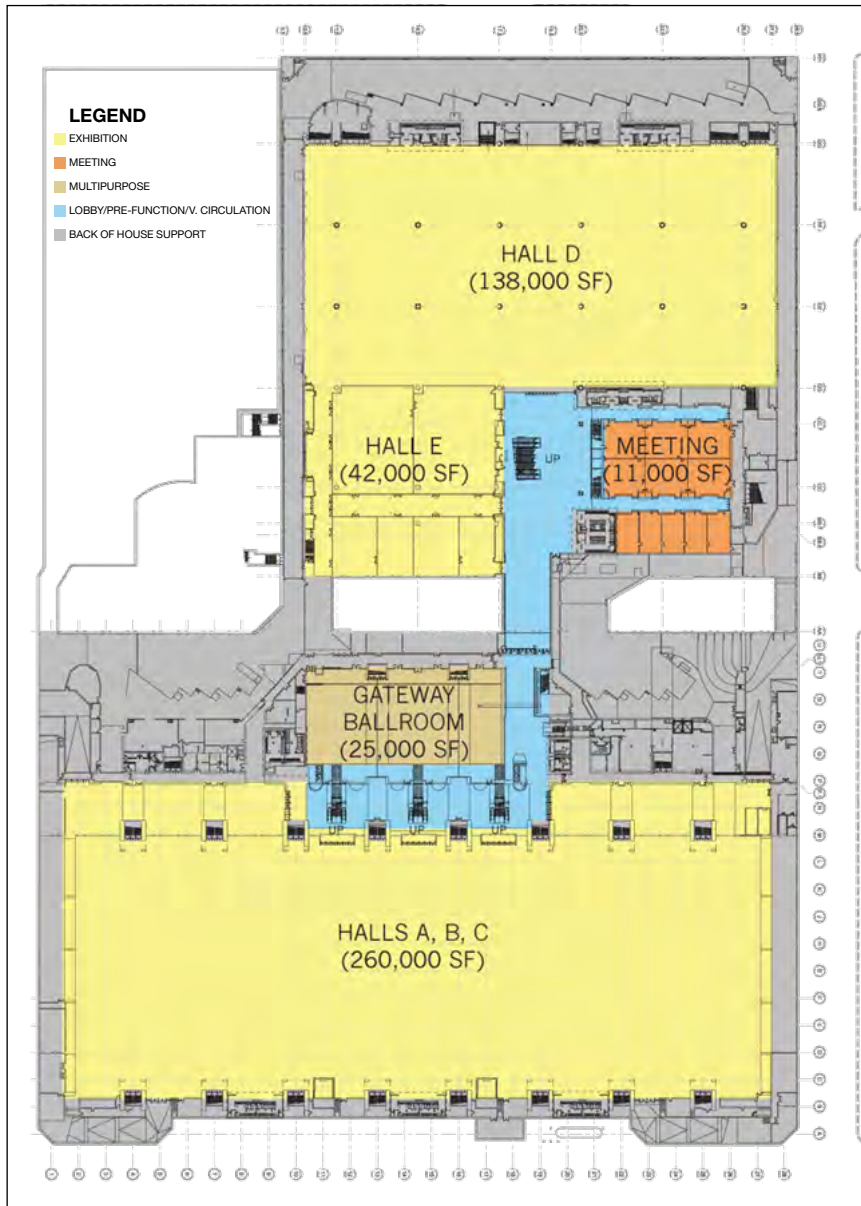
~~The Modified Massing Alternative would avoid the significant and unavoidable shadow impact on the Children's Garden. While this alternative would not reduce impacts to archeological resources, human remains, air quality, hazardous building materials, or transportation impacts, with incorporation of mitigation measures identified for the proposed project, impacts to these resource topics would be reduced to a less than-significant level. Therefore, with implementation of mitigation measures, the Modified Massing Alternative would not result in any significant and unavoidable impacts and impacts to all resource topics would be reduced to a less than significant level.~~



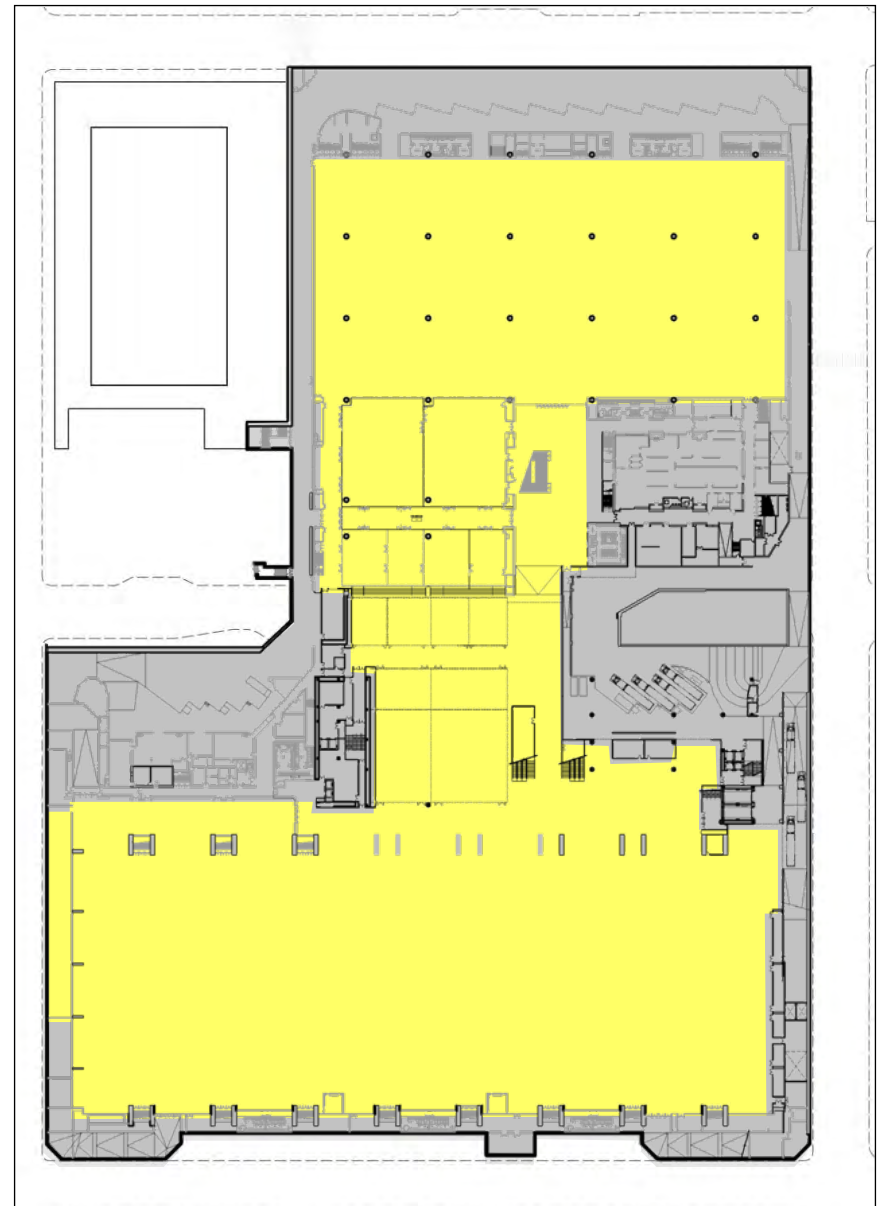
SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects, 2014

Moscone Center Expansion Project 2013.0154E
Figure II-3 (REVISED)
 Proposed Site Plan

RTC-88



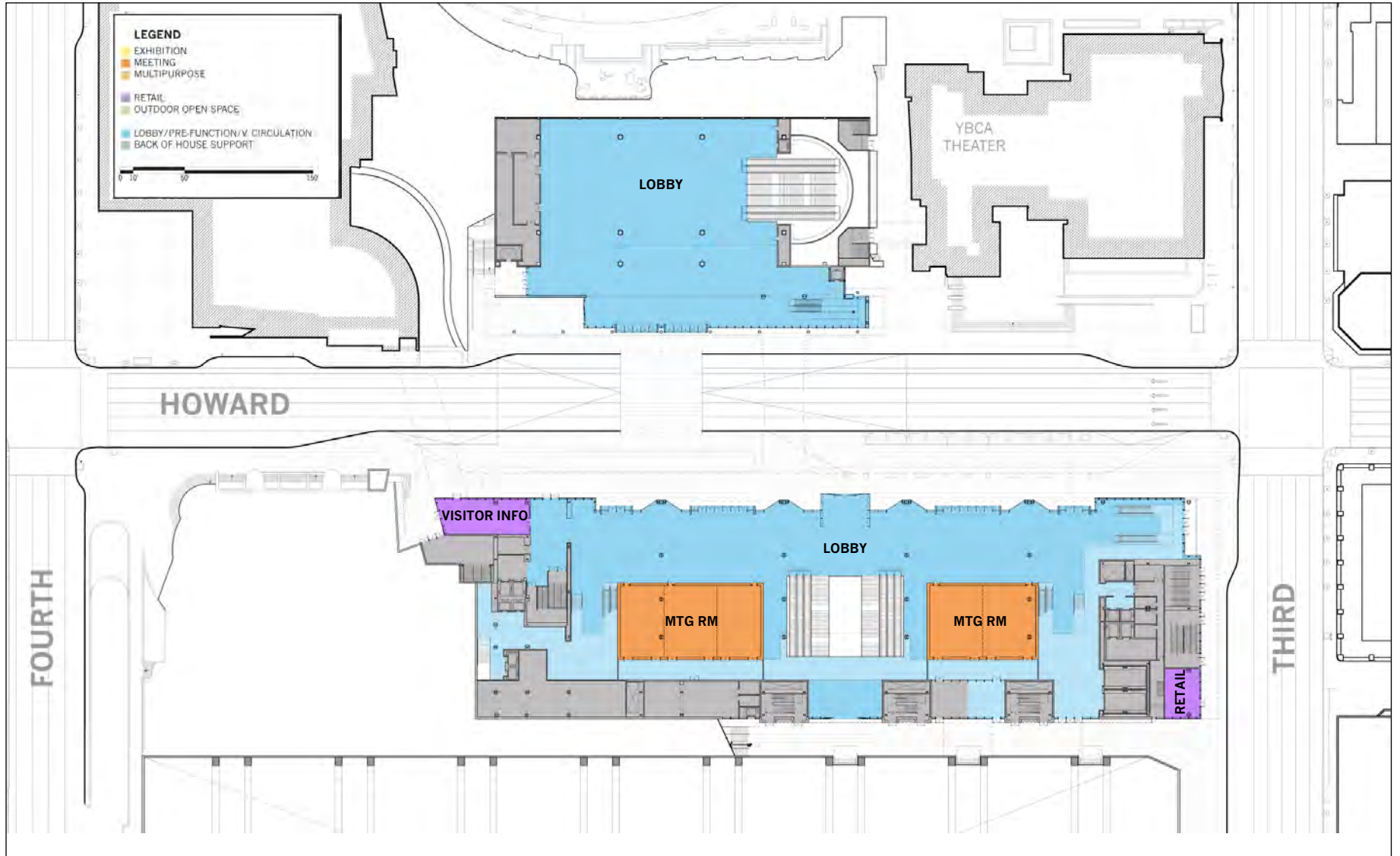
Existing



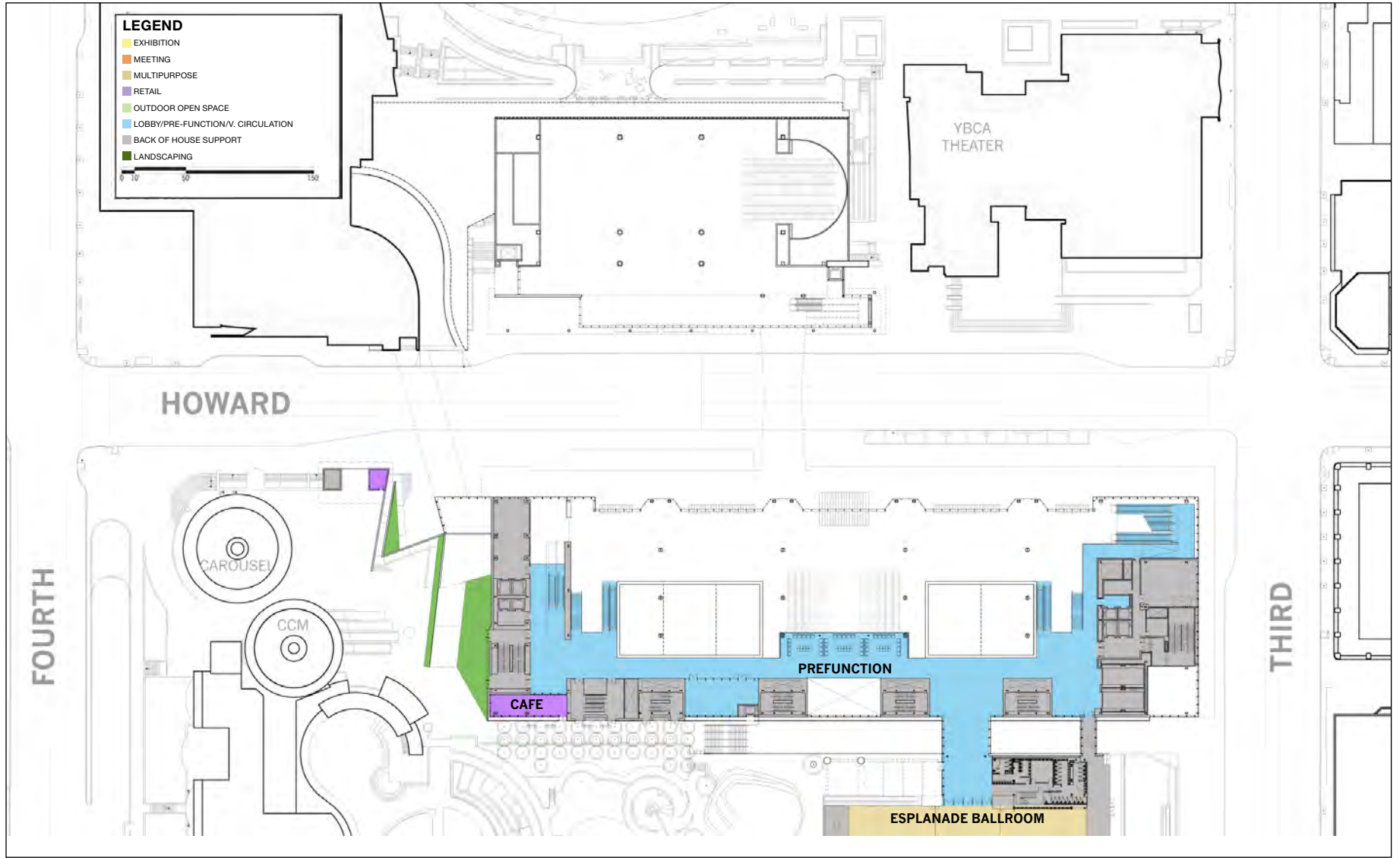
Proposed

SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects

Moscone Center Expansion Project 2013.0154E
Figure II-4 (REVISED)
Existing and Proposed Lower Level Plan



RTIC-90

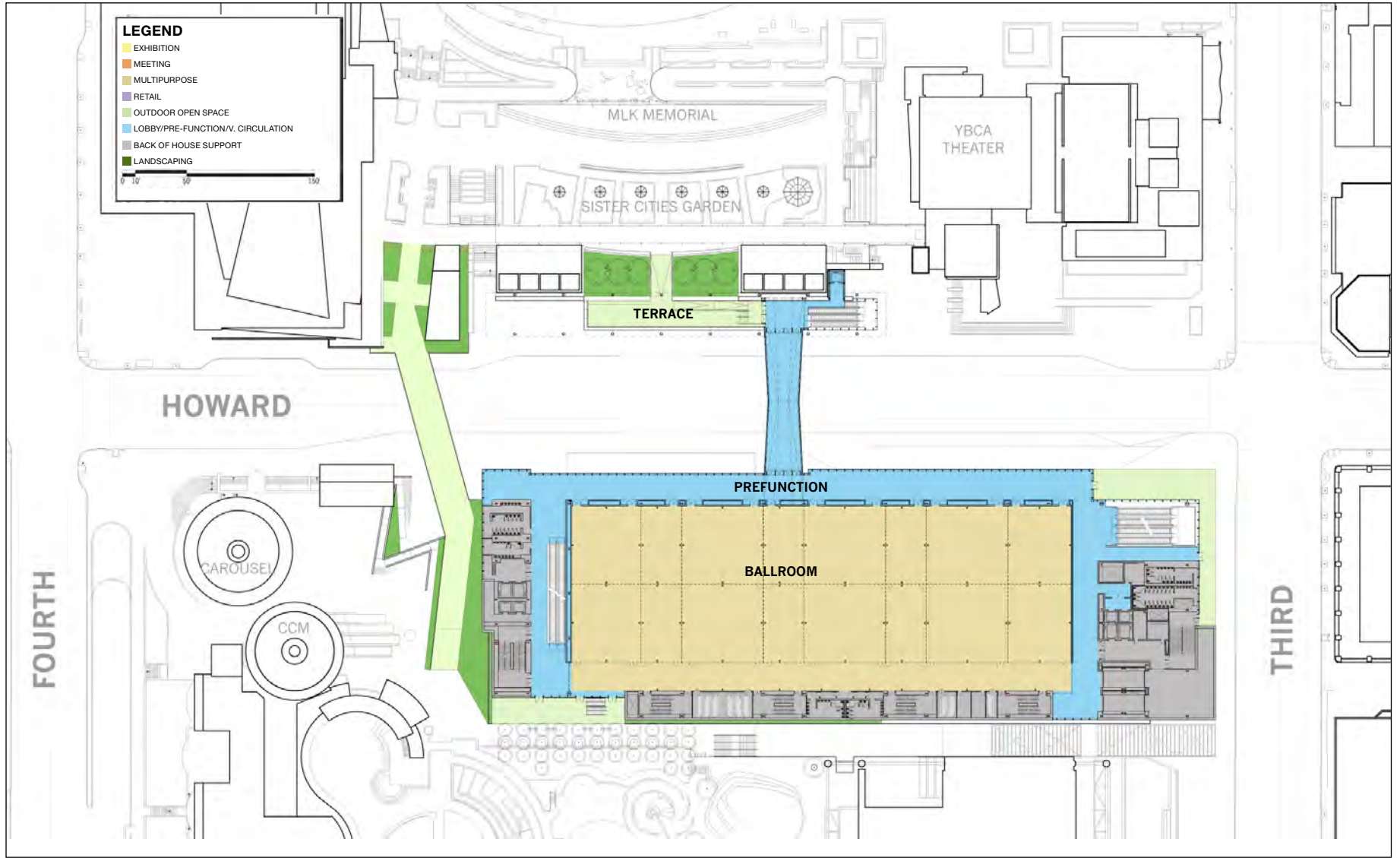


SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects, 2014

Moscone Center Expansion Project 2013.0154E

Figure II-6 (REVISED)
Proposed Mezzanine Plan

RTIC-91

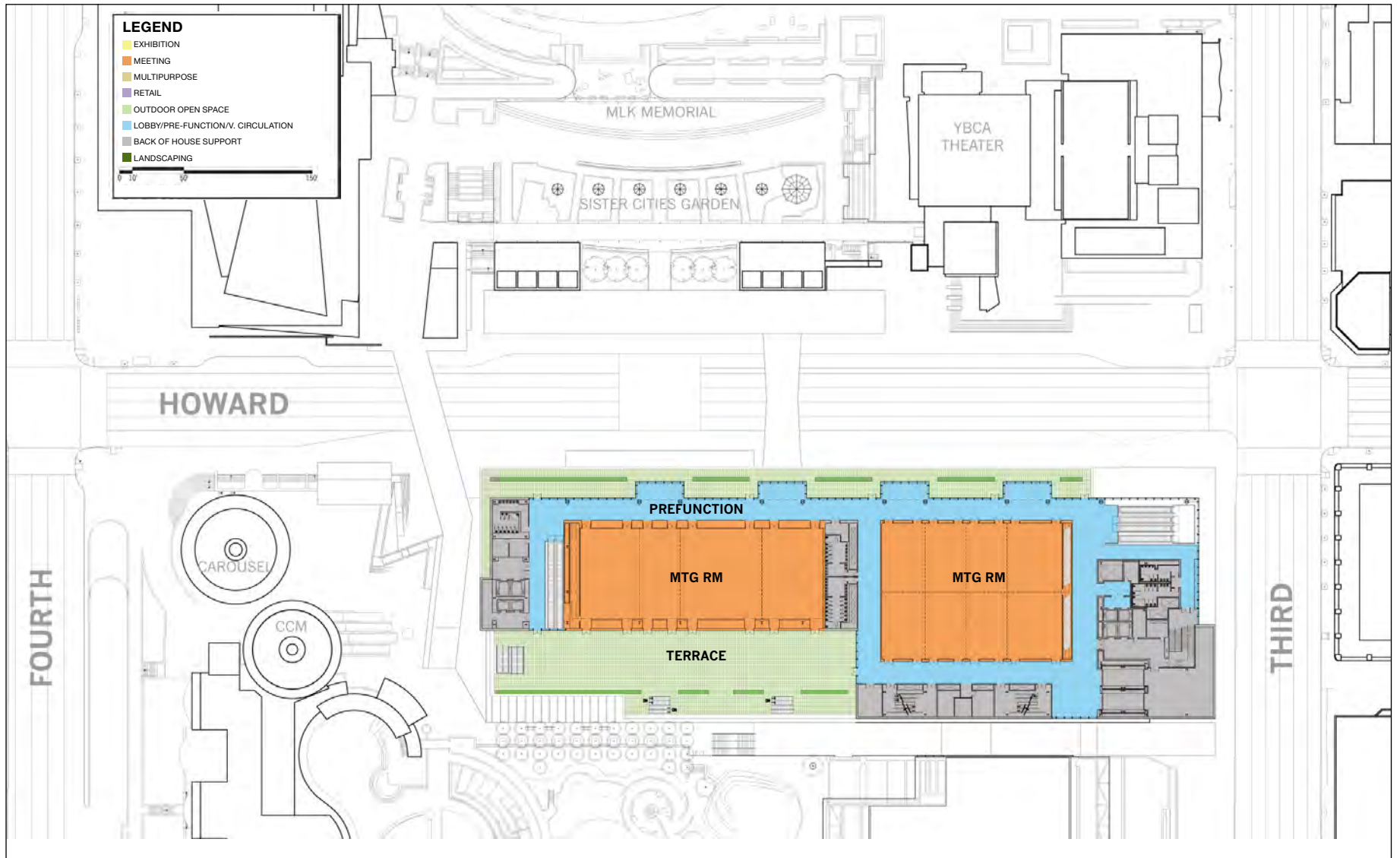


SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects, 2014

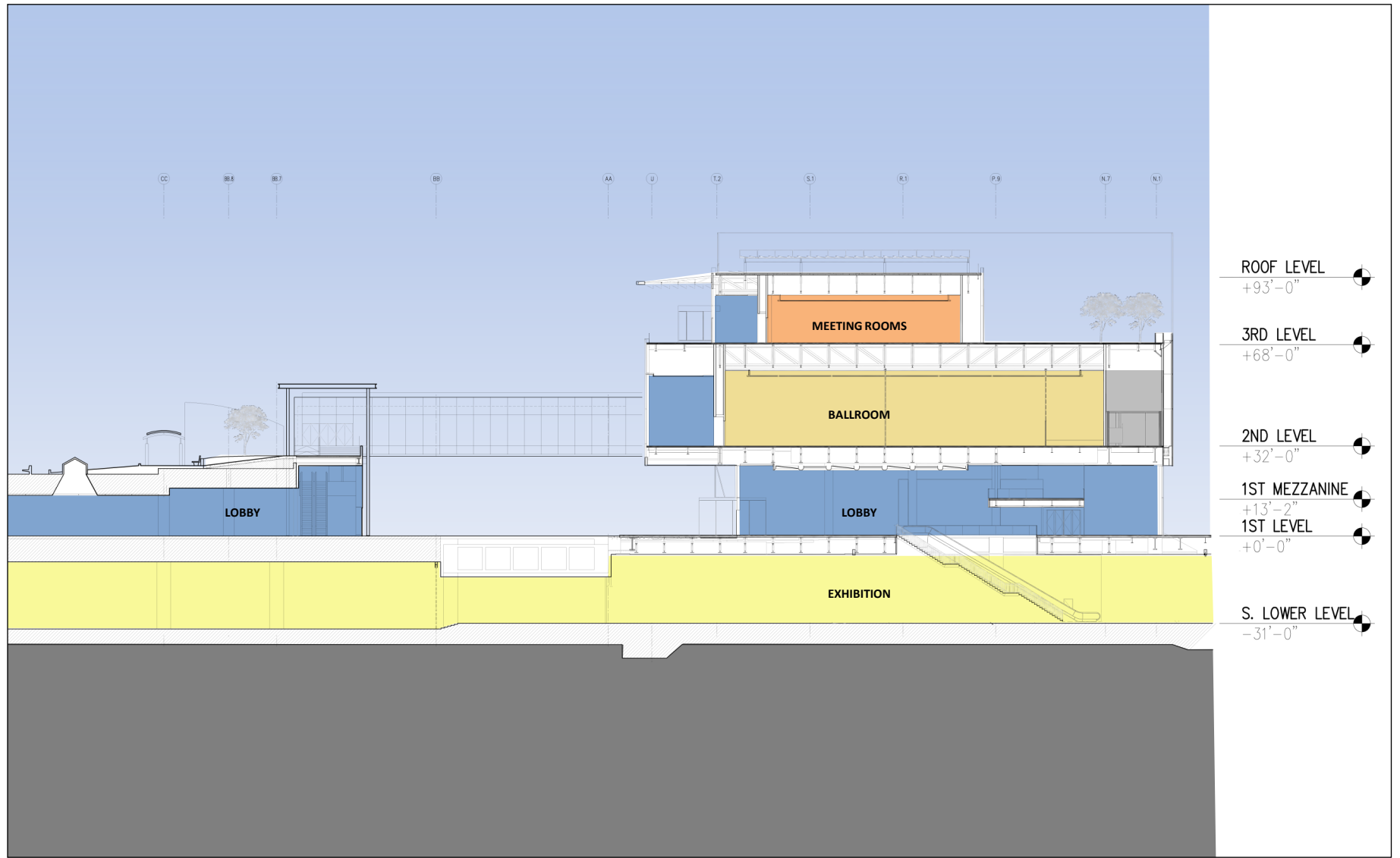
Moscone Center Expansion Project 2013.0154E

Figure II-7 (REVISED)
Proposed Level 2 Plan

RTC-92

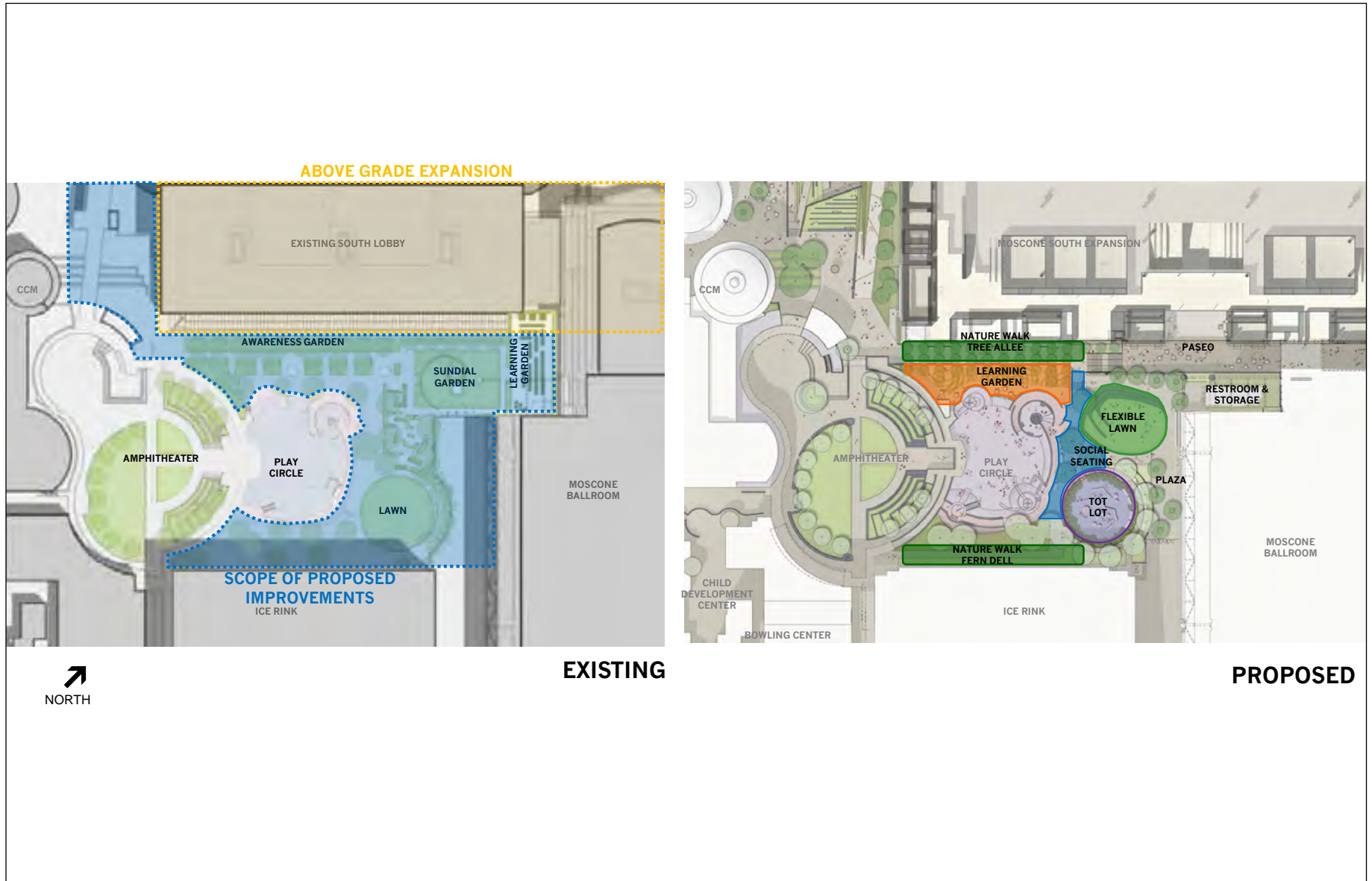


RTIC-93

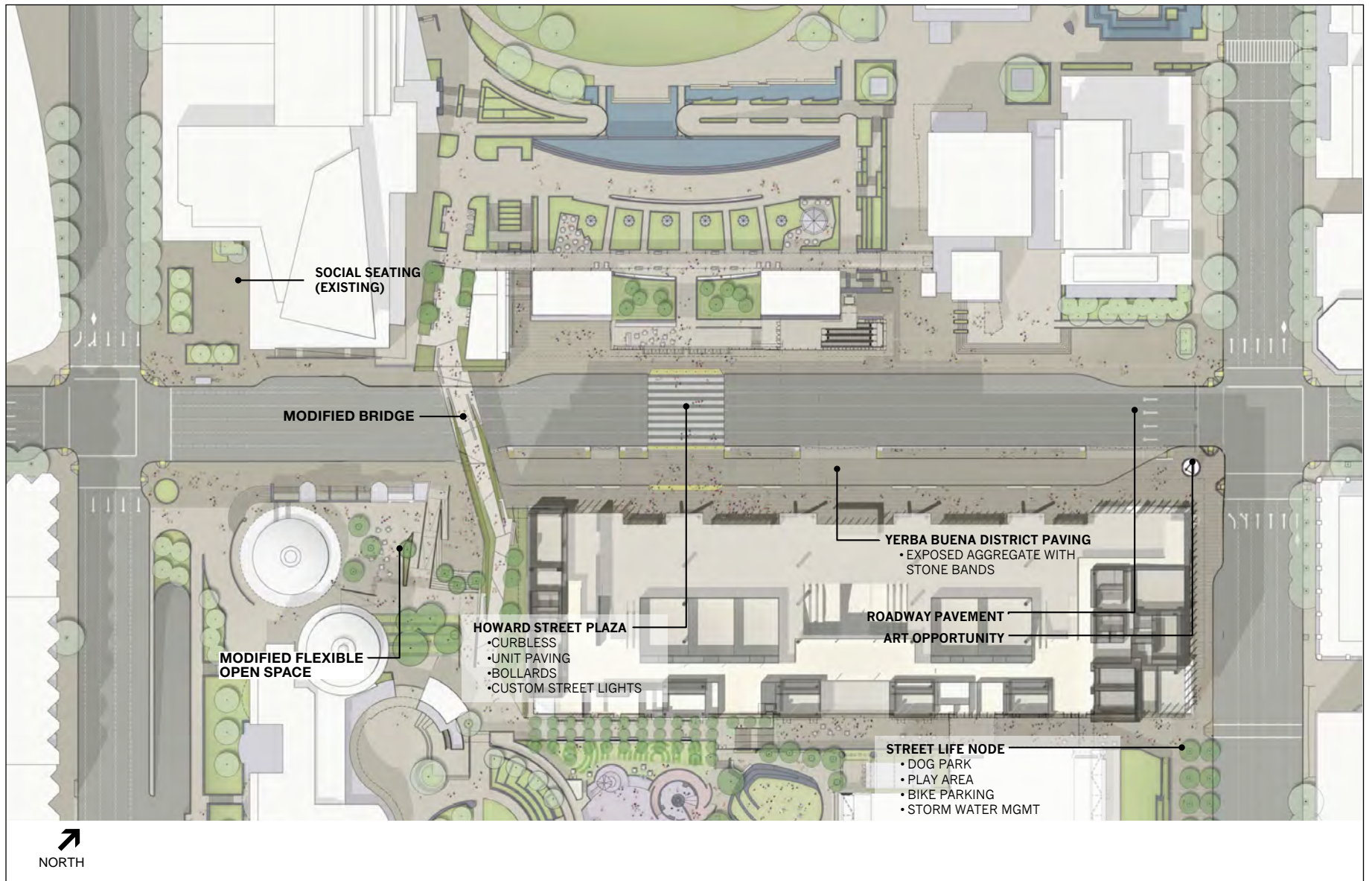


SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects, 2014

Moscone Center Expansion Project 2013.0154E
Figure II-9 (REVISED)
Section Through North and South Lobby Buildings Looking East



RTC-95

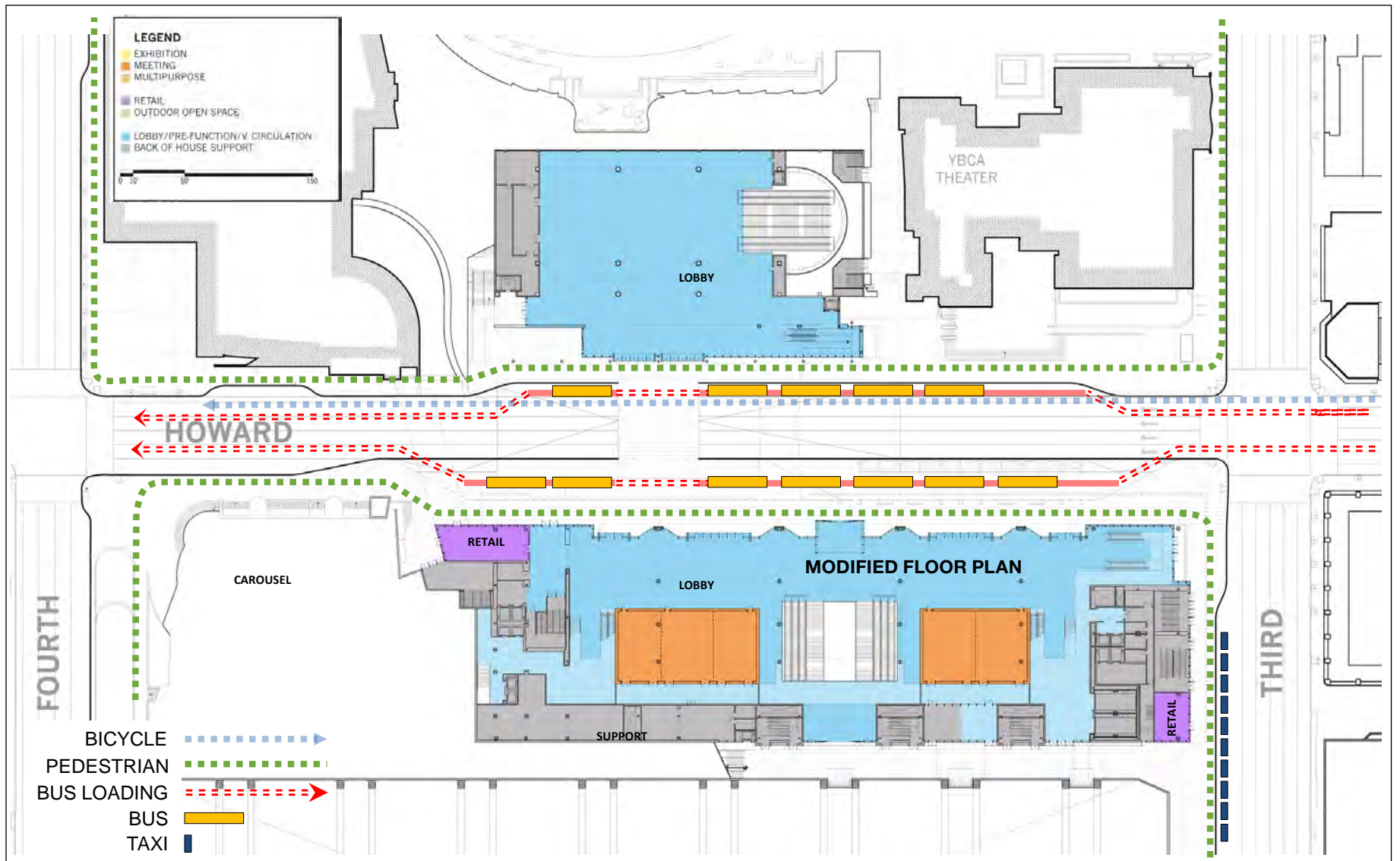


SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects, 2014

Moscone Center Expansion Project 2013.0154E

Figure II-10b (REVISED)
Proposed Landscaping Plan

RTIC-96

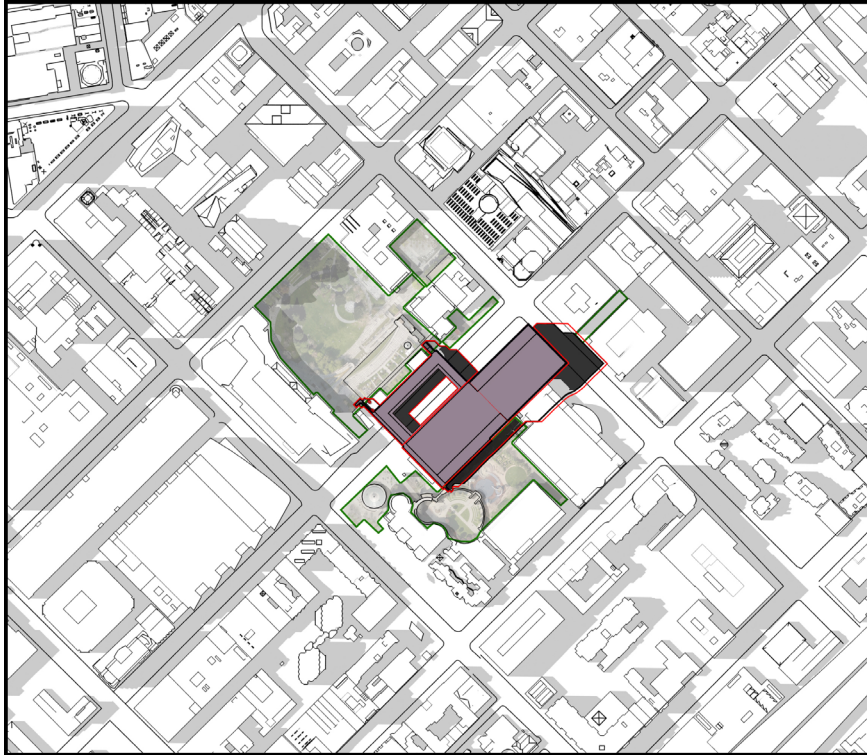


SOURCE: Skidmore, Owings & Merrill, LLP / Mark Cavagnero Associates Architects, 2014

Moscone Center Expansion Project 2013.0154E
Figure II-11 (REVISED)
 Proposed Howard Street Conditions








12



5:00pm



6:00pm

-  Open Space Perimeter
-  Extent of Project-Generated Shadow (Original Design)
-  Existing Shadow
-  Net New Project Shadow (Original Design)
-  Extent of Project-Generated Shadow (Revised Design)





7:00pm



Sunset -1 hour

- Open Space Perimeter
- Extent of Project-Generated Shadow (Original Design)
- Existing Shadow
- Net New Project Shadow (Original Design)
- Extent of Project-Generated Shadow (Revised Design)



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ATTACHMENT 1

DEIR Comment Letters

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DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-6053
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

RECEIVED

JUN 23 2014

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

*Serious Drought.
Help save water!*

June 13, 2014

SFVAR011
SF/Various
SCH# 2014012050

Ms. Elizabeth Purl
Planning Department
City and County of San Francisco
1650 Mission Street
San Francisco, CA 94103

Dear Ms. Purl:

Moscone Center Expansion Project – Notice of Preparation (NOP)

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. We have reviewed the NOP and have the following comment to offer.

Traffic Safety

We would like to provide you with the actual accident rates for the state highway facilities (e.g. off-ramps and on-ramps, freeway segments) affected by this development, along with the average accident rates for similar facilities statewide. These are listed in the attached Table B's. Please confirm that you approve of these findings in the next circulation.

Should you have any questions regarding this letter, please contact Shawn Hallum of my staff at (510) 622-1696 or shawn.hallum@dot.ca.gov.

Sincerely,

ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

California Department of Transportation

OTM22130

Table B - Selective Accident Rate Calculation

Policy controlling the use of Traffic Accident Surveillance and Analysis System (TASAS) - Transportation Systems Network (TSN) Reports

1. TASAS - TSN has officially replaced the TASAS - "Legacy" database.
2. Reports from TSN are to be used and interpreted by the California Department of Transportation (Caltrans) officials or authorized representative.
3. Electronic versions of these reports may be emailed between Caltrans' employees only using the State computer system.
4. The contents of these reports shall be considered confidential and may be privileged pursuant to 23 U.S.C. Section 409, and are for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Do not print, copy or forward.

OTM22130

Table B - Selective Accident Rate Calculation

Report Parameters-

Event ID: 3633651

Request Name: MAINLINE + RAMPS

Ref Date: 06/06/2014

Request- & Line	L O C	D I R	L S C	Route/Location	Begin Date	End Date	Rate Type	Out Seq	Override Rates			Override ADT		Req. Type	Com- bine?	Excl Ramp?
									Rate	Inj%	Fat%	Main	Cross			
1 1	H	T	I	04 SF 080 004.731 - 04 SF 080 004.932	01-JUN-09	31-MAY-12	N	L						N	N	N

Event Log:

Job id is : 558145 Accidents Table B Request MAINLINE + RAMPS Submitted by T4CHO
04 SF 080 4.731 - 04 SF 080 4.932 06/01/2009 TO 05/31/2012

Location Description	Rate Group (RUS)	No. of Accidents / Significance								Pers Kld Inj	ADT Main X-St	Total MV+ or MVM	Accident Rates					
		Tot	Fat	Inj	F+I	Multi Veh	Wet	Dark	Actual				Average					
												Fat	F+I	Tot	Fat	F+I	Tot	
04 SF 080 004.731 - 04 SF 080 004.931 0001-0001 2009-06-01 2012-05-31	.201 MI H U	104 H99	0	27	27	97	11	40	0	183.9	40.51	0.000	67	2.57	0.004	.27	.88	

Accident Rates expressed as: # of accidents / Million vehicle miles

+ denotes that Million Vehicles (MV) used in accident rates instead (for intersections and ramps).

For Ramps RUS only considers R(Rural) U(Urban)

California Department of Transportation

OTM22130

Table B - Selective Accident Rate Calculation

Policy controlling the use of Traffic Accident Surveillance and Analysis System (TASAS) - Transportation Systems Network (TSN) Reports

1. TASAS - TSN has officially replaced the TASAS - "Legacy" database.
2. Reports from TSN are to be used and interpreted by the California Department of Transportation (Caltrans) officials or authorized representative.
3. Electronic versions of these reports may be emailed between Caltrans' employees only using the State computer system.
4. The contents of these reports shall be considered confidential and may be privileged pursuant to 23 U.S.C. Section 409, and are for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Do not print, copy or forward.

OTM22130

Table B - Selective Accident Rate Calculation

Report Parameters-

Event ID: 3633652

Request Name: MAINLINE + RAMPS

Ref Date: 06/06/2014

Request- & Line	L O	D I	L S	Route/Location	Begin Date	End Date	Rate Type	Out Seq	Override Rates			Override ADT		Req. Type	Com- bine?	Excl Ramp?
									Rate	Inj%	Fat%	Main	Cross			
1 1	H	T	I	04 SF 280 T006.996 - 04 SF 280 T007.259	01-JUN-09	31-MAY-12	N	L						N	N	N

Event Log:

Job id is : 558146 Accidents Table B Request MAINLINE + RAMPS Submitted by T4CHO
04 SF 280 T 6.996 - 04 SF 280 T 7.259 06/01/2009 TO 05/31/2012

California Department of Transportation
Table B - Selective Accident Rate Calculation

Location Description	Rate Group (RUS)	No. of Accidents / Significance								Pers Kld Inj	ADT Main X-St	Total MV+ or MVM	Accident Rates					
		Tot	Fat	Inj	F+I	Multi Veh	Wet	Dark	Actual				Average					
									Fat				F+I	Tot	Fat	F+I	Tot	
04 SF 280 T006.996 - 04 SF 280 T007.258 0001-0001 2009-06-01 2012-05-31	.263 MI H 38 36 mo. U	29	0	17	17	20	3	9	0	67.2	19.38	0.000	88	1.50	0.010	60	1.45	

Accident Rates expressed as: **# of accidents / Million vehicle miles**

+ denotes that **Million Vehicles (MV)** used in accident rates instead (for intersections and ramps).

For Ramps RUS only considers R(Rural) U(Urban)

From: Marvis Phillips <marvisphillips@gmail.com>
Sent: Friday, June 13, 2014 7:15 PM
To: Purl, Elizabeth (CPC); Wiener, Scott; Kim, Jane (BOS); Cohen, Malia (BOS)
Cc: Van de Water, Adam (MYR); Avalos, John (BOS); Breed, London (BOS); Campos, David (BOS); Chiu, David (BOS); Farrell, Mark (BOS); Mar, Eric (BOS); Tang, Katy (BOS); Yee, Norman (BOS); Board of Supervisors (BOS); mayoredwin.lee@sfgov.org
Subject: Moscone Center Expansion Project

Dear Land Use Committee Members, Board of Supervisors, and Planning Commission Members,

RE: Planning Case #2013.0154E, Moscone Center Expansion Project

On June 10, 2014, Adam Vandewater from the Mayor's Office of Economic and Workforce Development, did a presentation at the Alliance for a Better District 6 monthly meeting on the expansion plans for Moscone Center.

The ABD6 Land Use Committee chair has reviewed the draft EIR and combined with the presentation, is supporting the project.

Also at the meeting, the Board of Directors voted to support the expansion project for Moscone Center, so we can stay competitive with other cities for convention business. We are also excited that the children's area will be enhanced. This will be a benefit for the City's children and their parents. This unique design will move our convention and related services into the 21st century. Again, the ABD6 Board of Directors supports the expansion plans proposed for Moscone Center and asks for your support.

Thank you for your consideration on this matter.

Sincerely,

Marvis J. Phillips, Interim Executive Director and Land Use Chair
Alliance for a Better District 6

Alisa Moore

From: Purl, Elizabeth (CPC) [elizabeth.purl@sfgov.org]
Sent: Monday, June 16, 2014 5:12 PM
To: Jonathan Carey
Cc: Alisa Moore; Range, Jessica (CPC)
Subject: FW: Comments on the Draft Environmental Impact Report for the Moscone Center Expansion Project (Case No. 2013.0154E)

Elizabeth Purl

Environmental Planner

Planning Department | City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9028 | Fax: 415-558-6409
Email: elizabeth.purl@sfgov.org
Web: www.sfplanning.org

From: Komal Panjwani [<mailto:komal@sfbeautiful.org>]
Sent: Monday, June 16, 2014 4:50 PM
To: Purl, Elizabeth (CPC); Jones, Sarah (CPC)
Subject: Comments on the Draft Environmental Impact Report for the Moscone Center Expansion Project (Case No. 2013.0154E)

To,

Sarah B. Jones
Environmental Review Officer
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Sarah,

My name is Komal Panjwani and I am submitting this comment on behalf of San Francisco Beautiful. San Francisco Beautiful is a group of citizens, neighbors, friends and philanthropists have been integral in making San Francisco the extraordinary place it is today. We work with members, community-minded individuals, community-based organizations, corporations, and local government to help create and implement sustainable improvements and civic initiatives that improve the quality of life in San Francisco.

In the same spirit, I would like to bring to your notice a few important concerns regarding the Moscone Center Expansion Project design and the related Draft EIR for the project:

1. **Shadow Impacts on the Children's Park:** The park is used extensively throughout the day, but more so during weekends and afternoon to evenings. The proposed project would create new shadow beyond existing shadow it receives from other buildings. This will affect the useable hours of the park. The times of the year (late spring and early summer months) and the hours of the day (mid-afternoon through evening hours) when the park is extensively used, the building will lay more shadows on the park, rendering it less useable during the short summer that SF gets. Design changes to the massing can help mitigate the issue of shadows.

2. **Pedestrian Circulation-** The DEIR does not take into account the pedestrian routes within the public spaces of the project, including the alley or the public routes within the nearby blocks. The analysis of the proposed alleyway will reveal low pedestrian counts rendering the walkway inactive and less safe.

3. **Over Street Pedestrian Bridge-** Not only is the over street pedestrian bridge contrary to the Urban Design element of the General Plan, it also fails to give a number of visitors from all over the world the experience of being on San Francisco's streets. An enclosed experience is parallel to the airport like design that Moscone Center should move away from and offer visitors unique San Francisco experience.

We hope that the above concerns are adequately addressed and impacts mitigated by changes to the proposed project and reflected in Final EIR. Thank you for the opportunity to comment on this project.

Best,

Komal Panjwani

Policy Manager
San Francisco Beautiful
100 Bush Street | Suite 1812 | San Francisco, CA | 94104

(415) 421.2608 | komal@sfbeautiful.org

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The Yerba Buena Neighborhood Consortium

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

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

Moscone Center Expansion Project Draft EIR: 2013.015E

Summary Comments

1. The DEIR Uses Every Math Trick In the Book To Low-Ball Project Convention Attendance Projections, And Thus Greatly Understates Future Project Impacts, Especially Pedestrian Impacts

- a. The DEIR starting point for all Transportation analyses is the average annual Moscone Center total attendance of 856,600 for 2010-12 of – a period of a national economic recession that indisputably and significantly depressed attendance – rather than the **peak attendance of 1,279,000 achieved in 2007-08, during a period of national economic expansion, which indisputably represents the true capacity of the existing Moscone Center** and thus a proven future likelihood but is nonetheless totally omitted from DEIR analysis. This Math Trick alone results in understating future foreseeable Project impacts by 33% - they should be 23% higher across the board. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive, violates CEQA, and is litigable.

It is indisputable that total Moscone Center convention attendance in any given year is directly impacted by the state of the national economy, as depicted on the attached chart. *Yet the DEIR authors blatantly "cherry picked" three particular years during which the national economy was in severe recession followed by a very slow recovery – clearly resulting in a very sharp drop off in total attendance from the much higher levels during the years of national economic expansion between the previous dramatic Post 9/11 national economic/tourism slump and the "Great Recession" which began in 2008-09. The DEIR authors then used only that depressed three year period as the "base" for all the DEIR's impact analyses. Thus, ignoring all its other methodological flaws, this DEIR analyses could only possibly be valid for future comparable years of economic recession, but plainly not times of economic growth.*

- b. The DEIR starting point for all Transportation analyses is only the Project's 140,000 ft – 32% - increase in Moscone Center Exhibit Space, from 440,000 to 580,000 ft, instead of the total 262,284 ft increase in event useable "functional space" (excluding logistical Support/Other Space), from 625,600 ft to 888,284 ft – 42%. This Math Trick alone results in understating future foreseeable Project impacts by 31%! This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive, violates CEQA, and is litigable.
- c. **The combined impact of these two Math Tricks is to Low-Ball the future projected Project attendance upon which all DEIR Impact analyses are based by 58%! The Project's increase in Transportation Impacts will actually be almost 75% higher**

during busy years of economic expansion than the DEIR assumes for its analyses.

The increase in average daily attendance used to determine future Project attendance and Impacts, from 22,000 now to about 29,000 as under-stated by the DEIR, should actually be from 27,000 now (based on the current proven annual capacity) to over 38,000. This is clearly a reasonable projection because in 2013 there were actually 24 Moscone Center event days with 30,000 or more attendance already, 16 exceeding 40,000, and the stated intent of the Project Sponsors is to maximize Convention attendance in the future for the economic benefit of the City and its Visitor Industry! More very large events will be accommodated than are now possible because of Center's current size limits, and especially as a result of the Project, for the first time simultaneous mid-sized conventions can be accommodated on the same day. Thus the event days of conventions smaller than 10,000 will be significantly reduced in number as they are supplanted by these larger conventions. All these factors are the driving forces behind the significant increase in Moscone Center attendance that will result. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive, violates CEQA, and is litigable.

- d. The DEIR's Transportation Impact modal split analysis posits that 30% of all convention attendees walk to events. **Thus the very possible average 38,000 attendance event day after the Expansion Project will add almost 5,000 more average daily pedestrians than now to Yerba Buena Neighborhood sidewalks.**

2. **The DEIR cynically ignores the overwhelming pedestrian impacts of large conventions/events.**

- a. Despite decades of readily observable actual Moscone Center real-world operating experience that indisputably prove that event days over 20,000 attendees – especially those of 30,000 or more – completely fill Fourth Street sidewalks during their peak to/from hours (which can vary somewhat), resulting in a readily observable “level of service” of E or even F, **the DEIR simply ignores all such larger events as irrelevant to all EIR Impact analysis** (except as they contribute to the overall average attendance) because they are not “typical”! There were 42 event days in 2013 of 20,000+, 24 of which were 30,000+ (chart attached). This is equivalent to ignoring routine wet weather floods as an Impact in a river system EIR because they only happen several days a year. That's absurd! What happens now 7-12% of days per year is very consequential. What will happen as an Impact of the Expansion Project 13-21% of the days of the year is even more consequential. Even if the impacts of the smaller (but not limited) number of truly “worst case” mega conventions such as Oracle World are not taken into account, the whole purpose of the Moscone Expansion Project is to physically accommodate many more very large conventions, such as the annual Semicon, in the future. Because that is the Sponsors' stated objective that is the size of convention that should be the “base” utilized to project future Project impacts. One Project Sponsor itself projects a 2014 Semicon total attendance of 31,000! This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive by omission, violates CEQA, and is litigable.
- b. Except for a brief mention of **the 2,000+ seniors/persons with disabilities Yerba Buena Neighborhood population that MUST use Fourth Street sidewalks in particular on a daily basis, including Moscone event days, the DEIR completely and callously ignores their severe safety vulnerability that occurs when local sidewalks are very congested.** While falling on a sidewalk is bad for anyone, it is extremely dangerous for the aged due to the greatly increased statistical likelihood of resulting serious fractures

and other grave injuries, and their much higher risk of further grave complications after such injuries. **This danger is so real that many Neighborhood elders are now trapped in their apartments during larger Moscone Center events because they are afraid to risk walking on Fourth Street.** While exacerbating these justifiable fears and the resulting isolation of many elders may not be a quantifiable environmental impact, their risk potential for increased pedestrian injuries during larger events at sidewalk congestion levels of E and F must be addressed as a matter of Public Safety, just as any potential release of hazardous materials would be in any EIR. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive by its omission, violates CEQA, and is litigable.

- c. The DEIR notes the annual occurrence of, but totally ignores in all its analyses, the extreme pedestrian impacts of the largest class of Moscone conventions of 60,000+ attendees that currently occur two weeks a year, 8 total event days (**Oracle World and DreamForce**). It simply posits that is unlikely that there will be more such events in the future and so their beyond-level F pedestrian impacts on Neighborhood sidewalks need not be assessed. This is preposterous! There is no factual basis for such a DEIR assumption. Nothing in current City law, contract, or regulation limits such Moscone Center events to only two per year, and there could very well be a lot more of them in the future. And none of these events has ever been subject to specific environmental review themselves because individually they last just four days. But they must be evaluated now as part of any cumulative impact scenario unless there is in fact a binding limit on their occurrence proposed as part of the Expansion Project. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive by its omission, violates CEQA, and is litigable.
- d. As a result of all of the above combined, the DEIR concludes that only 2 of the 12 Neighborhood sidewalk segments it evaluates will experience a Project+cumulative-impact E level of service at any time, and none an F level, while 7 of the 16 identified corner locations will have peak period Project+cumulative impacts of E or F. While this commenter cannot readily crunch the numbers without access to the authors' transportation model, it is highly likely that correction of the Low-Balled average event attendance projections would result in **many more sidewalks and more corners reaching the E or F level of service.** And given the real-world observable fact – which the DEIR totally ignores - that actual E and F local sidewalk and corner conditions now occur several dozen days a year as a result of large Moscone events at peak times, the cumulative E and F impact frequency would be even greater if accurately evaluated. A DEIR that ignores in its calculations the serious impacts of common events that are actually observed occurring in real life by the Math Trick of “averaging them out” is a cynical joke. This arbitrary methodology is an abuse of the EIR authors' discretion, is clearly deceptive by its omission, violates CEQA, and is litigable.

3. **As a Result of All Of The Above The DEIR Falsely Concludes That The Project's Pedestrian Impacts Are “Not Significant.”**

In fact, as detailed herein, the Project's Pedestrian Impacts are indeed “Significant” – and dangerous to Public Safety – per CEQA, and therefore require mandatory feasible Mitigation Measures to be implemented by its Sponsor, the City of San Francisco, as part of the Project itself. This arbitrary conclusion is an abuse of the EIR authors' discretion, is clearly based on a very incomplete and seriously flawed methodology, violates CEQA, and is litigable.

4. **The DEIR's Few Identified Pedestrian Impact Mitigations Are Hopelessly Inadequate To Deal With Even Today's Moscone Center Impacts, Let Alone The Expansion Project's.**

Only one block of Fourth Street sidewalk, adjacent to the Metreon, is identified for possible - **but not committed** - widening as a Project Mitigation Measure to create any necessary additional pedestrian capacity for the Project's Impacts. The even narrower sidewalk on the next block north adjacent to the Marriott Hotel/Ross Store which is a continuation of the very same route to Market Street and the Union Square hotels- an obvious bottleneck - is ignored because the authors assert with no supporting rationale whatsoever that it is somehow too far away from the Project (about 600 ft)! **This Pedestrian Impact Mitigation discussion of the DEIR can only be described as utterly, pathetically, and shamefully inadequate.**

5. **A Genuinely Effective Pedestrian Capacity/Safety Mitigation Program Must Be Identified by the Project EIR and Required To Be Implemented As Part of the Project Itself, Not Just For the Sake of Legal Compliance With CEQA But Most Of All To Protect the Lives and Physical and Emotional Well-Being of Our Yerba Buena Neighborhood's Residents, Especially Its 2000+ Elders and Persons With Disabilities.**

Attached is a diagram showing the needed street and sidewalk Significant Pedestrian Impact Mitigation Measures that need to be funded and implemented by the City as part of the Expansion Project itself, not deferred for later uncertain funding or subject to further study. Failure to identify and implement as part of the Project such Mitigation Measures will violate CEQA and is litigable. It includes:

- **Widening sidewalks on the east side of Fourth Street from Howard Street to Market Street.**
- **Adding several signalized crosswalks at key locations to increase pedestrian capacity and/or provide pedestrian safety at dangerous locations.**
- **Adding "red arrows" to the traffic lights at the intersections where "No Turns On Red" are allowed to improve pedestrian safety at those dangerous locations.**
- **Implementing a Sidewalk Management Plan (to be drafted by DCP/DPW in the coming year) that will optimize the location of all sidewalk street furniture, cafe tables, advertising signs, etc. to maximize Neighborhood sidewalks' pedestrian capacity and safety while also satisfying urban design and amenity goals.**

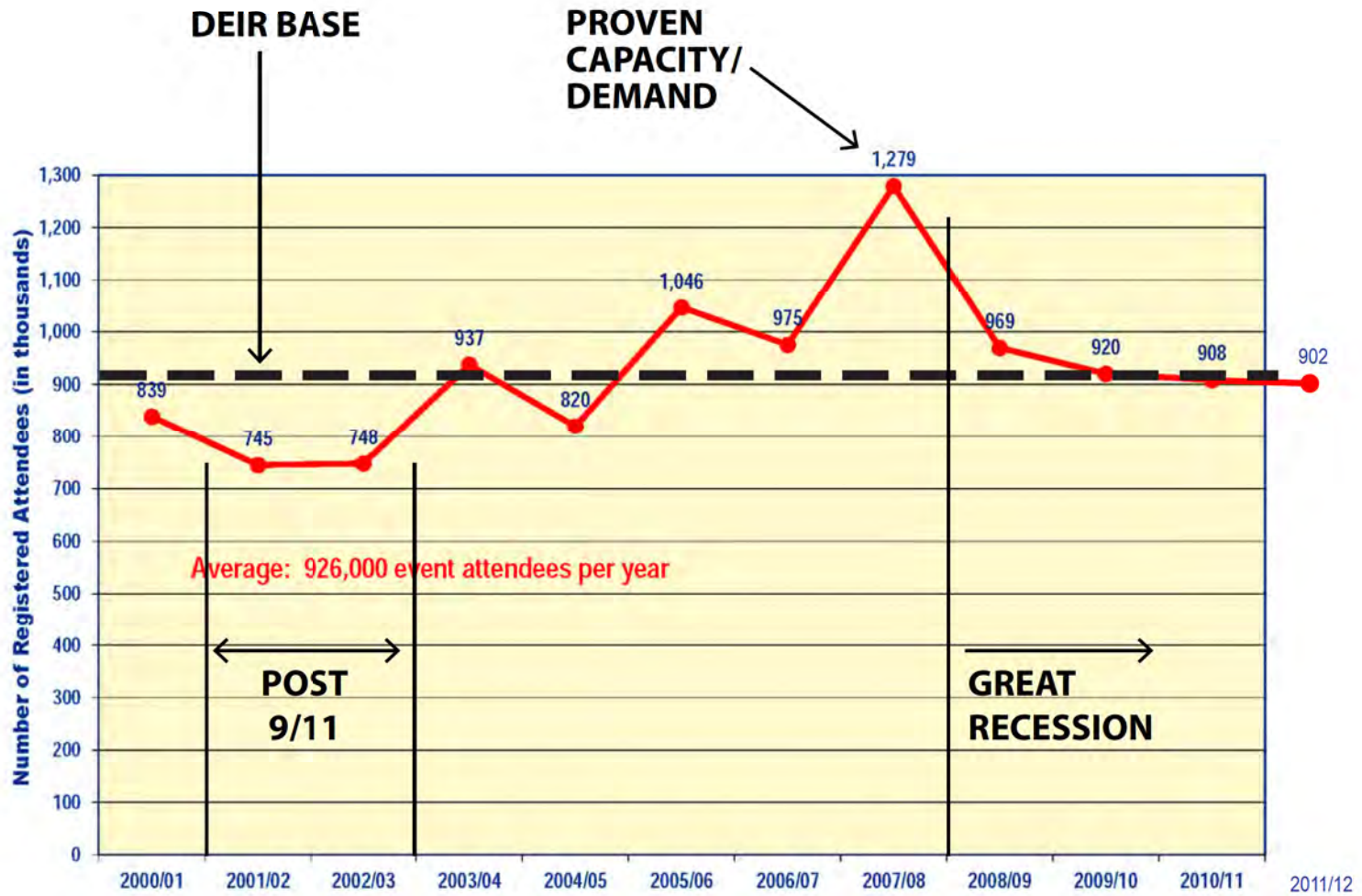
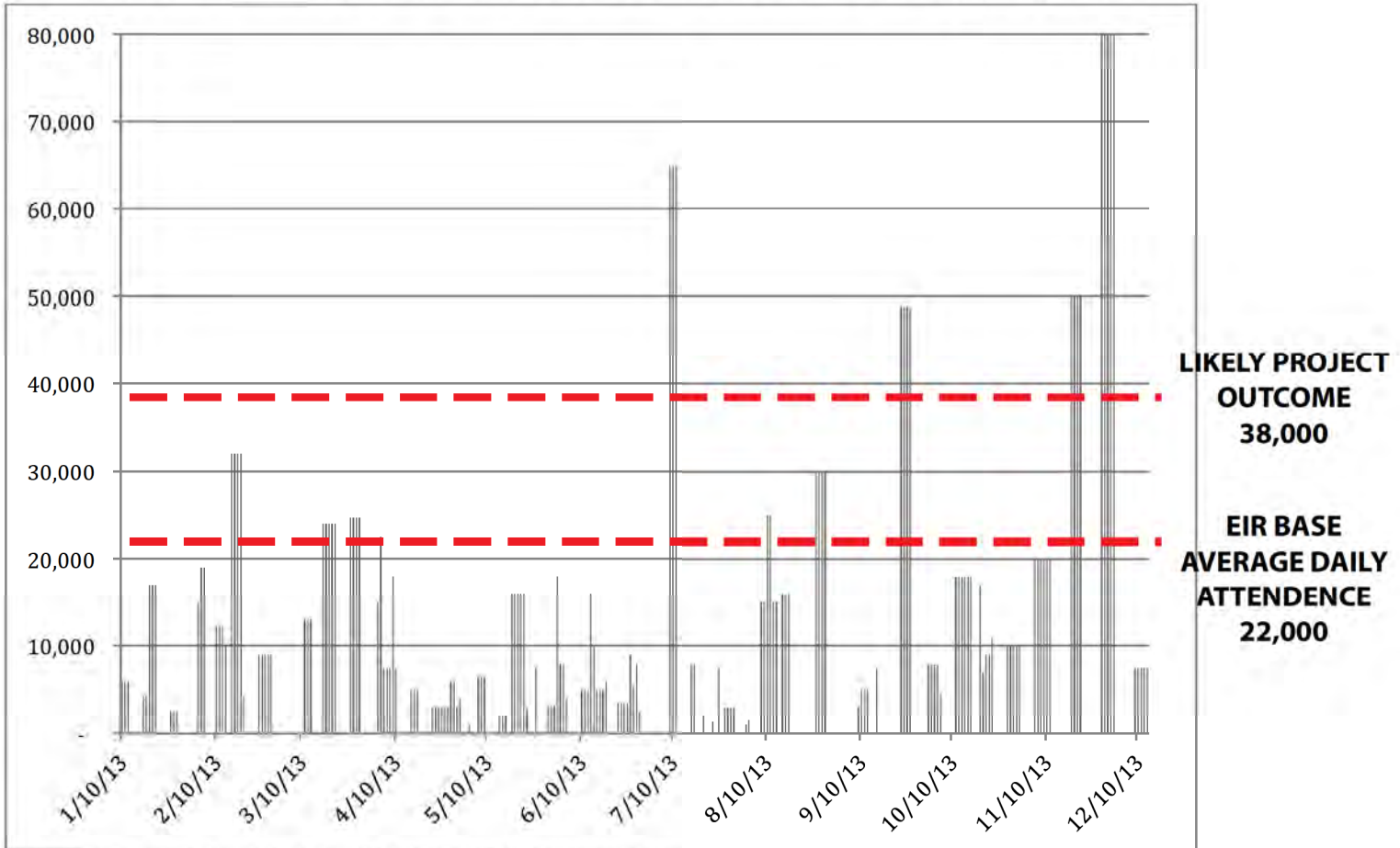


Figure 3
Moscone Center FY 2000/01 to FY 2010/11
Number of Total Registered Attendees per Year



Moscone Convention Center and Yerba Buena Gardens – Visitors per day in 2013

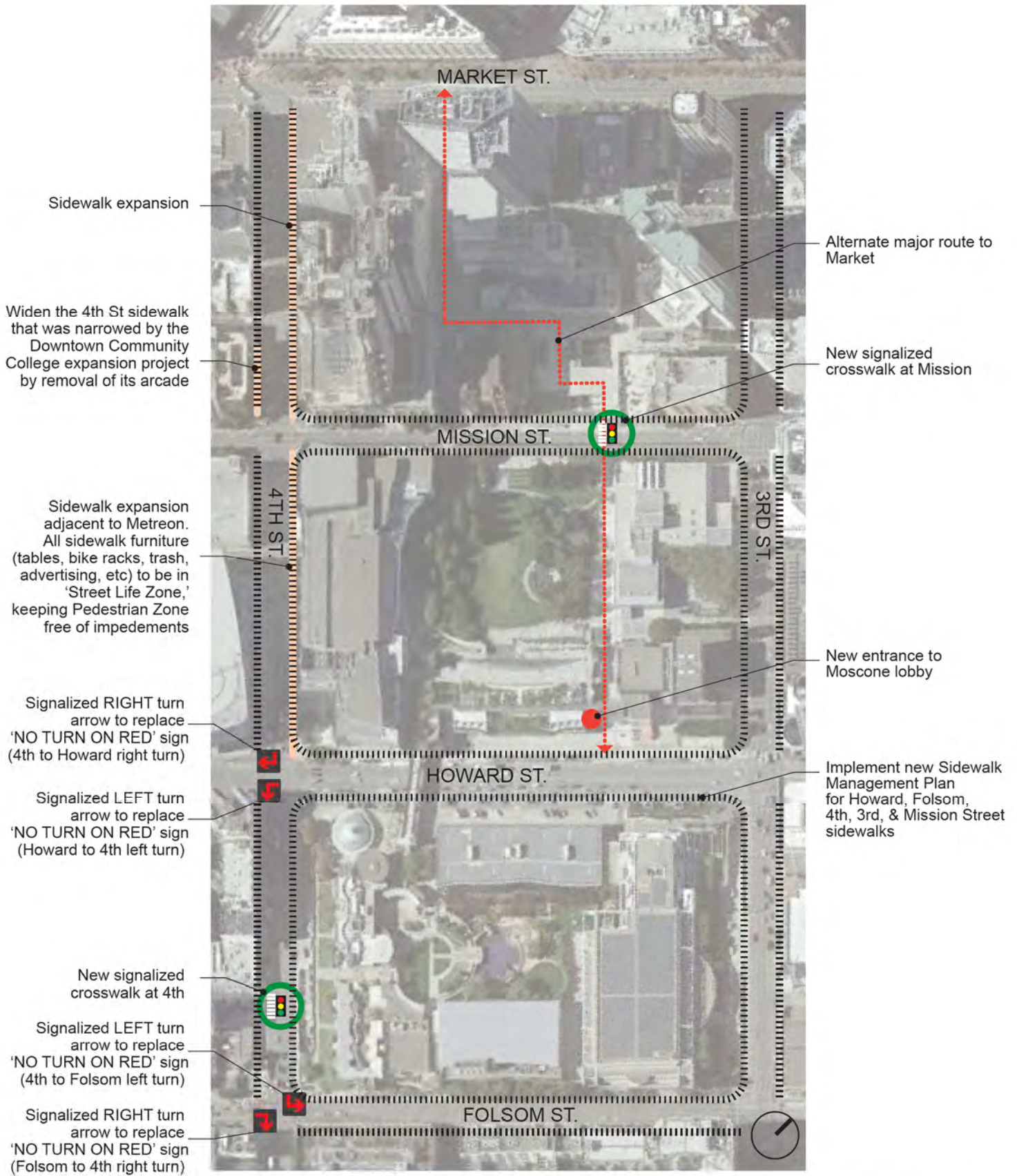


Source: Yerba Buena Gardens Activity Calendar, MJM Management Group

- Total weeks with conventions: **45 of 52 weeks**
- Total days of conventions: **175 of 365 days**
- Total daily visits to Moscone: **2,762,955 people**
- Average daily visits: **15,788 people**
- Number of days with XX,XXX visitors:
 - 90 days under 9,999 visitors
 - 43 days 10,000-19,999 visitors
 - 18 days 20,000-29,999 visitors
 - 8 days 30,000-39,999 visitors
 - 4 days 40,000-49,999 visitors
 - 4 days 50,000-59,999 visitors
 - 3 days 60,000-69,999 visitors
 - 5 days over 70,000 visitors

NOTE: Yerba Buena Gardens and Metreon City View events larger than 1,000 included

Moscone Center Project Pedestrian Mitigation Measures





The Yerba Buena Neighborhood Consortium

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

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

Moscone Center Expansion Project Draft EIR: 2013.015E

Design Comments

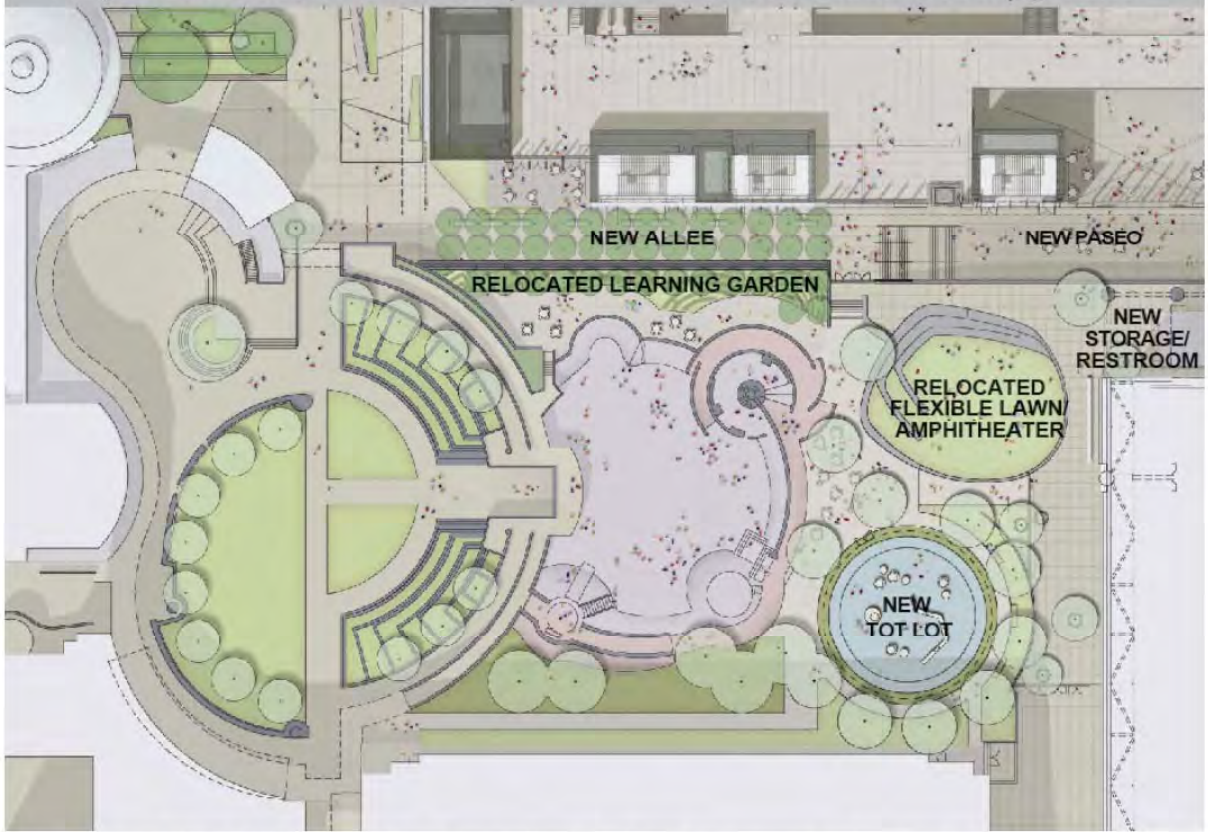
Yerba Buena Gardens is a San Francisco Treasure, a wonderful amenity enjoyed by people of all ages and all walks of life. The current Yerba Buena Gardens are the result of a “grand compromise” to build the Convention Center underground and maintain the beautiful, beloved gardens above, with public, recreational, and cultural facilities. There was a commitment that no one use would dominate the space.

The Proposed Moscone Expansion project has major impacts on Yerba Buena Gardens public space:
a.) The 95-foot tall proposed meeting and ballroom structure on the South Block will cast shadows on the current Children's Garden; b.) Convention Center circulation and fire exits will remove land from the play area; c.) The north edge of the Children's Garden, which currently has views of the San Francisco downtown skyline, will be boxed in by a dominant, imposing building face – the back of the meeting and ballroom structure.

In order to mitigate these negative impacts on the gardens, and maintain the commitment to balance of all uses in Yerba Buena, there must be real and substantial improvements to the public areas in the South Block **at the time of construction**. We respectfully request that the Commission require the project team to commit to the following:

- Adopt the May 2014 Project Design, most similar to Alternative 3, which resolved issues that were not part of the design in the Draft EIR and incorporated community input.
- The following improvements must be funded, coordinated, and built at the same time with the Moscone Expansion: the new Tot Lot; the relocated and improved Learning Garden; the removal of at least the southern most span of the existing Howard Street pedestrian bridge, which has created unusable space underneath; and the expansion of the carousel café and accompanying improved seating area. **The environmental analysis of these Children's Garden improvements must be also analyzed and incorporated within the Moscone Expansion Project EIR so that these improvements can completed as part of the Expansion project.**
- The proposed 'Green Wall' on the building facing the Children's Play area must be of the highest landscaping quality. More of the cheap, rat-infested ivy like the current Moscone South landscaping cannot be considered a mitigation for the loss of iconic city skyline views and building Convention uses above ground.

Moscone Center Project
Proposed Moscone Center Improvements to the Children's Playground



Adopt above May 2014 Design; Fund, coordinate & build improvements with the Moscone Expansion

Moscone Center Project
Proposed Moscone Center Improvements to the Children's Playground



Green Wall facing Children's Play Area must be of highest landscaping quality



The Yerba Buena Neighborhood Consortium

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

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

Moscone Center Expansion Project Draft EIR: 2013.015E
Additional Design Comments June 13, 2014

NOTE: These comments expand on the 'Green Wall' bullet point from our comments submitted June 12 to Elizabeth Purl.

The proposed 'Green Wall' on the building facing the Children's Play area must be of highest quality landscaping. Specifically, the first ten to fifteen feet from the ground up should be a truly special display of vegetation, like that seen in the images below. At this lower level, pedestrians, children in the Learning Garden, and users of the Playground, will readily enjoy vegetation details.

Above that pedestrian level, landscaping can be as proposed. That would make the upper 75-80% of the wall of lower maintenance landscaping materials.





June 16, 2014

San Francisco Planning Commission

To Whom It May Concern:

Lance Burwell
Karen Carr
Al Cosio
Nicole DuBee
Sean Jeffries
Mary McCue
John Ratto
Helen Sause
Chi-Hsin Shao

Thank you for the opportunity for comments on the expansion of the Moscone Convention facility.

The Yerba Buena Alliance is a 23 year organization representing the area's diverse residents, businesses, cultural institutions and visitors and promotes the area as a destination. The Yerba Buena Alliance supports and promotes the Yerba Buena Neighborhood by strengthening partnerships, providing neighborhood wide leadership and infrastructure and serving as an information source for the community.

The Alliance is very much aware of the importance of the Moscone and has consistently supported its presence and we want to see it thrive.

However our membership does have concerns regarding the expansion.

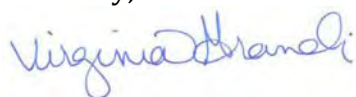
These concerns are broad in that they range from the impact of the expansion on the community, the children that use the Yerba Buena Gardens, concerns over children's safety, traffic impacts and pedestrian foot circulation, shadowing and changes to the bridge that provides connections to the two Gardens Blocks.

The Moscone team has been meeting with various groups on these issues for the last 18 months. These have been sometimes difficult for all parties but we would like to acknowledge the hard work listening to the Gardens stakeholders and the community engagement of the expansion team. We have seen the input and feedback be reflected in their plans that have continued to evolve.

Recently the meetings have become much more productive. The team has reduced some of the above ground square footage and shifted the new building mass and worked on the other issues in a collaborative manner that give us hope that the environmental/intrusive issues may be worked out in a satisfactory manner.

The Alliance and its members are reviewing the EIR to ensure that all of the issues are addressed and appreciate the work of the team in addressing community concerns.

Sincerely,



Virginia Grandi
Yerba Buena Alliance

Jonathan Carey

From: Jones, Sarah (CPC) <sarah.b.jones@sfgov.org>
Sent: Monday, June 02, 2014 6:55 PM
To: Purl, Elizabeth (CPC)
Subject: FW: Moscone expansion

From: jimmy carlos <jimmerican@yahoo.com>
Sent: Monday, June 2, 2014 5:42 PM
To: Purl, Elizabeth (CPC); Jones, Sarah (CPC)
Subject: Moscone expansion

Dear mam, I read about the public hearing for the moscone expansion and I have a question regarding wind circulation along the 700 block of Howard st., will the eansion promote stronger wind circulation on Howard st.,? If so, will stronger wind blow harm any concept when they close and use Howard st., as part of the moscone convention.

Another question I have is about the view. from the south upper lobby a good slice of the sanfrancisco skyline is being presented to conventioneers and when they get covered with fog it tells people what kind of city San Francisco is. Will those views be gone and be replaced with a single building facade which is that of the future moscone north? Thank you, Jim

TSent from Yahoo Mail for iPad

SUE C. HESTOR
Attorney at Law
870 Market Street, Suite 1128 · San Francisco, CA 94102
(415) 362-2778 · FAX (415) 362-8048

hestor@earthlink.net

RECEIVED

JUN 16 2024

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

June 16, 2014

Elizabeth Purl
Planning Department
1350 Mission Street 4th fl
San Francisco CA 94102

Moscone Center Expansion Project DEIR - 2013.0154E

Dear Ms. Purl:

My comments follow up on the excellent comments already submitted by TODCO on the DEIR . They restate TODCO's objections to the gross understatement of use and impacts - particularly transportation and pedestrian impacts for the expansion of the Moscone Center.

I have had my office at Market and Powell/Ellis since 1980 - since before and during YBC construction, during early Moscone operations to current operations. I have seen first hand the wide ranging impacts of convention operations of the Moscone Center. The CURRENT operations are already out of control. As to pedestrian and vehicular traffic. Adding any new capacity means increased DEMAND. That can only be accommodated if impacts of EXISTING operations are factored into those for the expansion.

- There are (a) Moscone Center operations VERY LOCALIZED on CB3 - aptly addressed by TOCDO.
(b) Impacts on the adjacent blocks of the Moscone Center, including 3rd, 4th, Mission, Howard, Folsom.
(c) Impacts on nearby blocks, e.g. Ellis, Market, Powell, Grant, Kearny, New Montgomery.
(d) Impacts on areas and streets even further away.

EVENTS WHICH BLOCK OFF HOWARD STREET

IV.A-37 implies that there would be no increase in the number of very large events such as Oracle Open World, Salesforce Dreamforce and similar events. These events, and any others which involve **closure of Howard Street** - from hours to days on end - **already** have a drastic impact on the surrounding area and often bring circulation to an anemic crawl. Since so many streets have one-way traffic, and may themselves have construction and diversions going on (e.g. Salesforce at 350 Mission and the Transit Center), there are **forced traffic diversions** that cover a substantial area. Even if there are no Giants games, and no subway construction.

There must be **mandatory** and substantial requirement that traffic control officers be dispersed around a LARGE area **controlling traffic** and if necessary overriding traffic signals to prioritize Muni operations.
on the DEIR I

This MUST be a cost imposed on/charged to those who close off Howard Street traffic. **Unlike many curret TCOs, the traffic controllers MUST BE TRAINED AND EXPECTED TO DO THEIR JOB.**

Assertiveness training might be considered. It is critical to pedestrian safety and safe movement of traffic/Muni that TCOs CONTROL pedestrians and vehicles that impede traffic diverted into turn movements. That they be required to intensively watch all traffic - no cell phones or conversations - **and TAKE CHARGE.** MUNI operations must be their priority so that transit can move riders and maintain their schedule.

TCOs MUST be deployed **blocks down stream** - not just immediate to Yerba Buena - wherever the traffic diversions start. MOBILE SIGNS SHOULD BE DEPLOYED FAR UPSTREAM WARNING OF A TRAFFIC DIVERSION. This means BLOCKS east of even 1st Street because Howard is the only solely west bound street between the Central Freeway and Market. The mitigation of TRAFFIC CONTROL BY TCO deployment should be imposed not solely by the whim of the entity booking the Moscone Center - who have the incentive to book the Center.

Muni has monitoring ability to understand in REAL TIME the movement of buses and where there are bottle-necks. THEY should have the ability to require traffic control in REAL TIME as bottle-necks develop. Whatever electronic monitoring of buses and traffic must be used to allow real time control of major disruptive events at the Convention Center.

ACTIONS INCLUDING CONSTRUCTION WHICH TAKE OVER THE STREET

Example - Construction of subway up 4th St and Stockton Street. All construction which blocks off the street for anything but a minor time must be REQUIRED to PAY for traffic control on important intersections. All the way up to Market Street at the very least. 4th/Stockton/Ellis has been blocked for well over a year - leading to out of control pedestrians, which includes a lot of people attending events at Moscone Center. 4th Street has also been ground zero for construction. This leads to major problems with out-of-control pedestrians who lack the VISUAL clues that they may NOT walk at will through an intersection (Stockton / Ellis / Market), ignoring traffic that has already restricted lanes.

ALL construction, including by public entities, must have EFFECTIVE TCOs to manage the flow of pedestrians (instructing them to NOT cross when they are impeding movement by Muni or those required to turn. In the case of the diversion of Muni off 4th and onto 5th and streets north of Market, the TCO requirement should follow the diversion if necessary.

Monitoring REAL TIME movement of buses and bottlenecks should be required and IMPOSED as a mitigation.

PEDESTRIAN TRAFFIC IN SURROUNDING AREA

I have had my office in the broad area affected by Moscone operations over 30 years. Dealing with average assumptions of traffic - particularly when they are intentionally underestimated (TODCO comments) fails to adequately address the impacts CEQA requires. You must address and effectively describe PEAK demand. I can tell when large, even middle-size conventions are at Moscone at Powell and Ellis (the rear door to the Flood Building), Sidewalks are clogged with pedestrians with badges

on the DEIR 2

walking in groups down Ellis to get to hotels, restaurants and other places north of Market. It is difficult to walk, particularly against the flow. At times people are hauling roll-on cases. Side walk traffic SEVERAL BLOCKS AWAY bear the traffic.

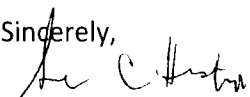
The situation at Powell and Ellis is nowhere near as intense as that faced by people directly adjacent to YBC as described by TODCO. You must listen to their serious comments about the situation faced by elderly seniors trying to negotiate the area near their homes. And children trying to use the childrens' facilities on CB3,

There needs to be SYSTEMATIC evaluation of the effective width of pedestrian routes. Sidewalks. Crosswalks. ENFORCEMENT of pedestrian crossing of streets. Impediments and widths that have difficulty accommodating CURRENT pedestrian flow are NOT going to be able to deal with additional demand. EVERY street intersection where traffic is inadequately managed puts pedestrians at risk and must have effective mitigation.

The pedestrian analysis needs a major overhaul. Sidewalks need widening and obstructions removed wherever possible. Diversion of traffic when Howard is closed causes chaos. TCOs are not deployed in anywhere near the numbers needed. AND THEY NEED TO TAKE CONTROL OF THE INTERSECTIONS AND BE ASSERTIVE ABOUT IT.

The City should be the leader in using technology to monitor the flow of buses and traffic. AND INTERCEDE IN REAL TIME to keep pedestrians safe and the Muni flowing.

We need to do a LOT better.

Sincerely,

Sue Hestor

on the DEIR 3

Alisa Moore

From: Purl, Elizabeth (CPC) [elizabeth.purl@sfgov.org]
Sent: Monday, June 16, 2014 3:51 PM
To: Jonathan Carey
Cc: Alisa Moore
Subject: FW: Expansion Moscone Center Case 2013.0154E Public Comment Period

Elizabeth Purl

Environmental Planner

Planning Department | City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9028 | Fax: 415-558-6409
Email: elizabeth.purl@sfgov.org
Web: www.sfplanning.org

From: Dennis Hong [mailto:dennisj.gov88@yahoo.com]
Sent: Monday, June 16, 2014 2:07 PM
To: Jones, Sarah (CPC)
Cc: Wycko, William (CPC); Chiu, David (BOS); Kim, Jane (BOS); Purl, Elizabeth (CPC); victoriya.wise@sfgov.org; Range, Jessica (CPC)
Subject: Expansion Moscone Center Case 2013.0154E Public Comment Period

Dennis J. Hong

101 Marietta Drive San Francisco, CA. 94127

June 16, 2014

San Francisco Planning Department

Atten: Miss. Sarah B. Jones, Environmental Review Officer

1650 Mission Street, Suite 400 San Francisco, CA. 94103

Subject: Case Number: 2013.0154E – Moscone Center Expansion Project

Good afternoon Miss. Sarah Jones,

I am writing in support/adoption of the expansion of the Moscone Center. In the past I had the opportunity to co-chair several venues at this wonderful Conference Center. Only regrets; the center as planned is still too small.

I have been a long time resident of San Francisco, Sixty plus. Thank you for letting me review and comment on this Project and many others in the past. My background is a professional architectural designer and a Professional Project Manager. (Retired).

So, let's get started. My following comments are based on the above Draft Environmental Impact Report (April 30, 2014 and the recent hearing of June 5th, 2014; which I attended. I found several other important points that may have not been addressed in the DEIR.

I. Minor details – I may have a bad copy of the document, part of this section may be related to the print quality / graphics of the DEIR.

- Pages II-22, fig II-11 shows some of the graphic symbols which I assume are used mostly thru out this Document. For example, the light blue dashed line represents a bike route. Be that the case, does this mean that there will still be a bike

route (Page II-7, figure II-2) shows an existing Bike Route, I did not realize bikes were allowed in the garden area. This is

shown on page II-10, figure II-3 shows a proposed (existing) Bike Route, I would have a concern for the safety of the pedestrians in the Garden.

- What provisions are being made to keep the Yerba Buena Garden in tack? The Proposed plan is a bit different than what the existing plan shows. The proposed plan shows some different details near the fountain. There has been a lot of work in the past in developing these wonderful gardens and we must retain them as it currently exists. We must also retain preserve the children's playground as best as possible, especially the carousel. On page II-20, figure II-10a – what is a CCM (upper left corner of the Amphitheater represent-to the lower right of the Carousel)?
- How will the proposed taxi stand on page II-22, figure II-11 and the Loading Ramp Entry as shown on page II-25, figure II-12 work? Is there enough room for all this?
- There is no photo for view #13 – page II-29 Figure II-14.
- A similar photo viewed (Photosimulation) from 4th and Howard – Moscone West looking towards the Children's Playground would be nice.
- Page IV-A.48, one other recent project that may impact the construction of this work is 222 2nd Street, I assume the Museum of Modern Art on 3rd Street will be completed by the time this project starts.

II. In the final EIR can more information be included as to what exactly is happening with the Yerba Buena Garden and the Children's

Playground, (back to the graphics issue), it does not show the fountain in the proposed plan Figure II-3, page II-10, but does a

good job in page VI-13 / Figure VI-1. We need to do as much as possible to keep these existing gardens intact. This includes

protecting them during the construction period from dust, debris, vibrations and etc...

III. Include the comments made during June 5th, 2014 Public Hearing. All issues were well presented.

IV. Construction Phase, request that the Final EIR provide the following analysis and or address the following:

- a. Provide the following for the pedestrians and traffic during the construction; traffic control office, signs, control barriers, etc.
especially if there is an event at the Moscone West and the Holidays. This item all to often is overlooked. This is a critical issue and should be addressed in depth in the EIR. directly impacts emergency access and public safety as well as City liability.
- b. Communicate with the local merchants, residences in the area of the dates, construction schedules. Especially if certain streets will be closed.
- c. Provide provisions to protect for the playground and the gardens, i.e., dust controls, safety barriers and control signs.
- d. A process for planned events during the Construction and the Moscone West. These needs more controls.
- e. Protect the current playground from dust and debris from getting in to the play area. I was too glad to see this was put back in to the Project, this includes the Gardens.
- f. Provide a number to call for the residences, merchants to call for help, coordination and etc..

V. As some suggest, it would be a tru shame to expand or build the additional convention space else where in the City. With the Cities

new transportation Plan in place, the new expansion is ideally located and the Transit Effectiveness Project (TEP) address this site.

VI. With the exception for the SOMA Museum and 222 2nd Street, it looks like all major adjacent projects that may or may not have

an impact on either projects have been covered. Any new/added Projects in this area should be updated and considered during the life of this Project construction.

VII. In Conclusion: Based on my comments and evaluation of the DEIR I have concluded there is sufficient information and I fully

support this Project and this DEIR. I only wished we were able to add much more convention space than planned. I request

that my comments be included in the Final EIR and place the Project on Fast Track.

I hope this is helpful and that it will assist you and the Commission in reaching its conclusion on the Project. Thanks to you, the Planning Department and the Board of Supervisors for working so hard on these projects. I will continue to review and comment on future projects as needed. Thank you for your consideration of my comments as part of the DEIR.

I would like to be copied on all future notifications in relation to this particular project as well as the notice of all hearings to be held. Finally, I request that the above items be addressed and included in final EIR.

Should you have any questions regarding this email/letter, please do not hesitate to contact me.

PS: If there are compelling reasons why this project should not continue or be delayed, I would be interested to understand why.

My Email is: dennisj.gov88@yahoo.com

Sincerely,

Dennis Hong

Alisa Moore

From: Purl, Elizabeth (CPC) [elizabeth.purl@sfgov.org]
Sent: Monday, June 16, 2014 5:12 PM
To: Jonathan Carey
Cc: Alisa Moore; Range, Jessica (CPC)
Subject: FW: Moscone Expansion EIR

Elizabeth Purl
Environmental Planner

Planning Department | City and County of San Francisco
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-----Original Message-----

From: Jones, Sarah (CPC)
Sent: Monday, June 16, 2014 5:04 PM
To: Purl, Elizabeth (CPC)
Subject: FW: Moscone Expansion EIR

From: Rick Smith <ybnabor@gmail.com>
Sent: Monday, June 16, 2014 4:19 PM
To: Jones, Sarah (CPC)
Subject: Moscone Expansion EIR

My main concern with EIR is with the analysis of pedestrian impact, TR-4, as current conditions can be unsafe.

While the study did do counting in the peak time of evening, I didn't see which events were included in analyzing the pedestrian load. There are times when Giants fans, Caltrain pedestrians, conventions, and events in Yerba Buena Gardens stack up. The count done in the EIR might reflect that, but I could not find references about those conditions in the analysis.

In addition to pedestrian counts, please consider including number of times the pedestrian walkway was blocked by a vehicle. This happens especially in the evening on the north cross walk across 3rd at Mission, and from buses stacking up on the south side of Mission at 3rd, blocking the east crosswalk.

Minor suggestions:

Page vii, please add 'screenline' to glossary. Example use is page S-12 Impact C-TR-2

Chapter II, page II-1, first paragraph, consider replacing South of Market with Yerba Buena as the name of the neighborhood.

Thank you for the document.

Rick Smith

Yerba Buena Neighborhood resident

Dear SARAH JONES:

I. Judy. V. WANG, LIVE
AT 330 CLEMENTINA ST.
#1115, SAN FRANCISCO, CA.
94103. U.S.A. I AM

DISAGREE YOUR PROJECT
OF THIRD & FOURTH ST
IN HOWARD ST. NEAR YERBA
BUENA GARDENS. WE DON'T
NEED EXPANSION PROJECT
TO INCREASE GROSS SQUARE
FOOTAGE OF THE MOSQUE
CENTER FACILITY BY 20 PERCENT!

from approximately 1.2
million square feet to 1.5
million square feet. New
construction will block the
sidewalk of passengers, cars,
and water pipe will be
dug out, not safe for
neighborhood residents'
drinking water supply?
and long time construction
will create inconveniences & waste
costing too much money,
and cause air pollution!
Thank you for attention
Sincerely Judy V. Wang

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ATTACHMENT 2

DEIR Hearing Transcript

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BEFORE THE
SAN FRANCISCO PLANNING COMMISSION

ITEM NO. 9 - 2013.0154E

MOSCONE CENTER EXPANSION PROJECT

PUBLIC HEARING ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

12:00 P.M.

Thursday, June 5, 2014

Commission Chambers - Room 400
City Hall, 1 Dr. Carlton B. Goodlett Place
San Francisco, California

REPORTED BY: DEBORAH FUQUA, CSR #12948

1 APPEARANCES:
 2 SAN FRANCISCO PLANNING COMMISSION
 3 President: CINDY WU
 4 Commissioners: MICHAEL ANTONINI, GWYNETH BORDEN,
 KATHRIN MOORE and HISASHI SUGAYA
 5
 Commission Secretary: JONAS P. IONIN
 6
 Planning Commission Staff:
 7
 Jessica Range, Environmental Planner
 8 Elizabeth Purl, Environmental Planner
 9
 Jonathan Carey, Environmental Sciences Associates,
 10 Consultant

11
 12 --o0o--

PUBLIC COMMENT:	PAGE NO.
JOHN ELBERLING.....	6
SONYA KOS.....	8
ALICE LIGHT.....	9
RICK SMITH.....	11
KEVIN CARROLL.....	13
JIM LAZARUS.....	14

21
 22 --o0o--

23
 24
 25

1 Thursday, May 5, 2014 12:28 o'clock p.m.

2 --o0o--

3 P R O C E E D I N G S

4 SECRETARY IONIN: Regular Calendar, Item 9, Case
5 No. 2013.0154E, the Moscone Center Expansion Project.
6 This is a public hearing on the Draft Environmental
7 Impact Report.

8 Please note that written comments will be
9 accepted at the Planning Department until 5:00 p.m. on
10 June 16, 2014.

11 JESSICA RANGE: Good afternoon, Commissioners,
12 Jessica Range, Department staff.

13 Before we begin today's presentation, I'd like
14 to take a moment to introduce you to Elizabeth Purl.
15 Elizabeth joined the Department in November 2012, and
16 this is her first appearance before the Commission.

17 We're really excited to have Elizabeth as part
18 of our team. She brings with her a wealth of
19 experience, and I'm certain that you will be seeing a
20 lot more of her in the future.

21 ELIZABETH PURL: Good afternoon, President Wu,
22 Members of the Commission. I'm Elizabeth Purl from the
23 Environmental Planning Section of the Planning
24 Department.

25 This item is a hearing to receive comments on

1 the Draft Environmental Impact Report for Case
2 No. 2013.0154E, the Moscone Center Expansion Project.

3 Today's hearing is not to consider approval or
4 disapproval of the project. A hearing to consider a
5 Downtown Project Authorization for the project under
6 Planning Code Section 309 and other approvals will
7 follow certification of the Final EIR. Comments today
8 should be directed the adequacy and accuracy of the
9 information contained the Draft EIR.

10 Staff is not here to respond to comments
11 today. Comments will be transcribed and responded to
12 in writing in the Responses to Comments document, which
13 will respond to all verbal and written comments
14 received and make revisions to the Draft EIR as
15 appropriate.

16 Commenters should speak slowly and clearly so
17 that the court reporter can produce an accurate
18 transcript. Also, commenters should state their names
19 and addresses so that they can be properly identified
20 and so that they can be sent a copy of the Responses to
21 Comments when it's completed.

22 After hearing comments from the general
23 public, we will also take any comments on the Draft EIR
24 from the Planning Commission.

25 The public comment period for this EIR began

1 on May 1st and extends until 5:00 p.m. on June 16th,
2 2014.

3 I would like to inform the Commission and
4 members of the public that, in response to community
5 input, the project sponsor has made some refinements to
6 the project design that would reduce the bulk of the
7 third level of the structure on the Moscone South
8 portion of the project. With these design changes, the
9 proposes project remains within the parameters of the
10 project as analyzed in the Draft EIR, and the changes
11 do not affect the analysis or conclusions of the Draft
12 EIR. These changes will be reflected in the Final EIR.

13 I understand that the project sponsor will be
14 returning to give you an update and make a full
15 presentation of the current project design on July
16 24th.

17 This concludes my presentation on this item.
18 And unless the Commissioners have any questions for me,
19 I would respectfully suggest that the public hearing be
20 opened.

21 PRESIDENT WU: Thank you.

22 Okay. I have a number of speaker cards.
23 Please line up on the screen side of the room.

24 John Elberling, Sonja Kos, Alice Light,
25 Rick Smith, and Kevin Carroll.

1 JOHN ELBERLING: Will the Secretary please
2 distribute these to the Commissioners?

3 Good afternoon, Commissioners. I'm John
4 Elberling. I'm president of the TODCO Group and chair
5 of the Yerba Buena Neighborhood Consortium. Our
6 address is 230 Fourth Street, San Francisco.

7 I'm going to start at the end. What do we
8 want? For 30 years, the number one issue of our Yerba
9 Buena neighborhood and its 2,000-plus elders and
10 persons with disability has been pedestrian safety due
11 to the dangerous conditions and impossibly crowded
12 conditions that often result from Moscone Center now.

13 Of course, the whole purpose of this expansion
14 project is to allow even larger conventions and even
15 more frequent multiple conventions at the same time
16 that could only dramatically increase the current
17 situation.

18 I'm sure any of you that have been there
19 during one of the large event, not just the Oracle or
20 the mega events but the big once like Semicon, have
21 experienced for yourself how difficult it is to travel
22 those sidewalks at the peak time of movement of the
23 conventioners. This is obvious to all concerned.

24 What we want and what we've been trying to get
25 for 30 years is the conclusive mitigation of

1 improvements to the sidewalks and neighborhood streets
2 that will solve the problem today. We have been
3 unsuccessful, largely, over these three decades to get
4 that done in this city.

5 Our mitigations we are seeking are on the
6 diagram map on the very last page of the comments.
7 They're very straightforward: wider sidewalks on two
8 blocks of Fourth Street at the obvious places where
9 needed; new mid-block signalized crossings in three
10 locations that are particularly crucial or hazardous in
11 the surrounding neighborhood; the mere installation of
12 red light arrows on the -- at the intentions where in
13 fact no turns are permitted on red so that auto drivers
14 can actually see them; and finally, implementing a
15 sidewalk management plan that organizes all the stuff
16 on the sidewalks -- all kinds, restaurant tables,
17 advertising signs, whatever, you name it -- logically
18 so that the open throughway for pedestrians is
19 optimized, unlike today, which is a mess.

20 That's what we want. And we want that to be
21 done as a mitigation prior to the Moscone Expansion
22 Project and built at the same that expansion project is
23 built.

24 Now, the letter goes into the long legal
25 issues about how the City is low-balling convention

1 attendance blatantly in the Draft EIR.

2 There's a simple point at the bottom of this.
3 If the mitigations we need and we identified are not
4 part of the project, we will litigate this EIR. That's
5 not a threat; that's a promise, no matter the
6 consequences.

7 I would very much, despite this impact,
8 actually support the project. It's part of the --
9 Moscone Center is part of the grand compromise of Yerba
10 Buena that we have worked hard for the City for 30
11 years to make work and often with great success.

12 But this is the end of the pedestrian game
13 with the City. Either they mitigate, or we will
14 litigate.

15 PRESIDENT WU: Next speaker?

16 SONYA KOS: I'm Sonja Kos with the TODCO
17 Group.

18 John Elberling kind of stole any thunder that
19 I may have had. But I'm here for pedestrian safety for
20 our seniors in our buildings right across from Moscone
21 Center. The seniors use the gardens, and they need to
22 consider with building -- during building and
23 construction, how pedestrians are to circulate around
24 the building.

25 It's very -- it's filled with residences. And

1 Moscone developer project sponsors need to consider
2 pedestrian safety and sidewalks and how the disabled
3 and the seniors get along and walk along these areas.

4 Thank you very much. And remember what John
5 Elberling said and what you've been given in writing.
6 Thank you.

7 PRESIDENT WU: Thank you.

8 Next speaker?

9 ALICE LIGHT: Hi, thank you. Thank you,
10 Commissioners. I'm Alice Light, Director of Community
11 Planning at the TODCO Group.

12 Yerba Buena Gardens is a very special place in
13 the City. It is the result of the grand compromise
14 that has been mentioned before. And there was a
15 commitment at the time that convention center
16 activities stay below ground and public recreation and
17 cultural activities be above ground. There was also a
18 commitment that no one use predominate the space.

19 This proposed Moscone Expansion Project most
20 definitely has impacts on the public space. One of
21 those is the 95-foot ballroom and meeting room
22 structure casts shadows on the play area.

23 Another is that convention center circulation
24 and fire exits actually take some of the space that is
25 currently the children's play area.

1 And third is that the wonderful view from the
2 play area they now get of the city skyline will
3 actually be blocked by the back side of the ballroom
4 and meeting room structure.

5 So in order to mitigate these negative
6 impacts, we would like to see the project team commit
7 to making any improvements to the project at the time
8 of construction. We would like to see the new design
9 that was mentioned at the introduction adopted.

10 This is something we saw most recently in May,
11 and it incorporates a lot of changes from the
12 community. The masking is set back. And it's very
13 important to us that this be the project that moves
14 forward.

15 And any improvements to the playground area
16 must be, as I said, funded and included in this
17 project.

18 In order to do that, the environmental
19 analysis of these changes needs to be considered. So
20 we'd like to see those added to the EIR. That includes
21 a new tot lot, the relocated and expanded learning
22 garden, the removal of the southernmost span of the
23 bridge, the Howard Street pedestrian bridge, as well as
24 the expansion and improvement of the Carrousel Cafe
25 area.

1 And then, finally, there's the wall that is --
2 that faces the garden area is -- has been proposed to
3 be a green wall. And we -- we really need that to be a
4 wonderful landscaping green wall. It can't be the
5 rat-infested ivy that we see in some of the other areas
6 in Moscone South currently. So we'd like to see that
7 required.

8 Thank you.

9 PRESIDENT WU: Thank you.

10 Next speaker?

11 SECRETARY IONIN: I'd like to remind members of
12 the audience that this comment period is on the
13 adequacy and accuracy of the Draft EIR, not on the
14 project itself.

15 RICK SMITH: Chair Wu, Commissioners, my name is
16 Rick Smith. I live at 680 Mission Street, which is at
17 the corner of Third and Mission about a block away from
18 the project.

19 I love living near the convention. It really
20 shapes the feel of the neighborhood. I've followed
21 this expansion project for more than two years,
22 regularly attending the Tourism Improvement District,
23 Moscone Expansion District board meetings and
24 participate in the Moscone Expansion Strategic Advisory
25 Group.

1 And generally, I heartily support the project
2 and the project team. And I also support the expressed
3 concerns of my colleagues at TODCO and Yerba Buena
4 Alliance in their advocacy for a balanced
5 neighborhood. So I'll limit my comments now to
6 Item GR4 in the EIR relating to pedestrian impacts
7 which were deemed to be less than significant.

8 That does not match my experience because I
9 realized, while this is an incremental impact being
10 analyzed, it's an incremental as something that's
11 already in need of mitigation with nothing going on.

12 I didn't see any -- some points. I didn't see
13 in the analysis any points talking about convention
14 days that were also on Giants days. And it
15 significantly impacts the pedestrian load on Third and
16 Fourth on the days of Giants baseball games.

17 Two, the sidewalk widths should be a continual
18 passing lane, excluding tree grates, restaurant
19 seating, and any other obstacles. Some of the
20 sidewalks which were talked about being 15 feet are
21 more like five feet.

22 Three, the traffic, counting the number of
23 cars able to turn at peak pedestrian times. So what
24 happens is pedestrians use up all of the time for right
25 turners, and only one or two cars can go. And also

1 count the number of frustrated drivers who enter the
2 crosswalk while pedestrians are still there because
3 they can't go otherwise.

4 The rest of my comments will be submitted in
5 writing. Thank you.

6 KEVIN CARROLL: Good afternoon, Commissioners. My
7 name is Kevin Carroll. I'm the executive director of
8 the Hotel Council of San Francisco.

9 We fully support the project and believe that
10 the Draft EIR sufficiently examines the impacts that
11 are related to the program itself.

12 One of the things that I wanted to remind the
13 Commission, too, is the amount of jobs that are related
14 to this. And the hotels employ 24,000 individuals.
15 And our workforce is made up of 57 percent San
16 Franciscans. So this project actually helps San
17 Francisco not only from the employment but also the
18 economic benefits coming out of it as well.

19 And our employees -- 77 percent of our
20 employees identify themselves as either Asian,
21 Hispanic, or African America. So the project itself,
22 as it grows in the expansion, will help a very vital
23 part of San Francisco's industry, which is tourism.

24 Obviously, it will help with work with the
25 hotels, that the hotels will ultimately be hiring more

1 and be able to work more with the citizens of San
2 Francisco.

3 So, again, we fully believe that this Draft
4 EIR addresses the issues that are related to it, and
5 thank you for your support.

6 PRESIDENT WU: Thank you.

7 Is there additional public comment?

8 JIM LAZARUS: Good afternoon, Commissioners.

9 Jim Lazarus, San Francisco Chamber of Commerce.
10 We strongly support the project, and we believe that
11 the Draft EIR accurately and adequately addresses the
12 environmental impacts from this expansion project.

13 San Francisco's economy is robust today
14 because we have targeted knowledge-based industry.
15 Economy is key to growth of jobs. San Francisco went
16 three, four years ago from 10 percent unemployment now
17 to just over 4 percent, almost full employment, the
18 envy of the country. And part of that is because of
19 the fine work of the City and its private partners in
20 developing San Francisco as visitor and convention
21 destination.

22 The impacts of this expansion are minimal, and
23 the impacts really don't grow the convention business
24 as much as preserve and maintain our convention
25 business by allowing Moscone to better serve customers

1 we've always attracted to San Francisco. I think the
2 total number of people coming to a particular
3 convention is really not what's at stake in this
4 project. It's making the building competitive in the
5 21st century to accommodate the exhibitors and the
6 breadth of uses for a modern convention center.

7 We strongly support the project. We urge you
8 to take all the steps necessary to approve the
9 environmental review and to approve the development of
10 this project with the City and County San Francisco.

11 Thank you.

12 PRESIDENT WU: Thank you.

13 Is there additional public comment?

14 (No response)

15 PRESIDENT WU: Seeing none, public comment is
16 closed.

17 Commissioner Antonini?

18 COMMISSIONER ANTONINI: Yes, I have a few comments
19 on the Draft EIR.

20 My first comment is one that deals with the
21 scope of the expansion. It's an expansion of
22 approximately 300,000 square feet, if I'm reading
23 correctly.

24 And I would assume that an analysis has been
25 done that we don't need an even larger expansion

1 because I've heard that we lose a lot of conventions to
2 places like Las Vegas, San Diego, Chicago because of
3 not having adequately sized facilities. While I just
4 heard Mr. Lazarus speak about the fact we want to keep
5 what we've got, also we should be striving to attract
6 even more conventions to San Francisco.

7 So my comment in regards to the EIR would be
8 is the amount being analyzed big enough, or should we
9 do an analysis or have done an analysis that includes a
10 larger square footage?

11 The second part is I certainly would be in
12 agreement with adding, as part of the Final EIR, to an
13 analysis that would allow the types of things that were
14 suggested by Mr. Elberling, which sounds like a win-win
15 situation, the widening of the sidewalks, signaled
16 crosswalks in various parts. Even though we're
17 building the bridges over Howard Street, we still need
18 to allow for some additional pedestrian crossings in
19 various places along Howard and other streets to not
20 force everyone to cross at the intersections as they
21 now have to.

22 And I thought it's very wise, no turns on red.
23 And the other thing that has to be part of the analysis
24 is we have a lot of intersections downtown which are
25 signaled in a way that pedestrians all go at one time,

1 and then traffic moves at different intervals. And
2 that's much safer because the frustration of drivers
3 waiting to make a right turn is not there because, when
4 they have the arrow to go right or they have the
5 ability to turn right, there are no pedestrians.

6 And an area like this is very similar to our
7 densest downtown areas. And we certainly should
8 implement that sort of signal controls. And again I
9 think this can be done fairly easily, to make sure the
10 EIR includes impacts from that -- those sorts of
11 changes to allow those to be part of the project when
12 it's finished.

13 So those are my main comments. And I assume
14 the reason it takes four years to complete this, this
15 is projected time; it's -- we have ongoing conventions
16 and everything, so we have to phase it over a period of
17 time.

18 PRESIDENT WU: Commissioner Moore?

19 COMMISSIONER MOORE: The EIR speaks, as it speaks
20 to the design of the project, seems very complete. The
21 project is a good one to move forward in moving the
22 project into more noticeable, recognizable buildings is
23 a good idea.

24 What I'm concerned about is that the EIR
25 addresses the transformation of an entire district.

1 Pedestrian circulation is a major part of it. It is
2 not just the building which adds growth, but as the
3 location becomes more successful, the pedestrian flow
4 as it extends up to Market Street going through the mid
5 block of Yerba Buena, recognizes what the expansion
6 will yield as one of the destinations in the larger
7 district, as it looks at the revitalized Metreon with
8 Target and the new retail on Fourth Street.

9 I think it creates a much more intensified
10 pedestrian circulation which, in addition to
11 accommodating the residents who are already there,
12 needs to be comfortable and gracious, I would say. It
13 needs to be like promenading rather than shoulder to
14 shoulder, trying to get across the intersection or a
15 new mid-block light.

16 We need to remember also that more and more
17 people will or already are walking down to the CalTrain
18 Station every day at about 4:30. It is very difficult
19 to circulate in that area. If there is a ball game, it
20 gets even worse.

21 So I think we are doing ourselves a favor in
22 expanding or making sure that the EIR looks at the
23 cumulative impacts of all these new additions together
24 with the objective of creating an extremely
25 comfortable, walkable public ground in the expanded

1 Yerba Buena Center.

2 That would be the only comments. Otherwise, I
3 think the EIR addresses all major aspects of the
4 project.

5 PRESIDENT WU: I am also looking forward to
6 reading your comments and responses. And I think these
7 questions about the assumptions of the number of
8 attendees -- I look forward to seeing what the work
9 behind these assumptions is.

10 SECRETARY IONIN: Commissioners, if there's no
11 other comments, we can move on to Item 10.

12 (Whereupon, the proceedings concluded
13 at 12:49 o'clock p.m.)

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1 STATE OF CALIFORNIA)
2 COUNTY OF MARIN) ss.

3 I, DEBORAH FUQUA, a Certified Shorthand
4 Reporter of the State of California, do hereby certify
5 that the foregoing proceedings were reported by me, a
6 disinterested person, and thereafter transcribed under
7 my direction into typewriting and is a true and correct
8 transcription of said proceedings.

9 I further certify that I am not of counsel or
10 attorney for either or any of the parties in the
11 foregoing proceeding and caption named, nor in any way
12 interested in the outcome of the cause named in said
13 caption.

14 Dated the 9th day of June, 2014.

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17 DEBORAH FUQUA

18 CSR NO. 12948

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