

January 27, 2020

Kansai Uchida
Project Manager
San Francisco Municipal Transit Authority
1 South Van Ness
San Francisco, CA 94103
(Via email: kansai.uchida@SFMTA.com)



RE: Proposed Central Subway T-Third – Phase 3 Extension

Dear Mr. Uchida,

On behalf of the Board of Directors of the Telegraph Hill Dwellers (THD), we offer the following input on our transportation goals, the desirability of a subway extension into North Beach, and proposed station locations.

First some background history of our organization as it relates to transportation issues in our neighborhood. Incorporated in 1954, THD's first effort was to save the 39 Coit bus, which is still operating today to provide transit service for residents and visitors to Telegraph Hill. During our 66-year history, THD has been instrumental in successfully opposing the extension of the Embarcadero freeway through North Beach (1974); developing the "A" parking sticker program, later adopted citywide (1976); and blocking the construction of an underground parking garage beneath our beloved Washington Square to prevent the loss of park land (1966, 1976).

THD has always supported funding to improve MUNI service and reliability and has opposed cuts in service that have impacted transportation to and from our part of the City. For example, we have urged MUNI to restore the #15-Kearny bus to Montgomery Station and to operate the #41-Union bus to the Embarcadero Station all day and on weekends, to restore the #10 and #12 buses to the Waterfront, and to provide regular fares on cable cars for residents.

Although THD does not oppose the T-Third – Phase 3 extension in concept, we set forth the following significant impacts to North Beach and Telegraph Hill that must be avoided.

I. No Impacts to Washington Square

The T-Third – Phase 3 Concept Study dated January 2015 (Concept Study) for the subway extension assumes that in order to utilize the "twin tunnels" built for the extraction of the tunnel boring machine (TBM) between Chinatown at the former Pagoda Palace site, a "North Beach" station would be located *at or near Washington Square*. (Pages 2-13 and 2-29) The extensive discussion in the Concept Study of the critical importance of using the Pagoda Palace site for the placement of permanent station facilities (Pages 4-16 through 4-18)¹ is obviously out of date and no longer relevant since the site has been fully developed.

¹ The TBM could have been retrieved in Chinatown or abandoned underground as analyzed in the final EIR. The unnecessary \$70 million tunnel from Chinatown to the Pagoda Palace site in North Beach seemed more about predetermining a future North Beach Subway Station than any need for an extraction site.

THD is strongly opposed to any and all impacts to Washington Square from a subway extension. We oppose the use of Washington Square as the location of a station, a staging area, entrances, emergency egress, ventilation stacks/shafts, portal structures, headhouses, and any other structures or construction activities of any nature. As noted above, THD was instrumental in blocking the construction of an underground parking garage beneath Washington Square and later initiated and supported its designation as City Landmark No. 226 with the intent to forever prevent any impacts to Washington Square in the future.

II. Protect the Fragile Ecosystem of North Beach

In connection with the proposed subway extension, the Concept Study recognizes that: “A significant body of research has demonstrated that the introduction of new transit service typically results in increased local property values and new development, with the effects most concentrated within a quarter to half-mile around the transit stations.” (Page 3-1) As further stated in the Concept Study, there are approximately 1,714 parcels within a quarter mile of the potential North Beach station, which reflects the “dense, fine grained character of North Beach with many small parcels.” The Concept Study also confirms that 91% of these parcels currently fall within the 40-foot height district and that the parcels nearest the potential station location are within the North Beach Neighborhood Commercial District. (Page 3-6)

Based on this research, a subway station would increase property values in North Beach, resulting in higher residential and commercial rents and corresponding displacement of existing tenants and small businesses. Such increased property values would attract new development, creating pressures to upzone and threaten historic resources. The Concept Study explores using the increases in assessed value of properties as a means to help pay for the capital costs of the subway extension.

THD prioritizes the protection of existing tenants and small businesses in North Beach, and strongly advocates for the preservation of our historic and cultural resources. We are therefore concerned that even the study of a proposed North Beach subway station will threaten these priorities.

(1) Designate North Beach Historic District

To add a level of protection for the historic and cultural resources of North Beach and to counter efforts by real estate interests to upzone the area, a North Beach Historic District should be designated by the City before any further study of a subway extension through North Beach.

In addition to the landmark designation of Washington Square, the buildings and resources of North Beach are recognized as historically and culturally significant. The buildings located within four historic districts within a quarter mile around the potential station are listed on the California Register of Historic Places, including the Washington Square, Powell Street Shops, Upper Grant Avenue, and Jackson Square Extension Historic Districts. In addition, 90% of the buildings on the 1,714 parcels noted in the Concept Study have recently been determined eligible for a National Register Historic District.

(2) Develop a Commercial Rent Stabilization Plan

Committed to preserving the unique character of small business in North Beach, THD was instrumental in establishing the North Beach Neighborhood Commercial District in 1987 and a legislative ban on formula retail (chain) stores in the District. THD works with the North Beach business community to attract more small-scale neighborhood-serving businesses.

Before further study of a subway extension through North Beach, a plan for commercial rent stabilization must be established to prevent rent increases from driving out existing small businesses and to maintain the attractiveness of North Beach to new creative and unique small businesses, which have historically characterized our commercial district. We are aware that substantial commercial rent increases are impacting Chinatown even before the opening of the subway station and that major rent increases have characterized commercial districts wherever an urban subway has been established.

(3) Establish a Fund to Compensate Small Business Owners

Construction will disrupt residents, businesses, pedestrians, and traffic, which could last for years, as is the case with the extension of the subway to Chinatown. We support the North Beach Business Association in their demand that a fund be established to adequately compensate North Beach businesses for their lost income and displacement during construction activities, should a subway extension through North Beach ever materialize. Given the history of cost overruns and major delays in constructing the extension to Chinatown, the adverse impacts on businesses caused by those construction activities are well known.

III. Comprehensive Study of Alternatives/Open Community Process

THD supports an open community process as a part of a comprehensive study of a Central Subway Extension to address the social, physical, environmental, and economic impacts to the neighborhood of a North Beach station. Given that the Pagoda Palace site is no longer available and the use of Washington Square is unacceptable, alternative sites must be explored. In addition, more cost-effective alternatives to implementing efficient transit improvements – with minimal construction impacts -- should be studied.

We urge you to continue an open public process, unlike the invitation-only meetings of the past, and to avoid an approach biased toward a pre-determined outcome. This seemed the case in the recent on-line questionnaire, which failed to provide a way to express our concerns regarding the impacts to our neighborhood.

We also urge you to specify and analyze lessons learned from the ongoing Central Subway project, and how SFMTA intends to mitigate, and ideally avoid, similar fiscal, schedule, personnel, and outreach problems on the Central Subway extension project.

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We look forward to a renewed dialog in which the issues raised above will be meaningfully addressed.

Sincerely,

Stan Hayes

President
Telegraph Hill Dwellers

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