



EUREKA VALLEY PROMOTION ASSOCIATION

serving the Castro and Upper Market neighborhoods since 1881

PO BOX 14137
SAN FRANCISCO, CA 94114

1 May 2008

Michael Smith, Planner
1650 Mission Street, 4th Floor
San Francisco, CA 94114

Re: 4127 18th Street (WALGREEN'S "SPECIALTY" PHARMACY)

The EVPA opposes the expansion of the Walgreen's Specialty Pharmacy. This issue has been very divisive to our community, pitting some real estate/business interests against residents who depend on the neighborhood serving businesses within the Castro NCD. This is the first time in over eight years that the EVPA has unconditionally opposed the approval of a conditional use request within our area (our records date back to 1998). We oppose both Conditional Use requests on the following grounds:

1. The proposed expansion does not meet the requirements of the San Francisco Planning Code section 303(c)(1)(A):

(1) That the proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community:

(A) In Neighborhood Commercial Districts, if the proposed use is to be located at a location in which the square footage exceeds the limitations found in Planning Code § 121.2(a) or 121.2(b), the following shall be considered:

- (i) The intensity of activity in the district is not such that allowing the larger use will be likely to foreclose the location of other needed neighborhood-servicing uses in the area; and
- (ii) The proposed use will serve the neighborhood, in whole or in significant part, and the nature of the use requires a larger size in order to function; and

a. The expansion of the existing pharmacy DID displace a very needed neighborhood serving small business. Walgreen's claims that they are only moving into a space that was previously vacant. The space had been a thriving laundromat for several decades. Per the SF Tax Collector, the laundromat ceased operations in November 2006 (the laundromat operator declines to give reasons for the closure). Within only three months (over the holiday season), Walgreen's developed a corporate plan for the space and in February 2007 signed a 20 year lease.

b. The proposed use will NOT serve the neighborhood "in whole nor in significant part." By Walgreen's description, it is a "specialty" pharmacy, serving a limited segment of the residents of this neighborhood, the only pharmacy of this type being considered city-wide, thus serving residents throughout the city. Additionally, Walgreen's has stated that they would not be willing to relocate this pharmacy to a different location outside the NCD. Some of the most vocal members of the community against this expansion were those who actually use this pharmacy for acquiring their drugs. Although some non-users of the pharmacy have stated that the additional staff such as a dietician sounds good, no one who uses the services of the current pharmacy stated that this expansion would be beneficial to them.

2. The size of the space is larger than necessary for the proposed use. The proposed 3696 sq-ft is significantly larger footprint than in any other Walgreen's specialty pharmacy. Per Walgreen's, most other specialty pharmacies are about the same size as the existing specialty pharmacy at 1429 18th Street (1,300 sq-ft based on Walgreen's 1999 CU application 98.909C for expanding into the space at 480 Castro Street). Per Walgreen's, the largest other Walgreen's specialty pharmacy of this type in the bay area region (Palo Alto) is about 1000 sq-ft smaller.

3. Walgreen's has demonstrated a consistent pattern of occupying or expanding into spaces previously occupied by neighborhood serving businesses. This expansion would increase Walgreen's footprint in the neighborhood to almost 14,000 square feet. Their history is as follows (numbers vary depending on the document from which they are retrieved):

Year	Addition	Total Footprint	
1978	6,470 sq-ft	6,470	Walgreen's opens at 498 Castro Street
1988	1,585 sq-ft	8,055	Walgreen's expands into 484 Castro Street
1997	1,300 sq-ft	9,355	Walgreen's opens pharmacy at 4129 18th street
1999	2,245 sq-ft	11,500	Walgreen's expands into 480 Castro Street
2008	2,396 sq-ft	13,896	Walgreen's proposed expansion into 4127 18th Street

4. The primary argument for supporting Walgreen's expansion is that empty storefronts are bad for business. This is undisputed. But for the past 15 months, the former laundromat space has remained unoccupied as Walgreen's pays the rent.

5. Walgreen's has not been a good neighbor since its arrival in the neighborhood over 30 years ago. The membership feels that the past performance in this neighborhood is a good indication of the future. Although there have been some recent contributions to the neighborhood since they began the process for this proposed expansion, the long term record over thirty years is dismal.

5. Walgreen's has not been in compliance with the Conditions of Use granted per 98.909C, albeit the violations are minor, they have taken no action to either comply or to request a modification of the conditions as granted.

Once we are provided with a case number, we will be forwarding a similar letter to the San Francisco Planning Commission for the hearing of this case. If you or other planning staff should have any further questions regarding this issue, please do not hesitate to contact me at (415) 863-2593 or at steve@steveclarkhall.com. The EVPA is the neighborhood group serving Eureka Valley since 1881, the oldest continuous neighborhood group in San Francisco. Visit us at online <http://EVPA.org>.

Respectfully submitted,



Steve Clark Hall
President, Eureka Valley Promotion Association