
From: CPC.BalboaReservoir
Sent: Thursday, August 15, 2019 4:44 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: Comment on 3.A.1 Initial Study, 3.A.2 Overall Approach, 3.B.3 Summary of Balboa Park Station Area Plan PEIR Transportation Section

From: aj <ajahjah@att.net>
Sent: Tuesday, August 13, 2019 3:58 PM
To: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>; CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Subject: Comment on 3.A.1 Initial Study, 3.A.2 Overall Approach, 3.B.3 Summary of Balboa Park Station Area Plan PEIR Transportation Section

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Hi Jeanie,

Here's comment on 3.A.1, 3.A.2, 3.B.3:

3.A.1 Scope of Analysis

Initial Study

In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR. Therefore, the topics addressed in the initial study are listed below and are not analyzed in this SEIR chapter.

Under Public Services, the PEIR did not analyze the impacts of a Reservoir Project on City College.

By way of the Initial Study, the SEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address impact on student attendance and enrollment and on gig-working part-time Instructors who have to travel between multiple community college sites.

The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the "less-than-significant" conclusion of impact on City College. The Initial Study states:

The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.

- Removal of parking would not conflict with CCSF sustainability plan.....**but it would conflict with access to education.**

Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.

- This is an non sequitur. Just because CCSF TDM doesn't conflict with loss of existing parking, does not mean that TDM measures will be able to solve the problem of student access to education. The success of TDM is speculative. Finally, reference to the PEIR is mystifying because CCSF was not assessed in the BPS Final EIR's Public Services section to begin with.

The SEIR/Initial Study implicitly considers TDM to be the overriding goal of City College instead of recognizing that the main purpose of CCSF is education, with TDM being a secondary consideration.

The SEIR's speculative possibility of success of TDM to alleviate loss of student parking in the Initial Study is an inadequate justification to come to a conclusion of less-than-significant impact on CCSF.

Instead of being relegated to the Initial Study, impact on City College's educational mission and on access to education must be comprehensively and objectively examined. The SEIR and Initial Study are inadequate.

3.A.2 Overall Approach to Impact Analysis

As a subsequent EIR to the PEIR certified in 2008, this SEIR, including the initial study, identifies and considers all mitigation measures that were identified in the PEIR and determines their

applicability to the currently proposed project.

Considering mitigation measures contained in the PEIR is insufficient. The Initial Study and DEIR has failed to identify and consider the PEIR rejection of the Lee Extension that had been proposed by CCSF.

The fact that the PEIR had rejected the Lee Extension has direct relevance and "applicability to the currently proposed project."

Here's what the PEIR says about the Lee Extension (westbound Ocean onto northbound Lee into Reservoir):

Access Option #1: Under this option, CCSF would be allowed westbound right-turn-only ingress on Lee Avenue.

It should also be noted that Option #1, the provision of westbound right-turn-only ingress to CCSF, would be expected to result in secondary design and operational issues at the Ocean/Lee intersection. With access provided into CCSF from Lee Avenue, it would not be possible to fully restrict access from other directions, such as the eastbound left-turn movement or the northbound through movement. As a result, vehicles would be unable to directly access the Phelan Loop or the Balboa Reservoir development sites from the west. Instead, these vehicles (approximately 44 vehicles during the weekday PM peak hour) would be required to divert into the residential neighborhood south of Ocean Avenue to be able access Lee Avenue from the south or the west. In addition, approximately 75 vehicles destined to CCSF during the weekday PM peak hour are anticipated to come from the west. With the restriction of the eastbound left-turn movement, it is likely that a portion of these vehicles would also divert into the residential neighborhood south of Ocean Avenue instead of using the Phelan Avenue access. The prohibition of the eastbound left turn movement would affect the access and circulation patterns of residents and visitors of the Phelan Loop and Balboa Reservoir development sites. In addition, the rerouted traffic from these two projects and CCSF would noticeably increase traffic volumes on the adjacent neighborhood streets, potentially affecting access into individual residences and resulting in other secondary impacts.

To discourage these vehicles from using neighborhood streets as a means to enter Lee Avenue, the northbound and southbound approaches to the Ocean/Lee intersection would need to be reconfigured to provide left-turn and right-turn movements only, precluding northbound through movements altogether. This would require the installation of a physical barrier (such as a channelizing island) at both approaches. Conversely, it may be possible to turn the south leg of the Ocean/Lee intersection into a right-in/right-out configuration. By prohibiting these through movements on Lee Avenue, it would no longer be advantageous for CCSF-destined vehicles to cut through the neighborhood south of Ocean Avenue. However, such a restriction in access would negatively affect access and circulation for the adjacent residences and would further complicate access routes for the Phelan Loop Site and Balboa Reservoir development traffic from the west by requiring these vehicles to cut further into the neighborhood south of Ocean Avenue to make a northbound left turn from Harold Avenue, and enter the westbound right-turn queue at Lee Avenue.

Therefore, as a result of the excessive queuing that would affect operations at the Ocean/Phelan/Geneva intersection and the secondary effects that the provision of westbound right-turn-only ingress would cause, the provision of CCSF westbound right-turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Restricting CCSF ingress would allow normal access to Area Plan projects and would avoid potential spillover effects on neighborhoods south of Ocean Avenue. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan.

3.B.3 Summary of Balboa Park Station Area Plan PEIR

Transportation Section

Balboa Park Station Area Plan PEIR Impacts and Mitigation Measures

Program-Level Impacts

Transit

Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva

Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.

The BPS Area Plan PEIR contains a comprehensive analysis of the Lee Extension. The Lee Extension analysis is directly applicable to the Balboa Reservoir Project.

Crucially, all Lee Extension options were eliminated from the BPS Area Plan.

Although the Lee Extension is referenced in the “Traffic” Section, the “Transit” Section only mentions Ocean/Geneva/Kahlo and the two Geneva/I-280 on/ off ramps.

It is only with willful disregard for objectivity that the BPS Final EIR’s rejection of a Lee Extension has not been incorporated into the Reservoir SEIR and Initial Study as it relates to transit delay.

The Kittelson Memorandum pales in comparison to the analysis that had been contained in the BPS PEIR.

The Lee Extension analysis contained in the PEIR cannot be legitimately omitted from Transit Delay analysis. Thus the SEIR/Initial Study is defective and inadequate.

Submitted by:

Alvin Ja