
From: Poling, Jeanie (CPC)
Sent: Thursday, September 12, 2019 7:49 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: comment on 3.B.5 Regulatory Framework
Attachments: LANDuseFramework.pdf

From: aj <ajahjah@att.net>
Sent: Monday, August 26, 2019 9:50 PM
To: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>; CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Subject: comment on 3.B.5 Regulatory Framework

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Hi Jeanie,

My comment on 3.B.5:

3.B.5 Regulatory Framework

This section provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site. No federal regulations, plans, or policies are relevant to the project.

3.B.5 critically omits the Land Use Framework that was adopted by the Public Utilities Commission in 2012, attached (PUC Resolution 12-0044).

Balboa Reservoir in context of PUC's Land Use Framework

The lease and sale of PUC property is governed by the PUC document, "FRAMEWORK FOR LAND MANAGEMENT AND USE."

The document lays down conditions for sale of PUC land to include economic, environmental, and community criteria.

The Balboa Reservoir Project has been promoted as part of the Public Land for Housing Program whose purpose is to build affordable housing.

Public Land for Housing in the context of Balboa Reservoir, will fail its overarching goal of affordability. Instead, Balboa Reservoir will achieve 67% unaffordable housing, in exchange for 33% affordable housing.

The PUC Land Use document states:

COMMUNITY CRITERIA: Land may be sold or transferred when:

1. The sale or transfer is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.

2. The sale or transfer would not significantly adversely affect the implementation of an adopted resource agency plan for the area.

3. The sale would not increase the risk of loss, injury or death to SFPUC employees or others on or near the parcel.

4. Use of the land sold will not to result in activities creating a nuisance.

The Balboa Reservoir Project fails Condition 4 of “Community Criteria.”

The current plan removes existing parking for City College students. It deliberately limits parking within the Reservoir to 0.5 parking spaces per residential unit in the unrealistic expectation that this will discourage car ownership by new Reservoir residents.

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance that would inhibit student enrollment and attendance at City College [The word “nuisance” understates the problem].

The Balboa Reservoir Project fails to comply with PUC’s “Framework for Land Management and Use.”

The sale of Balboa Reservoir to private developers would provide a short-term cash infusion to PUC Water Enterprise. However the short-term gain of quick cash doesn’t justify losing this valuable piece of public land in perpetuity to private developers in the guise of “affordable housing.”

The draft SEIR is deficient in its omission of the PUC Land Use Framework within the Regulatory Framework.

--Alvin Ja