
From: Poling, Jeanie (CPC)
Sent: Tuesday, September 17, 2019 8:34 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: SDEIR Balboa Reservoir Project
Attachments: Bal REs Alternative_081118 copy.pdf

From: Leslie Simon <lsimon@ccsf.edu>
Sent: Tuesday, September 17, 2019 12:13 PM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>; Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Subject: Re: SDEIR Balboa Reservoir Project

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September 17, 2019

Jeanie Poling
San Francisco Planning Department

1650 Mission Street, Suite 400
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Re: Balboa Reservoir Project

Case No: 2018-007883ENV

Dear Jeanie Poling:

This letter is to describe an adverse impact on City College of San Francisco (CCSF) of the development in the Balboa Reservoir, which has NOT been addressed by the Draft Subsequent Environmental Impact Report (DSEIR). The Balboa Reservoir Project DSEIR fails to place CCSF as being the main feature of the vicinity's "existing or baseline conditions." Since CCSF is not made the main feature of the baseline condition, the Reservoir's impact on CCSF is discounted and minimized as "less than significant." This is an unacceptable and justifiably illegal consequence of the DSEIR.

This letter also asserts that the DSEIR does not adequately address the alternative for 100% affordable housing on the Balboa Reservoir site.

Impact on City College of San Francisco

1. Transportation

The DRAFT SEIR says: "... it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..." and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the Draft SEIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." It avoids assessing the possibility that students might stop attending CCSF. The report must consider the true impact on student attendance and enrollment and also on gig-working part-time instructors who have to travel between multiple community college sites.

The DRAFT SEIR claims that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. But just because it doesn't conflict with the TDM/Sustainability Plan doesn't mean there is no impact on the public service of CCSF. The current use of the Reservoir serves a public benefit in providing physical access to education.

The description of the existing condition avoids identifying the project site as a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service.

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways.

From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.

There is no substantial evidence that the TDM would be able to resolve the effects of lost student parking on student enrollment.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.

The DRAFT SEIR must consider the impact of reduced parking without first putting viable transportation options in place. According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school.

[Inside Higher Ed](#) reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules." (February 12, 2019)

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

The Balboa Reservoir Project will bring in 2,200 adult residents and will supplant all 1,007 spaces from the Lower Lot decreasing capacity parking for City College students by 50%. This will further erode enrollment at the College. The Balboa Reservoir Project will succeed in permanently shrinking City College, a deeply adverse impact on the College.

FYI the proposed public parking by the Balboa Reservoir Project will be too expensive (estimated cost is \$12-\$20/day while students now pay \$3/day or \$40/semester) for City College students. Instead it will serve BART commuters with high paying jobs.

The proposed Reservoir development has forced City College to include in its Facilities Master Plan two to three new parking structures to make up for the loss of existing parking in the PUC Reservoir. This secondary impact must be addressed.

To alleviate this impact consider these proposals:

- establish a shuttle to BART from Frida Kahlo Way and offer free public transportation for college students (won for K-12 students in 2013);
- increase service on the lines serving the Reservoir area: K, 29, 43, 54, 15, and 8 Bayshore, and 49.

Only then can students with multiple responsibilities consider public transit as a means of getting to and from jobs and children's schools. Only then can they give up parking in the Balboa Reservoir allowing 100% affordable housing to be built on public land, leaving green space and enough parking for those students for whom even improved public transit will not alleviate their need to drive to school.

2. Unfair Burden on CCSF's Facilities Master Plan

The Balboa Reservoir Project is forcing City College to include new parking garages in its Facilities Master Plan (FMP). But where will the funding for the ambitious FMP come from? One of the proposed sources is a nearly billion-dollar bond measure not even on the ballot yet, let alone approved by the voters. Why force this added burden on one of the most treasured of San Francisco's institutions when it is struggling to regain its health?

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking.

When the Performing Arts and Education Center (approved by voters in bond measures in 2001 and 2005) is built on the Upper Reservoir, aka Upper Lot, at least 200 spaces will be lost, boosting usage to 80% of available space. When the 25% drop in enrollment is restored, then approximately 400 more parking spaces will be needed **pushing the combined lot's usage back to about 100% capacity.**

3. Alternative Plan

We refer you to an article by Joseph Smooke and Dyan Ruiz "Five Reasons Why San Francisco Must Not Give Up Public Land for Market Rate Development" (Truth-out, April 3, 2015). Smooke and Ruiz argue "You can't solve an affordable housing problem by building luxury housing." They further explain "...for every 100 market-rate units the city allows on public sites, there are another 43 affordable units that need to be built to compensate." This data comes from a 2007 study commissioned by the Planning Department. The people who serve folks in the market-rate housing will be forced to live far away from San Francisco contributing to further traffic congestion in the Bay Area region and seriously reducing their quality of life.

At most the Balboa Reservoir Project will offer 33% housing that is affordable to people with teachers salaries and below. That would provide about 350 units. An alternative plan would build **350 units only**, all of them affordable (100%) to people with teachers' salaries and below. A model for this plan exists adjacent to the Balboa Reservoir at 1100 Ocean, a development built on public land and 100% affordable. The possibility of this model must be explored.

I have attached a sketch that shows how these units would fit into the Lower Lot of the Reservoir. Alternative funding sources could include a proposed municipal bank and a reassessment of under-assessed commercial properties or a change in the Twitter tax. It is not necessary to use unneeded luxury housing, which create the need for a substantial number of additional affordable units, to fund affordable units.

Until funding for 100% affordable housing for the number of units that could be established in the Lower Lot in a sequenced manner so as not to radically reduce parking before public transit has been improved, no housing should be built on the Balboa Reservoir because it will have an adverse impact on the enrollment and consequent health of City College of San Francisco.

The attached alternative plan shows three structures, which could be built in phases, so that when the promised better transit services are established, some of the Lower Lot could be dedicated incrementally to affordable housing. I request that this alternative plan be explored.

4. DSEIR 6-58 100% Affordable Housing

The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing. San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR simply dismisses the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco already owns this parcel, so why is the City of San Francisco planning to sell public land that it already owns to a

private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense?

A development solely devoted to affordable housing would better blend with the residents of this working class neighborhood. The proposed development of mostly market rate units leaves these residents vulnerable to displacement due to gentrification. The adjacent neighborhood, Excelsior, is also a working class neighborhood vulnerable to displacement due to gentrification.

I again refer you to an article by Joseph Smooke and Dyan Ruiz “Five Reasons Why San Francisco Must Not Give Up Public Land for Market Rate Development” (Truth-out, April 3, 2015).

Policy 4.5.1 in the [BPSAP](#) says that when offering public land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

The DRAFT SEIR does not consider the impact of increasing the number of units from the original recommendation in the PEIR. The Reservoir Project’s two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR’s Housing option for the Reservoir referred to 425-500 units.

From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes “substantial unplanned growth.”

5. Educator Housing (Alternative Plan/100% Affordable)

The DRAFT SEIR must consider the possibility of using this public land to build dedicated educator housing. Most recently, the City of San Francisco has committed current and future funding for educator housing. Since approval of the PEIR the City of San Francisco has also identified a great need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers would be able to walk to work if they lived there.

Thank you for addressing this complaint and alternative suggestion that was NOT taken into consideration in the DSEIR for Balbo Reservoir.

Sincerely,

Leslie Simon

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