

## INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already stated the following:

The Initial Study's B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*

Going to the referred Ch.2 Project Description produces this:

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### Project Description

#### **2.A Project Overview**

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

Chapter 3 is entitled "Environmental Setting, Impacts, and Mitigation Measures." It states: "Sections 3.B through 3.D each includes descriptions of the environmental setting and regulatory framework."

In a careful search for descriptions of the environmental setting within Sections 3.B, 3.C, and 3.D, here are the descriptions provided:

#### **3.B.4 Existing Conditions:**

*The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land Use Planning, p. B-12.*

#### **3.C.3: Summary of BPS Area Plan PEIR Noise Section:**

##### **Balboa Park Station Area Plan PEIR Setting**

*The noise setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan [Program] Environmental Impact Report (PEIR) differs from the existing setting today primarily in terms of the increase in traffic volumes resulting from overall employment*

growth in the San Francisco area and number of noise sources that exist in the area. However, there was a decrease in annual enrollment at the adjacent City College Ocean Campus of nearly 25 percent between 2008–2009 and 2017–2018, the most recent year for which data are available.<sup>151</sup> In addition, since the December 2008 certification of the PEIR, development has occurred adjacent to the project site. City College filled the east basin of the reservoir site and raised its grade to match surrounding terrain to the east, and constructed the Multi-Use Building.

### 3.C.4 Environmental Setting:

3.C.4 contains technical information regarding noise. There is no content describing the overall existing setting.

### 3.D.3 Summary of BPS Area Plan Quality Section:

#### **Balboa Park Station Area Plan PEIR Setting**

*The air quality setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan Program EIR (area plan PEIR, or PEIR) differs from the existing setting today in terms of air quality conditions, the regulatory environment, and in the level of available information with respect to health risks and hazards. Specifically, at the time of the PEIR, localized concentrations of criteria air pollutants were higher than what are monitored today as many of the regulatory improvements implemented since then have improved air quality conditions. As an example, the PEIR reported that particulate emission standards were regularly exceeded in San Francisco. Since 2007, the effect of regulatory changes has resulted in a reduction in the number of violations of the particulate matter standard despite subsequent strengthening (i.e., more health protective) of the ambient particulate standards.*

### 3.D.4 Environmental Setting:

3.D.4 Environmental Setting contains information regarding climate and meteorology, and pollutants. There is no content describing the overall existing setting.

## **California Code of Regulations Title 14 Section 15125**

California Code of Regulations Title 14 Section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

*§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

The descriptions of the physical environmental setting in 3.B, 3.C, and 3.D are limited to descriptions involving transportation, noise, and air quality.

Thus, in order for the public and decision-makers to acquire the “most accurate and understandable picture possible of the project’s impacts”, we are left with the SEIR’s 2.A Project Overview contained in Chapter 2, Project Description.

Contrary to § 15125's requirement for a description of the existing condition "in the vicinity of the project", SEIR 2.A only provides a description of the project site:

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

#### **THIS FAILS § 15125's REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.**

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

*§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

**Subject:** Input for planning – CCSF must be considered

**Comments:**

CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.

Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!

Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!

#### **THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c).**