

Please consider the following specific comments and requests about expected impacts of the Balboa Reservoir development. Points 1-16 are related to noise impacts, and points #17 to 20 relate to others.

1. Noise effects on residences and child care centers in adjacent Sunnyside have not been tested although they are located within the 900 foot zone of project noise consideration. Two childcare centers and preschools were identified in the EIR in this area Northeast of the project. The sensitive receptors in this area are closer to some parts of the development than the studied 24-hour LT-3 location in Westwood Park, and the Northeast sites lie in an area that is typically downwind of the construction site. Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way Mighty Bambini location at the border of Sunnyside and Westwood Park appears to be a residence as well as childcare and preschool center. Like other childcare centers in surrounding residential neighborhoods, it deserves a 24-hour noise study. Additionally, noise testing will be needed at the corner of Judson and Frida Kahlo Way (formerly Phelan Avenue) where a replacement City College childcare center is planned within the construction timeframe, according to Dr. James Sohn of the City College of San Francisco.
2. The first Mitigation Measure for noise recommends selecting truck haul routes that “avoid the North Access Road and adjacent Riordan High School and residential uses along Plymouth Avenue.” But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, Harmony Family Childcare. A high school, nursery schools and daycare centers are located at, or near, all the identified possible entrance and exit points of the project. The Lee Avenue alternative is already identified in Cumulative Transportation Items 4 and 6b [C-TR-4 and C-TR-6b] as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation. It appears that the mitigation measure for noise #1 would exacerbate another unmitigable project issue.
3. The first mitigation measure of the Report also recommends undertaking the noisiest activities during “times of least disturbance” to surrounding residents and occupants which are identified as from 9am-4pm [per page 3.C-30], a period prior to the maximum existing use of the adjacent land at City College, which is between 11am and 1pm. This coincides with the period when daycare centers and nursery schools are in session, Riordan HS holds classes and after school activities, and the majority of City College classes, including child development classes in the Multi-Use Building, are in session. The times of least disturbance needs to be redefined. There may be no time of least disturbance for the many diverse uses of the area, and if that is the case, that should be noted.
4. The draft SEIR fails to include the City College Multi-Use Building (MUB) as a sensitive receptor. MUB is approximately 150 feet from the construction site (per the scale of Figure 2-1, p 2-2) and is used for childcare classes where children attend classes on

site. The short-term measurement location information in the SEIR for ST-3 (page 3.C-9) notes that “The Multi-Use Building is the nearest City College building to the project site; however, college campuses are generally not considered a noise-sensitive receptor.” The MUB has been used for childcare classes for children on site for several years and is expected to continue to be used for that purpose and therefore needs to be recognized as a noise-sensitive receptor site that qualifies as such for noise testing.

5. Additional noise studies need to be made to create a noise baseline at all noise monitoring sites. Long term (24-hr) sound assessments were made on the Western side of the project. Only short-term sound assessments were made on the East side at the City College MUB and Riordan High School, which is also a boarding school, and that testing was for a short period, less than half an hour before 9:30am. Not only will 24-hour noise monitoring enable an apples to apples comparison with the other 24-hour noise tests, 24-hour monitoring should be included to take into account the wide variation in sound levels as the City College lot fills, empties, and refills at different times of the day.
6. During Phase 0 of construction, there will be up to 200 one-way trips per day during peak activity, and the noisiest period will continue for two months (page 3.C-26). 22 truck trips are anticipated per hour. This is a truck trip every two to three minutes between the hours of 7am and 4pm. The noisiest period in Phase 1 would last four months. There is no school vacation that lasts for four months; so, even without including the seven-month noisiest period of Phase 2, during Phases 0 and 1, the level of truck hauling activity will occur during class hours and disturb classes as well as access to classes due to equipment VMT.
7. The project construction is “anticipated to occur in three main phases over the course of six years,” (page 2-3). If that is the case, then why does Table S-3 identify Alternative D: Six Year Construction Schedule” as an alternative rather than the plan? (pp s-44 to S-48.)
8. Four alternatives for number of units were proposed: 0, 800, 1100, and 1550. Why is the alternative for 800 units not included in assessments? The impacts and results of mitigation on the 800-unit proposal needs to be addressed.
9. In the Notes section at the bottom of Table 2-2 on p.2-38, “Phases 1 and 2 could occur simultaneously for a duration of two years following Phase 0.” But above, in the same table, Phase 1 and Phase 2 are each estimated to have a duration of 2.5 years. Please explain how the condensed schedule would take two years rather than 2.5 years for Phases 1 and 2.
10. We would appreciate a clear understanding of the noise impact of cutting the construction period from six to three (or four) years. Would the noisiest period of

construction occur in the first two or three (or four) years whether the time period of the project is three (to four) or six years?

11. We understand the same equipment will be used whatever the time schedule. But will a compressed time schedule mean more equipment will need to be operated simultaneously, increasing the noise level at certain times? It is to be expected that construction compressed into two phases would increase the level of disruption along community streets due to more frequent construction truck hauling near multiple sensitive receptors, residences, and education institutions.
12. If the construction schedule is compressed, please address the likelihood of the need for additional hours of work per day or night required to meet the compressed timeframe. Will compressing the time frame into three years increase the risk of emergency requests for special permits for night work?
13. If the City grants special work permits for periods outside of the standard allowable 7am to 8pm construction hours, boarding school students at Riordan HS and residents living along Plymouth, Ocean, Lee and on the Northeast side of the development in Sunnyside and Westwood Park, will likely experience sleep disturbance. The SEIR leaves open the possibility for special night permitting. This will affect the health, well-being and productivity of all concerned, and negative night permitting impacts should not be acceptable in this residential area.
14. Construction-related vibration impacts were not addressed in the PEIR. Studies do not include an evaluation of the vibration impact of construction equipment although as noted on p. 3.C-32, equipment used for demolition, site preparation and excavation activities, including the hoe ram and vibratory roller/compactor, which will be used, could generate varying degrees of temporary groundborne vibration.

Per Table 3.C-6 on page 3.C-14, older buildings may be damaged at .1 PPV (in/sec) if they are fragile though old buildings or residential structures would normally be able to withstand a maximum of .25 to .3 PPV when subjected to continuous or frequent intermittent sources. The Vibratory Roller/Compactor, a piece of equipment that will be used, creates .21 PPV (in/sec) at 25 feet. Although it may not be likely, it is possible there are homes along Plymouth Avenue that are in close enough proximity and fragile enough to be damaged by vibration. Have the homes along Plymouth been evaluated for their distance and fragility for possible vibration impacts?

15. In general, although SF Planning doesn't include City College students in their learning environment as sensitive receptors in noise assessments, due to the type of activity and the duration and amount of noise exposure, they should be considered in this category. Per the World Health Organization, as stated in the SEIR document, a known health effect from noise is decreased performance on complex cognitive tasks (reading, attention, memorization and problem solving.)

16. As you note, because City College has been making changes to their master plan, checking in with them for their most current plans for development in the areas closest to the Balboa Reservoir is an ongoing process. A recent plan calls for constructing a Performing Arts Education Center building twice as tall as the one indicated in the DEIR on the City College-owned "upper reservoir." Please take into account the cumulative impact to noise of new plans.

Non-Noise-related Comments:

17. Air Quality:

Please include the sensitive receptors identified above for noise in assessments of air quality as appropriate, although air travels farther than noise. The EIR construction modeling of air quality in Appendix D assumes three years. Again, six years is the Developers Option and should be the default, not three years which is not recommended due to air quality and other impacts.

18. Use of Natural Gas:

Per the EIR, efforts will be made to move away from fossil fuels toward renewable energy sources in accordance with the 2017 Clean Air Plan. As of 2017, electricity supplied to San Franciscans was 82% emissions-free, with 64% of electricity generated from renewable sources that include wind, solar and existing large hydropower. (DOE's Focus 2030: A Pathway to Net Zero Emissions report of July 2019, p. 7.) "Should the city fail to meet its renewable electricity goal by 2030, and continues to use natural gas and other fossil fuels, San Francisco could see up to five times more cumulative emissions by 2050." (Focus 2030 report, page 8.)

It is in the interest of San Francisco that all new buildings are powered by electricity and not natural gas. In the interest of meeting San Francisco's Net Zero Emissions plan, please identify only electrical infrastructure and appliances in all structures built on the Balboa Reservoir.

19. San Francisco ensures fire safety primarily through provisions of the building code and fire code. Do those codes take into account the lack of a water supply for emergencies for the western part of the City and any need for water storage? The City has been through many fire emergencies, and it would be irresponsible to take these issues lightly. Ignoring or postponing the issue of a water supply for emergencies is not going to help us during an emergency. The potential housing loss due to a fire could be much greater than the housing gain from any one development. Is there a need for water storage for fire emergencies, and if so, there needs to be an evaluation of possible sites while they still exist, including at the Balboa Reservoir.

20. Wind Impacts:

The creation of wind tunnels is a risk of constructing buildings up to or over 80 feet. But the DEIR indicates there is no significant impact from wind. To anyone who lives, studies or works in the area, the power of the wind coming off the ocean is already well known. To mitigate the risk of tunneling already strong winds into educational and residential communities, no new building should exceed 79-80 feet. The developers' option does not exceed 80 feet, but the additional housing option is likely to create wind tunnels. If San Francisco wants to sweep the many young children who congregate in the area off their feet, the additional housing option will do it.