
From: Poling, Jeanie (CPC)
Sent: Monday, September 23, 2019 10:59 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: Balboa Reservoir EIR comments

From: Yonathan <yonathan@gmail.com>
Sent: Monday, September 23, 2019 3:34 PM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Subject: Balboa Reservoir EIR comments

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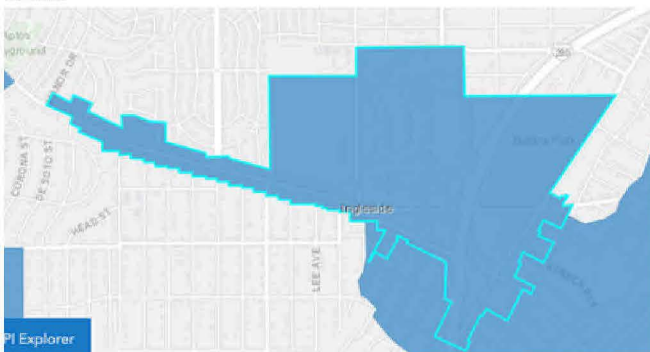
Thank you for this draft program EIR for the [Balboa Reservoir Project](#). San Francisco and the Bay Area are in desperate need of more housing in order to reduce displacement, increase access to opportunity, and reduce wealth inequality. This SEIR is a necessary step in the development of the Balboa Reservoir.

However, I think it is deficient in its discussion of cumulative greenhouse gas emissions and traffic impacts.

In two tables (Table S-3, Table 6-6) and in the discussion of the alternatives in 6.C (p. 6-14), the EIR says that the No Project Alternative would have No Impact (NI) on greenhouse gas (GHG) emissions, whereas the proposed project would have a Less than Significant (LTS) impact on GHG emissions. Therefore, section 6.D concludes that “the No Project Alternative would be the environmentally superior alternative because it would result in no impacts to all resources”.

I believe this is in direct conflict with the [Plan Bay Area 2040](#) FEIR, which finds that the “No Project and Main Streets Alternatives would result in a greater number of significant and unavoidable impacts compared to the proposed Plan” of concentrating jobs and housing in Priority Development Areas (PDAs) (p. ES-8). Indeed, the whole purpose of SB 375 (2008) and Plan Bay Area was to reduce GHG emissions by concentrating jobs and housing near transit. The Plan Bay Area 2040 EIR may be used “as the basis for cumulative analysis of specific project impacts” (Section 1.1.6).

This is relevant because the Balboa Reservoir is the biggest single development in the Balboa Park PDA (see screenshot of [PDA map](#), below). It is minutes away by foot from the Balboa Park BART station and numerous Muni light rail and bus lines.



If the project were not built, the people who would have lived there do not simply vanish. Instead, they move further away in the Bay Area or elsewhere in the United States with worse transit service. By excluding reasonable estimates of per capita GHG emissions under the No Project Alternative, the Draft EIR makes it impossible to compare GHG impacts among the No Project, Reduced Density, Developer's Proposed Project, and Additional Housing alternatives.

The same reasoning applies to VMT, though to your credit Table 3.B-9 includes a comparison of local VMT to Bay Area VMT that shows that Balboa Park area residents are likely to drive less per capita.

In my opinion, developing the Balboa Reservoir to the highest density is likely to have lower cumulative 2040 impacts on greenhouse gas emissions and traffic than any of the alternatives, including the no project alternative.

Thank you.

Yonathan Randolph