
From: Poling, Jeanie (CPC)
Sent: Monday, September 23, 2019 8:37 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: AFT 2121 PUBLIC COMMENT ON THE DRAFT SEIR OF THE BALBOA RESERVOIR PROJECT

From: Jenny Worley <jworley@aft2121.org>
Sent: Monday, September 23, 2019 12:42 PM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Cc: Alex Randolph <alexrandolph@ccsf.edu>; Tom Temprano <ttemprano@ccsf.edu>; Ivy Lee <ivylee@ccsf.edu>; bdavila@ccsf.edu; tselby@ccsf.edu; Shanell Williams <swilliams@ccsf.edu>; John Rizzo <jrizzo@ccsf.edu>; and <rudy@sflaborcouncil.org>
Subject: AFT 2121 PUBLIC COMMENT ON THE DRAFT SEIR OF THE BALBOA RESERVOIR PROJECT

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AFT 2121 PUBLIC COMMENT ON THE DRAFT SEIR OF THE BALBOA RESERVOIR PROJECT

The DRAFT SEIR is inadequate because it fails to place CCSF as the main feature of the vicinity's "existing or baseline conditions"

The DSEIR does not include CCSF as the main feature of the baseline conditions, despite the fact that CCSF abuts the parcel and has utilized it since 1946. CCSF is one of the most treasured institutions in San Francisco, offering higher public education to a wide range of communities, and a life line for many marginal and disenfranchised communities. Its value is incalculable. This omission means that, going forward, CCSF development priorities will become secondary to the interests of the Reservoir Project since the Reservoir Project will be considered the baseline condition.

The DRAFT SEIR is inadequate because it fails to consider the option of building 100% affordable housing

The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".

San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR does not consider the option of dedicating this publicly owned property to 100% affordable housing. Nor does it even consider its own PEIR ([Balboa Park Station Area Plan](http://generalplan.sfplanning.org/Balboa_Park_Station.htm)) which http://generalplan.sfplanning.org/Balboa_Park_Station.htm states that when offering public land for development, first consideration should be given to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

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 should not sell this public land to a private developer that will build mostly market rate housing.

The DSEIR accepts the unexamined premise that creating market rate housing in conjunction with some affordable housing is the only path forward. It does not explore the possibility of funding units which are 100% affordable.

The DRAFT SEIR is inadequate because it fails to consider the possibility of using this public land to build dedicated educator housing

Since approval of the PEIR, the City of San Francisco has identified an urgent need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers and students would be able to walk to work/school if they lived there. The DSEIR needs to examine this alternative.

The DRAFT SEIR is inadequate because it fails to consider the impact of market-rate units in working-class neighborhoods

The Draft SEIR does not consider the impacts of the project on the nearby working-class neighborhoods of Ingleside and The Excelsior. The development of mostly market rate units puts the residents at risk of displacement due to gentrification. A development solely devoted to affordable housing would better blend with these working class neighborhoods.

The DRAFT SEIR is inadequate because it fails to consider the impact of the zoning change

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE with no analysis of the impact this would have. The change is justified by the fiction of offering “affordable housing” when, in reality, most of the units will be market-rate housing.

The DRAFT SEIR is inadequate because it fails to consider the impact on public transit and recommend that public transit capacity be expanded

The Developer is counting on a 15% reduction in City College student parking in order to achieve a special project status under AB 900. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate already unreliable and inadequate transit service. **However, the SEIR fails to mandate improvements in infrastructure for public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation.**

The DRAFT SEIR is inadequate because it fails to consider the impact of monetary costs incurred to CCSF

The proposed Reservoir development has already cost the college money due to the major re-design of the original PAEC (Performing Arts Education Center).

The DRAFT SEIR is inadequate because it fails to consider secondary environmental impacts

The significant secondary environmental impacts of potential new CCSF parking construction replacing spaces eliminated by the project must be addressed.

Jennifer Worley
President, AFT 2121
City College of San Francisco Federation of Teachers
311 Miramar Ave

San Francisco, CA 94102

415-585-2121

www.aft2121.org