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**From:** Poling, Jeanie (CPC)  
**Sent:** Monday, September 23, 2019 8:24 PM  
**To:** Balboa Reservoir Compliance (ECN)  
**Subject:** FW: Balboa Reservoir SEIR Comments

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**From:** EDWARD HANSON <eshanson@sbcglobal.net>  
**Sent:** Monday, September 23, 2019 12:55 PM  
**To:** CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>  
**Subject:** Balboa Reservoir SEIR Comments

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Public Comments in response to  
Draft Subsequent Environmental Impact Report  
Balboa Reservoir Project.

As faculty at CCSF and a resident of the community I have been following the Balboa Reservoir Project closely and am writing to express my concerns. The DSEIR is not only inadequate, it stands as evidence to a planning process that runs contrary to the principles of good planning, fair input and democracy.

From the onset the project has been biased and selective in the way facts have been presented to the public for input. The SEIR clearly downplays and minimizes the potential impacts of the project on City College of San Francisco, and the surrounding educational institutions in the following ways:

1. The very fact that this process utilizes a Subsequent EIR is obfuscation. If the project from day 1 started with an impact assessment of 1550 units of housing on such a small footprint of 17 acres than it would be clear that the surrounding environment and neighborhoods would be severely impacted, as it stands the original plan has been expanded within the existing process of a previous EIR as a means to mitigate public concern.
2. Accompanying this is a SEIR document that does not address the potential impacts of the development on education or access to education. The existing condition of the 17 acre PUC owned land is that it is not only surrounded on two sides by educational institutions with more schools located in close proximity, its current use is by City College and has been so since the 1940's. Historically the college has always used this public space and this fact is downplayed in the SEIR restricting the impact on the college to "Areas of Known Controversy and Issues to be Resolved". The historical uses of the site have not been documented in the SEIR in context of historical significance of the site and to the civic functions of the City have been minimized.
3. The SEIR does not clearly document the existing conditions of parcel sharing between the PUC and CCSF, or the lengthy agreements that went into place to split the lot when CCSF decided to build upon its half of the shared parcel. If the plan is to complete the lot split when the land is transferred to a private developer, then this should be documented with clear reference to the sharing of the parcel in its existing condition, and spell out the consequences of a potential lot split as it constitutes transfer of lands from public to private ownership. In this context there is no analysis of the amount of public lands or other public land projects in the SEIR. Land

being something of very limited supply on the peninsula the impacts of public vs. private ownership is of relevance to future potential projects and civic developments.

4. Currently the site is the location of a motorcycle safety-training course, which is not mentioned in the SEIR. This is a direct educational use of the site, taking place right now, which would be displaced by the development.

5. Parking while not a mitigatable factor under CEQUA, is connected to historical use and the viability of the educational institutions that surround the site. If the impact of the development on parking has the potential to disrupt businesses surrounding the site causing them to close or significantly alters their future potential, than that impact needs to be documented in this report. The current report minimizes the impact report on enrollment consequences inherent in the removal of access to education. Nobody wants to argue for parking but in reality due to the unique student population and constraints of the urban environment ease of parking is related to enrollment dynamics and this factor should be taken into account in the projects impact on the surrounding institutions. Comparisons to other equivalent educational institutions should be analyzed.

6. To be more specific: The law states (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. The current SIER does not do this choosing instead to substitute an analysis restricted to the "project site" this substitution invalidates the impact analysis.

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