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**From:** Poling, Jeanie (CPC)  
**Sent:** Monday, September 23, 2019 5:55 PM  
**To:** Balboa Reservoir Compliance (ECN)  
**Subject:** FW: Comments on Draft SEIR for Balboa Reservoir project

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**From:** Christopher Pederson <chpederson@yahoo.com>  
**Sent:** Monday, September 23, 2019 10:31 AM  
**To:** CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>  
**Cc:** Yee, Norman (BOS) <norman.yee@sfgov.org>; Jones, Sarah (MTA) <Sarah.Jones@sfmta.com>  
**Subject:** Comments on Draft SEIR for Balboa Reservoir project

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Dear Ms. Poling:

Thank you for this opportunity to comment on the draft subsequent environmental impact report ("Draft") for the Balboa Reservoir project.

Although the Draft is sufficient in most respects, it is deficient in three different ways: it misidentifies the environmentally superior alternative, it fails to adequately evaluate the environmental impacts of the 750-space public parking garage included in the developer's proposed option, and it does not adequately address potential impacts to public transit.

A. The Additional Housing Option is the Environmentally Superior Alternative.

The Draft identifies the no project alternative as the environmentally superior alternative. Aside from the no project alternative, it identifies the alternative that requires a six-year construction period as environmentally superior. It also opines that a reduced density version of the project constructed over a six-year period, if feasible, would further reduce environmental impacts.

The Draft's evaluation of which alternative is environmentally superior is fundamentally flawed because it fails to address the adverse environmental consequences of providing less housing than proposed in the Additional Housing Option and of constructing the public parking garage component of the developer's proposed option.

The most urgent environmental problem that the world and the state face today is climate change. (IPCC, Climate Change 2014, Synthesis Report; Cal. Health & Safety Code, section 38501.) In 2017, transportation accounted for 41% of California's greenhouse gas ("GHG") emissions and 46% of San Francisco's GHG emissions. (California Air Resources Board (CARB), California Greenhouse Gas Emission Inventory: 2000-2017 (2019 Edition); [sfenvironment.org/carbonfootprint](https://sfenvironment.org/carbonfootprint).) The California Air Resources Board has concluded that California cannot meet its GHG reduction goals unless it substantially reduces vehicle miles travelled ("VMT"). (CARB, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target; CARB, 2018 Progress Report, California's Sustainable Communities and Climate Protection Act (Nov. 2018), pages 5, 27-28.) A primary strategy for reducing VMT is locating multi-family housing close to major employment centers, public transit, and other amenities

such as neighborhood commercial districts. Unfortunately, restrictions on residential development within the major urban cores of the state present a major obstacle to accomplishing the state's GHG emissions reduction goals. (CARB, 2018 Progress Report, pages 46, 53, 63-64.)

The Balboa Reservoir is unusually well-suited to be the location of high-density residential development because it is (1) immediately adjacent to City College, a major employment center and trip generator; (2) within easy walking distance of multiple transit lines, including BART and Muni lines KT, 8, 8BX, 29, 43, 49, 54, and 91 (and also the J, M, 28R, and 88 lines, which serve the Balboa Park BART station); and (3) adjacent to the Ocean Avenue neighborhood commercial district. To deny or reduce the amount of multi-family housing there would directly impede the state's efforts to reduce the most significant environmental impact of them all: climate change.

The potential adverse environmental impacts identified in the Draft all pale in comparison to the environmental impacts of climate change. To treat temporary construction-related noise and air quality impacts and traffic challenges associated with loading for the adjacent Whole Foods grocery store as more significant than climate change is self-evidently ludicrous. More importantly, the Draft's failure to provide a reasonable evaluation of the magnitude and significance of the very different kinds of environmental impacts that the City's action on this project might have means that it is not adequately informing decision-makers and the public about the potential environmental consequences of the City's action.

In addition, as discussed in more detail below, the Draft fails to address how the proposed public parking garage will undercut City College's efforts to reduce automobile commuting and thereby induce more GHG emissions and VMT than would occur if the public parking garage is not constructed.

The Draft's alternatives analysis should therefore be revised to address the environmental consequences of providing less housing than proposed in the Additional Housing Option and of providing the public parking garage. Once that analysis is provided, the SEIR should conclude that the Additional Housing Option is the environmentally superior alternative because it provides the most housing in a manner that is likely to result in the lowest per capita VMT and GHG emissions, thereby advancing the state's strategy for addressing the climate crisis.

B. The Draft fails to identify and evaluate the environmental impacts of the proposed public parking garage.

The Draft's assertion that the public parking garage included in the Developer's Proposed Option will not have any environmental impacts because it is replacing parking that already exists is fundamentally flawed.

According to the City College of San Francisco Transportation Demand Management (TDM) and Parking Plan (March 15, 2019), City College currently has excess parking even during the peak parking demand period of the first week of each semester. It has almost 1,000 excess parking spaces on typical semester days. It has an excess supply even though City College provides parking for free to its employees and at very low cost to its students (\$40 per semester, \$20 per semester for those receiving financial aid, or \$3 for a daily pass).

In light of its glut of free or low-cost parking, it is unsurprising that City College has very high rates of commuting by solo drivers. 66 percent of City College employees drive alone to the Ocean campus. This is almost double the citywide average of 34% (Metropolitan Transportation Commission data for 2018). Similarly, only 5 percent of City College employees walk or bike to the Ocean campus in comparison to the citywide average of 10%, even though a substantial portion of City College employees and students live within three miles of the Ocean campus. A lower percentage of students drive alone to campus (33%), but the TDM and Parking Management Plan concludes that student drivers are especially likely to switch modes of transportation if parking is restricted or becomes more expensive.

Projecting into the future, assuming 25% growth in student enrollment, the TDM and Parking Management Plan projects that a robust TDM program would be sufficient to avoid any parking shortfall on a typical semester day even if the Balboa Reservoir is developed without any replacement parking. If the Performing Arts and Education Center (PAEC) is constructed on an existing City College-owned parking lot, there might be unserved parking demand of up to 415 spaces

on a typical semester day, but that assumes no shift in parking demand due to limited supply. According to surveys of employees and students, up to 60% of drivers are likely to shift modes if parking becomes more difficult to obtain. Adding that shift in demand, the unserved parking demand if the Balboa Reservoir is developed without replacement parking, the PAEC is constructed, and enrollment increases by 25% is only 166 spaces.

The Draft has no discussion whatsoever about how construction of a 750-space public parking garage would affect parking demand or the effectiveness of City College's TDM program. Given that the availability of parking encourages more people to drive, the Draft should be revised to address how the proposed public parking garage is likely to result in more VMT and GHG emissions than if it weren't included in the project.

The Draft is also entirely silent about the rationale for the size of the public parking garage. Even if both the Balboa Reservoir project and the PAEC are constructed and the student body increases by 25%, the unserved parking demand on a typical semester day (either 415 spaces or 166 spaces, depending on how supply constraints affect demand) would be far less than 750 spaces if City College implements a robust TDM program. Given that the peak parking demand during the first week of each semester occurs only about 20 hours each year, the peak parking demand hardly seems a plausible rationale for the size of the garage. The only remaining rationale would appear to be a desire to perpetuate current commute patterns and parking demands despite the VMT and GHG emissions that those generate. The Draft should be revised to explain the reason for the size of the proposed public parking garage, the environmental impacts of a garage of that size (e.g., increased VMT and GHG emissions), and whether those environmental impacts could be reduced by shrinking or eliminating the public parking garage.

The Draft is also silent about how the public parking garage will be financed. If the developer will fund the garage with proceeds from the residential development, that raises the question about why those proceeds couldn't instead be used to fund more below-market rate housing. If the public parking garage will be paid for with public funds (either the City's or City College's), that should be disclosed as well. The Draft should address how any subsidy (whether public or private) for the garage would reduce the parking fees and thereby generate additional parking demand, VMT, and GHG emissions.

If the public parking garage will be financed entirely by parking fees paid by users of the garage, the Draft should address whether the garage will be financially viable. Those who currently commute to City College either park for free or pay nominal fees. It is unlikely that they would be willing to pay the kind of substantial fees that would be necessary to pay for construction of a 750-space garage.

If the users of the parking garage are instead anticipated to be the residents of the Balboa Reservoir project, that would be an end run around the City's and the developer's agreement that the overall parking ratio for the residential component of the project would be 0.5 parking spaces per residence. Using the public parking garage as residential parking would also mean that the project would exceed the zoning code's maximum 1:1 parking ratio for the site.

Finally, the Draft is entirely silent about how the parking rates for the garage would be structured. For example, would the daily rate be lower than 8 hours of the hourly rate? Would weekly, monthly, semester, or annual rates be allowed? If rates for periods longer than one day would be allowed, the Draft should address whether such rates would reduce incentives for commuters to take transit, walk, or bike on days during those periods when the commuter doesn't need to drive. Finally, would the rates and any leasing arrangements be structured so that any employer who pays for spaces within the garage on behalf of its employees would be subject to California's parking cash-out statute? (See Cal. Health & Safety Code, section 43845.) The Draft should address how the fee structure and the applicability of the parking cash-out statute would affect VMT and GHG emissions.

C. The Draft does not adequately address the impacts of the project on transit.

The Draft does not adequately explain how the City determined that an additional four minutes of delay for Muni routes in the vicinity of the project should be the threshold of significance for transit delays. Muni currently experiences significant delays related to traffic congestion when City College is in session and to congestion caused by drivers

attempting to turn at the intersection of Ocean and Brighton, where the entrance to the Whole Foods parking garage is located. In light of already existing delays for Muni service, the threshold of significance for additional transit delays should be less than four minutes.

In addition, in order to minimize VMT and GHG emissions associated with the project and with reasonably foreseeable development and expansion at City College, the City should implement transit improvements prior to occupancy of the project. Appropriate prior-to-occupancy mitigation measures include:

1. Restrict left turns at the intersection of Ocean and Brighton.
2. Install transit signal preemption or priority at all traffic lights on Ocean between San Jose and Junipero Serra and on Geneva between San Jose and Ocean. (Preemption is preferable, though priority might be acceptable at intersections with major cross streets such as Frida Kahlo and Junipero Serra.)
3. Give Muni lines higher priority at St. Francis Circle and West Portal. (Although St. Francis Circle and West Portal are a fair distance away from the project, delays there significantly degrade the speed and reliability of the K.)
4. Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.
5. Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full. (This could potentially be done as part of an enforcement action to address Whole Foods' violation of loading requirements.)

D. Miscellaneous

The Draft should address whether dedicating a substantial portion of the project to housing City College employees and/or students would minimize traffic-related impacts of the project and whether such dedication would be feasible.

The Draft should clarify why potential loading impacts caused by Whole Foods' failure to comply with permit requirements are treated as impacts caused by the Balboa Reservoir project. The City could resolve those impacts by simply requiring Whole Foods to comply with existing legal requirements.

Thank you for your consideration of these comments.

Sincerely,

Christopher Pederson

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