
From: Poling, Jeanie (CPC)
Sent: Monday, September 23, 2019 5:54 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: comments on the Balboa Reservoir Project, Case No. 2018-007883ENV (for SF Planning)

From: Harry Bernstein <riquerique@yahoo.com>
Sent: Monday, September 23, 2019 8:09 AM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Subject: comments on the Balboa Reservoir Project, Case No. 2018-007883ENV (for SF Planning)

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Hello, Ms. Poling

I would like to address several inadequacies of the draft SEIR, partly in relation to the PEIR Objective 1.4 of the Balboa Park Station Area Plan, regarding Land Use--

“This Plan encourages the owners of this site-to develop the reservoir in a manner that will best benefit the neighborhood, the city, and even the region as a whole.”

Housing is one recommendation, along with this excerpt from the Streets and Open Space Element of the Balboa Park Area Station Plan, p. 30:

“A number of open spaces are proposed in the plan area, including the Phelan Loop Plaza, the Geneva Plaza, open space associated with the proposed freeway deck, Brighton Avenue, the Library playground and the proposed Balboa Reservoir open space.

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Policy 4.5.1 in the Balboa Park Station Area Plan (or PEIR) says that when offering public land for development, first consideration should be given by such public agencies making the land available for the development of housing affordable to individuals or families making less than 120 percent of the area median income. This is a very low priority for the current development. Selling the valuable asset of publicly owned land is not the only or best option.

The Draft SEIR must consider the possibility of using this public land to build dedicated educator housing. This is an option that has begun to be explored more fully since the current Balboa Reservoir project was initiated just a few years ago.

One of the greatest inadequacies of the Draft SEIR is that it is obligated to define existing conditions, not only at the site of the proposed development but also in the vicinity. The description is limited to the physical location and the perimeters of the lower Balboa Reservoir lot. It fails to mention that except for the approximately two years when the Reservoir site was excavated for the purpose of creating a possible reservoir (1956-1958), the land was used by City College since 1946—

From September 13, 1946 to 1954, the College occupied for the site, taking over the former WAVES barracks—this was called West Campus.

After being evicted over the years 1954-55, enabling a move to the newly built classroom, Cloud Hall, the existing facilities were razed and the Reservoir site was prepared. Parking was made available to City College again starting in 1958, first in one of the two Reservoir basins and later in both. City College spent considerable money raising the level of what is today the upper Reservoir site and eventually secured ownership of its 10+ acres in a land swap from the Public Utilities Commission. So this historic use of the site, and the impact of its loss should not be ignored in this planning process. More on this further below.

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I feel that I cannot do better than quote another prior submission regarding the inadequacy of addressing the impact on public services in the vicinity of the Balboa Reservoir site—and public services significantly includes area schools.

“On page 7 of the ESA Scope of Work, under "Task 4. Administrative Draft Initial Study-1", the only mention of impact on schools is: "The public services section will include a discussion of public school capacity, the findings of the water supply assessment, and a discussion of the potential need for access to the SFPUC water/wastewater easement along the south side of the project site. EP will provide ESA with language regarding public schools..." This merging of two environmental effects categories of "Utilities and Service Systems" with "Public Services" is grossly deficient. The evaluation of adverse impacts on schools should not be legitimately bypassed:

The question, as per item 12a under Public Services is:

Would the project result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios,

response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?

The answer is objectively yes for schools and fire protection from this list.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.

That is the end of my current comments.

Harry Bernstein
San Francisco