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**From:** Poling, Jeanie (CPC)  
**Sent:** Monday, September 23, 2019 5:43 PM  
**To:** Balboa Reservoir Compliance (ECN)  
**Subject:** FW: Parking, parking, parking

-----Original Message-----

From: Charles Belbin <clbelbin@mindspring.com>  
Sent: Sunday, September 22, 2019 9:09 PM  
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>  
Subject: Parking, parking, parking

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Students work—this is obviously not a residential school, no dorms—and need to get to jobs all over the Bay Area on time. Schools come with parking lots, it's part of our car culture and the reality is we're still in a car culture.

Probably the most absurd moment in this fiasco of ignoring student (and faulty who often work several jobs) need is the survey done at midnight which found little use of the parking lot, duh!

The community has adjusted to the parking situation of the school for decades but this project will take away parking and add cars. Does anyone in their right mind imagine that people will buy expensive housing, work in Silicon Valley and own half a car? That dumps the parking problem on the neighborhood and, as a practical matter, deprives students of an education.

Please consider the following points from another concerned citizen..

"An EIR is supposed to give a description of the existing vicinity. Yet the Reservoir EIR Project SEIR's (Subsequent EIR) description limits it to the Reservoir lot/site itself.

This failure to place CCSF in the description will undermine CCSF's future.

Once the Reservoir Project gets built, the City and developers will establish the Project to be the "baseline existing condition." And at that point any future CCSF FMP projects will have to answer for CCSF's adverse impacts on the Reservoir Project.

BOT and Administration need to change its stance of being antagonistic to students, while being servile to the Reservoir Project. BOT and Administration need step up to defend CCSF interests, instead.

During the accreditation crisis many of us fought diligently to restore the BOT to power. Please don't continue to disappoint us.

To address the deliberate exclusion of CCSF from the description of the "Existing Setting", I have submitted the attached written comment. Here are excerpts:

## INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already stated the following:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

### Project Description

#### 2.A Project Overview

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

California Code of Regulations Title 14 Section 15125 California Code of Regulations Title 14 Section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

In order for the public and decision-makers to acquire the "most accurate and understandable picture possible of the project's impacts", we are left with the SEIR's 2.A Project Overview contained in Chapter 2, Project Description. Contrary to § 15125's requirement for a description of the existing condition "in the vicinity of the project", SEIR 2.A only provides a description of the project site:

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

THIS FAILS § 15125's REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.  
requirement

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC.  
Excerpt

Subject: Input for planning – CCSF must be considered

Comments:

CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.

Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!

Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!

THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c)."

Charles Belbin  
Retired CCSF Faculty  
Neighborhood resident