
From: Poling, Jeanie (CPC)
Sent: Monday, September 23, 2019 5:41 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: Written Comment for DSEIR Balboa Reservoir Project

From: Wynd Kaufmyn <wkaufmyn@ccsf.edu>
Sent: Sunday, September 22, 2019 3:04 PM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Subject: Written Comment for DSEIR Balboa Reservoir Project

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The DRAFT SEIR for the Balboa Reservoir Project is inadequate because it fails to consider the impacts of the project on the public service of CCSF

The Reservoir Project will have an adverse impact on higher public educational services offered by City College of San Francisco, a unique and treasured institution by all of San Francisco.

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. [Inside Higher Ed](#) reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules."

Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students' access to higher education services offered by CCSF.

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered as it will likely affect these workers' access to employment.

The Draft SEIR speculates that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." The assumption that those students and contingent faculty will transition to public transportation services is not realistic as both MUNI and BART have capacity issues. 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 the already unreliable service.

The DSEIR irresponsibly avoids assessing the possibility that students/contingent faculty will likely not be able to continue attending/working at CCSF.

Why is there no recommendation in the DSEIR to enhance public transit infrastructure?

The DRAFT SEIR notes that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of CCSF. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact on CCSF's ability to provide public higher educational services. It is erroneous to extend 21099's parking exemption onto the elimination of the public benefit of providing access to higher education.

The Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students' access to higher education services offered by CCSF.

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