From: Poling, Jeanie (CPC)
Sent: Friday, September 20, 2019 4:48 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: Public Comments to Balboa Reservoir EIR

From: Neighbors Against Flooding <stopfloodingit@gmail.com>
Sent: Tuesday, September 17, 2019 4:23 PM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Cc: Jessica@Waterboards <Jessica.Watkins@waterboards.ca.gov>; solutionsnotsandbags@gmail.com
Subject: Public Comments to Balboa Reservoir EIR

Dear Ms. Poling:

We would like to submit the following comments to the 2018-007883ENV: Balboa Reservoir Project (Assessors Block 3180, Lot 190) Environmental Impact Report:

San Francisco's sewer collection system and storm drain system are a combined sewer system (CSS). The vast majority of stormwater should be conveyed through the CSS, which includes the streets and their curbs, catch basins, and underground storm drain, which is then collected and treated. However, the sewers on Ocean Avenue between Frida Kahlo Way (formerly Phelan Avenue) and Miramar are undersized and unable to convey the combined sewage from the sewers uphill from them. Excess combined sewage flow is discharged from the sewers into the streets causing heavy overland flow along Ocean Avenue during moderate storm situations which has resulted in combined sewage, including human waste, flooding downstream of the Balboa Reservoir.

The following CCSF EIR report excerpt from the EIR report (Page 4.6-5 of https://www.ccsf.edu/MP/Docs/046Services_DEIR.pdf) documents that:

"The area west of Phelan Avenue is served by a 30-inch reinforced concrete sewer in Phelan Avenue that carries flow south to Ocean Avenue. Although the sewer's condition is unknown, it is severely undersized. According to the SFDPW, the sewers surrounding the Main Campus, while adequate for the dry weather flow from the campus, are inadequate for flows that occur in a 5-year storm event. Currently, the City does not have the funds to upgrade the under-sized sewers surrounding the campus. The SFPUC is in the process of revising its 1973 Wastewater Master Plan. Among other things, this Plan would include upgrading the City's hydraulically and structurally inadequate sewers."

In addition, low lying areas are already negatively impacted by flow from upstream projects like the 2011 Colon/Greenwood/Plymouth/Southwood/Wildwood/Miramar sewer system improvement project which resulted in a transfer of flood risk to Ingleside Terraces:

City and County of San Francisco 2030 Sewer System Master Plan TM505 (http://sfwater.org/modules/showdocument.aspx?documentid=592), Section 5.7.3.1, "Conveyance along Ocean Avenue (Upsizing and Auxiliary, page 107, "This alternative will lower the HGL and alleviate flooding in the upstream portions of the reach, along Ocean Avenue between Phelan and Miramar avenues. However, the

extra conveyance capacity provided by the relief and auxiliary sewers serve to move larger peak flows downstream to the Legion Court area west of Ashton Avenue. Predictably, the higher arriving peak flows will cause elevated HGLs and effectively transfer the flooding problems to this area."

Even though the Balboa Reservoir project would not "substantially" alter the existing drainage pattern, **any** additional waste from additional residents would increase the quantity of human waste discharged during these events and increase the exposure to residents and businesses downstream in low lying areas. The Balboa Reservoir EIR fails to address this issue and fails to fully disclose the project's dry and wet-weather impact on the existing sewer system.
The constant expansion of lines upstream, continued development, and the failure to correct the defects in the existing sewer lines have created and continues to create a nuisance and public health risk by subjecting those residents in low lying areas to the risk of exposure to hazardous waste.

The sewer lines downstream of the Balboa Reservoir project must be enlarged, and all known and foreseeable deficiencies corrected, prior to the start of this development.

Sincerely,

Ingleside Terraces Residents

Patricia Hechinger
Vanessa Quesada
Gina Buschiazzo
Jane Huey
Adrienne Sciutto
Irene Creps

cc: Jessica Watkins, P.E.
Senior Water Resource Control Engineer
San Francisco Bay Regional Water Quality Control Board