

Comment PP-1: Zoning Controls, Height Limits, Balboa Park Station Area Plan

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-ADAMS-2

I-BARISH3-2

I-BARISH3-3

I-BARISH3-4

I-BARISH3-6

I-BARISH3-36

I-BARISH3-37

I-BARISH3-40

I-BERNSTEIN4-1

I-JA11-4

I-TARQUINO-8

I-TARQUINO-11

I-WORLEY-4

“We’ve heard remarks about zoning. This project’s going to require a zoning change. Spot zoning is the substance of federal lawsuits. When a neighborhood is zoned a certain way and people, developers, come in and capture a spot, and create a spot zone exception to the normal asset value of a consistently zoned neighborhood, that’s lawsuit material.”

(Michael Adams, CPC Hearing, September 12, 2019 [I-ADAMS-2])

“This DSEIR is a project-level EIR that is tiered from a previously certified program-level EIR (“PEIR”)

The Project is a portion or sub-set of the Balboa Park Station Area Plan (the “Plan”). To better understand some of the defects with the DSEIR, it is important to refer to the Plan and several of its Objectives and Policies.

(http://generalplan.sfplanning.org/Balboa_Park_Station.htm#BPS_HSG)

Policy 1.4.2 states: *If the PUC should decide that the west basin is not needed for water storage, it should consider facilitating the development of a mixed-use residential neighborhood on part of the site to address the city-wide demand*

for housing. The development on the site should recognize the opportunity to knit the surrounding neighborhoods together through the creation of a community open space and pedestrian connections.

Policy 1.4.2, therefore, states that at best, only part of the west basin would be used for housing. The development of a project with up to 1,550 units goes far beyond partial development of the reservoir. It should be scaled back to be compliant.

Policy 4.4.1 states: *"If the PUC should decide that the west basin is not needed for water storage, it should consider development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. Affordable housing should be considered a high priority per Policy 4.5.1."*

and

Policy 4.5.1 states: *"...Where publicly-owned parcels are being developed, . . . city policy directs that surplus public property be considered for development of affordable housing. Thus, when offering their land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income.*

Since the Project only requires the developer to provide less than 1/3 affordable units, it is not compliant with the Plan policies. This must be considered when the Final SEIR ("FSEIR") is prepared.

Policy 6.4.1 states: *Regardless of scale, new development should add to the district's character, create a human scale public realm, and fit within the city's traditional fabric; regardless of architectural style. Larger-scale development efforts must take great care to not overwhelm the scale of the area and to positively establish a pedestrian-scale pattern. Urban design guidelines have been developed for the plan area and compliance with the guidelines is mandatory.*

The Project is massive and out of scale with the surrounding neighborhoods. It will have buildings up to 8 stories high, casting shadows on public open space and Archbishop Riordan High School. It will dwarf the single family homes surrounding it, and it will remove open space that is used by City College of San Francisco ("City College") for both parking and recreational purposes. A Feasible Alternative must be considered. In view of the foregoing, the Project is not in accord with the Plan and needs to be revised accordingly."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-2])

"Balboa Park Station Area Plan (p. B-3)

The area plan's land use map designates the site's land use as P (Public), and the height map indicates a 40-foot height limit (Maps 3 and 6). However, the Project will include buildings up to 78 feet in the Developer's Proposed Option and up to 88 feet in the Additional Housing Option. (B-4) The FSEIR must provide substantial evidence explaining why this increase in height limit will not have an unanticipated and significant environmental impact."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-3])

"The Accountable Planning Initiative (p. B-5)

Under Proposition M, planning policies must include conservation and protection of existing housing and neighborhood character (B-5). The DSEIR fails to discuss how the will impact neighborhood character. In accordance with Proposition M, the FSEIR must provide substantial evidence explaining this analysis."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-4])

"Land Use Impacts

Impact LU-2: No conflict with applicable land use plans (p. B-14)

According to this section, the proposed project would require rezoning to permit structures up to 88 feet tall. It would appear, therefore, that any significant land use conflict can simply be mitigated by rezoning the land. This appears to be an abuse of legislative discretion. The FEIR must consider the appropriateness of this rezoning option."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-6])

"The DSEIR must consider the impact of the change of zoning

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-36])

"The DSEIR must consider the option of leaving open space

The Balboa Reservoir is currently open space that allows for vistas of the Pacific Ocean to the Farralones from the CCSF Science Building. The BPS Area Plan contains a Streets and Open Space Element. Why is this consideration left out?"

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-37])

"The DSEIR must consider the option of leaving open space

The BPSAP contains a Streets and Open Space Element. Why is this left out?"

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-40])

"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.'

(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-1])

"Summary of Land Use Impacts in the PEIR (p. B-12)

This section omits the fact that a zoning change from P (Public) to a Special Use District is A BIG DEAL. Privatizing public land by a private developer is A BIG DEAL.

Since the certification of the BPS Final EIR, there has been a major change in the housing development environment for surplus public sites.

At the time of the PEIR, only non-profit agencies were able to buy and build on public surplus lands.

2015 Prop K Public Land for Housing ended the restriction that only non-profit builders could use public lands for housing. With the passage of Prop K, private for-profit developers were allowed to cash in on a bonanza to privatize public lands.

The change of zoning from P to SUD to enable privatization of public land is a new condition that did not exist at the time of the PEIR. A LTS determination based on conditions that did not exist at the time of the PEIR requires fresh treatment in SEIR."

(Alvin Ja, Email, September 11, 2019 [I-JA11-4])

" The DRAFT SEIR must consider the impact of the change of zoning"*

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-8])

"The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing."

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-11])

"The DRAFT SEIR is inadequate because it fails to consider the impact of the zoning change

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE with no analysis of the impact this would have. The change

is justified by the fiction of offering “affordable housing” when, in reality, most of the units will be market-rate housing.”

(Jennifer Worley, Email, September 23, 2019 [I-WORLEY-4])

Comment PP-2: Plans and Policies (SFPUC Land Use Framework)

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-41

I-HANSON4-1

I-JA5-1

I-JA11-5

I-JA11-6

I-TARQUINO-12

“The DSEIR must consider the impact of creating a nuisance

The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that *Land may be sold or transferred when...Use of the land sold is not to result in activities creating a nuisance.*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance.”

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-41])

“This section of the SEIR provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site.

3.B.5 as it is written in the SEIR, critically omits the Land Use Framework that was adopted by the San Francisco Public Utilities Commission in 2012. The lease and sale of PUC property is governed by this SFPUC document, “FRAMEWORK FOR LAND MANAGEMENT AND USE.” The document lays down conditions for sale of SFPUC land to include Economic, Environmental, and Community criteria.

Here is the excerpt from the SFPUC Land Use Framework:

4. Use of the land sold will not to result in activities creating a nuisance.

The Balboa Reservoir Project fails enormously to uphold Condition 4 of “Community Criteria.””

"3.B.5 Regulatory Framework

This section provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site. No federal regulations, plans, or policies are relevant to the project.

3.B.5 critically omits the Land Use Framework that was adopted by the Public Utilities Commission in 2012, attached (PUC Resolution 12-0044).

Balboa Reservoir in context of PUC's Land Use Framework

The lease and sale of PUC property is governed by the PUC document, "FRAMEWORK FOR LAND MANAGEMENT AND USE."

The document lays down conditions for sale of PUC land to include economic, environmental, and community criteria.

The Balboa Reservoir Project has been promoted as part of the Public Land for Housing Program whose purpose is to build affordable housing.

Public Land for Housing in the context of Balboa Reservoir, will fail its overarching goal of affordability. Instead, Balboa Reservoir will achieve 67% unaffordable housing, in exchange for 33% affordable housing.

The PUC Land Use document states:

COMMUNITY CRITERIA: Land may be sold or transferred when:

- 1. The sale or transfer is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.*
- 2. The sale or transfer would not significantly adversely affect the implementation of an adopted resource agency plan for the area.*
- 3. The sale would not increase the risk of loss, injury or death to SFPUC employees or others on or near the parcel.*
- 4. Use of the land sold will not result in activities creating a nuisance.*

The Balboa Reservoir Project fails Condition 4 of "Community Criteria."

The current plan removes existing parking for City College students. It deliberately limits parking within the Reservoir to 0.5 parking spaces per residential unit in the unrealistic expectation that this will discourage car ownership by new Reservoir residents.

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance that would inhibit student enrollment and attendance at City College [The word "nuisance" understates the problem].

The Balboa Reservoir Project fails to comply with PUC's "Framework for Land Management and Use."

The sale of Balboa Reservoir to private developers would provide a short-term cash infusion to PUC Water Enterprise. However the short-term gain of quick cash doesn't justify losing this valuable piece of public land in perpetuity to private developers in the guise of "affordable housing."

The draft SEIR is deficient in its omission of the PUC Land Use Framework within the Regulatory Framework."

(Alvin Ja, Email, August 26, 2019 [I-JA5-1])

"Impact LU-2: The proposed project would not conflict with any applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)"

The Initial Study fails to assess the PUC Land Use Policy. The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states: *"Use of the land sold is not to result in activities creating a nuisance."*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word "nuisance" understates the problem].

From earlier submission to the Reservoir CAC and City Team:

PUC LAND USE POLICY

1. The RFQ's section on Applicable Land Use Policies makes no reference to the PUC's own "Framework for Land Use and Management."
2. From the PUC website: By adoption of the Framework, the Commission is seeking to advance the analytical and decision-making process surrounding the administration of real estate assets under the SFPUC's exclusive jurisdiction.
3. PUC's Land Use Framework policy allows sale only if: *"Use of the land sold will not result in creating a nuisance."*
4. Even though the PUC Land Use Framework was formulated to focus on "Land Management Guidance for...Disposition of SFPUC Lands," The City Team has dismissed the importance of this policy document: *"It is not necessary, or feasible, for an RFQ to name all of the City policies and procedures that apply to the project."* [from Staff Response to *"Why doesn't the RFQ discuss the SFPUC Land Use Framework?"*]

Importantly, Staff misstated the essence of the question. **The real question was whether or not the intended disposition of the PUC Reservoir property complies with PUC's policy on "Disposition of SFPUC Lands"; the question was not whether the Land Use Framework policy is "named."**

The PUC Land Use Framework was adopted post-PEIR. Its requirement that use of the Reservoir not result in a nuisance should be enforced."

(Alvin Ja, Email, September 11, 2019 [I-JA11-5])

"The entire Reservoir Project process has avoided discussion or application of the State Surplus Property Statute:

STATE SURPLUS PROPERTY STATUTE

The State Surplus Land Statute 54222 says:

Any local agency disposing of surplus land shall send, prior to disposing of that property, a written offer to sell or lease the property as follows:

(c) A written offer to sell or lease land suitable for school facilities construction or use by a school district for open-space purposes shall be sent to any school district in whose jurisdiction the land is located.

PUC's principle of market rate return is not absolute. SF Administrative Code 23 for Real Property Transactions calls for:

SF Administrative Code 23.20 states

Transfers of Real Property pursuant to this Article shall be paid for no less than 100% of the appraised value, except where the Board of Supervisors determines by resolution that a lesser sum will further a proper public purpose, and provided that the Public Utilities Commission shall be paid at least the historical cost of such Real Property.

SF Administrative Code 23.3 for Real Property Transactions calls for:

"... sales price of at least 100% of the appraised value of such Real Property, except where the Board determines either that (a) a lesser sum will further a proper public purpose, or..."

The Balboa Park Station Area Plan had called for developing the Reservoir to "best benefit the Neighborhood, City, Region as a whole." Yet any analysis of what constitutes "best benefit" has been bypassed. Instead, by fiat, the City declared that the Reservoir would be used for housing to be developed by private developers. And despite the teacher shortage, consideration for teacher housing by school has been minimized.

The Reservoir Project has apparently ducked the State Surplus Property Statute's requirement that the property be offered for school facilities construction. This omission should trigger treatment in the SEIR."

(Alvin Ja, Email, September 11, 2019 [I-JA11-6])

"* The DRAFT SEIR must consider the impact of creating a nuisance The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that Land may be sold or transferred when....Use of the land sold is not to result in activities creating a nuisance.

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word “nuisance” understates the problem]. Please listen to the people of S.F. and this neighborhood.”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-12])

Comment LU-1: Cumulative Land Use

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-7

“Impact C-LU-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative impacts to land use. (Less than Significant) (p. B-15)

There is no objective data to support this conclusion. Rather, the DSEIR simply states that in combination with reasonably foreseeable future projects, the Project would have less-than-significant cumulative land use impacts. But absent a quantitative analysis of all the CEQA environmental impacts, it is improper to reach such a conclusion. The FSEIR must provide substantial evidence to support its conclusion. Absent an analysis of the substantial evidence, the FSEIR will be insufficient.”

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-2])

Comment PH-1: Population Growth

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH1-4

I-BARISH2-6

I-BARISH3-8

I-JA11-1

I-JA11-3

I-SIMON-14

I-TARQUINO-7

“The initial study says there would be a population increase of over 100 percent in the plan area, but then concludes there would be no significant cumulative population impacts because this is just a tiny increase

compared to the total population of the City as a whole. This is a flawed apples and oranges comparison and should not be accepted."

(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-4])

"2) The Initial Study says there would be a population increase of over 100% in the plan area, but concludes there would be no significant cumulative population impact because this is a tiny increase compared to the population of the City as a whole. This is a flawed apples and oranges comparison, and should not be accepted."

(Jean Barish, Letter, September 12, 2019 [I-BARISH2-6])

"Population and Housing Impacts

Impact C-PH-1 The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative population and housing impacts. (Less than Significant) (p. B-21)

The Developer's Proposed Option and Additional Housing Option would increase the onsite residential populations by 2,530 and 3,565 respectively. Compared to the increase in population analyzed in the PEIR or 1,150 residents (Table 1, p. B-19) this is an increase of over 100% in the plan area. Yet, despite this significant increase in population compared to the PEIR, the DSEIR concludes it is not significant. It justifies this decision by saying it would not be substantial for the City as a whole. While that may be true, it improperly fails to consider the impact on the immediate neighborhood. The FEIR must thoroughly analyze this population increase within the Area Plan, not within the entire City."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-8])

"I have added the following addition to "Comment on Initial Study: Land Use":

The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review."

(Alvin Ja, Email, September 11, 2019 [I-JA11-1])

"Summary of Land Use Impacts in the PEIR (p. B-12)

The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR.

For this to be accurate, the following question would have to be answered in the negative:

Would the project result in potentially significant effects not identified in the prior EIR? This question examines whether or not the proposed project would result in new significant or potentially significant environmental effects that were not identified in the PEIR. This could include significant effects that are due to:

Project-specific features of the proposed project.

Substantial changes with respect to the circumstances under which the project would be undertaken, such as real estate development trends in the surrounding area or major projects that were previously unanticipated.

I contend that the answer to the question is YES, thus triggering Impact treatment in the SEIR.

The section acknowledges: *The project site was located within the Balboa Reservoir Subarea and was assumed to include up to 500 residential units.*

A later paragraph states: *The PEIR concluded that implementation of the area plan would not result in significant land use impacts and did not require any mitigation measures.*

SF Planning Dept professionals are aware that a program-level determination is not the same as a project-level determination. Otherwise, the BPS FEIR would not have necessitated project-level reviews of the Kragen Project and the Phelan Loop Project within the FEIR.

It is professionally dishonest for the Planning Dept to pretend that the BPS FEIR's program-level determination for an BPS Area Plan **area-wide** target of 1,780 units could be legitimately used to insinuate that the Reservoir Project current numbers of 1,100-1,550 units had already gotten the thumbs-up from the PEIR.

Did you forget the earlier quote of the Reservoir sub-area "*assumed to include up to 500 residential units*" ?

In the context of "Project-specific features of the proposed project", by any objective measure, jumping from 500 units in the program-level PEIR to 1,100-1,550 units in the current two Reservoir options is a big increase of 120% and 210% respectively.

The area-wide target of 1,780 units is shown on the Area Plan Development Status Sept 2018 Update pdf. It consists of 790 Tier 1 (0-5 yrs) units and 990 Tier 2 (5-20 yrs) units. The pdf shows 482 units built or underway. This leaves an area-wide shortfall of 1,298 units.

Although I can understand the desire to achieve this area-wide target, forcing a square peg into a round hole out of desperation will not succeed without imposing adverse impacts onto the Reservoir vicinity. Trying to force the Reservoir Project-- targeted for 500 units in the PEIR--in order to fulfill the 1,298 unit area-wide shortfall is an objectively significant Reservoir impact.

The approval and certification of the program-level BPS Final EIR with an area-wide target of 1,780 units does not equate with a LTS determination for a project-level 1,100-1,550 Reservoir units. The Initial Study merely manipulates words and paragraphs to imply and assert, without evidence, that:

"The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR."

The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review."

(Alvin Ja, Email, September 11, 2019 [I-JA11-3])

"The DRAFT SEIR does not consider the impact of increasing the number of units from the original recommendation in the PEIR. The Reservoir Project's two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR's Housing option for the Reservoir referred to 425-500 units.

From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

(Leslie Simon, Email, September 17, 2019 [I-SIMON-14])

"From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR.

The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-7])

Comment GHG-1: Greenhouse Gas Emission Concerns

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-21

I-WEIBEL-1

"18. Use of Natural Gas:

Per the EIR, efforts will be made to move away from fossil fuels toward renewable energy sources in accordance with the 2017 Clean Air Plan. As of 2017, electricity supplied to San Franciscans was 82% emissions-free, with 64% of electricity generated from renewable sources that include wind, solar and existing large hydropower. (DOE's Focus 2030: A Pathway to Net Zero Emissions report of July 2019, p. 7.) "Should the city fail to meet its renewable electricity goal by 2030, and continues to use natural gas and other fossil fuels, San Francisco could see up to five times more cumulative emissions by 2050." (Focus 2030 report, page 8.)

It is in the interest of San Francisco that all new buildings are powered by electricity and not natural gas. In the interest of meeting San Francisco's Net Zero Emissions plan, please identify only electrical infrastructure and appliances in all structures built on the Balboa Reservoir."

(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-21])

"I saw in the Balboa Reservoir Project Draft Environmental Impact Report that natural gas will be installed in the development for space heating, cooking, and gas fireplaces.

In light of the climate crisis, I would like to request that no natural gas be installed in the development.

Supervisor Yee, I was impressed by Berkeley's ordinance that bans natural gas in new developments, and I hope you will lead a similar resolution here in San Francisco -- not just for city buildings, as Supervisors Brown and Mandelman have proposed, but for all new construction and major renovation. What a show of leadership it would be to have an 1100+ unit development on all renewable resources, and what a step in the right direction it would be."

(Christine Weibel, Email, September 19, 2019 [I-WEIBEL-1])

Comment WI-1: Wind Impacts

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-23

I-MUELLER2-4

"20. Wind Impacts:

The creation of wind tunnels is a risk of constructing buildings up to or over 80 feet. But the DEIR indicates there is no significant impact from wind. To anyone who lives, studies or works in the area, the power of the wind coming off the ocean is already well known. To mitigate the risk of tunneling already strong winds into educational and residential communities, no new building should exceed 79-80 feet. The developers' option does not exceed 80 feet, but the additional housing option is likely to create wind tunnels. If San Francisco wants to sweep the many young children who congregate in the area off their feet, the additional housing option will do it."

(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-23])

"Also, the particular situation of the land under consideration for this extremely dense proposed housing development was not fully researched in conjunction with the high wind velocity coming directly from the ocean to that property through what is commonly called The Gap. In this DSEIR, the only comments about wind concerned the effects that may be generated involving tall buildings. It did not describe the actual complex wind situation in this particular land area."

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-4])

Comment SH-1: Shadow Impacts

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH1-3

I-BARISH2-5

I-BARISH3-9

“There are numerous flaws in the draft SEIR. I’d like to highlight a few that are just representative of the problem in this document.

In the initial study, Appendix B, of the draft SEIR, these are just three examples of many problems with the SEIR.

The study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25 percent of the year and there would be significant shadow on Riordan High School. No significant effect.”

(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-3])

“1) The DSEIR Initial Study eliminated many environmental impacts for review by concluding they were not potentially significant. But these conclusions are flawed. The Study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25% of the year, and there would be significant shadow on Riordan High School.”

(Jean Barish, Letter, September 12, 2019 [I-BARISH2-5])

“Shadow Impacts

Impact SH-1 The proposed project would not create shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces (Less than Significant) (p. B-46)

The DSEIR states that there would be new shadow between May 1 and August 15 (B-47-50). Fig. 3 illustrates this new shadow. These are the warmer, drier summer months, when people are more likely to be outside closer to sunrise and sunset. Yet, despite any objective measure of significance and any substantial evidence, the DSEIR states that any new shadow would not be significant. The FSEIR must provide substantial evidence that such an increase in shadow is not significant.”

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-9])

Comment UT-1: Water Supply

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-11

I-FREY1-2

I-FREY2-2

I-HEGGIE2-22

I-MARTINPINTO-5

I-MUELLER1-1

I-MUELLER2-2

I-MUELLER2-3

I-TIMA-4

"Utilities and Service Systems Impacts"

Impact UT-1 Sufficient water supplies are available to serve the proposed project ... unless the Bay Delta Plan Amendment is implemented...Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term . . . (Less than Significant) (p. B-59)

According to the DSEIR, page B-57, SFPUC Resolution 02-0084 determined that there was sufficient water supply to serve expected development projects in San Francisco through the year 2020, and the implementation of the Area Plan was not expected to have any substantial impact on water supply. Since the Project will not be completed until approximately 2027, it appears this projection is obsolete. Please explain.

Further, in the Conclusion on page B-73, the DSEIR states that there is too much uncertainty related to the possible implementation of the Bay-Delta Plan Amendment to identify environmental effects, and such effects are, therefore, speculative at this time. Please explain how an informed decision regarding the availability of an adequate water supply for the Project can be determined in view of these uncertainties, and why, in view of these uncertainties, the DSEIR states the environmental impact is less than significant.

Further, according to a September 22, 2019 article in the *San Francisco Examiner*, a recent civil grand jury report, "Act Now Before It Is Too Late: Aggressively Expand and Enhance Our High-Pressure Emergency Firefighting Water System," raised the alarm about the lack of coverage for western San Francisco neighborhoods. According to the report, The City's high-pressure emergency water supply system "does not cover large parts of Supervisorial Districts 1, 4, 7 and 11, roughly one-third of the City's developed area," the report said. "As a result, these districts are not adequately protected from fires after a major earthquake."

(https://www.sfexaminer.com/news/report-large-parts-of-sf-not-adequately-protected-from-firesafter-major-earthquake/?fbclid=IwAR145KV4GH_CNfBJvCogj0bPF__iAYdlgyWcrmV5PyZkhjN995GTKpG6AOc)

The Project is in D 7. In view of the grand jury's report, the DSEIR is inadequate for not reviewing the environmental impact of building a massive development on a reservoir that could serve the area in case of an emergency. The DSEIR must provide substantial evidence that covering the Balboa Reservoir will not significantly impact Utilities and Service Systems."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-11])

"My second issue is density. This is a downtown style project, without the downtown style streets. And as Hedda mentioned, the firefighting infrastructure, water pipes that accommodate the dense housing in the other parts of the City that have dense housing, their water structure is totally different than what we have in this area. And that lack of firefighting infrastructure would be a hazard to the residents of the development itself, but it would also be a hazard to all of the surrounding neighborhoods."

(Laura Frey, CPC Hearing, September 12, 2019 [I-FREY1-2])

"Second issue is density. This is a very high density project--without the large streets or the firefighting infrastructure/water pipes to accommodate dense housing. (The fire-fighting infrastructure in dense parts of the City is different than in this area.) The lack of a sufficient fire-fighting infrastructure would be a hazard for the residents of any new dense housing project at Balboa Reservoir and for the residents in the surrounding areas."

(Laura Frey, Email, September 22, 2019 [I-FREY2-2])

"19. San Francisco ensures fire safety primarily through provisions of the building code and fire code. Do those codes take into account the lack of a water supply for emergencies for the western part of the City and any need for water storage? The City has been through many fire emergencies, and it would be irresponsible to take these issues lightly. Ignoring or postponing the issue of a water supply for emergencies is not going to help us during an emergency. The potential housing loss due to a fire could be much greater than the housing gain from any one development. Is there a need for water storage for fire emergencies, and if so, there needs to be an evaluation of possible sites while they still exist, including at the Balboa Reservoir."

(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-22])

"The loss of the 17.6 acre reservoir space will present a lost opportunity to store drinking water during an emergency, as was originally intended in 1957 when it was constructed. In San Francisco, there are three terminal reservoirs; the Sunset Reservoir, the University Mound Reservoir, and the Merced Manor Reservoir. Together, they contain about 327 000 000 gallons of water, which represents 79% of all the water in San Francisco Reservoirs. According to the November 2018 issue of the *Westside Observer*, only 33% of

this water belongs to San Francisco. State Water Code 73503 states that the water is jointly owned by San Francisco and the 27 wholesale water customers (cities on the Peninsula). This means when a disaster occurs, San Francisco is legally obligated to share the water equitably with Peninsula cities. According to the August 12, 2003 minutes of the SF Public Utilities Commission, after a major Earthquake, San Francisco could have as little as 86 000 000 gallons of water to serve a 900 000 population, or slightly less than 100 gallons of water per person.

It is important to remember that our water comes to San Francisco from Hetch Hetchy reservoir, approximately 170 miles away via transmission lines, which must cross four significant faults in the SF Bay Area alone (the Calaveras, Greenville, Hayward, and San Andreas). If a 9.0 earthquake were to occur, which is the theoretical maximum magnitude of Earthquake to occur in San Francisco, it would be about 10 times stronger than the 1906 earthquake and 100 times stronger than the 1989 earthquake. This has the potential to sever all transmission of water from Hetch Hetchy to San Francisco.

The Balboa Reservoir represents an opportunity to store an additional 110 000 000 gallons approximately (based on 17 acres x depth of 20 feet). This water storage capacity is not insignificant.

What does the project propose to do to increase our water storage when it comes to firefighting capacity?"

(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-5])

"San Francisco is listed as a city with housing more dense than Tokyo and Hong Kong. In America, San Francisco is second in density only to New York City. The proposed housing project for the lower Balboa Reservoir would have housing five times more dense than the surrounding area.

Thirty years ago a similar proposal involving a smaller number of housing units on the Reservoir site was rejected by San Francisco voters. One of the major concerns for housing at the site came from the fire department. The Chief had many reasons to not recommend housing in the Balboa Reservoir, citing conditions which have become even more dangerous over the years.

Increasing drought and the extreme winds coming through the reservoir gulch make a perfect storm for the type of fires that we now see devastating entire towns in California. The situation was dire before and now it's impossible to overstate the fire danger involving that particular basin (and all surrounding neighborhoods), a basin which is being proposed for impossibly dense housing. The lack of immediate water sources made and still makes the situation very bad. We've all seen what fires fed by strong horizontal winds, minus enough water, can do to houses and buildings."

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-1])

"In particular, the areas of water supply and safety have been largely ignored.

Appendix F: Water Supply Assessment contains the report given at a PUC hearing some months ago concerning the availability of water for the proposed development. I was at that hearing and clearly understood that such a supply was not actually assured except perhaps under the somewhat mythical

consideration: "during normal years". However, it is pretty apparent that with climate change reality upon us, we cannot consider anything in the future to be 'normal years' (!)"

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-2])

"At that hearing and in appendix F, it was also made clear that detailed research into water safety and the potential for urban fires was not addressed. Reports of lack of appropriate water supplies in the western half of San Francisco, should there be fires, has been reported as recently as a few days ago."

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-3])

"Then, you need emergency water in case we have an earthquake to kill the fires. There is no emergency water supply for the west and south area of San Francisco. Would you please get busy before you start building and get that done?"

(Etta Tima, CPC Hearing, September 12, 2019 [I-TIMA-4])

Comment UT-2: Stormwater and Sewer

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-NAF-1

I-GOODMAN-4

"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."

(Neighbors Against Flooding, Email, September 17, 2019 [O-NAF-1])

"I am for the design and proposal of the housing development as an individual, and feel the need for 100% affordable units and a more robust look at water-use and retention on the site for reclamation and sewage issues and infrastructure must be a part of both sites (Balboa Reservoir and CCSF land developments). My concerns were raised during meetings where I attended SFPUC water games planning charrettes and we indicated the importance of water/sewer systems above sea-level that can begin to alleviate lower down systems elevation wise."

(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-4])

Comment UT-3: Other Utilities and Service Systems Comments

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-MUELLER1-2

"The recent MUB building at City College and soon-to-be-built Performing Arts Education Center on the college portion of the reservoir use geothermal energy sources. Has there been research on the compatibility of the college's system with other projects?"

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-2])

Comment PS-1: Emergency Services

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-CURRIER-3

I-MARTINPINTO-1

I-MARTINPINTO-4

"The other thing is we're worried that fire trucks aren't going to be able to get to our school in case of a fire. There's not been enough detail or clarity about transportation. They've delayed that meeting. That was supposed to take place this week. That has not occurred. It's been delayed until September 30th. I need more clarity on the impact of transportation on our school."

(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-CURRIER-3])

"This Statement is an erroneous assumption. Response times for emergency vehicles located at Fire Station 15 (address 1000 Ocean Avenue) will be adversely affected, as well as response times from the next nearest three fire stations (Fire Station 33 at 8 Capitol Avenue, Fire Station 39 at 1091 Portola Drive, and Fire Station 19 at 290 Buckingham Way). It is generally assumed that with new residences comes new traffic, which will undoubtedly slow response times. Although response priority 3 emergency calls (also known as code 3 calls) permit the use of emergency lights and sirens to safely bypass traffic signals and other traffic control devices, response priority 2 calls (code 2 calls) do not. Because code 2 calls require that emergency vehicles negotiate traffic at regular speeds, code 2 calls have the potential to become severely extended. Furthermore, upon arrival to the scene of a code 2 call, often times the situation is found to be more severe than previously thought, and calls are often upgraded to code 3.

With the addition of 500 – 1550 new units, an additional 1000 – 3000 or more residents will arrive. This will undoubtedly increase demand on the emergency response system, depending on the demographics of the new residents (statistically, senior citizens and low-income people are more frequent users of 911).

Increased demand of the emergency response system combined with increased response times puts a strain on the ability of the SFFD to meet their 4 minute response time criteria (4 minutes from dispatch of call to patient contact)."

(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-1])

"what does the project propose to do to improve emergency vehicle response times?"

(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-4])

Comment PS-2: Public Services and Secondary Impacts (City College)

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH1-5

I-BARISH2-7

I-BARISH3-12

I-BERNSTEIN4-4

I-BERNSTEIN5-1

I-FRAKNOI-1

I-FREY1-1

I-FREY2-1

I-JA3-1

I-KAUFMYN2-1

I-MAGNUSON-1

I-RHINE-2

I-TIMA-1

I-WORLEY-7

"Finally, another example, the initial study, Appendix B, concludes the project would not result in cumulative impacts on public services, yet it did not analyze the impacts of the project on City College. Again, the draft SEIR review of this impact is inadequate."

(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-5])

"3) Finally, the Initial Study concludes the project would not result in cumulative impacts on public services. Yet it did not analyze the impacts of the project on City College. Again, the DSEIR review of this impact is inadequate."

(Jean Barish, Letter, September 12, 2019 [I-BARISH2-7])

"Public Services Impacts – Failure to Consider Impact on City College of San Francisco ("City College")

Impact C-PS-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on public services. (Less than Significant)

By way of the Initial Study, the DSEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address the impact on student attendance and enrollment and on part-time Instructors who have to travel between multiple community college sites."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-12])

"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."

(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-4])

"1) there's little acknowledgement of the effect of the development on City College as well as other nearby schools in terms of public services"

(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-1])

"As a long-time San Francisco resident and voter, I am appalled that the environmental report on the plan to do away with the parking for students on the Reservoir at CCSF did NOT consider the impact it would have on the college, the students, and the neighborhood."

(Andrew Fraknoi, Email, September 21, 2019 [I-FRAKNOI-1])

"My name is Laura Frey, Westwood Park. Thanks for your patience with all these people. Three main concerns. My first concern, like a lot of people, is City College. I don't think the impact on City College has been really addressed in this. And I want to remind the Planning Department that the timing of the development, the process began at the same time that the accreditation crisis began. So, City College, like Chris alluded to, was out of the loop and never really caught up."

(Laura Frey, CPC Hearing, September 12, 2019 [I-FREY1-1])

"First is City College. This is public land. I have heard from City College people, as well as long-time SF residents that the reservoir area had been set aside for City College use, if it were to be developed. This draft EIR does not sufficiently examine the long-term impact of this project on City College. Also the timing of the development should be remembered. The process for this proposed development began at the same time as City College's accreditation crisis began--this probably kept City College from having the time and resources to properly consider the impact of this development on its future at the very beginning... and it has probably been "behind" ever since."

(Laura Frey, Email, September 22, 2019 [I-FREY2-1])

"Initial Study

In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR. Therefore, the topics addressed in the initial study are listed below and are not analyzed in this SEIR chapter.

Under Public Services, the PEIR did not analyze the impacts of a Reservoir Project on City College."

(Alvin Ja, Email, August 13, 2019 [I-JA3-1])

"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."

(Wynd Kaufmyn, Email, September 22, 2019 [I-KAUFMYN2-1])

"What I had wanted to say was that I'm deeply disappointed in the Draft EIR . I feel it is tragic that it fails to consider City College of San Francisco and its viability, health and importance to the community as a critical and important element in any plans for development of the Balboa Reservoir."

(Sally Magnuson, Email, September 22, 2019 [I-MAGNUSON-1])

"This is a school that has been a part of the life of the City for generations. It's trained people for essential jobs and public services, provided enrichment to countless people through lifelong learning. And to not consider it, consider the impact seems to me a serious flaw that should be reexamined."

(Marcie Rhine, CPC Hearing, September 12, 2019 [I-RHINE-2])

"Thank you for your invitation. My name is Etta Tima. I'm a resident for 48 years and at times old age helps to understand something. I live on Plymouth Avenue. I view the parking lot every morning. It is full. And it is necessary. And it should remain because during at lease time, he said he wanted to put another 100,000 people into the County of San Francisco.

Now, I'm asking you, where should they find education? If you reduce the parking space, this at this moment presents 4 percent of the student body. That is not very much."

(Etta Tima, CPC Hearing, September 12, 2019 [I-TIMA-1])

"The DRAFT SEIR is inadequate because it fails to consider secondary environmental impacts

The significant secondary environmental impacts of potential new CCSF parking construction replacing spaces eliminated by the project must be addressed."

(Jennifer Worley, Email, Septemeber 23, 2019 [I-WORLEY-7])

Comment BIO-1: Biodiversity

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HALL-1

"I'm greatly disappointed to learn that the Balboa Reservoir Draft Supplemental Environmental Impact Report fails to take into consideration San Francisco's vanishing biodiversity.

Although the reservoir was meant to be a hard surface where plants shouldn't grow, over the years native coyote brush (*Baccharis pilularis*), yellow bush lupine (*Lupinus arboreus*) and various non-native shrubs have colonized the area. The result is a patchy habitat that has attracted a thriving flock of Coastal Nuttall's white-crowned sparrows. I saw breeding evidence this Spring. About 60 of the birds were counted. A local resident, Greg Gaar, assures me that they've been breeding there since, at least, the 1970s. The attraction is the native coyote brush, an amazing plant that offers cover for our local birds and sustenance for over 54 insect species (https://plants.usda.gov/plantguide/pdf/pg_bapi.pdf). Also present are house finch, red tail hawk, California scrub jay, Anna's hummingbird, West Coast lady butterfly, bumblebee, grasshopper and various lichens.

A recent World Wildlife fund study points out that the world has lost 52% of its biodiversity since the 1970s (<https://www.cbsnews.com/news/world-wildlifefund-wwf-half-the-worlds-biodiversity-gone-over-last-40-years/>). This means that, in San Francisco, where habitat for biodiversity is at a premium, we need to be careful where we tread. City and state officials agree, with each entity rolling out biodiversity resolutions that have the goal of protecting flora and fauna.

(<https://sfenvironment.org/policy/resolution-adopting-citywide-biodiversitygoals>)

(<http://opr.ca.gov/docs/20180907-CaliforniaBiodiversityActionPlan.pdf>)

I urge you to hire an ecologist and make plans to mitigate by building new local native habitat in the immediate proximity of your development so biodiversity can adapt to the stark changes you're proposing. Most of the creatures on this property are non-migratory and have no where else to go. Please include biodiversity mitigation in your report."

(Bob Hall, Email, August 21, 2019 [I-HALL-1])

Comment GE-1: Geology and Soils

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-TIMA-3

"If you are building 1,200 units on an earthquake fault, and I'm sure you know because I have expressed this before, the earthquake fault runs right through City College, and Riordan High School, and Wildwood."

(Etta Tima, CPC Hearing, September 12, 2019 [I-TIMA-3])
