

## 4.F Alternatives

The comments and corresponding responses in this section cover topics in draft SEIR Chapter 6, Alternatives. These include topics related to:

- Comment AL-1: Range of Project Alternatives
- Comment AL-2: Environmentally Superior Alternative
- Comment AL-3: Alternative A, No Project Alternative
- Comment AL-4: Alternative B, Reduced Density Alternative
- Comment AL-5: Alternative B, Economic Feasibility
- Comment AL-6: Alternative C, San Ramon Way
- Comment AL-7: Alternative D, Six-Year Construction Alternative

### *Comment AL-1: Range of Project Alternatives*

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

O-WPA1-6  
O-WPA3-8  
O-WPA3-15

I-COLLINS3-1  
I-HOUWER-4  
I-MEDAL-4

I-PEDERSON2-11  
I-SIMON-12

“And last, the rejection by the Planning Department of the use of the site for City College as an alternative was not appropriate. Public land should not be used for anything but public good.

Parties in the scoping process requested that this alternative of using project land for City College should be an alternative. The Planning Department rejected that and that was inappropriate under the law.

I only had two minutes. I tried to be brief. Thank you very much. We will put the rest of our comments in writing. Or, no, we will put those comments in writing.”

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-6])*

### “2. Alternatives Analysis

CEQA requires that an EIR ‘consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation’ (CEQA Guidelines Section 15126.6(a)). The Project DSEIR considers three alternatives, plus the required ‘No Project’ alternative. This may be a ‘reasonable range’ of alternatives, but as discussed below, the WPA believes the specific alternatives selected, and the discussion of those alternatives, fails to meet the CEQA alternative

analysis requirement that the alternative analysis will ‘foster informed decision-making and public participation.’”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-8])*

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“Rejection of the Alternative to use Project Site for CCSF

Parties of interest in the Scoping Process submitted requests for Alternatives to be considered in the DSEIR. Various parties requested that one Alternative that the City should include in the DSEIR is the use of the Project Site solely for CCSF [DSEIR, page 6-60]. The Planning Department rejected this alternative on the basis that the significant impacts cannot be eliminated and that the Project Sponsor’s objectives would not be implemented [DSEIR, page 6-60]. CCSF is a tuition free higher educational institution serving the educational needs of the residents of San Francisco, many of whom are immigrants. Since implementation of the free tuition policy, the student body of CCSF is estimated to increase by 55% by 2026. The new buildings in the CCSF Master Plan would occupy the current parking lot, which is the only undeveloped portion of the CCSF Ocean Campus leaving this campus no additional room to expand. Public land should be used for public use and not private residential use. In this case, educational buildings and housing for CCSF students, staff, and teachers (both CCSF teachers and those in nearby public schools) should have been included and analyzed as an alternative use of the Project site.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-15])*

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“Hello. Am writing to support alternative housing projects NOT located on Balboa Reservoir. I hope to enumerate various reasons for this here.

1. There are a lot of vacant, fallow lots not being used. Evidently these are now part of a passive Real Estate Investment Trust portfolio for folks who don't know they could do better if paid market rate by developers for building. Daly City is full of blighted vacant lots & closed businesses. Forward thinking developers have put in nice big apartments and condos literally minutes from the SF county line, very conveniently located.”

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-1])*

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“Further, the proposed developer that you have selected is already charging a premium for the other apartments that are on ocean which is unaffordable and means that you have double or triple the amount of tenants living in these units just to be able to afford the ridiculous rents. There are other vacant lots such as the old Geneva Drive In where you could place these units.”

*(Michell Houwer, Email, September 12, 2019 [I-HOUWER-4])*

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“This project should be built in a different location.”

*(Tomasita Medál, Email, September 23, 2019 [I-MEDAL-4])*

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“The Draft should address whether dedicating a substantial portion of the project to housing City College employees and/or students would minimize traffic-related impacts of the project and whether such dedication would be feasible.”

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-11])*

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“Until funding for 100% affordable housing for the number of units that could be established in the Lower Lot in a sequenced manner so as not to radically reduce parking before public transit has been improved, no housing should be built on the Balboa Reservoir because it will have an adverse impact on the enrollment and consequent health of City College of San Francisco.”

The attached alternative plan shows three structures, which could be built in phases, so that when the promised better transit services are established, some of the Lower Lot could be dedicated incrementally to affordable housing. I request that this alternative plan be explored.”

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-12])*

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### **Response AL-1: Range of Alternatives**

The comments state that the range of alternatives in the SEIR did not meet the CEQA alternative analysis requirements. One comment states that the City should identify what number of units could be constructed at the site without creating significant adverse impacts to transportation and circulation, air quality, noise, and secondary public benefits. Several comments suggest additional alternatives including a 100 percent affordable housing alternative, alternative locations, and an alternative plan with three structures “built in phases until the city delivers better transit services”. Other comments disagree with the rejection of using the site for City College facilities and state that the site should be used for educator and student housing.

The response below describes the CEQA requirements for the alternatives analysis, the objectives used to define alternatives, and the alternatives selection process. Comments regarding 100 percent affordable housing are addressed in Response ME-3, Section 4.J, Merits of the Project in this RTC.

#### *CEQA Requirements for Alternatives*

CEQA Guidelines section 15126.6(a) provides that “An EIR shall describe a range of reasonable alternatives to the project, or location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.”

The alternatives need not meet all of the project objectives, but should meet most of the basic project objectives. The CEQA Guidelines recognize that the range of conceivable alternatives to a proposed project is potentially vast, and that an EIR need not consider every conceivable alternative to a project. However, it must include a reasonable range of potentially feasible alternatives that are limited by the “rule of reason” and that will foster informed decision-making and public participation (see CEQA Guidelines section 15126.6(a)).

The main purpose of presenting a range of alternatives to a proposed project is to focus on alternatives that are capable of reducing or eliminating any significant effects of the proposed project identified in an EIR (CEQA Guidelines section 15126.6(b)). The SEIR for the Balboa Reservoir Project meets this requirement. For example, the SEIR includes one alternative that eliminate the significant and unavoidable air quality impacts, as well as two alternatives that reduce but do not fully avoid the significant and unavoidable noise, air quality, and transportation and circulation impacts, so that decision-makers can compare the environmental impact trade-offs among these alternatives and the proposed project.

The range of potential alternatives is limited to those that could feasibly attain most of the basic objectives of the proposed project. Among the factors to be considered in feasibility are site suitability, economic viability, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project sponsor can reasonably acquire or have access to an alternative site (CEQA Guidelines section 15126.6(f)(1)). As described below, the SEIR provides a discussion and analysis of the alternatives selection process that was used to identify the range of alternatives analyzed in the SEIR in compliance with CEQA guidelines section 15126.6.

#### *Alternatives Selection Process and Project Objectives*

SEIR Section 6.A.3, Alternatives Selection (pp. 6-3 to 6-7), describes the alternatives section process. The first step is to use the project objectives in the identification, selection, and evaluation of alternatives. As shown on SEIR pp. 2-4 and 2-5, the project objectives for the proposed project are as follows:

- Implement the goals of the City’s 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.
- Implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.
- Contribute to the City’s goal of creating 5,000 housing units each year on a site specifically identified in the general plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.
- Build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.

- Build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.
- Replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.
- Establish pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.<sup>1</sup>
- As stated in the City's Balboa Reservoir Request for Proposals, work with City College to address parking needs by identifying substitute parking and transportation solutions.
- Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.

The City and SFPUC have the following additional objective:

- Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the city's charter and applicable law.

The second step presents a summary of all of the significant and unavoidable impacts that were identified in SEIR Chapter 3. The third step focuses on strategies to address the significant secondary operational loading impacts, transit delay, and noise and air quality effects of construction activities. The strategies to address significant impacts are summarized below:

- Alternative Strategy to Address Secondary Loading Impacts (SEIR p. 6-5):
  - Providing an additional point of access to the project site, which would reduce the number of project-generated vehicle trips at the Ocean Avenue/Lee Avenue intersection;
- Alternative Strategy to Address Transit Delay Impacts (SEIR pp. 6-6 and 6-7):
  - Providing an additional point of access to the project site, which would reduce the number of project-related vehicle trips along transit routes;
  - Reducing the density of the project would reduce the number of project-generated vehicle trips, which would reduce to some extent, the potential for a project to have a considerable contribution to increases in transit delay;

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<sup>1</sup> The City College Terminal was formerly known as the Phelan Loop.

- Alternative Strategy to Address Construction-Related Impacts (SEIR p. 6-7):
  - Require construction be phased sequentially over a six-year period, with no compressed schedule; and
  - Reduce the scale of the project, which could reduce the magnitude of construction.

These strategies to address significant impacts are evaluated and alternatives screened for their feasibility and ability to meet most of the project objectives. Table 6-2 on SEIR pp. 6-9 and 6-10 summarizes the ability of the alternatives to meet project objectives. The range of alternatives includes the No Project Alternative as required by CEQA Guidelines Section 15126.6(3) and three alternatives at the project site (Reduced Density, San Ramon Way Passenger Vehicle Access, and Six-Year Construction Schedule). Together, the planning department determined that the four identified alternatives present a reasonable range of alternatives adequate to inform decision makers.

#### *Other Alternatives and Alternatives Considered but Rejected*

Several comments state that the project should be located elsewhere. One comment states that the SEIR should consider “whether dedicating a substantial portion of the project to housing City College employees and/or students would minimize traffic-related impacts of the project and whether such dedication would be feasible.”

As described in Chapter 6, Alternatives of the SEIR and above, the consideration of alternatives carried forward for analysis was based on three factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project’s basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

As described in SEIR Section 6.E.2, Alternatives Considered but Rejected, the SEIR considered alternative locations and included the reasons for rejecting alternative locations. As described on SEIR pp. 6-56 and 6-57, the reasons for rejecting alternative locations include: the sites would not meet the basic project objectives, which are specific to the Balboa Reservoir site based on policy considerations evaluated by the city; the sites would result in the same construction-related impacts as the proposed site; no comparable parcel of land is available within the plan area that the project sponsor could reasonably acquire, control, or otherwise have access. An alternative site would not meet the basic objectives related to “developing the reservoir site with a mixed-use residential neighborhood, including a substantial number of affordable housing units, site infrastructure, and bicycle and pedestrian connections”. Furthermore, an alternative location would not meet the project objective related to developing an underutilized side under the Public Land for Housing Program.” (SEIR p. 6-57)

An alternative dedicating most or all of the site to educator and student housing would not meet the basic objectives related to building a “mixed-income community with a high percentage of

affordable units to provide housing options for households at a range of income levels...” The range of income levels could include educators and students, but would not preclude other professions. The project sponsor’s commitment to the amount of affordable housing developed as part of the proposed project would be part of the development agreement between the City and project sponsor.

Although an alternative with the majority or all of the site dedicated to educator and student housing would not meet the basic project objectives, under such a scenario, the transportation impacts would still likely remain significant and unavoidable for several reasons. The cumulative transit impacts (Impact C-TR-4) presented on SEIR pp. 3.B-94 through 3.B-98 are based a conservative assumption of combined project vehicle trips and contribution from City College facilities master plan projects. The educator and student housing scenario would not completely reduce the project’s contribution to such a cumulative impact for the following reasons:

- In addition to the Ocean Campus, City College has eight centers and various other instructional sites throughout San Francisco. Providing educators and students with housing on the project site would not obviate the need for travel to and from these other sites for a substantial portion of residents.
- Work travel (employees and students traveling to and from the campus site) only accounts for a portion of total travel. Even among those students and employees who travel to and from the Ocean Campus for school and work purposes, a majority of travel is not work related. The travel demand spreadsheet provided in Appendix C1, Travel Demand Memorandum, provides a distribution of residential trips and shows that non-work trips account for approximately 69 percent of daily residential travel (5,878 person trips out of 8,495). Thus, trips (including vehicle trips) entering and exiting the project site would still be substantial.
- The co-location of student housing and a one of eight City College campus centers would not prevent project-related vehicle travel from using Ocean Avenue in the project vicinity. Project vehicle trips exiting and entering the project site would contribute to the significant and unavoidable transit impacts to the transit routes and segments presented in Table M-C-TR-4 on page 3.B-96 of the SEIR.

The cumulative impact to passenger and freight loading (Impact C-TR-6b, discussed on SEIR pp. 3.B-101 through 3.B-102) was determined based on the impact to existing loading zones along Lee Avenue between Ocean Avenue and the project site. Under such a scenario, the Lee Avenue extension would still occur, and impacts to loading on Lee Avenue would occur irrespective of potential changes travel demand or patterns from educator or student housing. Thus, the impact conclusion would be significant and unavoidable.

The SEIR presents and analyzes a reasonable range of alternatives consistent with CEQA Guidelines section 15126.6(a). CEQA does not require analysis of “every imaginable alternative” but rather it gives agencies the flexibility to eliminate certain alternatives that either do not reduce environmental impacts or do not further the project’s main objectives. The planning department has determined that all alternatives analyzed in the SEIR to be *potentially* feasible, consistent with the CEQA guidelines.

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### ***Comment AL-2: Environmentally Superior Alternative***

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

O-WPA3-13  
I-PEDERSON2-1  
I-PEDERSON2-4

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#### “Environmentally Superior Alternative

The DSEIR concludes that Alternative D is the “Environmentally Superior Alternative.” (DSEIR, pp. 6-49 – 6-50.) This conclusion contradicts the evidence provided in the DSEIR which states that the combination of the reduced density alternative (Alternative B) and Alternative D “*would result in less environmental impacts than the Project options and variants.*” (DSEIR, p. 6-50.) Therefore, it is clear that the combination of alternatives B and D would result in fewer environmental impacts. The inescapable conclusion would be that the environmentally superior alternative is Alternative B constructed over six years in two phases. As written, the alternative section of the DSEIR is drafted to lead, or mislead, the public and decision-makers into approving the Project or the Additional Housing Option that has a higher density even though neither the Project or the Additional Housing Option is the environmentally superior alternative.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-13])*

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“Although the Draft is sufficient in most respects, it is deficient in three different ways: it misidentifies the environmentally superior alternative”

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-1])*

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“A. The Additional Housing Option is the Environmentally Superior Alternative.

The Draft identifies the no project alternative as the environmentally superior alternative. Aside from the no project alternative, it identifies the alternative that requires a six-year construction period as environmentally superior. It also opines that a reduced density version of the project constructed over a six-year period, if feasible, would further reduce environmental impacts.

The Draft’s evaluation of which alternative is environmentally superior is fundamentally flawed because it fails to address the adverse environmental consequences of providing less housing than proposed in the Additional Housing Option and of constructing the public parking garage component of the developer’s proposed option.

The most urgent environmental problem that the world and the state face today is climate change. (IPCC, Climate Change 2014, Synthesis Report; Cal. Health & Safety Code, section 38501.) In 2017, transportation accounted for 41% of California's greenhouse gas ("GHG") emissions and 46% of San Francisco's GHG emissions. (California Air Resources Board (CARB), California Greenhouse Gas Emission Inventory: 2000-2017 (2019 Edition); [sfenvironment.org/carbonfootprint](http://sfenvironment.org/carbonfootprint).) The California Air Resources Board has concluded that California cannot meet its GHG reduction goals unless it substantially reduces vehicle miles travelled ("VMT"). (CARB, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target; CARB, 2018 Progress Report, California's Sustainable Communities and Climate Protection Act (Nov. 2018), pages 5, 27-28.) A primary strategy for reducing VMT is locating multi-family housing close to major employment centers, public transit, and other amenities such as neighborhood commercial districts. Unfortunately, restrictions on residential development within the major urban cores of the state present a major obstacle to accomplishing the state's GHG emissions reduction goals. (CARB, 2018 Progress Report, pages 46, 53, 63-64.)

The Balboa Reservoir is unusually well-suited to be the location of high-density residential development because it is (1) immediately adjacent to City College, a major employment center and trip generator; (2) within easy walking distance of multiple transit lines, including BART and Muni lines KT, 8, 8BX, 29, 43, 49, 54, and 91 (and also the J, M, 28R, and 88 lines, which serve the Balboa Park BART station); and (3) adjacent to the Ocean Avenue neighborhood commercial district. To deny or reduce the amount of multi-family housing there would directly impede the state's efforts to reduce the most significant environmental impact of them all: climate change.

The potential adverse environmental impacts identified in the Draft all pale in comparison to the environmental impacts of climate change. To treat temporary construction-related noise and air quality impacts and traffic challenges associated with loading for the adjacent Whole Foods grocery store as more significant than climate change is self-evidently ludicrous. More importantly, the Draft's failure to provide a reasonable evaluation of the magnitude and significance of the very different kinds of environmental impacts that the City's action on this project might have means that it is not adequately informing decision-makers and the public about the potential environmental consequences of the City's action.

In addition, as discussed in more detail below, the Draft fails to address how the proposed public parking garage will undercut City College's efforts to reduce automobile commuting and thereby induce more GHG emissions and VMT than would occur if the public parking garage is not constructed.

The Draft's alternatives analysis should therefore be revised to address the environmental consequences of providing less housing than proposed in the Additional Housing Option and of providing the public parking garage. Once that analysis is provided, the SEIR should conclude that the Additional Housing Option is the environmentally superior alternative because it provides the most housing in a manner that is likely to result in the lowest per capita VMT and GHG emissions, thereby advancing the state's strategy for addressing the climate crisis."

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-4])*

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## **Response AL-2: Environmentally Superior Alternative**

One comment states that the combination of Alternatives B and D would be the environmentally superior alternative and claims that the SEIR is drafted to lead or mislead the public and decision-makers into approving one of the proposed project options, despite neither being the environmentally superior alternative. Other comments state that the SEIR misidentifies the environmentally superior alternative because the analysis does not address the climate change consequences of providing less housing than the Additional Housing Option or constructing the public parking garage under the Developer's Proposed Option. Responses to the specific details of each comment as they relate to environmental issues are presented to below.

As stated in SEIR Section 6.D, Environmentally Superior Alternative, the environmentally superior alternative is the alternative that avoids or substantially lessens some or all of the significant and unavoidable impacts of a project. However, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines section 15126.6).

The draft SEIR concludes on p. 6-50 that "Alternative D, Six-Year Construction Schedule would meet all of the project objectives and would avoid and substantially reduce the severity of project- and cumulative-level impacts related to construction-related air quality and health risks." The comment omitted the preceding SEIR text regarding the combination of Alternatives B and D. The SEIR acknowledges that "[i]t is *possible* that Alternative D could be combined with Alternative B by the decision makers" which would lessen the severity of the significant and unavoidable adverse impacts of the proposed project.

Concerning VMT and GHG emissions of the project, the SEIR determined VMT to be less than significant (SEIR pp. 3.B-79 and 3.B-80) while the initial study (SEIR Appendix B) identified a less-than-significant impact to GHG emissions. Accordingly, neither VMT or GHG emissions was a concern in the development of alternatives since CEQA does not require that the alternatives address less-than-significant impacts. However, the commenter's concerns regarding VMT and GHG will be forwarded to the decision-makers for their consideration during deliberations on the proposed project.

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## ***Comment AL-3: Alternative A, No Project Alternative***

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

I-BIERINGER1-4  
I-BIERINGER4-4  
I-RANDOLPH-1

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“This is public land. It should be used for the public. I strongly urge you accept alternative A, which is to do nothing and start back at the drawing board to build affordable housing for teachers and students.”

*(Garry Bieringer, CPC Hearing, September 12, 2019 [I-BIERINGER1-4])*

“Please adopt Alternative A.”

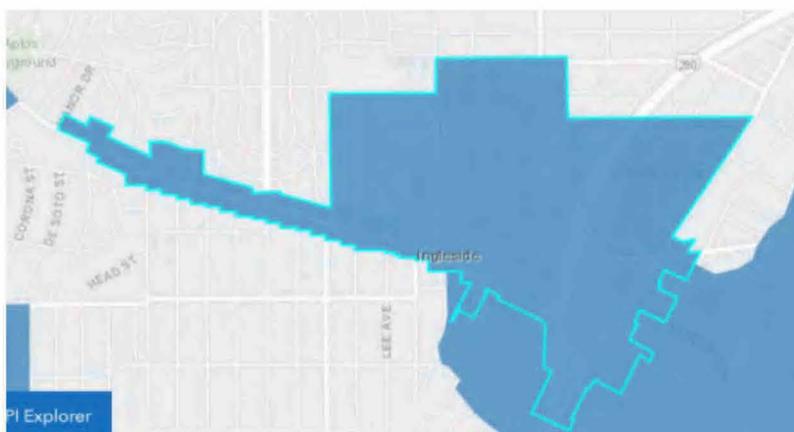
*(Garry Bieringer, Email, September 23, 2019 [I-BIERINGER4-4])*

“However, I think it is deficient in its discussion of cumulative greenhouse gas emissions and traffic impacts.

In two tables (Table S-3, Table 6-6) and in the discussion of the alternatives in 6.C (p. 6-14), the EIR says that the No Project Alternative would have No Impact (NI) on greenhouse gas (GHG) emissions, whereas the proposed project would have a Less than Significant (LTS) impact on GHG emissions. Therefore, section 6.D concludes that ‘the No Project Alternative would be the environmentally superior alternative because it would result in no impacts to all resources’.

I believe this is in direct conflict with the Plan Bay Area 2040 FEIR, which finds that the ‘No Project and Main Streets Alternatives would result in a greater number of significant and unavoidable impacts compared to the proposed Plan’ of concentrating jobs and housing in Priority Development Areas (PDAs) (p. ES-8). Indeed, the whole purpose of SB 375 (2008) and Plan Bay Area was to reduce GHG emissions by concentrating jobs and housing near transit. The Plan Bay Area 2040 EIR may be used ‘as the basis for cumulative analysis of specific project impacts’ (Section 1.1.6).

This is relevant because the Balboa Reservoir is the biggest single development in the Balboa Park PDA (see screenshot of PDA map, below). It is minutes away by foot from the Balboa Park BART station and numerous Muni light rail and bus lines.



If the project were not built, the people who would have lived there do not simply vanish. Instead, they move further away in the Bay Area or elsewhere in the United States with worse transit service. By excluding reasonable estimates of per capita GHG emissions under the No Project Alternative, the Draft EIR makes it impossible to compare GHG impacts among the No Project, Reduced Density, Developer's Proposed Project, and Additional Housing alternatives.

The same reasoning applies to VMT, though to your credit Table 3.B-9 includes a comparison of local VMT to Bay Area VMT that shows that Balboa Park area residents are likely to drive less per capita.

In my opinion, developing the Balboa Reservoir to the highest density is likely to have lower cumulative 2040 impacts on greenhouse gas emissions and traffic than any of the alternatives, including the no project alternative."

*(Yonathan Randolph, Email, September 23, 2019 [I-RANDOLPH-1])*

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### **Response AL-3: Alternative A, No Project Alternative**

Two comments express support for the adoption of Alternative A, No Project. Regarding the comment that calls for building affordable housing for teachers and students, refer to Response ME-3, Public Land and Affordable Housing, in Section 4.J, Merits of the Project, on RTC p. **Error! Bookmark not defined..** The comments expressing support of the No Project Alternative will be provided to the decision-makers for their consideration during deliberations on the proposed project.

One comment states that the SEIR did not include a full analysis of greenhouse gas emissions for the No Project Alternative, which then makes it impossible to compare GHGs emissions with the proposed project options and alternatives. Analysis of potential greenhouse gas emission impacts of the proposed project is addressed in SEIR Appendix B, Initial Study, on pp. B-37 through B-40 and analysis of the alternatives is addressed in SEIR Chapter 6. As stated on page B-37 of the SEIR initial study, CEQA Guidelines section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project, and CEQA Guidelines section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gas emissions. This approach is in recognition of the fact that while no single project could generate enough GHG emissions to noticeably change the global average temperature, the combination of GHG emissions from past, present, and future projects around the world have contributed and will continue to contribute to global climate change and associated environmental impacts. Consistent with these guidelines, the initial study provides a qualitative analysis of greenhouse gas emission impacts by demonstrating the project's consistency with the City's Greenhouse Gas Reduction Strategy.

Concerning VMT and GHG emissions of the project, the SEIR determined VMT to be less than significant (SEIR pages 3.B-79 and 3.B-80) while the initial study (EIR Appendix B) identified a less-than-significant impact to GHG emissions. Accordingly, neither VMT or GHG emissions was a concern in the development of alternatives since CEQA does not require that the alternatives

address less-than-significant impacts. However, the commenter's concerns regarding VMT and GHG will be forwarded to the decision-makers for their consideration during deliberations on the proposed project.

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***Comment AL-4: Alternative B, Reduced Density Alternative***

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

O-WPA3-10  
I-BARISH2-4  
I-HEGGIE2-11-HEGGIE2-10  
I-OSAWA-8  
I-SIMON-11

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**"Alternative B: Reduced Density Alternative Mitigates Construction Impacts on Riordan High School and the Childcare Center"**

A noise monitoring report was prepared to establish the existing noise levels within 900 feet of the project site as part of the DSEIR. This report included a long term (24 hr. or longer) and a short term (15 min.) study. The closest Noise-Sensitive Receptor is Archbishop Riordan High School ("Riordan High School") which is within 80' of the North Access Road which is the route to be used by construction haul trucks for 4 months, and approximately 50' from the standard construction activities for the Lee Avenue extension and the Block G building. The estimated duration of construction noise from the project is six years.

Table 3.C-7 provides a list of equipment that generates noise between 74 (Welder, Concrete Truck) and 90 dBA (Hoe Ram, Concrete Saw, Rock/concrete Crusher) at a distance of 50' and at 110' the noise is reduced to 68 dBA (a welder) to 84 dBA (Hoe ram, Concrete Saw, Rock/Concrete Crusher). After Phase 1 is complete, in addition to the construction noise there will be an increase in noise from project related traffic. The noise impact on the Riordan High School as well as other nearby sensitive receptors such as the Ingleside Library and the Shining Stars Family Childcare Center will be significant.

The project included multiple buildings and is proposed to be constructed in two phases. Therefore, construction haul trucks will use the North Access Road not just during the estimated 4 months of the excavation and grading phase of the Project but for the full six years of the proposed construction. Although the DSEIR describes the construction noise as intermittent, these noisy periods will be disruptive to students and teachers throughout the Riordan High School day. The most effective way to mitigate construction impacts is to decrease the density of the project so as to not prolong the construction schedule and require a noise buffer zone adjacent to Riordan High School. We request that the analysis of the lower density alternative be included as a variant. A noise buffer zone next to Riordan High School and the Childcare Center should also be included as a mitigation measure."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-10])*

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“I urge the Commission to consider reducing the project to one that is about 400 units, such as illustrated in this drawing. (Att 2)”

*(Jean Barish, Letter, September 12, 2019 [I-BARISH2-4])*

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“Knowing that the development will cause serious risks to our educational institutions, neighbors, students and small children, I believe it is worth taking a step back and asking what is the highest good for this area that causes the least damage to the City and the immediate surroundings. In that light, please identify what number of units could be safely constructed in the Balboa Reservoir without creating significant adverse impacts to transportation and circulation, air quality, and noise, and secondary public benefits, such as educational services.

As we are aware, City College is an engine for the service jobs of San Francisco and provides opportunity including childcare and child development for students who need them while taking classes to develop skills and a better future. There are reasons that a 100% affordable housing building which houses aged-out foster youth among others was constructed next to City College at the Balboa Reservoir. Adding to the public good is an adjacent private school which is well-known as a high school, but also for its special treatment facilities for learning disabilities. Those institutions as well as many childcare, nursery school and other educational institutions are located nearby. This education hub is important for providing services to all of San Francisco. Therefore, it would benefit the City to first identify what number of units would meet City standards before shoe-horning in a project that is known in advance to have unmitigable adverse impacts.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-1])*

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“8. Four alternatives for number of units were proposed: 0, 800, 1100, and 1550. Why is the alternative for 800 units not included in assessments? The impacts and results of mitigation on the 800-unit proposal needs to be addressed.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-10])*

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“I would urge the adoption of the lowest density alternative option for the development.”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-8])*

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“At most the Balboa Reservoir Project will offer 33% housing that is affordable to people with teachers salaries and below. That would provide about 350 units. An alternative plan would build **350 units only**, all of them affordable (100%) to people with teachers’ salaries and below. A model

for this plan exists adjacent to the Balboa Reservoir at 1100 Ocean, a development built on public land and 100% affordable. The possibility of this model must be explored.

I have attached a sketch that shows how these units would fit into the Lower Lot of the Reservoir. Alternative funding sources could include a proposed municipal bank and a reassessment of under-assessed commercial properties or a change in the Twitter tax. It is not necessary to use unneeded luxury housing, which create the need for a substantial number of additional affordable units, to fund affordable units.”

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-11])*

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### **Response AL-4: Alternative B, Reduced Density Alternative**

One comment asserts that the 800-unit alternative was not included in the assessments and its impacts and results of mitigation need to be addressed. One comment states that construction impacts to Riordan High School can be reduced by decreasing the project density and requiring a noise buffer zone adjacent to the school and childcare center in as a mitigation measure. The comment further requests that the analysis of the lower density alternative be included as a variant. Several comments suggest additional reduced density alternatives including a 400-unit alternative and a 100 percent affordable housing alternative with 350 units should be considered.

The 800-unit reduced density alternative (Alternative B) is analyzed on SEIR pp. 6-14 to 6-28. The 800-unit alternative is not considered a variant to the proposed project. As described SEIR p.5-1, variants are “variations of the proposed project at the same project site, with the same objectives, background, and development controls, but with a specific variation that may or may not reduce environmental impacts... these variants modify limited features or aspects of the project, unlike the alternatives to the project... which analyze different approaches to developing the project site to address significant impacts that would result from the project.”

As noted on SEIR p. 6-7, one potential alternative screening strategy to avoid or lessen construction noise impacts would be to reduce the scale of the project. As such, Alternative B was selected to address construction-related noise and air quality effects of the proposed project options. The SEIR acknowledges that the “type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur. Thus, the potential to generate occasional temporary noise increases of at least 10 dBA over ambient levels at offsite locations along Ocean Avenue, Plymouth Avenue, and Archbishop Riordan High School and future onsite receptors would remain...”. Noise impacts from construction activities under Alternative B would also be significant and unavoidable. As with the proposed project options, Mitigation Measure M-NO-1 would include measures that are intended to buffer or place distance between the construction noise sources and nearby sensitive receptors to reduce the construction noise impacts of Alternative B. For example, Mitigation Measure M-NO-1 would require the contractor to locate stationary noise sources as far from adjacent or nearby sensitive receptors as possible; erecting temporary noise barriers around the site, particularly

where a site adjoins noise-sensitive uses (such as Archbishop Riordan High School). However, impacts would remain significant and unavoidable with mitigation.

The SEIR does consider a reduced density compared to the proposed project, which would develop 800 units, or approximately 33 to 40 percent less gross square footage than the proposed project options. To the extent the comments request an alternative with fewer and/or smaller building footprints, the fact that the alternatives analyzed maintain the same street grid as that of the proposed project serves the purposes of a more valid comparison by keeping block sizes the same. As discussed in SEIR pp. 6-14 to 6-28 and summarized in Table 6-6 (pp. 6-51 to 6-55), Alternative B would lessen the significant impacts related to secondary loading, transit delay, and construction-related noise and air quality impacts, but these impacts would remain significant and unavoidable.

A reduced alternative of 350 or 400 units would increase the City's housing supply, however it would contribute fewer units towards the City's housing goals; therefore, a further reduced alternative would not meet the basic project objective of maximizing the number of housing units at the site. It should be noted that any construction at the site would result in air quality and noise impacts. Regardless of the number of units (such as 350 or 400 units) construction would require the initial phase (Phase 0) to prepare the site. Phase 0 would include the demolition of the parking lot, west side berm, and north and east embankments, followed by grading, excavation, and construction of the site infrastructure. The installation of site infrastructure and finish grading would be required for any residential construction at the site. For the same reasons described above for Alternative B, the type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur under a further reduced alternative. Thus, the significant and unavoidable construction-related noise and air quality impacts identified in the SEIR would occur. As such, another reduced density alternative would not lessen or avoid any significant impact identified for the proposed project that is not already reduced and adequately addressed by Alternative B in the SEIR. Because the impacts would be considerably similar to Alternative B, there is no requirement to include another reduced density alternative in the SEIR.

Draft SEIR Chapter 6, Alternatives, discusses the impacts that would result from construction of the reduced density alternative at an appropriate level of detail and compares these impacts to the proposed project, and these comment does not raise any specific environmental issues or questions regarding the adequacy or accuracy of the draft SEIR's analysis. The range of alternatives included in the SEIR is adequate under CEQA Guidelines section 15126.6.

### ***Comment AL-5: Alternative B, Economic Feasibility***

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

- O-WPA1-4
- O-WPA2-2
- O-WPA3-9

“Next, there is an extreme error in the DSEIR in discussing Reduced Density Alternative B in stating that no financial analysis has been conducted. That’s false and we will show why.”

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-4])*

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“It doesn’t accomplish these goals. However, there was a proposal, submitted by Related of California, a developer, during the RFP process, a process that Westwood Park was frozen out of by the Balboa Citizens Advisory Committee. A project that could be one we could support.

It brings me to the relevant objection. The draft concludes that the financial feasibility of a reduced option of 800 units referred to as Plan B is unknown. That is factually incorrect.

Related proposed a 680-unit project, with parking to accommodate City College. And in discussions with Related, they said they could reduce the number of units even further and still make a profit.

Yet, this document ignores that real world fact and concludes that the financial feasibility option of 800 units is unknown, even though a well-known and respected developer concluded it could make a profit with far fewer units.

The EIR must conclude that a reduced density option is financially feasible and study the impacts of that option.

We will submit in writing as well. And thank you very much for your time.”

*(Anita Theoharis, Board Member, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA2-2])*

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“Alternative B: Financial Feasibility of Reduced Density Alternative

The WPA objects to the conclusion regarding the financial feasibility of Alternative B, the Reduced Density Alternative, that would reduce the number of housing units from either 1550 or 1100 units to 800 units. The DSEIR incorrectly states that “the financial feasibility of the reduced density alternative is unknown” (DSEIR, page 6-17). As noted on pages 2-5 in the Project Description/Background section of the DSEIR, the SFPUC issued a request for qualifications for development of the property in November 2016. From the submissions, SFPUC selected three developers to submit comprehensive proposals: Avalon, Emerald Fund and Related California. The proposal from Avalon and its development partners was selected by SFPUC to enter into exclusive negotiations for the development.

The Related California RFP proposal was to develop 680 units, of which 50.2% were proposed to be affordable and work force housing units, or 120 fewer units than the Alternative B project with 800 units. Therefore, there is no factual basis for the conclusion in the DSEIR that the financial feasibility of the Alternative B project is unknown as this is contrary to Related California’s

proposal with fewer units that they clearly considered to be financially feasible. A copy of the Related California's Response to the RFP proposal is attached to this letter as exhibit 3.

The WPA submitted a Scoping Letter on November 12, 2018, which is attached hereto as Exhibit 4. That Scoping Letter fully discussed the financial feasibility of a reduced density project. As WPA stated in that letter, the Related California proposal was for 680 units but in addition, Related California disclosed to WPA that a project with fewer units than 680 was feasible. Footnote 1 of the Scoping Letter, states that 'In discussion with the Westwood Park Community, Related California acknowledged that a 500 unit development is financially feasible'. Hence, the statements in the DSEIR that the 'financial feasibility of the reduced density alternative is unknown' are simply incorrect, contrary to the evidence, and ignores the factual evidence that is readily available to the Planning Department."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-9])*

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## **Response AL-5: Alternative B, Economic Feasibility**

**[Note to Reviewers: To be updated in RTC-2]**

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### ***Comment AL-6: Alternative C, San Ramon Way***

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

O-SNA1-1	O-WPA3-16	I-FREY1-4
O-SNA2-1	O-WPA3-17	I-FREY2-4
O-WPA1-5	I-BURGGRAF-3	I-OSAWA-5
O-WPA3-11	I-DELROSARIO-1	I-OSTEN-2

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"Good afternoon Commissioners. My name is Amy O'Hare. I'm the Sunnyside representative on the Balboa Reservoir Community Advisory Committee. I'm also on the Board of Sunnyside Neighborhood Association, and I'm speaking for the Board today.

I want to address a particular aspect of the environmental report and that is Alternative C. That's opening San Ramon Way to vehicular traffic.

I want to urge the Planning Department to support this alternative. As currently planned, there are only two openings for vehicular traffic in and out of the reservoir sites. By opening San Ramon Way, a third access point would be provided, mitigating some of the locked in nature of the site.

When AECOM did the initial transportation analysis, in 2015, they conclude: Extending San Ramon Way would reduce local traffic bottleneck into the neighborhood. The extension would attract a portion of the Reservoir site traffic and it can be accommodated without resulting in substantial negative impacts on the existing neighborhood.

The draft SEIR states that opening San Ramon Way to vehicles would redistribute traffic from Ocean Avenue and Frida Kahlo Way, where it would otherwise contribute to the transit delay. Opening San Ramon Way would provide emergency vehicles better access.

Further, it would reduce project generated traffic volume at Lee Avenue, which is identified in the draft report as a troublesome intersection with a lot of projected congestion.

In 1917, Westwood Park laid out several stub-ended streets. It was laid out with several stub-end streets, including San Ramon.

In 1986, Westwood Park Association successfully blocked the opening of the one of the east – the west side of Westwood Park and so that’s just a solid wall. And on the other side of that is the El Dorado development, which happened in the 80s.

The original planners fully envisioned that these stubs would be connecting up with new streets as future residential development happened in the surrounding neighborhoods.

Connecting San Ramon Way to the Balboa Reservoir Project would seem like an obvious part of effectively developing this site. But apparently, the barrier to do so lies far in the past.

I have a conveyance real estate, which was just provided to me by the assessor today, which shows that in 1955 Westwood Park acquired a very tiny slice of San Ramon Way, as a lot. Which a lot was just made up out of public streets. And this is a barrier that’s right at the edge of the Balboa Reservoir Project. And I urge the Commission to override this ownership that costs them \$1.36.”

*(Amy O’Hair, Board Member, Sunnyside Neighborhood Association, CPC Hearing, September 12, 2019 [O-SNA1-1])*

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“Please urge the Planning Dept to **open San Ramon Way to all traffic** at the Balboa Reservoir housing site, which was studied as Alternative C in the Balboa Reservoir SEIR. The current two plans include only two openings for vehicle traffic into and out of the site, at Lee Avenue and Ocean, and onto Frida Kahlo Way near Cloud Circle. By opening San Ramon Way, a third street access would be added to the building site, mitigating some of locked-in nature of the site.

When AECOM did the initial transportation analysis in March 2015, they concluded: ‘Extending San Ramon Way would **reduce local traffic** at bottlenecks into the neighborhood....The extension would likely attract a portion of the reservoir site traffic heading to or from the west end and could likely be accommodated **without resulting in substantial negative effects** on the existing Westwood Park neighborhood.’<sup>1</sup>

The Balboa Reservoir draft SEIR states that opening San Ramon Way to vehicles would **redistribute traffic** from Ocean Avenue and Frida Kahlo Way, where it would **otherwise contribute to transit delay** (p.6-37). It would provide emergency vehicles better access to the western portions (p.6-36). Further, this alternative would **reduce project-generated traffic**

**volumes** at the Lee Avenue-Ocean Avenue intersection (p.6-37), which is identified as a point of heavy traffic congestion (p.3.B-3).

In 1917, Westwood Park was laid out with the several stub-end streets, including San Ramon, abutting its periphery. The original planners naturally envisioned these stubs connecting up with new streets in future adjacent residential developments. Connecting San Ramon Way might seem an obvious part of effectively developing the site, but apparently the barrier to doing so lies far in the past.

In 1950s the Westwood Park homeowners association decided that a completed street at this location was something they wanted to prevent forever.

On June 30, 1955<sup>2</sup> the City and County of San Francisco sold a ten-foot wide strip of the public street to the Westwood Park Homeowners Association (3178/018), for just \$1.36.

Thus a HOA of 600-some households, owning a thin strip of previously public land, now stands against a better distribution of traffic, better emergency vehicle access, and the alleviation of transit delay.

**The Commission can and should correct this incomplete street.** Please urge the Planning Department to pursue Alternative C. Thank you for your consideration.”

**Footnotes:**

- <sup>1</sup> Memorandum from AECOM to the SF Planning Dept about Balboa Reservoir existing conditions, dated March 17, 2015. <http://default.sfplanning.org/~plans-and-programs/planning-for-the-city/public-sites/~balboareservoir/Balboa-Reservoir-Study Existing-Conditions-Transportation.pdf>.
- <sup>2</sup> See attached conveyance from the SF Assessor’s.

*(Amy O’Hair, Board Member, Sunnyside Neighborhood Association, Letter, September 12, 2019 [O-SNA2-1])*

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“Next, there is the improper inclusion of Alternative C on San Ramon Way, on Passenger Vehicle Alternative. That should be rejected and we will say why. That has to do with Plymouth Avenue and others.”

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-5])*

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**“Alternative C: San Ramon Way Passenger Vehicle Alternative**

It is WPA’s opinion that Alternative C, the San Ramon Way Passenger Vehicle Alternative should be rejected as an alternative by the Planning Department. As described in the DSEIR, San Ramon Way currently terminates just west of the Project site and that the WPA owns the 10-foot wide parcel that separates the end of the street and the Project site. Implementation of this alternative would require purchase of this parcel by the Developer or the City.

Allowing San Ramon Way to be used for vehicle access would create significant adverse consequences. Attached to this letter as exhibit 5 is the declaration of Jenny Perez, a resident who

has lived on lower Plymouth Avenue near San Ramon Way for 37 years. Ms. Perez submitted a declaration commenting on the inaccuracies in the DSEIR relating to the alternative use of San Ramon Way for vehicle traffic and to the additional adverse consequences if San Ramon is opened to through vehicle traffic.

Also attached as exhibit 6 is the declaration of Anne Chen, a resident of lower Plymouth for 40 years. Ms. Chen's declaration comments on the inaccuracies in the DSEIR relating to the alternative of using San Ramon Way for Vehicle traffic. WPA could have solicited many more similar declarations from WPA residences, and is willing to do so if that would be helpful.

The residents residing in WPA believes that this alternative, if implemented, would have a negative traffic and noise impact on the Westwood Park neighborhood, especially on Plymouth Avenue and San Ramon Way. WPA objects to this alternative and will not sell the WPA owned parcel to allow access to the project site. Thus, this alternative is not reasonably feasible and should have been rejected by the Department as an Alternative."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-11])*

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"The Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project ('DSEIR') correctly notes the effective roadway width with on street parking at the lower segment of Plymouth is approximately 10 feet wide or less and two way vehicle travel is not feasible on Plymouth. (See DSEIR, page 6-34). However, the DSEIR is totally incorrect when it says as follows: 'These instances are rare and this is not an issue under existing conditions due to the low traffic volumes on the segment.'

The DSEIR also says as follows: '[T]he proposed project is not expected to pose potentially hazardous conditions due to the low traffic volumes' (DSEIR, page 6-35). The DSEIR is totally wrong in their conclusions.

At another place the DSEIR says that the addition of vehicle traffic over San Ramon would increase instances of oncoming traffic on Plymouth, but 'drivers would have sufficient opportunities to pull over into available street parking spaces or driveway curb cuts.' [DSEIR, page 6-37]

All of these comments in the DSEIR are without any basis in fact and are incorrect. At the current time there are seldom any parking spaces on the lower segment of Plymouth near San Ramon. I have witnessed many times a day, two to seven behind the main car driving up or down the hill, are meeting each other and unable or unwilling to move. Many times, these confrontations turn in road rage. They have hit each other's car, yell profanities, because of the tight squeeze of the road, will hit parked cars. The neighbors have woken up to the anger of the drivers in the morning or at night. It's all day everyday. That is the situation now.

If San Ramon is opened to traffic, 1100 from up to 1500 new units with approximately 1500-4000 people living in the complex(s), there certainly will continue to be no open spaces to park. Moreover, there will be an increase in the violent problems on Plymouth and additional problems with potential road rage, car damages for driving on the street. I disagree with the DSEIR

conclusion, that if San Ramon is opened there would be sufficient opportunities to pull over into available on street parking. There are generally no parking spaces available now, and if San Ramon is opened to traffic, there would be allocations for any available parking space that would guaranty no open parking spaces.

The DSEIR concludes that the use of San Ramon as a vehicle street would not create potentially hazardous conditions for people walking, biking, driving or public transit, and this alternative is 'less than significant.' [DSEIR 6-36]. This is a conclusion that is not based on any factual analysis. I have lived on Plymouth for 37 years, and can testify that opening San Ramon to vehicle traffic from 1100 or 1550 units and from City College would create something close to a war zone on this narrow street.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14 day of September, 2019, at San Francisco, California."

*(Jenny Perez statement attached to Westwood Park Association, Letter, September 22, 2019 [O-WPA3-16])*

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"The Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project ('DSEIR') correctly notes the effective roadway width with on street parking at the lower segment of Plymouth is approximately 10 feet wide or less and two way vehicle travel is not feasible on Plymouth. (See DSEIR, page 6-34). However, the DSEIR is totally incorrect when it says as follows: 'These instances are rare and this is not an issue under existing conditions due to the low traffic volumes on the segment.'

The DSEIR also says as follows: '[T]he proposed project is not expected to pose potentially hazardous conditions due to the low traffic volumes' (DSEIR, page 6-35). The DSEIR is totally wrong in their conclusions.

At another place the DSEIR says that the addition of vehicle traffic over San Ramon would increase instances of oncoming traffic on Plymouth, but 'drivers would have sufficient opportunities to pull over into available street parking spaces or driveway curb cuts.' [DSEIR, page 6-37]

All of these comments in the DSEIR are without any basis in fact and are incorrect. At the current time there are seldom any parking spaces on the lower segment of Plymouth near San Ramon. I have witnessed many times a day, two to seven behind the main car driving up or down the hill, are meeting each other and unable or unwilling to move. Many times, these confrontations turn in road rage. That is the situation now.

If San Ramon is opened to traffic from up to 1500 new units there certainly will continue to be no open spaces to park. Moreover, there will be an increase in the problems on Plymouth and additional problems with potential road rage and simply driving on the street. I disagree with the DSEIR conclusion in the DSEIR, quoted above, that if San Ramon is opened there would be sufficient opportunities to pull over into available on street parking. There are generally no parking spaces available now, and if San Ramon is opened to traffic, there would be certain fights for any available parking spaces that would guaranty no open parking spaces.

The DSEIR concludes that the use of San Ramon as a vehicle street would not create potentially hazardous conditions for people walking, biking, driving or public transit, and this alternative is 'less than significant.' [DSEIR 6-36]. This is a conclusion that is not based on any factual analysis. I have lived on Plymouth for over 40 years, and can testify that opening San Ramon to vehicle traffic from 1100 or 1550 units and traffic from City College would create something close to a war zone on this narrow street."

*(Anne Chen letter attached to Westwood Park Association, Letter, September 22, 2019 [O-WPA3-17])*

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"I especially agree with my neighbors on statements made in regards to traffic up and down on Plymouth Avenue already nowadays, which is a narrow street, with not a lot of open parking spots already and certainly not "sufficient opportunities to pull street parking spaces over into available on or driveway curb cuts", as mentioned in the DSEIR (page 6-37).

There are several incidents per week - occasionally per day - already where cars get stuck, because they cannot get out of each others way, subsequently stalling traffic both ways. This is already today's situation, that would just worsen with any alternative of the project (besides A: No Project). Parking and traffic on Plymouth Avenue - and all surrounding streets of the planned project - would increase tremendously, depending on the picked alternative, but especially, if San Ramon Way would be opened up, even just for pedestrian traffic, which would make parking in Westwood Park even more attractive to people wanting and needing parking and quick access to the new development.

Please provide evidence that backs up your statement that any project alternative – especially Alternative C (San Ramon Way Passenger Vehicle) would have a "less-than-significant impact", as my impression is to the contrary, namely that any project alternative (other than A) would have a stark impact in terms of parking and traffic on the whole surrounding neighborhood, specifically Westwood Park."

*(Alex Burggraf, Email, September 23, 2019 [I-BURGGRAF-3])*

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"The only ongoing headache has been the traffic through Plymouth Avenue (between Ocean Avenue and Monterey Boulevard).

I'm told and concerned that your office is considering opening San Ramon to vehicles?? The streets are very narrow as it is, causing regular arguments between drivers, and accidents to parked cars when drivers attempt to squeeze through. Please reconsider so that this issue does not get worse for residents of this neighborhood."

*(Ronnie Del Rosario, Email, September 11, 2019 [I-DELROSARIO-1])*

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“And then, my third concern is opening San Ramon Way. In the DEIR it downplayed and, in fact, it even said it was a positive that on Plymouth, it’s basically one lane. The 1200 block of Plymouth, where I live, there’s always parking cars on both streets, so it’s single lane. So, you have to go into the driveways and let people pass. And this happens all day. And the driveways are small and if the car is big, or the driver isn’t such a good driver, it can take a long time for people just to move down the street. And sometimes people get upset. Sometimes they get really nasty. Sometimes they scream. Sometimes they just sit.

And the EIR just sort of really downplayed this, that this would slow traffic. Well, as a previous speaker said, that sometimes people still go very fast on Plymouth and people on Plymouth regard this situation as a negative, not as a positive.

And then, just, I think the predictions of the traffic through San Ramon is inaccurately low because the EIR does not address that if that San Ramon Way was opened you’d get other traffic than just the project. Thank you.”

*(Laura Frey, CPC Hearing, September 12, 2019 [I-FREY1-4])*

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“Thirdly, a very big concern is allowing vehicle traffic on San Ramon Way (alt. C). We live on the 1200 block of Plymouth between Ocean and San Ramon. Plymouth is the only north/south road between Monterey and Ocean, and we have cars on Plymouth all day. All parking spaces on either side of the 1200 block of Plymouth are usually filled. As stated in the Draft EIR drivers continually have to yield to each other because it is a single lane of traffic between parked cars. Usually the pullout space (the driveway) is small, and if the car is not small or the driver not great this can take awhile. Often people get impatient, sometimes they get nasty. Commute times and weekends are especially congested and nasty. It is a continual problem. The Draft EIR dismisses this problem as helping with speed, but drivers sometimes still go fast on Plymouth, which exacerbates the ONE LANE traffic problem. Getting in-and-out of driveways is difficult because of space and traffic, and side-swiping is a problem. Opening San Ramon to vehicles would increase traffic, so it would increase the problems we already have. And, I believe the predictions of traffic are inaccurately low in the Draft EIR--perhaps, resident traffic will be greater than the prediction, but the Draft EIR does not even address the traffic from non-resident cars--i.e. "cutting through" the development.”

*(Laura Frey, Email, September 22, 2019 [I-FREY2-4])*

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“The analysis of an additional automotive access route (Alternative C, pages 6-29 to 6-44) focuses disproportionately on the impact on a short tab of a street that will access the project (San Ramon Way) rather than the broader impact on the narrow streets that would feed into that access. These feeder streets are two-way but *de facto* single lane roads due to parking, and even today cars routinely must leapfrog from driveway cutout to cutout as they pass in opposite directions. A somewhat comical argument is made in the Alternative C analysis that the increased congestion will result in safer driving conditions as traffic speed will be reduced; indeed, it is difficult to have an injurious accident in a gridlock situation. The analysis also fails to adequately account for the

likely increase in bicycle traffic along Plymouth and other feeder streets, as San Ramon will become a useful shortcut for bicyclists to get to City College.”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-5])*

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“We are also opposed to the opening of San Ramon Avenue to traffic as this would directly impact parking and activity in front of our home.”

*(G. Scott Osten and Ralph J. Torrez, Email, September 19, 2019 [I-OSTEN-2])*

### **Response AL-6: Alternative C, San Ramon Way**

Comments include support and opposition to Alternative C, San Ramon Way. Comments opposing the alternative state that the analysis of the Alternative C: (1) would have negative traffic and noise impact on the Westwood Park neighborhood, (2) does not address the broader impact on narrow streets that feed into San Ramon Way, and (3) downplays potential traffic hazards impacts because there are seldom any parking spaces available. The comments also include statements that there are many instances of stalled traffic in both directions due to vehicles unable or unwilling to move, and instances of confrontations. Several comments also assert that the analysis does not account for likely increase in bicycle traffic along Plymouth Avenue and other feeder streets. One comment also states that the Westwood Park Association owns the 10-foot-wide parcel separating the end of San Ramon Way and the project site, and further states that they would not sell the parcel to allow access to the project site.

These comments will be provided to the decision-makers for their consideration during deliberations on the proposed project.

The analysis of Alternative C: San Ramon Way Passenger Vehicle Access is discussed starting on SEIR p. 6-29 and the discussion of transportation and circulation impacts begins on SEIR p. 6-31. Operational traffic noise impacts are analyzed on SEIR pp. 6-39 and 6-40 and concludes that the trip distribution of traffic on Plymouth Avenue would result in an increase of roadside noise levels by 1.0 to 1.3 dBA for the Developer’s Proposed Option and Additional Housing Option, respectively. These increases would be below the applicable threshold of 5dBA, resulting in a less-than-significant impact with respect to roadside traffic noise. The comments received on the SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts there were not addressed in the SEIR, or that impacts would be substantially more severe than those identified in the SEIR.

The effect of the addition of project-generated vehicle traffic to surrounding streets within the Westwood Park neighborhood (e.g., Plymouth Avenue, Southwood Drive, and San Ramon Way west of Plymouth Avenue) is discussed starting on SEIR p. 6-35. As shown in Table 6-4 and Table 6-5 (SEIR pp. 6-32 and 6-33), a portion of vehicle trips generated by the project options would utilize San Ramon Way. Under the Developer’s Proposed Option, 31 and 48 vehicles would utilize San Ramon Way during the weekday a.m. and p.m. peak hours, respectively. Under the Additional

Housing Option, 41 and 62 vehicles would use San Ramon Way during the weekday a.m. and p.m. peak hours. Traffic data was collected along Plymouth Avenue between Ocean and Greenwood avenues, which showed that parking utilization ranges between 40 and 88 percent with between 37 and 81 vehicle parking spaces during the weekday a.m. (9 a.m.), midway (2 p.m.), and p.m. (8 p.m.) periods (SEIR p. 6-37). As mentioned in this section, the addition of project-generated vehicle traffic would increase instances of oncoming traffic and where there is not sufficient space for vehicles to pass side-by-side.

It is possible that the project connection to Plymouth Avenue via San Ramon Way could encourage some drivers to cut through the site to avoid traveling on portions of Ocean Avenue. However, the aforementioned presence of parking on both sides of Plymouth Avenue (which is approximately 24 feet wide) would limit the potential time savings of taking this cut-through route utility of such a cut-through route for more than a small number of drivers. A relatively low number of cut-through trips would not have an effect on noise, air quality, or traffic hazards.

With respect to parking, as discussed on SEIR p. 3.A-3 and p. 3.B-31, the Developer's Proposed Option and Additional Housing Option meet the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area and therefore parking is not an environmental impact for the purposes of CEQA. However, given that the topic is of interest to the public and decision makers, more detail is provided in an analysis of secondary environmental impacts related to City College in SEIR Appendix B, Initial Study, Section E.14, Public Services (pp. B-87 to B-90). For informational purposes, a discussion of existing and project parking supply and demand within the site and within the neighborhood, is provided starting on p. 1 of the Non-CEQA Analysis, which is available as part of the administrative record.<sup>2</sup> Additional comments and responses related to parking are presented and discussed under Response TR-7, Parking, on RTC p. **Error! Bookmark not defined.** of this RTC document.

Additionally, subsequent to San Francisco Planning Commission Resolution No. 19579 (adopted March 3, 2016), automobile delay (traffic congestion) and level of service (LOS) are not measures used to measure environmental impact within San Francisco and are thus not CEQA issues. Thus, increased levels of traffic only have the potential to create significant impacts as they relate to other environmental impacts, including safety hazards. Further comments and responses related to increased traffic congestion are presented and discussed under Response TR-8, Increased Traffic Congestion, on RTC p. **Error! Bookmark not defined.**

With respect to people biking and walking, the evaluation criteria for a significant impact requires the assessment of potential hazards. For purposes of environmental analysis, *hazard* refers to a project generated vehicle potentially colliding with people walking or biking that could cause serious or fatal physical injury, accounting for engineering aspects of a project that may cause a greater risk of collisions resulting in serious or fatal physical injury than a typical project. These engineering aspects include but are not limited to speed, turning movements, complex designs,

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<sup>2</sup> Balboa Reservoir – Non-CEQA Analysis, August 1, 2019.  
[http://ab900balboa.com/DEIR\\_to\\_NOD\\_Documents/2019-08-200000401.pdf](http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf)

substantial distance between street crossings, and sight lines. Human error or non-compliance with laws, weather conditions, time-of-day, and other factors are not included in such consideration.

As discussed on SEIR p. 6-35, the primary access point for people walking and biking to the project site would be from the northern extension of Lee Avenue, the paseos connecting to Brighton Avenue and San Ramon Way, and the shared use path connecting to Plymouth Avenue. The analysis acknowledges the potential of the addition of project-generated vehicle traffic to San Ramon Way under Alternative C to increase potential for conflicts between people driving and people walking and biking to/from the site. However, given the low vehicle speeds (less than 25 miles per hour) and the presence of unobstructed sightlines and available sight distance to see people walking on the sidewalk and biking along the roadway, Alternative C would not create potentially hazardous conditions for people walking or bicycling.

In response to the comment regarding the 10-foot-wide parcel, as described in Response AL-5, whether an alternative is feasible is a determination made by the lead agency after the environmental review process has been completed; this determination is based on the entire record before the lead agency, including (but not limited to) the information in the SEIR. Alternative C is identified as a potentially feasible alternative in the SEIR, with the final decision made by decision makers in adopting CEQA findings regarding the *actual* feasibility of infeasibility of alternatives, which can be based on considerations outside of those evaluated in the EIR. The decision makers are required to take into consideration and to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits of a proposed project in their deliberations (CEQA Guidelines section 15093).

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### ***Comment AL-7: Alternative D, Six-Year Construction Alternative***

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

O-WPA3-12  
I-HEGGIE2-9

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#### **“Alternative D: Six Year Construction Alternative**

Alternative D is the “Six-Year Construction Alternative”. This Alternative does not meet the criteria of an alternative as it is clearly nothing more than a variant of the proposed Project with a two phase construction schedule. The discussion of Alternative D in the DSEIR does not provide any additional information or analysis of potential impacts that are not already provided in the impact analysis of the Project. A potential six year construction schedule is noted as realistic and possible in the Project description, which can be imposed as a condition of approval by the Planning Commission. For Alternative D to be a true alternative, it must also include a comparison the impacts of Alternative B that would be constructed in two phases over a six year period. This is necessary so that there will be an objective basis for determining which project variant or alternative will have the least impact on the environment. Thus, the analysis in Alternative D does

not provide any meaningful comparison of potential impacts or the ‘comparative merits of the alternatives’, as required by CEQA Guidelines Section 15126.6(a). If the DSEIR is to include a two phase project as an alternative, then it should also include a two phase Alternative B in the Alternative D discussion.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-12])*

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“7. The project construction is ‘anticipated to occur in three main phases over the course of six years,’ (page 2-3). If that is the case, then why does Table S-3 identify Alternative D: Six Year Construction Schedule’ as an alternative rather than the plan? (pp s-44 to S-48.)”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-9])*

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### **Response AL-7: Alternative D, Six-Year Construction Alternative**

The comments state that Alternative D does not meet the criteria of an alternative and asserts that it is a variant of the project. One comment questions why Alternative D is an alternative, and not the project. One comment states that the impacts of Alternative D should be compared to Alternative B (Reduced Density Alternative), and that Alternative B should be analyzed assuming construction in two phases over a six-year period.

One comment incorrectly states that construction would occur in two phases. The proposed project would be constructed in three phases (Phase 0, Phase 1, and Phase 2) as described on SEIR pp. 2-38 and 2-39. Under the CEQA process, the SEIR analyzes the environmental impacts of the project as proposed by the project sponsor. The project as proposed by the sponsor includes a six-year and three-year compressed construction scenario. The three-year compressed schedule represents a conservative analysis of the baseline plus project conditions for the proposed project, and was therefore analyzed as the proposed project and not as an alternative.

As described in Chapter 6, Alternatives of the SEIR and in Response AL-1 above, the consideration of alternatives carried forward for analysis was based on three factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project’s basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

Alternative D would not have a compressed construction schedule scenario and the six-year schedule was selected to avoid the significant and unavoidable impacts related to air quality. This alternative was carried forward to make it more transparent to the decision makers that an alternative with a six-year schedule is an option for their consideration during deliberations on the proposed project. Alternative D would substantially lessen the severity of four significant and

unavoidable impacts, reducing it to less than significant with mitigation (construction-related criteria air pollutant emissions, construction-related exposure of sensitive receptors to pollutant concentrations and resulting excess cancer risk, cumulative regional air quality impacts, and cumulative health risk impacts).

The SEIR presents and analyzes a reasonable range of alternatives consistent with CEQA Guidelines section 15126.6(a). CEQA Guidelines section 15126.6(d) states that an EIR “shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison *with the proposed project.*” A comparison of impacts between Alternative B and D are therefore not required under CEQA. Contrary to the commenter’s assertion, the Alternative B analysis did evaluate both a six-year and compressed construction schedule (SEIR p. 6-18). Table 6-6 on SEIR pp. 6-51 to 6-55 provides a comparison of environmental impacts of the proposed project options to impacts of the alternatives.

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