

4.J Merits of the Project

The comments and corresponding responses in this section cover topics generally related to the merits of the proposed project, as described in Draft SEIR Chapter 2, Project Description. These include topics related to:

- Comment ME-1: Support for the Proposed Project
- Comment ME-2: Opposition to the Proposed Project
- Comment ME-3: Public Land and Affordable Housing

Comment ME-1: Support for the Proposed Project

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

I-ANDERSON1-1	I-HONG-6	I-SCHNEIDER2-3
I-ANDERSON2-1	I-HONG-7	I-SUBIN-1
I-BARNARD-1	I-HONG-8	I-T.RANDOLPH
I-BARZ-1	I-JOHNSON-1	I-TASSE-1
I-BUTTON-1	I-MAURO-1	I-TRIPATHI-1
I-CIABATTONI-1	I-OSAWA-8	I-ZONTA-1
I-CRONE-1	I-PEDERSON1-1	I-ZONTA-2
I-CROSBY-1	I-SCHNEIDER1-1	O-MHDC-1
I-GONZALEZ-1	I-SCHNEIDER1-2	O-SFHAC-1
I-HONG-1	I-SMITH-1	O-YIMBY-1
I-HONG-2	I-SCHNEIDER2-1	

“Hello. I’m Theodore Randolph, resident of the Excelsior. And I think if there’s inadequacy in the EIR it’s that it plans for the impacts of too few people. So, the previous attempts to build housing at the Balboa Reservoir were planning for like 100, or 500 units of housing and now the developer’s option is 1,100. I think that’s too small.

When we started this process that was five years ago. It looks like it’s going to take up to another ten years, if this goes ahead, to finish all those new buildings. And in the subsequent years, our needs could increase even more. So, we should be open to -- Malia Cohen mentioned a number, like 5,000 units in the reservoir.

So, just because you say what would be the impact of so many people doesn’t mean you are going to build up to that amount. So, we should preserve the option of having more units.”

(Theodore Randolph, CPC Hearing, September 12, 2019 [I-T.RANDOLPH-1])

“Hello, my name is Lisa Anderson. I’m here on behalf of myself, my husband, and my son. We live in Monterey Heights and we’re supporters of this project. Looking at the Environmental Impact Report, we don’t see any reason that this project should not go through.

Housing is such an issue in San Francisco and this project has already been reduced in scope, so we would urge you to support this.

As a former high school administrator, it broke my heart to see all of the students who could not afford to live here. And I’ve just had to say goodbye to my son’s best friend, who grew up on Wildwood, just blocks from this project.

So, please, approve this project.”

(Lisa Anderson, CPC Hearing, September 12, 2019 [I-ANDERSON1-1])

“We need housing. There should be 5000 units on this lot.”

(Lisa Anderson, Email, September 12, 2019 [I-ANDERSON2-1])

“I urge you to build SF's fair share of market rate housing and specifically affordable housing. Even providing allowing market rate housing will alleviate pressure on displacement, evictions and rent escalations for those who cant afford to live in SF. Further, this is an opportunity to increase the number of BMR units (either as inclusionary housing or as stand alone buildings).

San Francisco does a great job of providing space for new job creation and should really be approving and providing equal numbers of new units!”

(Julie Barnard, Email, September 11, 2019 [I-BARNARD-1])

“I am a District 11 resident and neighbor of Balboa Reservoir, and I strongly support adding 1,100 units of housing in place of the parking lot at Balboa Reservoir.

This is absolutely the right choice for our city to make. New residents will help support our local retail and hopefully bring much needed foot traffic to Ocean Ave and Mission. We absolutely need to build more housing to address the housing crisis, and that housing should ideally be built within walking distance from transit stations like Balboa Park BART and corridors with good Muni access like Ocean Ave. Finally the 50/50 affordability split is an incredible opportunity to bring in affordable homes for people at risk of displacement in Ingleside and the Excelsior.

We absolutely need this parking lot to turn into housing. Please support this project.”

(Sara Barz, Email, September 11, 2019 [I-BARZ-1])

“My name is Gary and I live in the 94112 area code in Balboa Park. I wanted to let you know that I am pro the building at Balboa Reservoir because I think that San Francisco needs more housing. There are people that will always disagree with how things are done but we need to be urgent about the housing shortage and this project seems like a good step.”

(Gary Button, Email, September 12, 2019 [I-BUTTON-1])

“Please support mixed affordable and market rate housing at the BALBOA RESERVOIR site.

My husband and I live in Zip Code 94127 and as such we are very aware of the neighborhood near the Balboa Reservoir. It is a perfect area for the planned 50/50 new market rate and new subsidized affordable housing plan. It is near public transit as well as stores and services on Ocean Avenue. The neighborhood already has new apartment development that is merging successfully into the community. It is perfect for this development.

We feel it is important to build mixed income housing. We do not need more large public housing development in SF. Both low income, working people and middle income working people need housing.

Please approve this project for 50/50 income housing. And move the project along as speedily as possible.

Thank you for your willingness to plan appropriately for housing in our wonderful city.”

(Kathleen and Alger Ciabattoni, Email, September 12, 2019 [I-CIABATTONI-1])

“I am writing to urge you to support the Balboa Reservoir Project, which would create 1,100 new units of housing, 50% of which would be subsidized affordable units. The entire Bay Area must do more to build housing, both market rate and below market rate, in order to address our chronic housing crisis. I live in the vicinity of the project (zip code 94112), and I welcome the prospect of having new housing occupy what is currently a 17-acre surface parking lot.”

(Phil Crone, Email, September 12, 2019 [I-CRONE-1])

“I’m a homeowner in San Francisco and I enthusiastically support the Balboa Reservoir building project. There is strong evidence to support the fact that the more housing we build, the more it will bring down the cost of housing for all. And with 50 percent of it being set aside for affordable housing, I’m confident that this will be a good thing for the neighborhood, and for the city.

Those that oppose the project use the 100% affordable or nothing as a tactic to get nothing built, to maintain the status quo and keep the parking spots for their vehicles, which for some reason they feel they have a right to park on public land. We need to make this city a livable one with great

public transportation, fewer cars, and more housing for those who cannot afford the market rate housing.

Please approve this project so we can develop housing for those that need it most. Homelessness or the threat of it is the most critical issue facing our city today, and this is a very important step toward its resolution.”

(Lisa M. Crosby, Email, September 11, 2019 [I-CROSBY-1])

“I am writing in full support of building the maximum number of 50/50 new market rate and new subsidized affordable units of housing at this site.

This project will bring much needed housing to our community which drastically needs it, and is a substantially better use of the space than parking.”

(Daniel Gonzales, Email, September 12, 2019 [I-GONZALEZ-1])

“Please use this as my continued support for this project.”

(Dennis Hong, Email, September 11, 2019 [I-HONG-1])

“1. We desperately need housing. The city can not afford to do this work. The sponsors and the community have worked hard on this project. This project fits the bill as it address' our housing issues.”

(Dennis Hong, Email, September 11, 2019 [I-HONG-2])

“5. I would like your comments good or bad so that the sponsor and the community can continue to work together to get this project moving without further delays. In my opinion by working together and solving these issues before the DEIR is certified only makes sense so there aren't any road blocks before it is certified. As I see it, these road blocks all too often hold up the progress and sometimes we lose the project completely.

6. I'm not too sure how the current SB's and other bills will impact this wonderful project.”

(Dennis Hong, Email, September 12, 2019 [I-HONG-6])

“7. I like the open space. Since this project focus on family, I would like to see a few four bedroom units.”

(Dennis Hong, Email, September 11, 2019 [I-HONG-7])

“8. Finally, we must move quickly before we loose another project like this. I will be submitting additional comments for the RTC.”

(Dennis Hong, Email, September 12, 2019 [I-HONG-8])

“I know these opposition groups are now asking for 100% BMR units. But that request does not align with the arguments they originally put forth against this project. They are just shifting the goal posts to prevent this vital, humanitarian housing at any cost. The Planning Commission must see through these tactics. Look at what happened to the proposed affordable senior housing in Forest Hills. It's absolutely barbaric and self-interested. Please give San Francisco a chance, and support this housing.”

(Eric Johnson, Email, September 11, 2019 [I-JOHNSON-1])

“Hi, I’m a local resident and I want to express my support for the balboa reservoir project. 50/50 affordable and market rate seems like a great balance. Thank you!”

(Jacqueline Mauro, Email, September 11, 2019 [I-MAURO-1])

“Thank you very much. My name is Christopher Pederson, a resident of the Ingleside. I strongly support the additional housing option version of this project. It is environmentally superior to options and alternatives that provide less transit-oriented affordable housing and/or more public parking.”

(Christopher Pederson, CPC Hearing, September 12, 2019 [I-PEDERSON1-1])

“As a resident of Ingleside Terraces in District 7, and a frequent patron of the Ocean Avenue corridor, I'm writing to ask that you support the Balboa Reservoir plan at tomorrow's meeting. The 50-50 affordable and market rate housing mix is an excellent ratio, similar to what is seen in many other countries with more enlightened housing policies. The neighborhood will greatly benefit from more foot traffic, and more people to advocate for better transit and bike infrastructure.”

(Benjamin Schneider, Email, September 11, 2019 [I-SCHNEIDER1-1])

“My only reservation is that there are not more units planned for this site. We should not be afraid to go up to 10 or more stories. Please do not let the naysayers "preserve" this parking lot.”

(Benjamin Schneider, Email, September 11, 2019 [I-SCHNEIDER1-2])

“Everyone in SF is shouldering the burden of an extreme lack of housing supply. This state of affairs puts enormous strain on those among us with the least means, and drives people to blame any number of important but ultimately tertiary reasons for the strain. I am writing this note to make clear that as a member of the community I wholeheartedly support attempts like this one to increase housing density while supplying (50%!! amazing) subsidized units. Unfortunately, I am afraid the folks in the community who speak the loudest will be the ones who oppose all development, not understanding that by restricting development of new housing they will only increase our peril.

Please do the right thing by your community and your city and forward this beneficial project.”

(Aaron Smith, Email, September 12, 2019 [I-SMITH-1])

“Hi there. My name is Benjamin Schneider. I’m a resident of District 7, in Ingleside Terraces, and I’m speaking on behalf of myself and my parents, with whom I live as a 24-year-old college grad, largely because of the dearth of the affordable housing options in San Francisco. And, specifically, the dearth of affordable, reasonably-sized housing options in my own neighborhood, in the OMI, off Ocean Avenue.

So, I’m thrilled to see that this project is making its way through the process with all of these more reasonably sized units, that are still transit accessible, and in this great location.

And it appears to me, with my untrained eye, that the Environmental Impact Report is in order and it should proceed to the next rounds of approval.”

(Benjamin Schneider, CPC Hearing, September 12, 2019 [I-SCHNEIDER2-1])

“I want to also reiterate what the previous speaker said. That I hope that the Commission approves the more housing-rich option and thinks very seriously about these parking garages, and increasing transit service sooner, rather than later. Thank you.”

(Benjamin Schneider, CPC Hearing, September 12, 2019 [I-SCHNEIDER2-3])

“Under these conditions, building new housing on a vast surface parking lot near a college and the biggest transit hub in the western half of the city, with 50% dedicated affordable housing, should be an absolute no-brainer. I would love to have seen more units than the 1,500 units considered, but we should absolutely have 1,500 rather than 1,100: we need homes for people, not cars! Reserving large amounts of off-street parking does not effectively reduce congestion and parking scarcity but rather facilitates continued car-dependence-- which is in direct contradiction to the city's recently published "Focus 2030" report that set a strong goal for getting people out of cars into healthier, more sustainable modes of transportation. I hope that the draft EIR appropriately considered this: the reductions in greenhouse gas emissions associated with allowing more dense

urban infill in a transit-rich neighborhood, rather than seeing those same people housed in distant sprawl, have been well-documented and should be noted.

Finally, these new homes would be a great improvement to the neighborhood—I would get access to new green space, new bike routes, and have more people on the street to make for safe, vibrant conditions on Ocean Ave. that will help local businesses thrive.”

(Zack Subin, Email, September 11, 2019 [I-SUBIN-1])

“Hello. I’m Theodore Randolph, resident of the Excelsior. And I think if there’s inadequacy in the EIR it’s that it plans for the impacts of too few people. So, the previous attempts to build housing at the Balboa Reservoir were planning for like 100, or 500 units of housing and now the developer’s option is 1,100. I think that’s too small.

When we started this process that was five years ago. It looks like it’s going to take up to another ten years, if this goes ahead, to finish all those new buildings. And in the subsequent years, our needs could increase even more. So, we should be open to -- Malia Cohen mentioned a number, like 5,000 units in the reservoir.

So, just because you say what would be the impact of so many people doesn’t mean you are going to build up to that amount. So, we should preserve the option of having more units.”

(Theodore Randolph, CPC Hearing, September 12, 2019 [I-T.RANDOLPH-1])

“I live in Noe Valley, pretty close to the planned Balboa reservoir project. Please build it! 1100 units of housing would be a huge help, and 50% of that being affordable is even better. And if it’s on the site of a parking lot, we don’t even lose much of anything.

I know some people are concerned that it’s not *more* affordable. Well, I’d much rather see 550 units of affordable housing plus 550 market rate, than nothing. And I’d much rather see these 1100 units now than anything delayed. As they say, “justice delayed is justice denied” – the same is true for housing. Any units we build will eventually make all of our housing more affordable.”

(Dan Tasse, Email, September 11, 2019 [I-TASSE-1])

“I am writing to urge you to approve the market rate and subsidized affordable housing project that has been proposed on the Balboa Reservoir.

We are in desperate need for both types of housing and this project will add many needed units. Without additional housing our city can not grow. Please approve this project immediately.”

(Priti Tripathi, Email, September 11, 2019 [I-TRIPATHI-1])

"Let's get moving on this."

(Mike Zonta, Email, August 8, 2019 [I-ZONTA1-1])

"I think we ought to get on with this. As long as there are affordable units included, I'm good to go."

(Mike Zonta, Email, September 3, 2019 [I-ZONTA2-1])

"My name is Sam Moss. I'm the Executive Director of Mission Housing Development Corporation. We're a 48-year-old nonprofit, affordable housing developer that is one of three affordable housing developers on this team.

Really want to reiterate that, that when developers are being disparaged, it is disparaging three nonprofits who have provided over a century, and thousands upon thousands of one hundred percent low-income affordable housing to San Francisco.

And to be frank, Avalon is an incredible market rate developer that knows and understands the community. This project has taken everything into account and then some. And, you know, Mission Housing has over a thousand children that live in our buildings. We take their health and safety very seriously. We do occupied rehab projects in their buildings all the time.

So, not to say that those concerns aren't valid, but I am personally saying that as one of the co-developers of this project that the community and its safety are top of our list.

But I do hope that you see fit to keep this going forward today and thank you for your time."

(Sam Moss, Executive Director, Missions Housing Development, CPC Hearing, September 12, 2019 [O-MHDC-1])

"Good afternoon Commission. My name's Nicholas Nagle. I'm representing the San Francisco Housing Action Coalition. We've been going to these meetings for years, so I'll keep it short. I assume you know our position on it.

We've been advocating for this project because of our City's housing shortage. And while no one project can solve the housing shortage, this is a bit step towards it.

In terms of the EIR, we do find it to be adequate and complete. And that's all from me, today. Thank you."

(Nicholas Nagle, San Francisco Housing Action Coalition, CPC Hearing, September 12, 2019 [O-SFHAC-1])

“Hi, Laura Foote, YIMBY Action. I have been speaking in favor of Balboa Reservoir for a couple years, now. And if we can’t have an Environmental Impact Report tell us that it’s better to have dense, vibrant, walkable housing instead of a giant parking lot, then I don’t know what to say about the future of San Francisco’s ability to deal with climate change.

It’s obvious that we should be turning parking into housing. It is obvious that it will be for the benefit of literally thousands of people who will have the ability to live in this 50-percent affordable housing project.

Another great thing, planners have worked really hard to do these cross-subsidized projects in a world where we don’t have enough funding for subsidized affordable housing. We’re working on things like the bond. We’re working on other sources of stable funding. These 50-percent affordable projects, where we get to cross-subsidize with market rate housing in order to get more low-income housing, we need to be celebrating those projects.

This is exactly the kind of thing that allows the city to get a lot more units of subsidized affordable housing.

It’s tragic to be speaking for this project over and over again. It’s been since 2008 and this is the fourth time they have tried to build housing here. And if San Francisco cannot get its act together and turn a 17-acre parking lot into walkable housing, then we are not going to solve any of our other problems. Thank you.”

(Laura Foote, YIMBY Action, CPC Hearing, September 12, 2019 [O-YIMBY-1])

Response ME-1: Support for the Proposed Project

Comments express support for particular aspects of the proposed project based on its merits. Comments include support for the proposed project options, support for increasing the number of housing units on the project site, and support for the proposed housing mix. Comments also include general statements about the adequacy of the SEIR.

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the SEIR’s coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. CEQA directs public agencies to treat EIRs as “full disclosure” documents to ensure that the public is aware that public agencies have considered potential adverse environmental effects in their decision-making processes. In addition to the physical environmental effects disclosed in the SEIR, all comments provided to the planning department on the proposed project options through the CEQA process, whether on the SEIR analysis or the merits of the proposed project or project variant, are included in their entirety in this RTC document. Although general in support of the proposed project do not raise specific issues concerning the adequacy or accuracy of the SEIR under CEQA, such comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the

proposed project. This consideration is carried out independent of the environmental review process.

Comment ME-2: Opposition to the Proposed Project

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

I-AISSA-2	I-HALFORD1-3	I-OSAWA-9
I-ALI-1	I-HALFORD2-1	I-OSTEN-1
I-BARISH1-1	I-HOUWER-1	I-SCHNEIDER2-3
I-BARISH2-1	I-HOUWER-5	I-T.RANDOLPH-1
I-BARISH2-3	I-HOUWER-7	I-TARQUINO-1
I-BARISH2-9	I-JA1-1	I-TIMA-5
I-COLLINS2-1	I-KOPP-1	I-WEYER-1
I-EVBUOMA-4	I-KOWALSKI-4	I-ZELTZER-1
I-FISHER-1	I-MUHLHEIM-8	I-ZELTZER-3

“Keep the height limit and density as originally proposed.”

(Sharon Aissa, Letter, September 13, 2019 [I-AISSA-2])

“I am a librarian at City College of San Francisco and am deeply opposed to the use being proposed for the Balboa Reservoir land owned by SFPUC but leased to City College for many years. City College will be negatively impacted by this development, the brunt being borne by students from whom parking would be taken away and disruption caused due to construction activities. San Francisco is already suffering at the hands of construction of luxury housing masquerading as affordable housing, disrupting our lives and taking away resources utilized by needy San Franciscans. Please do not add to skyrocketing costs of living in the city and the fact that so called affordable housing is completely out of the reach of so many families and students in particular. Why are private developers given so much room to decide what belongs in our city?”

(Amna Ali, Email, September 18, 2019 [I-ALI-1])

“Good afternoon. My name is Jean Barish. Thank you very much for giving me the opportunity to speak this afternoon.

I’m a former CCSF faculty member and have also practiced law for over 20 years, including working on a number of cases involving CEQA.”

(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-1])

“My name is Jean Barish. I'm a former CCSF Faculty Member, teaching Anatomy, Physiology, and Health Education. I have also practiced law for over 20 years. I am here to state my opposition to the Project”

(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH2-1])

“Coalition of San Francisco Neighborhoods, Westwood Park Neighborhood Association, and other groups have signed Resolutions opposing this project. Hundreds of people have signed petitions and letters. I hope you will pay attention to their concerns.”

(Jean Barish, Letter, September 12, 2019 [I-BARISH2-3])

“In conclusion, I hope you agree this Field of Dreams should be replaced with a scaled-down, environmentally sound, 100% affordable project with no significant environmental impacts.”

(Jean Barish, Letter, September 12, 2019 [I-BARISH2-9])

“Everyone I know has a different set of reasons for opposing the Balboa Reservoir Project under the nose of City College. Many focus on the effects to health for young ones, not only the children at CCSF day care, but CCSF students, exposed to carcinogens and other calamitous health threats, when young and having decades ahead to become ill and suffer. Riordan High School is across the street- the students are all teenagers. Others are concerned with already horrible traffic on one-lane Frida Kahlo Way, on which the college is situated and on which the proposed large project is to be located, with thousands of new residents.

Many are upset at the terrible damage that will result to the civic gem that is City College. Still others observe that there is little about this enormous, for profit development that will alleviate the housing crisis in a 7 x 7 square mile city or the zooming rents and mortgages. This push for more for profit development, with a little actually affordable housing as a sidebar, is also advancing gentrification on steroids. We're becoming a city of wealthy professionals with a few token elders or poor people remaining and losing our working and middle classes and our families. People of color are not benefiting from this- few can afford to remain in the city. For profit development is DRIVING housing inflation. I cannot help but be appalled by the problems arising from all of these effects of this huge, horribly situated project.

What brought us to the point that developer money from for profit corporations is all that matters? When car shaming, wishing away cars, and using Orwellian terms like "transit rich" stands in for planning, budgeting and spending? When was the last time the people making these decisions had to punch a clock? Had to worry about being late to work or school? There are many vacant lots in San Francisco for so many years, no one can remember what stood on these fenced sites. And even more in Daly City, a few minutes from the county line. Some are now offered for sale. Besides those, what tax policies drive the hoarding of fallow land like this? This is a society. We can't do

whatever we want with our property. Can't burn down our house to build a tent on the site to be one with nature. Can't have public nuisances and hazards on the property. Can't have a cross burning out front. We are governed by laws intended to protect the commonweal.

If the state can tell us we have no right to limit enormous developments in quiet residential neighborhoods, the state can manage tax policy to help the housing crisis. This project would be disastrous for struggling students, for working class residents, for many people of color and families just squeaking by. In the 1960's our city saw the shameful bulldozing and development of the Fillmore, now gentrified into the Western Addition. Countless happy black homeowners saw their beloved Victorian houses bulldozed or run out of town on rails- literally, and were virtually deported, never to return. Ethnic cleansing. Bleaching, if you will. Are we doing same to Ocean/ Merced/ Ingleside using public policy instead of a bulldozer?

As to traffic policy, if we can dignify it with the term "policy", it's not policy deliberately to ignore traffic problems or to create worse ones. This is not benign neglect. Car shaming feels good to the virtuous, I am sure and the effects have been disastrous. There are no provisions to get people out of their cars (in order to wait for packed buses to pass them by, one after another. To watch panicked drivers fill intersections hoping the green light will stay green, only to block the intersections when the light turns red, endangering pedestrians, cyclists, enraging cross traffic drivers and those waiting. Please keep in mind that bus riders, who are absolutely above reproach, also pay the price, getting stuck in traffic snarls on Frida Kahlo, Ocean (these are both horrible already, btw) or nearby. "Forget you" is not traffic planning. Coming after cars (and who likes the internal combustion engine? NO ONE!) OK, now what are you going to do to help the situation?

I worked for CCSF for decades. I've seen countless people with little hope get their degrees, go on to university/ careers/ vocations, to leave welfare and become happy taxpayers. Often this is their last chance at success. It's why public education is an investment, why CCSF is a lifeline for so many, and has been for generations. Boost the school, don't attack or undermine it. The day any of us concerned here have to live in an adjoining town, far from transit, and drop off a pre schooler in one spot and a 7 year old student in another, have to have two jobs to manage, or to struggle to pay the bills on public assistance, to follow an academic or vocational course of study as a commuting working parent, by all means, let's talk! You can help these people or you can doom their dreams with callous and short sighted disregard for their situation, and for the well being of the school, the neighborhood, and our beloved city. Please do your jobs and say no to this horribly misbegotten, for-profit calamity. There are lots of other and better sites to develop, and there is the money for subsidized housing in the city budget from the ubiquitous projects we see all over. It's a matter of priorities. Don't poor mouth people who need your help because they aren't developers brandishing big bucks. Some things are about more than just short sighted things like this mistake of a development. Please excuse poor editing- it's hard to edit when you are dealing with countless points like we enumerate against this ill thought out, misbegotten development!"

(Monica Collins, Email, September 11, 2019 [I-COLLINS2-1])

"I urge you to stop this project, for our collective future."

(Marria Evbuoma, Email, September 19, 2019 [I-EVBUOMA-4])

"I strongly oppose the massive housing project that is being planned for the Balboa Reservoir."

(Allan Fisher, Email, September 12, 2019 [I-FISHER-1])

"We all know that our city needs more affordable housing, but affordable for whom? The private developers define affordable as \$139,000 a year, single income! But building market-rate luxury housing on land that City College clearly needs, a need affirmed by the voters three times already, is more than immoral. It's just crazy."

(Daniel T. Halford, Email, September 9, 2019 [I-HALFORD1-3])

"The proposed housing would cost City College over a thousand parking spaces, thus denying access to education to thousands of CCSF students who cannot attend classes unless they drive. The typical CCSF student is a part-time student, meaning that s/he needs to drive in order to be able to juggle a job (or two jobs), family responsibilities and classes. Therefore eliminating parking spaces seriously limits access to education. City College is still recovering from the massive loss of students caused by the accreditation crisis; we simply cannot afford to lose more students."

(Daniel T. Halford, Email, September 16, 2019 [I-HALFORD2-1])

"I am writing in opposition to this proposal. I live in the neighborhood and feel that this project especially with the amount of proposed units that you wish to develop would produce a negative impact on both the college and the surrounding community."

(Michell Houwer, Email, September 12, 2019 [I-HOUWER-1])

"It is not necessary to place a huge amount of units in a small place which critically impacts both the students of CCSF and the outlying community. CCSF has a huge student population and this land should be provided for further development of the college which will provide a better education for our own local residents and not be concerned about techies from other regions. Often times these techies get their housing subsidized by their companies. When are the supervisors going to consider the fact that we need to be more concerned about our local tax payers than these techies from other areas."

(Michell Houwer, Email, September 12, 2019 [I-HOUWER-5])

"If the rents are similar to the sister properties this proposal is a joke and further how long is this developer required to support a portion of lower income housing? It is bad enough that the supervisors are putting a homeless triage center to be replaced by units at Balboa Park Bart. Please add this to the record in opposition of this proposal."

(Michell Houwer, Email, September 12, 2019 [I-HOUWER-7])

"I'm wearing this shirt that says "No War on Iraq". That's because I don't have a shirt that says no invasion of luxury housing onto the Balboa Reservoir. And I am in favor of affordable housing, but not luxury housing.

Yeah, I'll just talk about two inadequacies out of all the things that I've written so far, and there will be more written comments forthcoming. But I'll talk about two.

This is a weapon of mass destruction in terms of what the Balboa Reservoir project is doing. You know, similar to the Iraq war where they were looking for weapons of mass destruction, we have one right here with the reservoir project.

And how do I mean? During the Iraq war, the British Intelligence Agency, M16, wrote what was called the Downing Street Memo. And what the Downing Street memo said that the facts -- excuse me. The evidence and the facts or the intelligence and the facts were fixed around the policy.

And that's what we have right here. You have the Planning Department that has set this whole -- which is sponsoring the reservoir project. And the policy and the SEIR is being fixed around that policy."

(Alvin Ja, CPC Hearing, September 12, 2019 [I-JA1-1])

"Please deliver to Jeanie Poling, Senior Planner in the Planning Department, my heartfelt objection to the Balboa Reservoir Draft Subsequent Environmental Impact Report."

(Judge Quentin L. Kopp, Email, September 23, 2019 [I-KOPP-1])

"Please reject this EIR. If you want one in reality and not the stylized façade this one is, then have all the stakeholders participate in creating one to see the truth of what's going on in this neighborhood. Thank you for your time."

(Ken Kowalski, Member, Westwood Park Homeowners Association, CPC Hearing, September 12, 2019 [I-KOWALSKI-4])

"This monster sized project is inappropriate for this site."

(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-8])

“By no means should the higher density option be considered.”

(Ed Osawa, Email, September 22, 2019 [I-OSAWA-9])

“As the homeowners at 1222 Plymouth Avenue, we are opposed to any proposal for more than the least amount of density, number of units possible and the highest percentage of parking spaces.”

(G. Scott Osten & Ralph J. Torrez, Email, September 19, 2019 [I-OSTEN-1])

“I’m frankly terrified at the idea of having the reservoir sold to a Private developer. PLEASE don’t.

I live in Westwood Park. I’m a student and a former instructor of CCSF. As a former coordinator of a CCSF academic program, it is now very difficult to find instructors as there aren’t affordable housing and many of the positions are part time. Even full time instructors find it difficult to live in S.F.”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-1])

“I’m against building any 1,200 units.”

(Hedda Tima, CPC Hearing, September 12, 2019 [I-TIMA-5])

“I have read about the Balboa Reservoir DSEIR and feel that I must formally express my opposition to the current draft.”

(Andy Weyer, Email, September 20, 2019 [I-WEYER-1])

“Steve Zeltzer, United Public Workers for Action. I think we see today, already, the results of your disastrous Planning Commission decisions. Warrior Stadium is a good example of that. You approved that without proper transit. A violation of your rules, but you did it because you’re basically a kept commission, which represents the developers. That’s why all today you’ve been going along with whatever the developers want. You’re saying to hell with the people of San Francisco, it’s okay to have more gridlock.

Now, this project, at Ocean, the Balboa Reservoir, is a project that will destroy City College of San Francisco. That’s not in your plans, although that will be the result. To have construction, massive construction and 1,500 condos next to the college prevents the college from developing. It will

create chaos. But you don't really give a damn about City College or the people of San Francisco because you represent the developers.

That's what I think more and more people understand who come here; they see you as shills for the developers. The fact of the matter is this is a corrupt operation and the City of San Francisco has spent millions of dollars for Avalon for these meetings, staged meetings to really grease the way for this development. These homes, these condos are not for the people of San Francisco, working people, students, professors; they're for people who have a lot of money, who can afford million-dollar condos. That's not the kind of construction we need. We need working class construction."

(Steve Zeltzer, United Public Workers for Action, CPC Hearing, September 12, 2019 [I-ZELTZER-1])

"Avalon and the developers are interested in one thing, profit, profiteering off the land of San Francisco. We need working class housing in San Francisco, not more million-dollar condos. But that's, apparently, what you are driven to do by the developers who appointed you and who you represent."

(Steve Zeltzer, United Public Workers for Action, CPC Hearing, September 12, 2019 [I-ZELTZER-3])

Response ME-2: Opposition to the Proposed Project

Comments express opposition to the project generally or to particular aspects of the proposed project options based on its merits. Comments include general statements that the proposed project would worsen traffic in the area, disrupt City College students, remove parking used by City College students, prevent City College expansion, and cause health impacts. The SEIR evaluates transportation and air quality health risk impacts of the proposed project in Sections 3.B, Transportation and Circulation and 3.D, Air Quality, respectively. Responses to comments related to transportation and air quality are addressed in Section 4.C, Transportation and Circulation and 4.E, Air Quality in this RTC. Comments also state that the proposed project is too large for the site, or too dense, and express general opposition to the existence of private development. Comments also include general statements about the adequacy of the SEIR.

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. CEQA directs public agencies to treat EIRs as "full disclosure" documents to ensure that the public is aware that public agencies have considered potential adverse environmental effects in their decision-making processes. In addition to the physical environmental effects disclosed in the SEIR, all comments provided to the planning department on the proposed project through the CEQA process, whether on the SEIR analysis or the merits of the proposed project, are included in their entirety in this RTC document. Although general in opposition of the proposed project do not raise specific issues concerning the adequacy or accuracy of the EIR under CEQA, such comments, including

recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

Comment ME-3: Public Land and Affordable Housing

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

I-ALI-2	I-KAUFMYN1-2	I-TARQUINO-2
I-BARISH3-29	I-LEGION-1	I-TARQUINO-5
I-BARISH3-35	I-LEGION-4	I-TARQUINO-9
I-BERNSTEIN4-2	I-MARTINEZ-2	I-VICKY-2
I-BERNSTEIN5-7	I-RHINE-3	I-WEYER-2
I-BIERINGER4-3	I-SAPPHIRE-2	I-WHITE-1
I-COLLINS3-5	I-SIMON-2	I-WILENSKY-3
I-EVBUOMA-3	I-SIMON-12	I-WORLEY-2
I-FISHER-3	I-SIMON-13	I-ZELTZER-2
I-HALFORD1-4	I-SIMON-15	O-WPA2-1
I-HALFORD2-4		

“I would request that the PUC place the needs of City College above those of a private developer. It should either continue to lease the land to City College or transfer it for once and all to City College to make use of according to principles of equity and relevance for the college community.”

(Amna Ali, Email, September 18, 2019 [I-ALI-2])

“The DSEIR must consider the option of using this public land to build 100% affordable housing

The DSEIR states the need to “Develop the reservoir in a manner that will best benefit the neighborhood, the city, and the region as a whole.

San Francisco is woefully behind in creation of affordable housing, and yet, this DSEIR does not study or offer the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would be have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco

already owns this parcel, so why is the City of San Francisco planning to sell public land that it already owns to a private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense?

Policy 4.5.1 in the Balboa Park Station Area Plan says that when offering public 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.”

(Jean B. Barish, Letter, September 23, 2019 [I-BARISH3-29])

“The DSEIR must consider the possibility of using this public land to build dedicated educator housing

Since approval of the PEIR the City of San Francisco has also identified a great need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers would be able to walk to work if they lived there.”

(Jean B. Barish, Letter, September 23, 2019 [I-BARISH3-35])

“Policy 4.5.1 in the Balboa Park Station Area Plan (or PEIR) says that when offering public land for development, first consideration should be given by such public agencies making the land available for the development of housing affordable to individuals or families making less than 120 percent of the area median income. This is a very low priority for the current development. Selling the valuable asset of publicly owned land is not the only or best option.

The Draft SEIR must consider the possibility of using this public land to build dedicated educator housing. This is an option that has begun to be explored more fully since the current Balboa Reservoir project was initiated just a few years ago.”

(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-2])

“The other option, even though rather peremptorily dismissed in the Draft SEIR, is to have the land transferred to the College, thereby retaining it as public land. At that point, modest plans might be made for some faculty or student housing without overwhelming the neighborhood or interfering significantly with traffic or parking—due to the smaller scope of the project. But this would have to be determined later.”

(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-7])

“The proposed housing project is currently public land. PUBLIC LAND SHOULD BE USED EXCLUSIVELY FOR THE PUBLIC!!!, and not for the bennefit of private corporations/developers.

I strongly urge the Planning Commission to adopt recommendation A, which is to scrap the entire project, and then go back to the drawing board and propose a smaller scale development to be exclusively for San Francisco public school educators, CCSF Educators, and CCSF students. A smaller housing development like this will keep the land for public use and will tremendously help those most impacted by the high cost of SF housing and it will help those who are contributing to the betterment of San Francisco.

Your proposed project is not designed for affordability. It will not help the housing shortage for lower income working San Franciscans. It will line the pockets of rich developers while crushing 2 outstanding educational institutions and destroying the vitality of this community."

(Garry Bieringer, Email, September 23, 2019 [I-BIERINGER4-3])

"9. The city definition of affordable housing, like the definition of transit rich, is frankly self serving and spurious. It has absolutely nothing to do with real lives, families, working classes, workers struggling with student loans, high rents, child care and other expenses.

10. AvalonBay developers charge \$4000 now for a one bedroom apartment over Whole Foods one km away on Ocean. Not rent controlled either as it's new, I believe. Can we put to rest the false, rather offensive trope that this is affordable housing for other than the well paid?

11. "up to" 50% affordable or subsidized housing is similarly meaningless. "Up to" is another term for "LESS THAN". or "UNDER". The subsidies also very widely."

(Monica Collins, Email, September 22, 2019 [I-COLLINS3-5])

"It's a demoralizing process. If this land is to be developed into housing, the city should own the property, not Avalon Bay. We should invest in our residents, our workers in all trades- not just tech. And having publicly owned housing would do this."

(Marria Evbuoma, Email, September 19, 2019 [I-EVBUOMA-3])

"A smaller project with 100% of the housing units affordable to low- and moderate-income residents, could merit our support."

(Allan Fisher, Email, September 12, 2019 [I-FISHER-3])

"The best outcome to this controversy would be for the SFPUC to transfer the 'reservoir' land once and for all to the College, or at least the current lease could be extended for a 60-year contract, for the benefit of all the people of San Francisco. We look for your support in this outcome."

(Daniel T. Halford, Email, September 9, 2019 [I-HALFORD1-4])

“The best outcome to this controversy would be for the SFPUC to transfer the 'reservoir' land once and for all to the College, or at least the current lease could be extended for a 60-year contract, for the benefit of all the people of San Francisco.”

(Daniel T. Halford, Email, September 16, 2019 [I-HALFORD2-4])

“Housing. This project is not addressing the real crisis in San Francisco. It’s not addressing the affordability crisis of housing. Public land should be kept in public hands for public good, and it should only be used for 100 percent deeply affordable housing on the Balboa Reservoir. It certainly should not be given over to a private developer, whose CEO makes \$7 million a year.”

(Wynd Kaufmyn, CPC Hearing, September 12, 2019 [I-KAUFMYN1-2])

“I believe that the DSEIR on the Balboa Reservoir has many deficiencies.

Policy 4.5.1. in the BPSAP says the when offering public land for development, first consideration should be given to the development of housing affordable to individuals families making less than 120% of AMI. Instead, the privatization of the lower Bal Reservoir will remove one of the most important resources for building affordable housing—public land owned by the city—turning it over to a large national for-profit real estate corporation that owns eight entirely unaffordable rental housing developments.”

(Vicki Legion, Email, September 22, 2019 [I-LEGION-1])

“The Draft SEIUR doe not consider the possibility of using this public land to build dedicated educator housing, taking the dominant but inaccurate point of view that 100% affordable housing is not realistic. There is already a 100% affordable building at 1100 Ocean, which was built on land previously owned by the MTA. There are many possible sources of funding for 100% affordable educator housing.

Public land is a sacred trust that must stay in public hands forever, and be used only for public good—not for the seven-million plus annual salary that goes to the AvalonBay CEO.”

(Vicki Legion, Email, September 22, 2019 [I-LEGION-4])

“A third value that we hope we share with you is that **public lands must be used for the public good**. The Balboa Reservoir should not be turned over to for-profit developers to build market rate housing and maybe some affordable housing that perhaps in reality is not for low income, working class people. There is such scant open space available for new housing that the City of San Francisco

focus on more housing for those who cannot buy market rate housing: teachers and other public servants who would likely use transit or walk or bike to work at nearby schools or at City College.

We encourage the Planning Commission to **live up to these San Francisco values. Build housing on public open space, but build it for those who would otherwise be shut out of the market and who would likely use transit or walk/bike to work (nonpolluting alternatives to cars).**"

(Anita Martinez, Email, September 23, 2019 [I-MARTINEZ-2])

"The second thing I wanted to address is there's a lot of talk about affordable housing. So, I just wanted to put out a couple of figures for your consideration. If you look at the development plan, the request is for 18 percent affordable housing for people who are making 80 percent of the area median income, and that would be \$66,500 a year.

Then, an additional 17 percent for moderate income. That's 120 percent over the AMI. We're talking \$99,500 a year. And then, you get to 50 percent with an additional, optional moderate income housing and that additional housing is -- there's no responsibility for the developer to build it and there's currently no funding in the plan.

So, I know this is about the EIR and not the project itself, but I just wanted you to have those figures that the actual affordable housing that will be gotten from giving away this public land to a private developer is less than one-fifth. So, and of course, the biggest cost in building housing is the land. If the public land were not given away, it could all be affordable. So, just to think about that. Thank you very much."

(Marcie Rhine, CPC Hearing, September 12, 2019 [I-RHINE-3])

"Furthermore, there are not going to be enough units in this building for students to be able to access them. It's public land and it should be only 100 percent affordable. And if that can't be, then the situation that we have currently, with the available parking, is the best situation for the students. That's all, thank you."

(Sophie Sapphire, CPC Hearing, September 12, 2019 [I-SAPPHIRE-2])

"This letter also asserts that the DSEIR does not adequately address the alternative for 100% affordable housing on the Balboa Reservoir site."

(Leslie Simon, Email, September 17, 2019 [I-SIMON-2])

"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])

“The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing. San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR simply dismisses the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco already owns this parcel, so why is the City of San Francisco planning to sell public land that it already owns to a private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense?

A development solely devoted to affordable housing would better blend with the residents of this working class neighborhood. The proposed development of mostly market rate units leaves these residents vulnerable to displacement due to gentrification. The adjacent neighborhood, Excelsior, is also a working class neighborhood vulnerable to displacement due to gentrification.

I again refer you to an article by Joseph Smooke and Dyan Ruiz “Five Reasons Why San Francisco Must Not Give Up Public Land for Market Rate Development” (Truth-out, April 3, 2015).

Policy 4.5.1 in the BPSAP says that when offering public 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.”

(Leslie Simon, Email, September 17, 2019 [I-SIMON-13])

“* The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing

The Draft SEIR states the need to “DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE”.

* The DRAFT SEIR must consider the possibility of using this public land to build dedicated educator housing”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-2])

“The City already owns this land, why sell it to developers that will not use it for affordable housing? The City can build affordable housing and instructor housing so our city dwellers can be supported.”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-5])

“We Need affordable housing in our neighborhood, not MORE market-rate housing!”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-9])

“And I would say, I am all for affordable housing. I grew up living in Section 8s. And to me this plan is not aggressive enough. I’m sorry, it’s public land. A hundred percent of it should go to affordable housing.

We know that the cost of land in San Francisco is incredibly high. Why would we take public land and privatize it? We should be asking for a more aggressive plan. If anything, to expand access to education, to provide affordable housing to students, to faculty.

I mean, unless we’re addressing their ability to access education, then I’m sorry, this plan is just not good enough. Thank you.”

(Vicky, CPC Hearing, September 12, 2019 [I-VICKY-2])

“The Balboa Reservoir, as I understand it, is currently owned by the public. Given the high cost of living in this city, the number of people living on the streets or in their automobiles/campers, and the general difficulty the city has had in trying to encourage more developers to build affordable housing, it strikes me as absolutely ludicrous that the proposed project does not prioritize below-market rate housing options. We the public own this land, and this land should be used to benefit the public. While I acknowledge that it may be difficult to entice a for-profit developer to build an entirely market-rate complex, I think that at least 50% of the units should be market rate in order to serve the public good. Furthermore, why not give the land to a non-profit developer - work with them to build a complex that is entirely for the public good. Quit lining the pockets of the developers just because they are lining the pockets of our politicians.”

(Andy Weyer, Email, September 20, 2019 [I-WEYER-2])

"Homelessness and housing insecurity impacts some of my students every semester. It is commonplace for students to leave school due to housing loss or a housing crisis. Please help our community college students by creating short term housing options for CCSF students experiencing an emergency. Short term housing for students is needed in San Francisco and the Balboa Reservoir is the best location. Prevent homelessness while supporting individuals engaged in activities that will lead to wage increases and financial self sufficiency. Support students..provide a roof over their heads while they are in school! Help them to complete their education!"

(Kathleen White, Email, September 19, 2019 [I-WHITE-1])

"And none of this addresses future needs that CCSF might have for this land. Ideally, the SFPUC should transfer the 'reservoir' land once and for all to the College. Public land should be preserved for the public and not sold to private developers."

(Debra Wilensky, Email, September 23, 2019 [I-WILENSKY-3])

"The DRAFT SEIR is inadequate because it fails to consider the option of building 100% affordable housing

The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".

San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR does not consider the option of dedicating this publicly owned property to 100% affordable housing. Nor does it even consider its own PEIR (Balboa Park Station Area Plan) which http://generalplan.sfplanning.org/Balboa_Park_Station.htm states that when offering public land for development, first consideration should be given to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco should not sell this public land to a private developer that will build mostly market rate housing.

The DSEIR accepts the unexamined premise that creating market rate housing in conjunction with some affordable housing is the only path forward. It does not explore the possibility of funding units which are 100% affordable.

The DRAFT SEIR is inadequate because it fails to consider the possibility of using this public land to build dedicated educator housing

Since approval of the PEIR, the City of San Francisco has identified an urgent need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers and students would be able to walk to work/school if they lived there. The DSEIR needs to examine this alternative."

(Jennifer Worley, President, AFT 2121, Email, September 23, 2019 [I-WORLEY-2])

"Now, the San Francisco Labor Council has said, along with the Union, AFP 21, the PUC should transfer that property to City College for development. That's what we support. It shouldn't be privatized, as you're supporting these developers to do."

(Steve Zeltzer, United Public Workers for Action, CPC Hearing, September 12, 2019 [I-ZELTZER-2])

"Good afternoon Commissioners. Anita Theoharis, Westwood Park Association Board Member on behalf of Westwood Park. I know that comments should be narrowly focused on technical issues, but I do have one nontechnical observation that does have relevance to one of our -- to one of the technical objections to the sufficiency of the draft.

Our goal is to support a housing project on the reservoir that includes affordable housing for people of modest means. A project that creates a new neighborhood with sufficient open space and a welcoming environment for everyone. A project with a number of units that can be supported by the existing and planned infrastructure. And one that does not damage a crown jewel of the City, City College, or the students who attend in the hopes of a better life for themselves and their families."

(Anita Theoharis, Board Member, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA2-1])

Response ME-3: Public Land and Affordable Housing

These comments state that because the project site is public land, development of 100 percent affordable housing units, development of dedicated educator and student housing, retention of the land in public ownership, or sale of the land to City College should be alternatives considered in the SEIR.

Under the CEQA process, the SEIR analyzes the environmental impacts of the project as proposed by the project sponsor. The proposed project would include housing for a range of income levels. The project sponsor's commitment to the amount of affordable housing developed as part of the proposed project (including educator housing) would be part of the development agreement between the City and project sponsor. The development agreement requires recommendation for approval by the planning commission and approval by the board of supervisors. The development

agreement is a separate process concurrent with CEQA review and are part of the entitlement process for project approval with separate noticing requirements. Pursuant to the requirements of Administrative Code Chapter 56, the proposed development agreement will be made available for public review prior to presentation to the planning commission for its consideration and recommendation to the board of supervisors per standard City procedures.

The comments call for the inclusion of additional alternatives or express support for other future uses of the project site. See Response AL-1, Range of Project Alternatives, on RTC p. **Error! Bookmark not defined.**, which describes the CEQA requirements for alternatives, alternatives selection process, and alternatives considered but rejected. A brief summary of the of the alternatives process is described below.

Draft SEIR Chapter 6, *Alternatives*, describes the purpose of and requirements for consideration of alternatives in an SEIR, the alternatives selected for evaluation and the process by which they were selected, and alternatives that were considered but eliminated from analysis. As described on SEIR p. 6-2, pursuant to the CEQA an EIR must include a range of reasonable alternatives to the project that are feasible, are capable of meeting most of the basic objectives of the project, and would avoid or substantially lessen any of the significant effects of the project. As stated in the CCR Title 14 section 15126.6(a), alternatives to a project selected for analysis in an EIR must substantially lessen or avoid any of the significant environmental impacts associated with the project.

In accordance with the CEQA, the Draft SEIR evaluated the physical environmental effects of the proposed project. Economic (e.g., property values) and social or quality-of-life effects of a project are not considered environmental impacts under CEQA (CCR Title 14 Section 15131) unless there would be a physical impact on the environment resulting from such effects (such as impacts addressed in air quality, traffic, and noise sections of the SEIR), or if such effects result in the need for the construction of new or physically altered facilities that would result in significant physical environmental impacts. The alternatives proposed in the comments are not specified to reduce significant physical environmental impacts, but instead focus on socioeconomic concerns related to the project, and would not meaningfully alter the alternatives analysis completed in the SEIR.

As shown in Section 2.B, Project Objectives in the draft SEIR, three of the basic objectives of the proposed project are related to developing a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels; develop a project that is financially feasible; and provide the SFPUC's water utility ratepayers with fair market value for the land as required by the city's charter and applicable law.

The concept of a fully affordable housing alternative is discussed under Section 6.E.2, Alternatives Considered but Rejected, on SEIR pp. 6-58 and 6-59. The concept of using the site for future expansion of City College and providing student or teacher housing is described on SEIR pp. 6-60 and 6-61. In both of these cases, the alternatives would not meet project objectives to implement the goals of the Public Lands for Housing Program for mixed-income housing. As noted on SEIR p. 6-59, "...100 percent affordable housing developments in San Francisco are typically sponsored by the Mayor's Office of Housing and Community Development, which provides substantial financial support for such projects and which typically seeks out not-for-profit developers who

specialize in the production of fully affordable residential projects. Accordingly, it has never been the case that the planning for this project assumed or required a 100 percent affordable housing development, which would require a substantially different financial structure and City development partner(s)."

The comments regarding the affordable housing ratio of the project do not concern the adequacy or accuracy of the environmental impact analysis and no further response is required. Comments on socioeconomic or quality-of-life effects will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

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