

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 [Passenger Vehicle Access Alternative](#)
- 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	I-EVBUOMA-3	I-SIMON-2
O-WPA2-1	I-FISHER-3	I-SIMON-11
O-WPA3-8	I-HALFORD1-4	I-SIMON-12
O-WPA3-15	I-HALFORD2-4	I-SIMON-13
I-ALI-2	I-HOUWER-4	I-SIMON-15
I-BARISH3-29	I-KAUFMYN1-2	I-TARQUINO-2
I-BARISH3-35	I-LEGION-1	I-TARQUINO-5
I-BERNSTEIN4-2	I-LEGION-4	I-TARQUINO-9
I-BERNSTEIN5-8	I-MARTINEZ-2	I-VICKY-2
I-BIERINGER1-4	I-MEDAL-4	I-WEYER-2
I-BIERINGER4-3	I-PEDERSON2-11	I-WHITE-1
I-COLLINS3-1	I-RHINE-3	I-WILENSKY-3
I-COLLINS3-5	I-SAPPHIRE-2	I-WORLEY-2
		I-ZELTZER-2

"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])

“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])

“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])

“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])

“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 Balbo 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-BERNSTEIN5-8])

“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])

“The proposed housing project is currently public land. PUBLIC LAND SHOULD BE USED EXCLUSIVELY FOR THE PUBLIC!!!, and not for the benefit 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])

“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])

“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 Ebuoma, 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])

“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])

“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])

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

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

“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])

“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])

"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])¹

"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

¹ The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

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])²

“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])

² The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

**** 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])

Response AL-1: Range of Alternatives

The comments raise concerns regarding the range of alternatives in the SEIR and suggest additional alternatives. Other comments disagree with the rejection of using the site for City College facilities and 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 draft SEIR.

Comments regarding secondary impacts to City College are addressed in Response PS-2, Public Services and Secondary Impacts, on RTC p. **Error! Bookmark not defined..** The alternatives presented in the draft SEIR meet CEQA requirements.

The response below describes the CEQA requirements for the alternatives analysis, the objectives used to define alternatives, and the alternatives selection process. The response is organized by the following subtopics:

- CEQA Requirements for Alternatives
- Alternatives Selection Process
- Other Alternatives and Alternatives Considered but Rejected
 - Alternative Locations
 - Public Land and Affordable Housing

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 draft SEIR for the Balboa Reservoir Project meets this requirement. For example, the draft SEIR includes one alternative that eliminates 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 draft SEIR provides a discussion and analysis of the alternatives selection process that was used to identify the range of alternatives analyzed in the draft SEIR in compliance with CEQA guidelines section 15126.6.

Alternatives Selection Process and Project Objectives

The draft SEIR Section 6.A.3, Alternatives Selection, on pp. 6-3 to 6-7, describes the alternatives selection process. The first step is to use the project objectives in the identification, selection, and evaluation of alternatives. As shown on draft SEIR pp. 2-4 to 2-5, the City, the SFPUC, and the project sponsor has nine shared project objectives and the City and the SFPUC has one additional objective.

The second step presents a summary of all the significant and unavoidable impacts that are identified in draft SEIR Chapter 3, which consist of secondary operational loading impacts, transit delay impacts, and noise and air quality impacts during construction.

The third step focuses on strategies to address the significant and unavoidable impacts. The strategies are summarized below:

- Alternative Strategy to Address Secondary Loading Impacts (draft 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 (draft SEIR pp. 6-6 to 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;
- Alternative Strategy to Address Construction-Related Impacts (draft 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 are evaluated and alternatives screened for their feasibility and ability to meet most of the project objectives. Table 6-2 on draft SEIR pp. 6-9 to 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 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. Several comments state that an alternative dedicating the site only for City College uses should be considered. One comment states that the draft 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 draft SEIR Chapter 6, Alternatives, 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

Alternative Locations. As described in draft SEIR Section 6.E.2, Alternatives Considered but Rejected, the draft SEIR considers alternative locations and included the reasons for rejecting alternative locations. As described on draft SEIR pp. 6-56 to 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”; and
- 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)

Alternative locations such as Daly City⁷ are not considered, as that is not within the City and County of San Francisco’s jurisdiction; however, the same reasons for rejecting alternative locations above ~~would be~~ applicable.

Public Land and Affordable Housing. As described in draft SEIR Section 6.E.2, Alternatives Considered but Rejected, the SEIR considers a fully affordable housing alternative. As described on draft SEIR pp. 6-58 to 6-59, the reasons for rejecting this alternative include:

- It would not meet the project 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 ...,” “develop a project that is financially feasible ...,” and “provide SFPUC’s water utility ratepayers with fair market value ...” and
- This alternative would arguably be a fundamentally different project given the request for qualifications process that occurred for the project site. As noted on draft 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).”

An alternative dedicating all of the site to City College uses would not meet the basic objective of implementing the City’s 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), 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.

A project that dedicates housing only to educators and student housing would require affordable subsidies and thus is similar to the fully affordable housing alternative considered but rejected. The range of income levels proposed by the project could include housing for educators and students but would not preclude other professions. As described in RTC Chapter 2, the project sponsor is proposing to provide approximately 150 moderate-income dwelling units dedicated to educator households as part of the 50 percent affordable housing. The project sponsor’s

commitment to the amount and type of affordable housing developed as part of the proposed project would be part of the development agreement between the City and the project sponsor.³

As stated, an alternative with the majority or all the site dedicated to educator and student housing would not meet the basic project objectives; therefore, it is rejected from further consideration. For informational purposes, the transportation impacts under such a scenario would still likely remain significant and unavoidable for several reasons as described on draft SEIR pp. 6-59 to 6-60:

- Providing educators and students with housing on the project site may lead to less vehicular travel than not providing such dedicated housing. However, the cumulative impact related to public transit delay (Impact C-TR-4, discussed on draft SEIR pp. 3.B-94 to 3.B-99) is based on the addition of vehicle and transit trips generated by the proposed project in combination with the City College facilities master plan projects and other cumulative developments. Due to the uncertainty surrounding the development at City College's Ocean Campus and the uncertainty of SFMTA approval of other measures under their jurisdiction, cumulative transit delay impacts would be significant and unavoidable. The impacts to transit delay would occur irrespective of potential changes in travel demand or patterns from educator or student housing.
- The cumulative impact to passenger and freight loading (Impact C-TR-6b, discussed on draft SEIR pp. 3.B-101 to 3.B-102) is 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.

Additional reasons that the transportation impacts under such a scenario would still likely remain significant and unavoidable are:

- 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.
- Employees and students traveling to and from the campus site only accounts for a portion of total daily travel to and from the project. Even among those students and employees who travel to and from the Ocean Campus for school and work purposes, other travel would still occur from those students and employees throughout the day.
- The co-location of student housing at one of eight City College campus centers would not prevent project-related vehicle travel from using Ocean Avenue in the project vicinity.

Such a scenario also would not reduce the significant and unavoidable noise and air quality construction impacts, as described on draft SEIR p. 6-60. The draft SEIR presents and analyzes a

³ ~~The development agreement is a separate process concurrent with CEQA review and is part of the entitlement process for project approval.~~ 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 is part of the entitlement process for project approval.~~ Pursuant to the requirements of Administrative Code Chapter 56, the proposed development agreement is subject to noticing requirements and 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.

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 draft SEIR to be *potentially* feasible, consistent with the CEQA guidelines.

In accordance with CEQA, the draft SEIR evaluates the physical environmental effects of the proposed project. Economic, 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, transportation, and noise sections of the draft 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 draft SEIR.

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.

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

“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])

“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])

“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.) 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])

Response AL-2: Environmentally Superior Alternative

The comments disagree with the identification of the environmentally superior alternative. Responses to the specific details of each comment as they relate to environmental issues are presented to below. Please also refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12, for more details on the development of alternatives process.

As stated in draft 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." One comment states that the combination of Alternatives B and D would be the environmentally superior alternative and claims that the draft 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. The comment omits the preceding draft SEIR text regarding the combination of Alternatives B and D. The draft SEIR acknowledges that "[i]t is also possible that Alternative D could be combined with Alternative B by the decision makers." The draft SEIR

goes onto to describe that this combined alternative would lessen the severity of the significant and unavoidable adverse impacts of the proposed project.

Other comments state that the draft 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. Concerning VMT and GHG emissions of the project, the draft SEIR concludes impacts related to vehicle miles traveled (VMT) (draft SEIR pp. 3.B-79 to 3.B-80) and greenhouse gas emissions (draft SEIR Appendix B, pp. B-37 to B-40) to be less than significant. Accordingly, neither VMT nor GHG emissions were the main criteria in the development of alternatives because CEQA does not require that the alternatives address less-than-significant impacts.

The commenter is correct that a denser project would be more VMT and GHG efficient at this project site than a less dense project. However, none of the alternatives analyzed would have significant impacts on VMT or GHG emissions.

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-BIERINGER4-4
I-RANDOLPH-1
I-SCHNEIDER2-2

"Please adopt Alternative A."

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

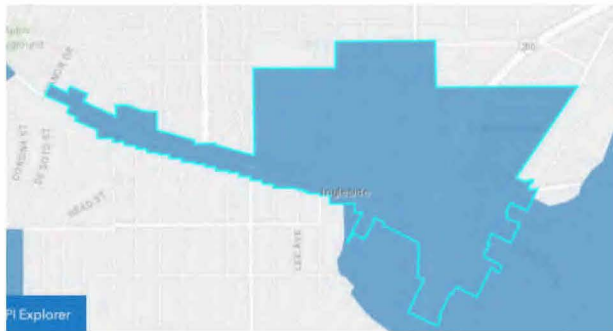
"However, I think it is deficient in its discussion of cumulative greenhouse gas emissions and traffic impacts.

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])

"And I'd also like to say that the kind of thing that isn't included in the Environmental Impact Report is the number of people who will live in these places in the future, without cars, and who will be taking public transit in San Francisco, rather than that same number of people living out in Modesto and driving into San Francisco every day, for an hour and a half. So, I think those are really important environmental considerations to make as well."

(Benjamin Schneider, CPC Hearing, September 12, 2019 [I-SCHNEIDER2-2])

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 AL-1, Range of Alternatives, on RTC p. 4.F-12.

One comment states that the draft SEIR ~~did~~ does 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. Comments regarding affordable housing and the alternatives screening process are addressed in Response AL-1, Range of Alternatives, on RTC p. 4.F-12.

Concerning VMT and GHG emissions of the project, the draft SEIR concludes impacts related to vehicle miles traveled (VMT) (draft SEIR pp. 3.B-79 to 3.B-80) and greenhouse gas emissions (draft SEIR Appendix B, pp. B-37 to B-40) to be less than significant. Accordingly, neither VMT nor GHG emissions were the main criteria in the development of alternatives because CEQA does not require that the alternatives address less-than-significant impacts.

The commenter is correct that a denser project would be more VMT and GHG efficient at this project site than a less dense project. However, none of the alternatives analyzed would have significant impacts on VMT or GHG emissions.

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-HEGGIE2-1
I-HEGGIE2-10
I-OSAWA-8
I-SIMON-11

“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])

"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])

"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])

“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])

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

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

“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])

Response AL-4: Alternative B, Reduced Density Alternative

The comments state that the draft SEIR ~~did~~ does not adequately analyze the impacts of the 800-unit alternative. Comments also request that additional lower density alternatives be analyzed. In response to the comment that a 100 percent affordable housing project “would better blend” with the project vicinity, refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12.

The 800-unit reduced density alternative (Alternative B) is analyzed on draft SEIR pp. 6-14 to 6-28. The 800-unit alternative is not considered a variant to the proposed project. Because, as described on draft 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.” The 800-unit reduced density alternative is not considered a variant because it is not a variation of the

proposed project with the same development controls; rather, it is a project of a different scale and is not considered a limited modification to a project feature.

As noted on draft 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. Alternative B was selected to address construction-related noise and air quality effects of the proposed project options. The draft 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 ..."

One commenter states that construction impacts to Riordan High School can/could be reduced by decreasing the project density and requiring a noise buffer zone adjacent to the school and childcare center as a mitigation measure. As discussed in draft SEIR Section 3.D, noise impacts from construction activities under would also be significant and unavoidable. As with the proposed project options and as described on SEIR p. 6-21, construction noise impacts of Alternative B would be reduced with Mitigation Measure M-NO-1, which 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; and erecting temporary noise barriers around the site, particularly where a site adjoins noise-sensitive uses (such as Archbishop Riordan High School). However, as stated on draft SEIR p. 6-21, noise impacts under Alternative B would remain significant and unavoidable with mitigation.

Several comments suggest additional reduced density alternatives, including a 400-unit alternative and a 100 percent affordable housing alternative with 350 units. The draft SEIR considers Alternative B, a reduced density alternative compared to the proposed project, which that would develop 800 units, or approximately 33 to 40 percent less gross square footage than the proposed project options. A further reduced alternative of 350 or 400 units would not meet most of the basic project objectives related to:

"replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing," and

"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 ... by maximizing the number of housing units in the project."

Thus, such an alternative is considered, but rejected. As discussed on draft SEIR pp. 6-14 to 6-28 and summarized in draft SEIR Table 6-6 (pp. 6-51 to 6-55), Alternative B would result in significant and unavoidable impacts related to secondary loading, transit delay, and construction-related noise and air quality impacts, although impacts may be reduced.

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For informational purposes, ~~any~~ construction of any number of buildings at the site would result in significant and unavoidable project-level and cumulative impacts for air quality (compressed schedule) and noise (six year and compressed schedule). 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~~ Like 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. If housing is concentrated on the south side of the site, such an alternative may result in less construction-related noise impacts to Archbishop Riordan High School. However, the noise levels at the receptors nearest to the southern and western project property lines would still exceed the "Ambient + 10 dBA" standard. As stated on draft SEIR p. 3.C-29, "it should be noted that the majority of construction activity would not occur at the closest project site boundary to these closest receptors. However, given the extended duration of these phases of construction ... this impact is considered significant and unavoidable with mitigation."

Commented [w1]: Let's discuss if other objectives should be listed. Otherwise, we may need to change the first and last sentences within this comment.

Commented [PJ(2R1)]: I took it out of bullet point format, so it doesn't make is so obvious that we are not calling out every objective.

A further reduced density alternative would reduce project-generated traffic volumes and transit trips compared to the proposed project. However, similar to Alternative B and as discussed under Impact C-TR-4 on draft SEIR p. 3.B-94, the cumulative growth in traffic volumes and transit trips associated with implementation of the City College facilities master plan is uncertain at this time, and the transit delay contribution from City College in combination with a further reduced alternative is unknown. The addition of vehicle and transit trips generated by a further reduced density alternative in combination with the facilities master plan projects and other cumulative development ~~is expected to~~ would increase transit delay and may exceed the four-minute transit delay threshold. Therefore, a further reduced density alternative, in combination with cumulative projects ~~would~~ could result in significant cumulative transit impacts related to transit delay ~~even with implementation of Mitigation Measure M-C-TR-4.~~

Commented [w3]: Describe if this would likely contribute considerably to that impact, which it may not.

Commented [PJ(4R3)]: Liz, please review and respond, or decide if the consultants can respond. Wade highlighted his comment for internal review.

~~Thus, the significant and unavoidable construction-related noise and air quality impacts would occur and cumulative transit delay impacts identified in the draft SEIR would occur. Thus, 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 draft SEIR. Because the impacts would be considerably similar to Alternative B, there is no requirement to include another reduced density alternative in the draft SEIR.~~

Commented [w5]: Please provide a paragraph about Lee Avenue loading impact before this and add Lee Avenue to this sentence.

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 draft 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])

“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])

“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])⁴

Response AL-5: Alternative B, Economic Feasibility

The commenters object to the statement in the draft SEIR that the financial feasibility of the reduced density alternative is unknown. One comment provides Related California's proposal for 680 units ~~in response, which that~~ was submitted in response to the original SFPUC request for qualifications for development of the project site (the proposal is included in its entirety in RTC Attachment B).

The commenters assert that because Related California's ~~submitted a 680-unit proposal for the SFPUC's request for qualifications was feasible,~~ a reduced density alternative by the Reservoir Community Partners, LLC, would ~~also~~ be financially feasible. The Related California proposal is not relevant to the current project as proposed by Reservoir Community Partners, LLC, because they are different projects by different developers. A response to a request for ~~qualifications also~~ does not prove that the respondent has a feasible project. Alternative B is considered to be a potentially feasible reduced density alternative ~~because it due to the ability of the project sponsor to have access to the site meets most of the basic project objectives, and the potential for the alternative it to lessens the project's significant environmental effects. Furthermore, as explained on draft SEIR p. 6 2 and CEQA Guidelines section 15126.6(a), the purpose of the alternative analysis is to "evaluate a reasonable range of alternatives to the proposed project that would~~

Commented [PJ(6)]: Or was this a request for proposals?

Commented [PJ(7)]: Request for proposals?

⁴ The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project." The draft SEIR concludes, on pp. 6-27 to 6-28 that the reduced density alternative would have slightly less severe significant impacts than the proposed project options, but the significant and unavoidable impacts would remain.

The Planning Commission will certify the EIR if they determine that the EIR has been completed in compliance with CEQA, including that it describes a reasonable range of potentially feasible alternatives. The Planning Commission will determine the actual feasibility of the alternatives after and separate from EIR certification. 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. It is most common for financial and other non-environmental information to be provided separately from the EIR in making the actual feasibility determination. This practice is consistent with established CEQA case law distinguishing potential feasibility of alternatives analyzed in an EIR 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.

Comment AL-6: Alternative C, San Ramon Way Passenger Vehicle Access Alternative

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

"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])

"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.'¹

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, 1955² 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:

¹ 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>.

² See attached conveyance from the SF Assessor's.

(Amy O'Hair, Board Member, Sunnyside Neighborhood Association, Letter, September 12, 2019 [O-SNA2-1])⁵

“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])

“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

⁵ The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

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])

"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 **alerications** for any available parking space that would guaranty no open parking spaces.

Commented [PJ(8)]: Confirm this error is in the original, and if so keep it as is.

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])

"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])

"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])

"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])

"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])

"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])

“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])

“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 Passenger Vehicle Access Alternative

Comments include support and opposition to Alternative C, San Ramon Way Passenger Vehicle Access Alternative. Comments opposing the alternative state that Alternative C would have negative traffic and noise impact on the Westwood Park neighborhood. The comments also state the draft SEIR does not address the broader impact of the alternative and the analysis downplays potential traffic hazards impacts on San Ramon Way. Comments regarding parking are addressed in Response TR-7, Parking, on RTC p. **Error! Bookmark not defined.** Comment regarding increased traffic congestion are addressed in Response TR-8, Increased Traffic Congestion, on RTC p. **Error! Bookmark not defined.** Comments regarding the feasibility of an alternative are discussed under Response AL-5, Alternative B, Economic Feasibility, on RTC p. 4.F-28.

The response to the Alternative C analysis is organized by the following subtopics:

- Draft SEIR Alternative C Analysis
- Walking and Biking Impacts
- Operational Traffic Noise
- Alternative Feasibility

Draft SEIR Alternative C Analysis

The analysis of Alternative C: San Ramon Way Passenger Vehicle Access is discussed starting on draft SEIR p. 6-29 and the discussion of transportation and circulation impacts begins on draft SEIR p. 6-31.

Commented [w9]: Don't you discuss these issues as they relate to this alternative below?

Commented [PJ(10R9)]: Some of the same topics are covered in the comments, so that's why these are repeated, but ESA, please confirm.

~~Plymouth Avenue is 24-feet wide. Traffic data was collected along Plymouth Avenue on the block faces between Ocean and Greenwood avenues (just north of Archbishop Riordan campus). Plymouth Avenue Based on the data collected and confirmed with SFMTA, these block faces includes approximately 118 on-street parking spaces, including 65 residential permit spaces along both sides of the street. The Collected data shows that parking utilization ranges between 40 and 88 percent with between 37 and 81 on-street vehicle parking spaces available during the weekday a.m. (9 a.m.), midway (2 p.m.), and p.m. (8 p.m.) periods (draft SEIR p. 6-37).~~

~~There are frequent curb cuts along the street, including at least 20 in the approximately 400-foot block of Plymouth Avenue between Wildwood Way and Greenwood Avenue.~~

~~Collected data also show a total of 268 and 226 vehicles during the p.m. and a.m. peak hours, respectively, at the San Ramon Way/Plymouth Avenue/Southwood Drive intersection. For comparison purposes, this is approximately 12 to 15 percent of the existing peak hour volumes at the Ocean Avenue/Miramar Avenue intersection and approximately 29 to 30 percent of the existing peak hour volumes at the Judson Avenue/Genessee Street intersection (refer to draft SEIR table 3.B-2 on p. 3.B-10).~~

Commented [w11]: Why do the volumes on draft SEIR p. 3.B-10 differ from those on p. 6-34?

Commented [PJ(12R11)]: Liz, please review.

Commented [w13]: Please confirm accuracy of edits.

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 draft SEIR p. 6-35. As shown in Table 6-4 and Table 6-5 (draft 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, representing 12 and 15 percent of project vehicle trips 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, representing 12 and 15 percent of project vehicle trips respectively. These project trips would correspond with a decrease in the same number of vehicles utilizing the Frida Kahlo Way/North Access and Ocean Avenue/Lee Avenue project access routes. The project trips likely to use the San Ramon Way access were identified based on the project vehicle trip distribution presented in Table 3.B-15 on draft SEIR p. 3.B-44.

~~Traffic data was collected along Plymouth Avenue on the block faces between Ocean and Greenwood avenues (just north of Archbishop Riordan campus). Based on the data collected and confirmed with SFMTA, these block faces include approximately 118 on-street parking spaces, including 65 residential permit spaces. The data shows that parking utilization ranges between 40 and 88 percent with between 37 and 81 on-street vehicle parking spaces available during the weekday a.m. (9 a.m.), midway (2 p.m.), and p.m. (8 p.m.) periods (draft SEIR p. 6-37). As mentioned on draft SEIR p. 6-37, the addition of project-generated vehicle traffic would increase instances of oncoming traffic and locations where there is not sufficient space for vehicles to pass side-by-side. There are frequent curb cuts and low vehicular volumes (including at least 20 in the approximately 400-foot block of Plymouth Avenue between Wildwood Way and Greenwood Avenue) that would continue to provide opportunities for drivers to pull over and let oncoming traffic pass without resulting in potentially hazardous conditions. However, should the current configuration of Plymouth Avenue, with parking on both sides of the street, result in significant~~

congestion associated with drivers unable to pass side-by-side, the SFMTA could eliminate on-street parking on one side of the Plymouth Avenue, instead of its current configuration of parking on both sides of the street. This would result in the removal of approximately 10 spaces. With parking confined to one side of Plymouth Avenue, the 24-foot-wide street would provide sufficient additional clearance for two-way operation of vehicles without the need for drivers to pull over to let oncoming traffic pass.

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It is possible that the project's new connection to Plymouth Avenue via San Ramon Way could encourage some existing drivers to cut through use the site this new connection to avoid traveling on portions of Ocean Avenue. However, it is unlikely that these cut-through routes new connection would provide meaningful travel time savings, even under congested conditions, and thus not a substantial increase in existing drivers using this new connection. The presence of parking on both sides of Plymouth Avenue (which is approximately 24 feet wide) and the need for drivers to yield to oncoming traffic, would limit the potential time savings of taking this cut-through route. For existing eastbound Ocean Avenue drivers that continue north on Frida Kahlo Way, the cut-through new connection route would include a left-turn onto Plymouth Avenue, a right-turn on San Ramon Way, traveling through the proposed project's roadway network, and a left turn onto Frida Kahlo Way. For southbound drivers vehicles on Frida Kahlo Way that continue west on Ocean Avenue, the cut-through new connection route would include traveling through the proposed project's roadway network and turning left onto Plymouth Avenue from San Ramon Way. It is unlikely that these cut-through routes would provide meaningful travel time savings, even under congested conditions. Furthermore, even if some drivers chose to utilize this cut-through new connections route, a low number of cut-through trips would not change impact conclusions. If parking is removed from one side of Plymouth Avenue, the cut-through routes would still include travel along neighborhood streets and would be unlikely to provide meaningful travel time savings.

The draft SEIR analysis is supported by substantial evidence. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts there were not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

With respect to parking, as discussed on draft 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 draft SEIR Appendix B, 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 RTC Attachment 1, Non-CEQA Transportation Analysis.⁶

⁶ Balboa Reservoir – Non-CEQA Analysis, August 1, 2019.
http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf

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. as discussed on draft SEIR p. 3.B-25, the San Francisco Planning Commission adopted Resolution No. 19579 on March 3, 2016, removed automobile delay (traffic congestion), as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as significant impact on the environment pursuant to CEQA. Further, CEQA removed automobile delay statewide in December 2018.⁷

Thus, increased levels of traffic only have the potential to create significant impacts as they relate to other environmental impacts, including safety hazards.

Walking and Biking Impacts

With respect to people biking and walking, the evaluation criteria for a significant impact requires the assessment of potentially hazardous conditions. 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, 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 draft 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.

Operational Traffic Noise

Operational traffic noise impacts are analyzed on draft 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 proposed project. These increases would be below the applicable threshold of significance of 5dBA, resulting in a less-than-significant impact with respect to roadside traffic noise. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts there were not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

⁷ Public Resources Code section 21099(b)(2) states: "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." The secretary certified the guidelines in December 2018.

Alternative Feasibility

In response to the comment regarding the 10-foot-wide parcel, as described in Response AL-5, Alternative B, Economic Feasibility, on RTC p. 4.F-28, 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 draft SEIR. Alternative C is identified as a *potentially* feasible alternative in the draft SEIR, with the final decision made by decision makers in adopting CEQA findings regarding the *actual* feasibility or infeasibility of alternatives, which can be based on considerations outside of those evaluated in the draft SEIR, ~~such as the cost that the City or developer would incur in acquiring the 10 foot wide parcel by a negotiated purchase from the Westwood Park Association or through the City's exercise of eminent domain.~~ 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).

Commented [w14]: Please update to the extent applicable based on earlier edits to prior response.

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

"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])

"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])

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

The comments state that Alternative D does not meet the criteria of an alternative, 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 draft SEIR pp. 2-38 to 2-39. Under the CEQA process, the draft 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 draft SEIR and in Response AL-1, Range of Project Alternatives, on RTC p. 4.F-12 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 significant and unavoidable impacts, reducing them 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 draft 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 Alternatives 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 on draft SEIR p. 6-18.

Table 6-1 on draft SEIR pp. 6-8 to 6-9 provides a comparison of the proposed project and alternatives, including construction schedule. Table 6-6 on draft SEIR pp. 6-51 to 6-55 provides a comparison of environmental impacts of the proposed project options to impacts of the alternatives. Regarding Alternatives B and D, as described earlier in Response AL-2: Environmentally Superior Alternative, on RTC p. 4.F-19, it is possible that Alternative D could be combined with Alternative B by the decision makers.
