

From: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Sent: Tuesday, May 26, 2020 8:56 AM
To: Christopher Pederson <chpederson@yahoo.com>
Cc: ECN, BalboaReservoirCompliance (ECN) <balboareservoircompliance.ecn@sfgov.org>
Subject: RE: Balboa Reservoir Project (Planning Commission agenda items 17-18f)

Hello, Mr. Pederson,

Thank you for your comments.

Sincerely,

Jeanie Poling, Senior Environmental Planner

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[San Francisco Property Information Map](#)

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From: Christopher Pederson <chpederson@yahoo.com>
Sent: Monday, May 25, 2020 11:32 AM
To: Hong, Seung Yen (CPC) <seungyen.hong@sfgov.org>; Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Subject: Fwd: Balboa Reservoir Project (Planning Commission agenda items 17-18f)

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Begin forwarded message:

From: Christopher Pederson <chpederson@yahoo.com>
Subject: Balboa Reservoir Project (Planning Commission agenda items 17-18f)
Date: May 25, 2020 at 11:27:33 AM PDT
To: commissions.secretary@sfgov.org
Cc: Norman Yee <Norman.Yee@sfgov.org>, "Peskin, Aaron (BOS)" <Aaron.Peskin@sfgov.org>

Dear President Koppel and Commissioners:

Given the urgency of the affordable housing crisis and the climate crisis, I urge you to approve the Balboa Reservoir Project with the maximum amount of housing evaluated in the SEIR and to eliminate the proposed public parking garage.

Maximize the Amount of Affordable Housing

Given the site's location close to the Balboa Park BART station and multiple Muni routes, its adjacency to City College, and its proximity to the Ocean Avenue neighborhood commercial district, it is an ideal location for genuinely transit- and pedestrian-oriented housing. The severity of the City's affordable housing crisis and the magnitude of the earth's climate crisis mandate that the City maximize the amount of housing, especially affordable housing, on the site and minimize automobile commuting to the area. As the SEIR's

Response to Comments acknowledges, including more housing in the project would result in lower per capita driving and greenhouse gas emissions. (RTC pg. 4.F-22.)

The Additional Housing Option evaluated in the SEIR allows the City to approve a total of 1550 residences on the site, 775 of which would be below-market rate units. The developer's proposal to build only 1100 units (including 550 affordable units) on the site would fail to achieve the project's full potential. The Planning Commission should treat the developer's proposal as the absolute minimum amount of housing appropriate for the site. Indeed, any significant reduction in the number of units below the developer's proposal is likely to render the entire project infeasible, depriving the City of sorely needed affordable housing. (See Economic Planning Systems, Memorandum: Financial Feasibility of Balboa Reservoir Project Alternative B, May 12, 2020.)

Minimize Automobile Commuting by Eliminating Public Parking Garage

Consistent with the Additional Housing Option, the Commission should eliminate the proposed public parking garage. Constructing a new public parking garage is irreconcilable with the City's Climate Action Strategy for 80% of all trips to be by sustainable modes by the year 2030. As the SEIR's Response to Comments admits, providing additional parking encourages more automobile commuting and undermines the effectiveness of TDM programs. (RTC pp. 4.C-62-63, 4.H.63-64.) Given that the Balboa Reservoir site currently functions merely as overflow parking for City College and is mostly empty even when college is in session, there would be little reason to build a public parking garage even if City College hadn't committed to undertaking an aggressive TDM program to reduce automobile commuting.

The public parking garage would also be an end-run around project's 1:2 residential parking ratio. The public parking garage would be open to non-residents only during weekday daytime hours. The rest of the time project residents could park there. That would defeat the intent of having a reduced parking ratio for the residences.

The City's Transit First policies and its climate change goals mandate minimizing automobile commuting. As the City's experience with managing parking in downtown demonstrates, the single most effective mechanism for reducing automobile commuting is to reduce parking supply.

Alternatively, Shrink the Public Parking Garage and Prohibit Parking Discounts

If the Commission is bound and determined to allow a public parking garage despite the Transit First mandates of the City Charter and the general plan, the Commission should dramatically reduce the size of the garage. The record before the Commission includes no justification whatsoever for a massive 450-space parking garage. According to parking surveys, the maximum parking shortfall that might occur during the midday peak is 239 spaces. That assumes that changes to parking supply and TDM measures will have absolutely no effect on automobile commuting, which would be a striking deviation from the City's experience elsewhere. Any public parking garage, therefore, should include substantially fewer than 239 spaces in order to avoid undercutting efforts to minimize automobile commuting.

The Commission should also revise the Development Agreement (Exhibit J, Transportation Plan) to prohibit the developer from subsidizing commuter parking by offering monthly parking passes and by allowing discounted rates for City College users. Planning Code sections 155(g) and 303(t) expressly prohibits multi-day passes or discounts for new parking garages in downtown and mixed-use districts precisely because they encourage automobile commuting. The Commission should apply these prohibitions to any public parking garage at the Balboa Reservoir. All users of the parking garage should be required to pay market rates on an hourly or (at most) a daily basis.

If the project ultimately includes a public parking garage, the TDM credits that the developer receives for having a low residential parking ratio (see Development Agreement, Exhibit J-1, TDM Plan, Strategy Pkg-4) should be reduced proportionately to the size of the public parking garage.

Prohibit Natural Gas

The Development Agreement allows the project to include natural gas service. Given the urgent need for the City to reduce greenhouse gas emissions, the Commission should prohibit any natural gas connections to the project.

For these reasons, please approve the Additional Housing Option version of the Balboa Reservoir Project as described in the SEIR. Thank you.

Sincerely,
Christopher Pederson

District 7 resident