

From: [aj](#)
To: [Poling, Jeanie \(CPC\)](#)
Cc: [BRCAC \(ECN\)](#); [Shanahan, Thomas \(ECN\)](#); [Yee, Norman \(BOS\)](#); [Board of Supervisors, \(BOS\)](#); [Hood, Donna \(PUC\)](#); [Secretary, Commissions \(CPC\)](#); [Rafael Mandelman](#)
Subject: Comment on Balboa Reservoir NOP re: "Summary of Potential Environmental Issues"
Date: Thursday, October 11, 2018 1:26:06 AM
Attachments: [2018-7-2 Comment on Transportation.docx](#)
[2018-7-7 additional comment on Transportation.docx](#)

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Ms. Poling:

The NOP's "Summary of Potential Environmental Issues" states:

The proposed project and project variants meet all of the requirements of a transit-oriented infill development project under California Public Resources Code section 21099; therefore, the subsequent EIR shall not consider aesthetics and parking in determining if the project has the potential to result in significant environmental effects.

The main idea behind PRC 21099 is changing the evaluation of transportation & circulation impacts from Level of Service (LOS) to Vehicle Miles Travelled (VMT). In reference to parking, the NOP cites 21099 states:

The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section.

Although 21099 exempts parking adequacy as a CEQA impact "**for the** (Reservoir Project itself) **project**", 21099 does not exempt the secondary parking impact on CCSF's public educational service to students from assessment and consideration.

Student parking, **being the existing condition and setting**, cannot be be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.

The proposed Reservoir development has forced City College to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This is the secondary impact that must be addressed in the Subsequent EIR.

Please also enter into your administrative record the following two attachments that relate to this subject:

- 7/2/2018 comment on Transportation to BRCAC and Reservoir Community Partners
- 7/7/2018 additional comment on Transportation

Sincerely,
Alvin Ja

From: aj <ajahjah@att.net>
To: BRCAC (ECN) <brcac@sfgov.org>; Shanahan Thomas (ECN) <thomas.shanahan@sfgov.org>;
Sent: Monday, July 2, 2018 11:27 PM
Subject: COMMENT ON TRANSPORTATION FOR 2018-7-9 BR CAC MEETING

COMMENT ON TRANSPORTATION FOR 2018-7-9 BR CAC MEETING

Much of the City Team's strategy to promote the Reservoir Project is derived from a 2012 study/development proposal sponsored by NAIOP (National Association of Industrial and Office Properties). Much of Avalon-Bridge's Base Plan for the Reservoir is also derived from this NAIOP-sponsored study/proposal.

The study/development proposal was done as a project by UC Berkeley's Haas School of Business students. The development proposal was part of a competition for a "Golden Shovel" award.

The development proposal was entitled "Westwood Terrace in Balboa Park."

FRAMING/ MARKETING.....DECEPTIVE ADVERTISING

The "Westwood Terrace" development proposal offered a marketing/PR approach:
... Given the depth of anti-development sentiment related to the site and the coordination of the local neighborhood groups, it is vital that the project be framed as a solution to current problems and an asset to the local community.

The Reservoir Project has been skillfully framed/ marketed as "50% affordable housing". But what are the facts?

The truth of the matter is that that the Reservoir Project's own Development Overview provides only for:

- 50% (550 units) market-rate;
- 18% (198 units) low-income (80% AMI-- \$66,300)
- 15% (165 units) moderate-income (120% AMI-- \$99,500)
- 17% (187 units) HYPOTHETICAL (not funded or planned by the private developer) "additional affordable" middle-income (150% AMI-- \$124,350)

SINCE RESERVOIR COMMUNITY PARTNERS, LLC HAS NO RESPONSIBILITY TO ACTUALIZE THE 17% "ADDITIONAL AFFORDABLE" (for individuals of up to \$124,350 annual income per Mayor's Office of Housing & Community Development's 4/1/2018 max income table), the marketing hype of "50% affordable" is a lie.

KEY CHALLENGES: PARKING & TRAFFIC

The "Westwood Terrace" development proposal identified "Key Challenges" for the proposed development:

1. *The Site will need to overcome a difficult entitlement process. In order to maximize the value of this unique Site, rezoning and increased density will be required. Obtaining*

these entitlements in the City of San Francisco can be a drawn-out process spanning multiple years.

2. As the largest student parking area on-campus, preservation of parking capacity on the Balboa Reservoir is a focal point for both the City College and the local community.

3. Due to limited access points and large influx of new residents, traffic impact and flow is a primary concern for the project.

4. Development of the Site will require significant infrastructure costs

Points #2 and #3 of “Key Challenges” reflect the real world. Yet throughout the City Team’s public engagement process, the City Team has sought to ignore the real world and has downplayed the adverse impacts of the Project on parking and traffic.

The City Team’s solution consists of TDM (Transportation Demand Management) and Residential Permit Parking. The TDM and RPP solutions fundamentally dump the burden and responsibility to mitigate adverse traffic and parking impacts from the new Reservoir Project onto existing City College and neighborhood stakeholders.

Furthermore, the biggest contributing factor in demand would be the influx of 2,200 new Reservoir residents—something which Key Challenge #3, unlike the City Team’s Development Parameters, acknowledges.

The 2012 “Westwood Terrace” development proposal, unlike the City Team’s TDM solution, offered a more real-world solution to Key Challenges #2 and #3.

The “Westwood Terrace” proposal’s “Core Programmatic Concepts” to address key challenges of parking and transportation included these more sensible ideas (compared to the City Team’s TDM/RPP solution):

*2. Maintain majority of student parking on-site; a **major** consideration of both CCSF and the surrounding neighborhood group. Current Site layout allows for developer to build below the natural grade without incurring significant excavation costs.*

3. Inclusion of “car-free” Student Housing units allows Site to reach revenue and absorption potential while minimizing traffic impacts highlighted as major concern due to Site’s limited ingress/egress points.

CITY COLLEGE

The “Westwood Terrace” proposal included a section on “Primary Neighborhood Stakeholders”, among which was City College.

The “Westwood Terrace” development proposal’s section on City College stated:

Conversations with City College representatives suggest that the predominant concern that the school has for the site pertain to reduction in parking. The Reservoir is the

school's primary parking facility and with over 32% of students and 63% of faculty driving to school, any substantial reduction of parking would create serious problems for the campus. If the parking issue can be resolved, the City College would be likely to support on-site development that provides student or faculty housing. To-date, the City College has not been an active advocate or opponent of nearby development but we believe that dynamic is likely to change should new development be proposed that substantially impacts the school's supply of parking.

It should be noted that the SFCCD authorities have appointed and re-appointed a Program Manager to represent City College interests vis a vis the Reservoir Project. It should also be noted that the Program Manager is a Principal of Curtis Development who was co-developer in the Related California Proposal for the Reservoir. Because of this background, it may be difficult for the Program Manager to unequivocally advocate for grassroots CCSF stakeholders.

The grassroots CCSF stakeholders' position can only be for full mitigation of loss of student parking. The costs of any and all replacement parking necessitated by the loss of parking in the Reservoir must be borne by Avalon-Bridge and not by SFCCD.

This written comment on Transportation repeats what has been brought up constantly by many at BRCAC meetings and in written submissions over the past several years. The only thing new here is the citation of content from the NAIOP Golden Shovel proposal.

--aj
7/2/2018

BRCAC:

A few days ago I had sent you a Written Comment on Transportation that cited a UCB Haas School of Business "Westwook Terrace" study/ proposal.

The Written Comment quoted "Key Challenges" from that study proposal. I urge you to examine how the Reservoir Project has addressed those "Key Challenges" --in particular:

2. As the largest student parking area on-campus, preservation of parking capacity on the Balboa Reservoir is a focal point for both the City College and the local community.

3.

Due to limited access points and large influx of new residents, traffic impact and flow is a primary concern for the project.

The Reservoir Community Partners, LLC's (Avalon-Bridge) Base Plan shows motor vehicle access at two points: Lee Avenue (Whole Foods exit) and North Street (adjacent to Riordan High). This confirms the Haas Business School study's observation of "limited access points and large influx of new residents."

Yet the Reservoir Project's solution has been TDM and Residential Permit Parking which is totally deficient in addressing a "Key Challenge."

To refresh your memory, please consider and review the following (from an earlier submission regarding the Nelson-Nygaard TDM Framework) for your Transportation discussion:

The main significance of the TDM Framework is that it functions as a means for the Reservoir Project to avoid its responsibility to mitigate its adverse impacts:

**INHERENT INEQUITY IN THE BALBOA AREA TDM FRAMEWORK:
DUMPING THE BALBOA RESERVOIR PROJECT'S RESPONSIBILITY TO MITIGATE
ITS ADVERSE IMPACTS ONTO ITS VICTIMS**

CEQA principles call for new projects like the Balboa Reservoir Project to mitigate adverse impacts on the existing setting.

Being a public service, City College has CEQA standing as an "environmental factor" that would require the proposed Reservoir Project to mitigate its adverse impacts.

From the very beginning of the Reservoir Project's public engagement process, CCSF stakeholders have complained about the adverse impacts on student enrollment and attendance that would be generated by the Project's eviction of existing student parking.

GENESIS OF BALBOA AREA TDM FRAMEWORK STUDY

In order to assuage community concerns regarding parking and traffic, the Reservoir Project initiated the Balboa Area TDM Study.

People in the community were expecting the study to be an all-around and objective analysis of transportation issues. What people in the community did not realize was that the TDM Study's general conclusions had already been pre-ordained.

The Balboa Area TDM Study had been given its marching orders:

"The Planning Department and SFMTA are proposing a Transportation Demand Management (TDM) study in coordination with CCSF Ocean Campus to reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents."

WILLFUL DISREGARD FOR HARD DATA

The City Agencies have managed the Reservoir Project in a manner similar to how the Iraq War had been promoted. Just like the Iraq War in which, according to British Intelligence's Downing Street Memo, "... *the intelligence and facts were being fixed around the policy*", the recommendations and conclusions of the Nelson-Nygaard study have been fixed around the pre-determined TDM policy.

The Balboa Area TDM Framework has been fixed..... with willful disregard for the hard data from surveys that would refute the pre-determined TDM dogma.

WILLFUL EXCLUSION OF COMPREHENSIVE PARKING ASSESSMENT

Sunshine Ordinance documents reveal the following:

In 2014, the AECOM Transportation Analyst had proposed performing a comprehensive supply & demand assessment for all on-street and off-street parking in the neighboring vicinities. Jeremy Shaw of the Planning Dept put a stop to AECOM's proposal to perform this comprehensive assessment.

Instead, in a 2014 email to the AECOM Transportation Analyst, Planning Dept told AECOM to confine their study to the Reservoir parking lots alone:

*"...edits made in the attached word document reflect the current thinking in SF transportation analysis...
"Comment[JS4]: We'd recommend just looking at the [Balboa Reservoir parking lots--aj] parking lots. --- Off-site parking analysis is nice to have. But really we want to focus the effort on what will drive the on-site design and what kind of trips that design will generate – rather than worry about off-site impacts and mitigations..."*

So from the very beginning, starting with the AECOM Existing Conditions' Transportation Analysis, a full and objective assessment and analysis had already been stopped in its tracks by the Reservoir Project Staff.

"THE CURRENT THINKING IN SF TRANSPORTATION ANALYSIS"

What was--and is--the “current thinking?”.....The thinking is: **Don’t “worry about off-site impacts and mitigations.”**

MANIPULATION AND BIAS IN CITY’S SURVEY OF CITY COLLEGE PARKING

The Reservoir Project's data collection was deliberately skewed to minimize apparent parking demand at City College. It did this by collecting PM data from 10 pm to 12:30 am when no classes are in session. From the Reservoir Project's Balboa Area TDM Existing Conditions Report: *"The surveys were conducted during two periods; midday, between 10:00 AM to 4:00 PM; and late evening, between 10:00 PM to 12:30 AM."*

Why would a parking survey be performed between 10pm and 12:30am when any fool could tell you that the CCSF parking lot would be empty?

DELIBERATELY OBSCURED: CONTEXT OF RESERVOIR BEING A NEW PROJECT

The TDM Study was a response to community concerns about transportation issues that would be generated by the new Reservoir Project that would impact the existing setting of City College and the surrounding neighborhoods.

The TDM Framework obscures this context by placing the new Reservoir Project on an equal footing with City College and the surrounding neighborhoods. The Balboa Area TDM Framework delineates three sub-areas: 1) City College Ocean Campus, 2) Balboa Reservoir , and 3) Balboa Area neighborhoods.

The TDM Framework fails to acknowledge the fact that the Balboa Reservoir sub-area, as a new proposed project, is responsible for mitigation of its adverse impacts. Instead, the TDM Framework presents the Reservoir Project as a fact-on-the-ground with importance equal to--if not greater than--City College and the neighborhoods.

THROWN OVERBOARD: STUDENT INTERESTS OF ACCESS TO EDUCATION

By putting the Reservoir Project on equal footing with City College and the neighborhoods, the Reservoir Project has been, with a sleight-of-hand, absolved of its CEQA responsibility to mitigate its adverse impacts on the existing setting.

Instead, mitigation has been dumped onto the Reservoir Project’s victims. Instead of the Reservoir Project being held responsible for providing replacement parking for students, City College’s FMP has had to respond by proposing new parking structures on SFCCD property.....but with no realistic funding sources for such structures necessitated by eviction of student parking.

INEQUITY IN BALBOA AREA TDM FRAMEWORK

Page 18 of the TDM Framework has a section entitled "Parking availability." The section brings up Balboa Park Station and City College as mahor trip generators. The section says that concerns have been expressed about parking during class times. **Yet this "Parking availability" section pointedly avoids any mention whatsoever of the impact of 2,200 new residents in a new residential project projected to contain about 550 parking spaces!**

On page 25, the TDM Framework has set up car-use reduction targets for the City College students and employees, and for the new Reservoir residents. It has also proposed Residential Permit Parking for the neighborhoods:

- The target for City College is **20%**.
 - According to Figure 4 “Current and Recommended Mode Split, CCSF’s Ocean Campus”, the TDM Framework calls for student drivers be cut back from 35% to 20% (a reduction of 43%).
 - The TDM Framework calls for CCSF employee drivers to be cut back from 45% to 20% (a reduction of 56%).
- The TDM Framework sets an initial car use target for new Balboa Reservoir residents to be **60%**.
 - In comparison, CCSF student car use is already down to **35%** and CCSF employee car use is already down to **45%**. Further cuts to 20% mean that **CCSF students and employees are being expected to sacrifice access to City College in order to benefit new Reservoir residents.**
- The TDM Framework has called for neighborhood residents to initiate Residential Permit Parking to mitigate spillover parking generated by students who will no longer be able to park in the Reservoir and to discourage new Reservoir residents to park in the surrounding neighborhoods.
 - This is another shameless example of dumping mitigation responsibilities onto the victims of the Reservoir Project instead of the new Project taking responsibility for its own adverse impacts.

OVERARCHING GOALS

The TDM Framework sets up 4 overarching goals:

- i. Reduce vehicle-miles traveled
- ii. Reduce auto trips
- iii. Reduce traffic congestion
- iv. Reduce transportation costs to preserve housing affordability

FALSE EQUIVALENCE: REDUCING CAR USE vs. STUDENT ACCESS

Conspicuously missing from the list of overarching goals is: ENSURING STUDENT ACCESS TO EDUCATION. Other than providing Orwellian vacuous and perfunctory talk about “*the importance of accessible education and striv[ing] to establish equitable transportation choices...*” the TDM Framework proffers no realistic or effective solution to the priorities shown to be important to CCSF stakeholders in data collected in the CCSF Transportation Survey.

Hard data from the survey shows that “Reducing Travel Time” and “Arriving on Time” are overwhelmingly the most important considerations in choosing transportation mode.

CONFLATING MEANS WITH ENDS: THE OVERARCHING IMPORTANCE OF THE DESTINATION

A fundamental flaw of the TDM Framework is that it only treats the issue of reducing car usage in isolation.

It should not take a lot of smarts to realize that transportation is an issue only when there's a destination involved. Lacking a desired destination, transportation and parking are a non-issues.

The TDM Framework fails to recognize the fact that transportation is just a way to get to a desired destination. Instead, it dogmatically asserts that parking in and of itself generates traffic.

TDM FRAMEWORK: SPEAR-CARRIER AND PROPAGANDA FOR BALBOA RESERVOIR PROJECT

The Nelson-Nygaard TDM documents serve as spearhead documents to advocate for the interests of the Balboa Reservoir Project, NOT for the interests of City College stakeholders or for the neighborhoods.

The main significance of the TDM Framework is that it functions as a means for the Reservoir Project to avoid its responsibility to mitigate its adverse impacts.

--aj 7/7/2018