

From: [aj](#)
To: [Poling, Jeanie \(CPC\)](#); [BRCAC \(ECN\)](#); [Shanahan, Thomas \(ECN\)](#); [Board of Supervisors, \(BOS\)](#); [Secretary, Commissions \(CPC\)](#); [Hood, Donna \(PUC\)](#)
Cc: [Yee, Norman \(BOS\)](#); [Low, Jen \(BOS\)](#); [Maybaum, Erica \(BOS\)](#)
Subject: Impact on Public Services and Cultural Resources (MUNI, City College, schools)
Date: Thursday, November 01, 2018 8:40:00 AM
Attachments: [2018-11-1 MANDATORY FINDINGS OF SIGNIFICANCE.docx](#)

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Dear Ms. Poling:

Please enter the following (also attached as WORD document) into the Administrative Record for the Reservoir Project:

MANDATORY FINDINGS OF SIGNIFICANCE: UNAVOIDABLE IMPACTS ON CULTURAL RESOURCES, PUBLIC SERVICES

Balboa Reservoir Development: Subsequent EIR to Balboa Park Station Program-level Final EIR
The Balboa Park Station Program-level Final EIR had already made some determinations of unavoidable impacts on the Public Service of Municipal Railway operations. These determinations had already been made without the consideration of the Tier 2 Balboa Reservoir development. Any additional impacts generated by the Tier 2 Balboa Reservoir project cannot logically reverse or make better the determinations of unavoidable significant impacts already contained in the BPS FEIR.

The Community Partners LLC plan envisions two vehicle access points to the development: 1) Lee Extension, 2) City College easement south of Riordan/Kahlo Way (Phelan).

Lee Extension

The Lee Extension has already been treated extensively in the BPS FEIR. The Lee Extension was analyzed in relation the City College's desire to have access to what is now the East Reservoir via Ocean/Lee. The conclusions for the City College-proposed Lee Extension should apply to the Reservoir Development as well, if not even more so.

The BPS was written before the Phelan Loop/Mercy and Kragen/Avalon projects were completed. The current conditions for transit operations have been worse than was projected in the BPS FEIR. Even then, the BPS FEIR had already reached the following conclusions without even taking into consideration 1100-1550 Reservoir housing units:

Therefore, for purposes of CEQA, no feasible mitigation measures have been identified, and the impact on the K Ingleside line would remain significant and unavoidable. (SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED, BPS FEIR p. 60)

... In order to avoid this significant impact, the provision of vehicular access to City College parking facilities through Lee Avenue is not recommended. (FEIR, p. 185)
In summary, absent adoption and implementation of mitigation that reduces to a level of insignificance the transportation impacts associated with provision of full access to CCSF parking facilities from the Lee Avenue extension, such access would create significant traffic impacts. Any future plan to allow full access to CCSF parking facilities from the Lee Avenue extension would require separate environmental review. (FEIR, p. 186)
... traffic levels on Ocean Avenue and Lee Avenue would correspondingly increase, leading to undesirable conditions for traffic, transit, and pedestrians on Ocean Avenue. (FEIR, p. 186)

BPS FEIR conclusion for "Access Option #1: Under this option, CCSF would be allowed westbound right-turn-

only ingress on Lee Avenue.”:

Therefore, as a result of the excessive queuing that would affect operations at the Ocean/Phelan/Geneva intersection and the secondary effects that the provision of westbound right-turn-only ingress would cause, the provision of CCSF westbound right-turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Restricting CCSF ingress would allow normal access to Area Plan projects and would avoid potential spillover effects on neighborhoods south of Ocean Avenue. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan. (FEIR, p. 189)

In summary, it would be possible to allow CCSF vehicles to utilize Lee Avenue as an egress from the campus (no ingress), when combined with modifications to the Ocean/Lee intersection traffic signal and physical modifications to restrict vehicles from traveling across Ocean Avenue and continuing on Lee Avenue south of Ocean Avenue; however, ingress to CCSF from Lee Avenue (as described in Access Option #1) would result in significant adverse transportation impacts. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan. (FEIR, p.191)

City College Easement South of Riordan High/Kahlo Way (Phelan)

The Reservoir Community Partners vehicle access point via a City College easement adjacent to Riordan will cause problems for 43 Masonic.

The 43 line serves many schools from Marina Middle School in the northern part of SF to Denman and Balboa in the south. Queuing to get in and out of the Reservoir Development via ride-hailing services as well as Reservoir residents' own vehicles will impact the 43's reliability. The 43 buses cannot help but be hindered by the introduction of 2,200 to 3,100 new adult Reservoir residents.

I am a Muni Railway retiree. I have real-world experience and expertise having been an Operator, Inspector, Dispatcher, Instructor for the lines in the Reservoir area—K, 29, 43, 54, 15, and 9X (now the 8 Bayshore), 49. As Flynn Division Instructor, I had participated in simulation of the MUNI City College Loop configuration. As a special assignment, I had been the main author of the training materials and lesson plans for the KT/Third Street Rail Project and for the MME.

The now-completed Kragen/Avalon/Whole Foods and Phelan Loop/Mercy/Philz developments have made transit operations for those lines more difficult and unreliable because of the congestion at both Lee and Brighton. And the already bad congestion on Frida Kahlo/Phelan will be made much worse for the riders of the 43 who far outnumber the relatively small number of Reservoir residents (only 33% of whom will be of low to moderate income!) who will benefit from the development.

SF City Charter mandates 85% MUNI on-time performance. Historically, MUNI has averaged only around 60% on-time performance. A Lee Extension, and a City College easement adjacent to Riordan for the Reservoir Project will assuredly make MUNI reliability much worse.

Congestion generated by the Reservoir Project will impact the Public Services of MUNI, and the Public Services and Cultural Resources of schools, especially City College, that are served by the 8, 29, 43, 49, KT.

Submitted by: Alvin Ja, District 7

November 1, 2018

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