

# RESPONSES TO COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT Volume 1

## Balboa Reservoir Project

SAN FRANCISCO PLANNING DEPARTMENT  
CASE NO. 2018-007883ENV  
STATE CLEARINGHOUSE NO. 2018102028



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

Draft EIR Publication Date:	AUGUST 7, 2019
Draft EIR Public Hearing Date:	SEPTEMBER 12, 2019
Draft EIR Public Comment Period:	AUGUST 8, 2019 – SEPTEMBER 23, 2019
Responses to Comments Publication Date:	APRIL 29, 2020
Final EIR Certification Hearing Date:	MAY 28, 2020

*NOTE: Because of the COVID-19 shelter-in-place order, the planning commission may have to hold the certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at [www.sfplanning.org](http://www.sfplanning.org) and on the planning commission agenda.*



# SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: April 29, 2020  
TO: Members of the Planning Commission and Interested Parties  
FROM: Lisa Gibson, Environmental Review Officer  
Re: **Attached Responses to Comments on Draft Subsequent  
Environmental Impact Report Case No. 2018-007883ENV  
[Balboa Reservoir Project]**

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Attached for your review please find the responses to comments document for the draft subsequent environmental impact report (SEIR) for the above-referenced project. **This document, along with the draft SEIR, will be before the planning commission for final EIR certification on May 28, 2020.** The planning commission will receive public testimony on the final SEIR certification at the May 28 hearing. Please note that the public review period for the draft SEIR ended on September 23, 2019; any comments received after that date, including any comments provided orally or in writing at the final SEIR certification hearing, will not be responded to in writing.

The planning commission does not conduct a hearing to receive comments on the responses to comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may write to commission members or to the president of the commission at [commissions.secretary@sfgov.org](mailto:commissions.secretary@sfgov.org) (preferred) or 1650 Mission Street and express an opinion on the responses to comments document, or the commission's decision to certify the completion of the final SEIR for this project.

Please note that the responses to comments document in addition to the draft SEIR is the final SEIR. If you have any questions concerning the responses to comments document or the environmental review process, please contact Jeanie Poling at [Jeanie.Poling@sfgov.org](mailto:Jeanie.Poling@sfgov.org) or by leaving a voicemail at 415.575.9072.

Thank you for your interest in this project and your consideration of this matter.

*NOTE: Because of the COVID-19 shelter-in-place order, planning department offices are closed and staff are working from home, and the planning commission may have to hold the certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at [www.sfplanning.org](http://www.sfplanning.org). To reduce risks to outside service providers, the department is aiming to limit the distribution of hard copy documents. Please contact Jeanie Poling if you still require a hard copy of the responses to comments document.*

Memo

007894



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Attachment 1 Planning Commission Hearing Transcript

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Attachment 4 Travel Demand Workbook

Attachment 5 SFMTA Transit Delay Analysis Memorandum

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# CHAPTER 1

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## Introduction

### 1.A Purpose of This Responses to Comments Document

The purpose of this responses to comments (RTC) document is to present comments on the draft subsequent environmental impact report (draft SEIR) for the Balboa Reservoir Project (proposed project), to respond in writing to comments on environmental issues, and to revise the draft SEIR as necessary to provide additional clarity. Comments were made in written form during the public comment period from August 8, 2019, to September 23, 2019, and as oral testimony received before the San Francisco Planning Commission at the public hearing on the draft SEIR held on September 12, 2019. A complete transcript of proceedings from the public hearing on the draft SEIR and all written comments are included herein in their entirety. A complete list of commenters is provided in Chapter 3, Public Agencies, Organizations, and Individual Persons Commenting on the Draft SEIR. Note that some commenters re-submitted their comments on the Notice of Preparation (NOP); these comments are included in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

Pursuant to the California Environmental Quality Act<sup>1</sup> (CEQA) Public Resource Code section 21091(d)(2)(A) and (B) and the CEQA Guidelines,<sup>2</sup> the San Francisco Planning Department (planning department) has considered the comments received on the draft SEIR, evaluated the issues raised, and provides written responses that fully address each substantive physical environmental issue that has been raised. CEQA Guidelines section 15088 requires the evaluation of all public comments received on the draft SEIR and the identification of comments that raise significant environmental issues requiring a good faith, reasoned analysis in the written response. As further stated in CEQA Guidelines section 15088(c), the level of detail in response may correspond to the level of detail provided in the comment. Where appropriate, this RTC document also includes SEIR text changes made in response to comments.

In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. “Significant effects on the environment” means substantial, or potentially substantial, adverse changes in any of the physical conditions within the area affected by the project. Economic or social changes alone are not considered a significant effect on the environment.<sup>3</sup> Therefore, this document focuses

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<sup>1</sup> Public Resources Code sections 21000–21189 (the California Environmental Quality Act, or CEQA).

<sup>2</sup> *California Code of Regulations*, title 14, division 6, chapter 3, sections 15000–15387, Guidelines for Implementation of the California Environmental Quality Act (the CEQA Guidelines).

<sup>3</sup> CEQA Guidelines section 15064 (e).



primarily on responding to comments that relate to physical environmental issues, in compliance with CEQA.<sup>4</sup> However, for informational purposes, this RTC document also provides limited responses to general comments on the draft SEIR received during the public review period that were not related to physical environmental issues.

The comments do not identify any new significant environmental impacts, or substantial increases in the severity of previously identified environmental impacts, from those analyzed in the SEIR. Nor do the comments identify feasible project alternatives or mitigation measures that are considerably different from those analyzed in the SEIR that would clearly lessen the significant environmental impacts of the proposed project or project variant, but which the project sponsor has not agreed to study or implement.

The planning department is the Lead Agency under CEQA responsible for administering the environmental review of projects within the City and County of San Francisco. The draft SEIR and this RTC document together constitute the final SEIR for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The final SEIR has been prepared in compliance with CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. This final SEIR is an informational document for use by (1) governmental agencies (such as the planning department) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts; and (2) the San Francisco Planning Commission, other commissions/departments, and the Board of Supervisors prior to their decision to approve, disapprove, or modify the project. If the San Francisco Planning Commission, Board of Supervisors, or other City entities approve the proposed project, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP or mitigation program) to ensure that mitigation measures identified in the final SEIR are implemented.

## **1.B Environmental Review Processes**

### **Notice of Preparation of an EIR and Public Scoping**

On October 10, 2018, the planning department published a Notice of Preparation (NOP) of an Environmental Impact Report and Notice of Public Scoping Meeting (draft SEIR Appendix A), announcing its intent to solicit public comments on the scope of the environmental analysis and to prepare and distribute an SEIR on the Balboa Reservoir Project. The planning department mailed the Notice of Availability of an NOP and Notice of Public Scoping Meeting to the State Clearinghouse and relevant state and regional agencies; occupants of adjacent properties; property owners within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations and individuals who have requested such notice. A legal notice in the newspaper was also published on Wednesday October 10, 2018.

Publication of the NOP initiated a 30-day public review and comment period that ended on November 12, 2018. Pursuant to CEQA section 21083.9 and CEQA Guidelines section 15206, the

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<sup>4</sup> CEQA Guidelines sections 15382, 15064(c), and 15064 (d).

planning department held a public scoping meeting on October 30, 2018, to receive input on the scope of the environmental review for this project.<sup>5</sup> During the NOP review and comment period, a total of 84 comment letters and emails were submitted to the planning department and 16 speakers provided oral comments at the public scoping meeting. The comment letters received in response to the NOP and a copy of the transcript from the public scoping meeting are available for review at the planning department offices as part of Case File No. 2015-014028ENV.<sup>6</sup> The planning department considered the comments made by the public in preparation of the draft SEIR for the proposed project.

## Draft SEIR Public Review

The planning department prepared the Balboa Reservoir Project Draft SEIR in accordance with CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. The draft SEIR was published on August 7, 2019. The draft SEIR identified a 45-day public comment period from Thursday August 8, 2019, through Monday September 23, 2019, to solicit public comment on the adequacy and accuracy of the information presented in the draft SEIR. Paper copies of the draft SEIR were made available for public review at the following locations: (1) San Francisco Planning Department, 1650 Mission Street, and Planning Information Counter, 1660 Mission Street, and (2) the San Francisco Main Library, 100 Larkin Street.<sup>7</sup> The planning department also distributed notices of availability (NOAs) of the draft SEIR; published the NOA in a newspaper of general circulation in San Francisco (*San Francisco Examiner*); posted the NOA at the San Francisco County Clerk's office; and posted NOAs at multiple locations within and adjacent to the project site.

Comments on the draft SEIR were made in written form during the public comment period and as oral testimony received at the public hearing on the draft SEIR before the San Francisco Planning Commission on September 12, 2019. A court reporter was present at the public hearing to transcribe the oral comments verbatim and provide a written transcript.

## Responses to Comments Document and Final SEIR

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the draft SEIR. Under CEQA Guidelines section 15201,<sup>8</sup> members of the public may comment on any aspect of the project. Further, CEQA Guidelines section 15204(a) states that the focus of public review should be "on the sufficiency of the [Draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." CEQA Guidelines section 15088 specifies that the lead agency is required to respond to the comments raising significant environmental issues received during the public review

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<sup>5</sup> The public scoping meeting was held at the Lick Wilmerding High School Cafeteria at 755 Ocean Avenue, San Francisco on Tuesday October 30, 2018, between 6 p.m. and 8 p.m. A transcript of the proceedings is available as part of Case No. 2018-007883.

<sup>6</sup> The administrative record is also online at <http://www.ab900balboa.com>.

<sup>7</sup> Electronic copies of the draft SEIR can be accessed online at <https://sfplanning.org/environmental-review-documents>.

<sup>8</sup> CEQA section 21082.1(b).

period. Therefore, this RTC document is focused on the sufficiency and adequacy of the draft SEIR in disclosing the significance of the environmental impacts of the proposed project or project variant that were evaluated in the draft SEIR.

The planning department distributed this RTC document for review to the San Francisco Planning Commission as well as to the other public agencies and commissions, non-governmental organizations including neighborhood associations, and individuals who commented on the draft SEIR. The San Francisco Planning Commission will consider the adequacy of the final SEIR – consisting of the draft SEIR and the RTC document – in complying with the requirements of CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. If the San Francisco Planning Commission finds that the final SEIR is adequate, accurate, and complete and complies with CEQA requirements, it will certify the final SEIR and will then consider the associated MMRP, and the requested approvals for the proposed project.

Consistent with CEQA Guidelines section 15097,<sup>9</sup> the MMRP is designed to ensure implementation of the mitigation measures identified in the final EIR and adopted by decision-makers to mitigate or avoid the proposed project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA sections 21002, 21002.1, and 21081 and CEQA Guidelines sections 15091 and 15092). The draft SEIR identifies six significant impacts that can be mitigated to less-than-significant levels with mitigation measures; these six impacts are related to:

- Noise (project-level and cumulative operational noise from fixed mechanical equipment)
- Air quality (consistency with the Clean Air Plan)
- Cultural resources (archeological resources)
- Tribal cultural resources
- Geology and soils (paleontological resources)

This SEIR also identifies nine significant impacts that cannot be mitigated to less-than-significant levels even with mitigation measures; these impacts are related to:

- Cumulative public transit delay
- Project-level and cumulative loading effects along Lee Avenue
- Project-level and cumulative construction noise
- Project-level and cumulative criteria pollutant emissions and health risks under the compressed three-year construction schedule

Thus, the San Francisco Planning Commission must adopt findings that include a statement of overriding considerations for relevant significant unavoidable impacts (CEQA sections 21081(a)(3) and (b) and CEQA Guidelines section 15093(b)) if the proposed project would be approved. The project sponsor would be required to implement the MMRP as a condition of project approval.

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<sup>9</sup> CEQA Guidelines section 15097 cites CEQA section 21081.6 as the authority for the CEQA Guidelines section.



The project sponsor, Reservoir Community Partners, LLC, applied to the Governor of California for certification of the Balboa Reservoir Project as an Environmental Leadership Development Project (ELDP), pursuant to Assembly Bill (AB) 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code section 21178 et seq., with public review commencing on June 25, 2019. The AB 900 process included a public comment period from June 25, 2019, to July 28, 2019. The ELDP application is available at <http://opr.ca.gov/ceqa/california-jobs.html> (see “201802028 – Balboa Reservoir Project”). The AB 900 Record of Proceedings is available at <http://www.ab900balboa.com>.

The ELDP application was certified. On December 30, 2019, the California Air Resources Board (CARB) issued Executive Order G-19-195 determining that the proposed project would not result in any net additional greenhouse gases with payment of offsets for purposes of certification under AB 900. On December 30, 2019, Governor Gavin Newsom, with assistance from the Governor’s Office of Planning and Research, certified the proposed project as an eligible project under AB 900, and the Governor’s Office of Planning and Research forwarded the Governor’s determination to the Joint Legislative Budget Committee. The State Legislative Analyst’s Office indicated that the project aligns with the intent of AB 900, and recommended to the Joint Legislative Budget Committee that they concur with the Governor’s determination. On January 27, 2020, the Joint Legislative Budget Committee concurred with the Governor’s determination that the project is an eligible project under AB 900.

## 1.C Document Organization

This RTC document is organized into the following chapters:

- **Chapter 1, Introduction** – This chapter discusses the purpose of the RTC document, the environmental review processes, and the organization of the RTC document.
- **Chapter 2, Revisions and Clarifications to the Proposed Project** – This chapter summarizes changes to the description of the proposed project, as described in draft SEIR Chapter 2, that the project sponsor has initiated since publication of the draft SEIR. The revisions and clarifications consist of minor updates to the project description and the associated environmental analysis previously presented in the draft SEIR. RTC Chapter 2 analyzes and concludes that these revisions and clarifications to the proposed project would not result in any new environmental impacts not already discussed in the draft SEIR or a substantial increase in the severity of previously identified significant environmental impacts.
- **Chapter 3, Public Agencies, Organizations, and Individual Persons Commenting on the Draft SEIR** – This chapter provides tables that list the public agencies, organizations, and individual persons who submitted written comments during the public review period or spoke at the public hearing for the draft SEIR. The tables identify whether the persons submitted comments in writing (i.e., via letter) during the public comment period or verbally at the draft SEIR public hearing. Commenters within each category are listed in alphabetical order. These lists also show the comment code (described below) and the format (i.e., public hearing transcript, letter, or email) and date of each set of comments.
- **Chapter 4, Comments and Responses** – This chapter presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. The complete

transcript, letters, and emails containing the comments are provided in Attachments 1 and 2 of this RTC document. The comments and responses in this chapter are organized by topic and, where appropriate, by subtopic, including the same environmental topics addressed in draft SEIR Chapter 4 and draft SEIR Appendix B. The comments appear as single-spaced text and are coded in the following way:

- Comments from public agencies and commissions are designated by “A-” and an acronym of the agency’s name
- Comments from non-governmental organizations including neighborhood associations are designated by “O-” and an acronym of the organization’s or association’s name
- Comments from individuals are designated by “I-” and the individual’s last name

In cases where a commenter spoke at the public hearing and also submitted written comments, or submitted more than one letter or email, the individual’s last name or the acronym of the organization’s name is followed by a sequential number by date of submission. A final number at the end of the code keys each comment to the order of the bracketed comments within each written communication or set of transcript comments. Thus, each discrete comment has a unique comment code. The coded comment excerpts in Chapter 4 tie in with the bracketed comments presented in Attachments 1 and 2 of this RTC document.

Preceding each group of comments is a summary introduction of issues raised about the specific topic. Following each comment or group of comments on a topic are the planning department’s responses. The responses generally provide clarification of the draft SEIR text. In some instances, the responses may result in revisions or additions to the draft SEIR. Text changes to the draft SEIR are shown as indented text, with new text double underlined and deleted material shown as ~~striketrough~~ text.

- **Chapter 5, Draft SEIR Revisions** – This chapter presents the text changes to the draft SEIR made as a result of a response to comments, and/or staff-initiated text changes identified by planning department staff to update, correct, or clarify the draft SEIR text. This chapter also includes revisions to the text of the draft SEIR described in RTC Chapter 2 relating to changes to the proposed project initiated by the project sponsor, shown as indented text, with new text double underlined and deletions shown with ~~striketrough~~. In addition, as described in RTC Chapter 2, the proposed project has been revised, and text and graphic changes are limited to the minor modifications.

Staff-initiated text changes are identified by an asterisk (\*) in the margin. These changes and minor errata do not result in significant new information with respect to the proposed project or project variant, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft SEIR pursuant to CEQA Guidelines section 15088.5 is not required.

The revisions also include the addition of two appendices to the SEIR, which are provided at the end of RTC Chapter 5:

- Appendix C4: Transit Delay Analysis and Capital Improvements Memorandum
- Appendix I: Updated Health Risk Assessment Memorandum

- **Attachments** – The following attachments (called “attachments” to distinguish them from the draft SEIR appendices) are included as part of this document:
  - Attachment 1: Planning Commission Hearing Transcript
  - Attachment 2: Comment Letters and Emails on the Draft SEIR
  - Attachment 3: Non-CEQA Transportation Analysis
  - Attachment 4: Travel Demand Workbook
  - Attachment 5: SFMTA Transit Delay Analysis Memorandum



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## CHAPTER 2

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# Revisions and Clarifications to the Project Description

### 2.A Introduction

Since publication of the draft SEIR, the project sponsor has initiated minor revisions to the proposed project as described in draft SEIR Chapter 2, Project Description. This chapter summarizes these minor revisions, describes updates to the text in the draft SEIR (deletions are shown in ~~striketrough~~; new text is double-underlined), and describes the environmental impacts of the revisions. Draft SEIR text revisions are presented in this chapter only where they have been made specifically in SEIR Chapter 2, Project Description. Text revisions in other portions of the SEIR that are updated as a result of these changes are presented in RTC Chapter 5, Draft SEIR Revisions.

The revisions update the information in the draft SEIR. The revisions do not provide new information that would result in any new significant impacts that were not already identified in the draft SEIR, nor would these changes increase the severity of any of the project's impacts identified in the draft SEIR. Mitigation measures identified in the draft SEIR would continue to be required in order to reduce or avoid significant environmental impacts. No new measures would be required to mitigate the significant impacts identified for the proposed project in the draft SEIR.

CEQA Guidelines section 15088.5 requires recirculation of an EIR when "significant new information" is added to the EIR after publication of the draft EIR but before certification. The CEQA Guidelines states that information is "significant" if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement." Section 15088.5 further defines "significant new information" that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, of a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact to a less-than-significant level), or of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines section 15088.5(b) states that recirculation is not required if "new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

As described below, the revisions and clarifications to the proposed project options would not introduce new characteristics or substantially modify previously proposed characteristics that would result in any new significant impacts not already identified for the proposed project studied in the draft SEIR, nor would these changes increase the severity of any identified significant impacts.

## **2.B Project Description Revisions**

The minor revisions to the proposed project are described below. Certain aspects of the proposed project are superseded and replaced by the minor revisions presented in this chapter; all other aspects of the project description remain unchanged, as presented in draft SEIR Chapter 2, Project Description. The environmental effects of the proposed project with the project refinements incorporated are fully covered by the analyses in this chapter together with the analyses in draft SEIR Chapter 4, Environmental Setting and Impacts.

### **Proposed Street Type Plan**

As illustrated on Figure 2-12, Proposed Street Type Plan, on draft SEIR p. 2-27, the portion of West Street that is south of South Street is proposed as a private street and the portion of Lee Avenue that is north of North Street is proposed as a neighborhood residential street. The type of street has been modified by the project sponsor such that West Street south of South Street is proposed as a neighborhood residential street, and Lee Avenue north of North Street is proposed as a private street. These revisions would only change the street ownership and would not result in changes to roadway configurations or vehicle, pedestrian, or bicycle access to and from the project site. The revised street ownership is shown in Revised Figure 2-12 in RTC Chapter 5, Draft SEIR Revisions.

### **Educator Housing**

Under the Developer's Proposed Option, a total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income. The project sponsor has provided information regarding the affordable housing component, which would include approximately 150 moderate-income dwelling units dedicated to educator households as part of the 50 percent affordable housing. Under the Additional Housing Option, approximately 150 moderate-income dwelling units would also be dedicated to educator housing as part of the 50 percent affordable housing. This would not change the number and mix of residential units, building footprints, or overall development program of the proposed project.

### **Parking**

Under the Developer's Proposed Option, public parking spaces could be provided in the up to 750-space garage located under Blocks A and B, or in dedicated public parking areas within several of the residential garages, all of which would be separate from the residential parking. This would not change the overall number of parking spaces provided at the site.

### **Temporary Use of the Project Site**

Since publication of the draft SEIR, the San Francisco Municipal Transportation Agency (SFMTA) has been temporarily using a portion of the project site since October 1, 2019, for SFMTA employee parking, under an agreement with the SFPUC. The agreement for this temporary use will expire September 2020, prior to the potential start of project construction activity, and therefore would neither be affected by, nor affect, the proposed project.

## 2.C Draft SEIR Revisions

The following figure has been revised to show the revised street ownership; the revised figure is provided in RTC Chapter 5, Draft SEIR Revisions.

- Figure 2-12 on draft SEIR p. 2-27

The last paragraph on SEIR p. 2-7 is revised as follows:

The site does not contain any permanent structures and currently contains 1,007 surface vehicular parking spaces. The lot provides overflow vehicular parking for City College students, faculty, and staff.<sup>26</sup> The San Francisco Municipal Transportation Agency (SFMTA) is also temporarily using a portion of the project site for SFMTA employee parking, under an agreement with SEPUC. The SFMTA started temporarily using on October 1, 2019, an approximate 29,100-square-foot area of the project site. This temporary use will expire September 2020.

The paragraph under Section 2.E.1, Developer's Proposed Option, on SEIR p. 2-13 is revised as follows:

The Developer's Proposed Option would include up to 1.64 million gsf in new construction on 10 Blocks (**Figure 2-4, Developer's Proposed Option Site Plan and Height Ranges**). Construction under this option would provide 1,100 residential units totaling about 1.3 million gsf. Housing would be provided on each block. A total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income, depending on market surveys, funding source restrictions and other stakeholder input on the affordable housing plan. Affordable housing would be distributed throughout the site. For purposes of this SEIR, the unit mix is assumed to be 40 percent studio/one bedroom units and 60 percent two-or-more-bedroom units. The project proposes to provide approximately 150 moderate-income dwelling units (as a component of the project's 50 percent affordable housing element) that would be deed-restricted to occupancy by educator households with an average income of 100 percent of the area median income. Households with at least one full-time employee of the City College of San Francisco or San Francisco Unified School District would have preferential priority for all educator dwelling units, with City College households having first priority and San Francisco Unified School District households having second priority.

**Figure 2-5, Ground Floor Use Plan for Developer's Proposed Option**, presents the proposed ground floor use plan at the project site. With the exception of the townhome blocks (Blocks TH1 and TH2), the ground floor areas on all blocks could include common spaces, building lobbies, residential units, as well as utility and parking access. As shown in Figure 2-5, the ground floor of Block B would contain approximately 10,000 gsf of childcare and community space. Approximately 7,500 gsf of retail space, including a café, could be provided on the ground level of Block A, C, D, E, or F.

The first bullet under Section 2.E.6, Vehicle Parking and Loading, on SEIR p. 2-23 is revised as follows to clarify that: (1) residential parking may also be included under Blocks A and B as shown

in draft SEIR Figure 2-10, and (2) that public parking could be provided in the up to 750-space garage under Blocks A and B or within several of the residential garages:

- **Developer's Proposed Option:** The Developer's Proposed Option would provide a total of up to 1,300 off-street vehicle parking spaces. **Figure 2-10, Developer's Proposed Option Parking Facilities and Street Parking Plan**, illustrates the proposed off-street parking locations. Up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks A, B, C, D, F, and G and in the townhomes. In addition to resident parking, the Developer's Proposed Option would include a below-grade multilevel public garage of up to 750 spaces located under Blocks A and B and accessed from South Street. Alternatively, the public parking could be located in several of the residential garages. The Developer's Proposed Option would include a minimum of seven car-share parking spaces located on streets and in buildings. In addition, the Developer's Proposed Option would include approximately six on-street freight loading areas and approximately eight passenger loading areas along the internal streets.

Section 2.I.2, Local Agencies, on SEIR pp. 2-50 to 2-51 is revised as follows to update or correct local agency approval actions:

## 2.I.2 Local Agencies

### San Francisco Board of Supervisors

- Adoption of CEQA findings
- Approval of general plan amendments
- Approval of planning code amendments (SUD) and associated zoning map and height map amendments
- Approval of a development agreement
- Approval of final subdivision map(s)
- Approval of dedications and easements for public improvements, and acceptance of public improvements, as necessary
- Approval of an amended easement and access agreement with ~~City College of the~~ San Francisco Community College District for roadway access and any joint development of streets, if applicable
- Approval of a resolution(s) authorizing the sale of property under SFPUC jurisdiction and various license agreements for use, construction, and open space on SFPUC property
- Approval of a resolution acknowledging City's intention to fund affordable housing in the project

### San Francisco Planning Commission

- Certification of the final SEIR
- Adoption of CEQA findings

- Approval of special use district design standards and guidelines
- Initiation and recommendation to the San Francisco Board of Supervisors to approve amendments to the general plan
- Initiation and recommendation to the San Francisco Board of Supervisors to approve planning code amendments adopting an SUD and associated zoning map amendments
- Approval of Design Standards and Guidelines
- Recommendation to the San Francisco Board of Supervisors to approve a development agreement

#### **San Francisco Public Utilities Commission or General Manager**

- Adoption of CEQA findings
- Actions and approvals related to a development agreement and ~~purchase and sale an agreement for the sale of property under SFPUC jurisdiction, and various license agreements for use, construction, and open space on SFPUC property~~ and other actions and approvals related to its jurisdictional authority
- Approval of an amended easement and access agreement with the San Francisco Community College District for roadway access and any joint development of streets, if applicable

#### **San Francisco Department of Public Works**

- Actions and approvals related to its jurisdictional authority

#### **San Francisco Municipal Transportation Agency**

- Actions and approvals related to a development agreement and approval of transit improvements, public improvements and infrastructure, including certain roadway improvements, stop controls, bicycle infrastructure and loading zones, to the extent included in the project

#### **San Francisco Fire Department**

- Actions and approvals related to its jurisdictional authority

#### **San Francisco Department of Building Inspection**

- Approval and issuance of demolition, grading, and site construction permits
- Nighttime construction permit, if required

#### **San Francisco Department of Public Health**

- Actions and approvals related to its jurisdictional authority

#### **~~City College of San Francisco~~ Community College District**

- Act as responsible agency under CEQA



- Approval of an amended easement and access agreement

## 2.D Environmental Impacts

The minor modifications described in RTC Section 2.C above would not result in any changes to the site layout, street configuration, proposed number of housing units, or construction assumptions. These modifications would result in no changes to the assumptions, analysis, or conclusions described in the draft SEIR assessment of environmental impacts of the proposed project as presented in draft SEIR Chapter 3, Environmental Setting and Impacts, and draft SEIR Appendix B with respect to any resource topics. The significant and unavoidable transportation, noise, and air quality would remain and are discussed below.

The transportation impacts would remain significant and unavoidable for several reasons as described on draft SEIR pp. 6-59 to 6-60:

- Providing approximately 150 moderate-income dwelling units dedicated to educator households may lead to slightly 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 development. Due to the uncertainty surrounding the development at City College's Ocean Campus and the uncertainty of SFMTA approval of other measures under its 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 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.

An additional reason that the transportation impacts would remain significant and unavoidable is:

- The 150 educator-dedicated housing at the site would not obviate the need for travel to and from other City College centers and instructional sites and San Francisco Unified School District schools throughout San Francisco. Employees traveling to and from the Ocean Campus accounts for only a portion of total daily travel to and from the project; other travel would still occur from these employees throughout the day. Thus, educator housing at the project site would not prevent project-related vehicle travel from using Ocean Avenue in the project vicinity.

The minor modifications described in RTC Section 2.C would not change the configuration of the site or size of the buildings. Therefore, construction assumptions and durations would remain the same. The construction-related noise and air quality impacts would remain significant and unavoidable as described in draft SEIR Sections 3.C, Noise, and 3.D, Air Quality.

The revisions to the proposed project would not result in any new significant impacts that were not already identified in the draft SEIR, nor would these changes substantially increase the severity of any impacts identified in the draft SEIR. The mitigation measures identified in the draft SEIR for the proposed project would continue to be required to reduce or avoid the significant environmental impacts of the revised proposed project. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project in the draft SEIR. Therefore, references to the proposed project in this RTC document, including Chapter 5, Draft SEIR Revisions, shall be interpreted to include and incorporate any changes proposed by the revised proposed project, unless otherwise noted.

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## CHAPTER 3

# Public Agencies, Organizations, and Individual Persons Commenting on the Draft SEIR

### 3.A Introduction

This chapter presents the agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearings on the draft SEIR. This RTC document codes the comments in the following way:

- Comments from agencies are designated by “A-” and the acronym for the agency’s name.
- Comments from organizations are designated by “O-” and the acronym for the organization’s name.
- Comments from individuals are designated by “I-” and the individual’s last name.

Within each category, commenters are listed in alphabetical order. In cases where commenters provided oral testimony at the public hearing and submitted written comments, or submitted more than one letter or email, comment codes end with a sequential number (e.g., O-WPA1, O-WPA2).

The planning commission hearing transcript is included as Attachment 1. Comment letters and emails received are included as Attachment 2.

### 3.B State, Regional, and Local Agencies, Boards, and Commissions

TABLE RTC-1  
FEDERAL, STATE, REGIONAL, AND LOCAL AGENCIES, BOARDS, AND COMMISSIONS COMMENTING ON THE DRAFT SEIR

Commenter Code	Name and Title of Commenter	Agency/Organization	Format	Date
A-CALTRANS	Wahida Rashid, Acting District Branch Chief	California Department of Transportation (Caltrans)	Letter	September 10, 2019
A-BAAQMD	Areana Flores, Environmental Planner	Bay Area Air Quality Management District (BAAQMD)	Email	September 23, 2019
A-SCH	Scott Morgan, Director	State Clearinghouse	Letter	September 23, 2019

## 3.C Organizations

**TABLE RTC-2  
ORGANIZATIONS COMMENTING ON THE DRAFT SEIR**

<b>Commenter Code</b>	<b>Name and Title of Commenter</b>	<b>Agency/Organization</b>	<b>Format</b>	<b>Date</b>
O-BRCAC	Jon Winston, Chair	Balboa Reservoir Community Advisory Committee	Hearing Transcript	September 12, 2019
O-ARHS	Dr. Andrew Currier, President	Archbishop Riordan High School	Hearing Transcript	September 12, 2019
O-MHDC	Sam Moss, Executive Director	Mission Housing Development Corporation	Hearing Transcript	September 12, 2019
O-NAF	Neighbors Against Flooding	Ingleside Terraces Residents	Email	September 17, 2019
O-SFHAC	Nicholas Nagle	San Francisco Housing Action Coalition	Hearing Transcript	September 12, 2019
O-SNA1	Amy O'Hair	Sunnyside Neighborhood Association	Hearing Transcript	September 12, 2019
O-SNA2	Amy O'Hair	Sunnyside Neighborhood Association	Letter	September 12, 2019
O-WPA1	Michael Ahrens, President	Westwood Park Homeowners Association	Hearing Transcript	September 12, 2019
O-WPA2	Anita Theoharis, Board Member	Westwood Park Association	Hearing Transcript	September 12, 2019
O-WPA3	Michael Ahrens, President	Westwood Park Association	Email	September 22, 2019
O-YIMBY	Laura Foote	YIMBY Action	Hearing Transcript	September 12, 2019

## 3.D Individuals

**TABLE RTC-3**  
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

Commenter Code	Name and Title of Commenter	Format	Date
I-ADAMS	Michael Adams	Hearing Transcript	September 12, 2019
I-AISSA	Sharon Aissa and David Bean	Scan	September 13, 2019
I-ALI	Amna Ali	Email	September 18, 2019
I-ANDERSON1	Lisa Anderson	Hearing Transcript	September 12, 2019
I-ANDERSON2	Lisa Anderson	Email	September 12, 2019
I-BARISH1	Jean Barish	Hearing Transcript	September 12, 2019
I-BARISH2	Jean Barish	Scan	September 12, 2019
I-BARISH3	Jean Barish	Email	September 23, 2019
I-BARNARD	Julie Barnard	Email	September 11, 2019
I-BARZ	Sara Barz	Email	September 11, 2019
I-BELBIN	Charles Belbin	Email	September 22, 2019
I-BERNSTEIN1 <sup>a</sup>	Harry Bernstein	Hearing Transcript	September 12, 2019
I-BERNSTEIN2	Harry Bernstein	Email	August 11, 2019
I-BERNSTEIN3	Harry Bernstein	Email	September 23, 2019
I-BERNSTEIN4	Harry Bernstein	Email	September 23, 2019
I-BERNSTEIN5	Harry Bernstein	Email	September 23, 2019
I-BIERINGER1	Garry Bieringer	Hearing Transcript	September 12, 2019
I-BIERINGER2	Garry Bieringer	Email	August 16, 2019
I-BIERINGER3	Garry Bieringer	Email	September 23, 2019
I-BIERINGER4	Garry Bieringer	Email	September 23, 2019
I-BRAD	Brad	Hearing Transcript	September 12, 2019
I-BURGGRAF	Alex Burggraf	Email	September 23, 2019
I-BUTTON	Gary Button	Email	September 12, 2019
I-CIABATTONI	Kathleen Ciabattoni	Email	September 12, 2019
I-COLLINS1	Monica Collins	Hearing Transcript	September 12, 2019
I-COLLINS2	Monica Collins	Email	September 11, 2019
I-COLLINS3	Monica Collins	Email	September 22, 2019
I-CRONE	Phil Crone	Email	September 12, 2019
I-CROSBY	Liana Crosby	Email	September 11, 2019
I-CUTTEN	Merritt Cutten	Email	September 16, 2019
I-DELROSARIO	Ronnie Del Rosario	Email	September 11, 2019
I-E.HANSON	Edward Hanson	Email	September 23, 2019
I-EVANS1 <sup>b</sup>	Rita Evans	Hearing Transcript	September 12, 2019
I-EVANS2	Rita Evans	Email	September 23, 2019

**TABLE RTC-3**  
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

Commenter Code	Name and Title of Commenter	Format	Date
I-EVBUOMA	Marria Evbuoma	Email	September 19, 2019
I-FISHER	Allan Fisher	Email	September 12, 2019
I-FRAKNOI	Andrew Fraknoi	Email	September 21, 2019
I-FREY1	Laura Frey	Hearing Transcript	September 12, 2019
I-FREY2	Laura Frey	Email	September 22, 2019
I-GOMEZ	Wilson Gomez	Email	August 28, 2019
I-GONZALEZ	Daniel Gonzalez	Email	September 12, 2019
I-GOODMAN	Aaron Goodman	Email	September 12, 2019
I-HALFORD1	Daniel Halford	Email	September 9, 2019
I-HALFORD2	Daniel Halford	Email	September 16, 2019
I-HALL	Robert Hall	Email	August 21, 2019
I-HANSON1	Christine Hanson	Hearing Transcript	September 12, 2019
I-HANSON2	Christine Hanson	Email	August 8, 2019
I-HANSON3	Christine Hanson	Email	September 11, 2019
I-HANSON4	Christine Hanson	Email	September 23, 2019
I-HANSON5	Christine Hanson	Email	September 23, 2019
I-HEGGIE1	Jennifer Heggie	Hearing Transcript	September 12, 2019
I-HEGGIE2	Jennifer Heggie	Email	September 23, 2019
I-HONG	Dennis Hong	Email	September 11, 2019
I-HOUWER	Michell Houwer	Email	September 12, 2019
I-JA1	Alvin Ja	Hearing Transcript	September 12, 2019
I-JA2	Alvin Ja	Email	August 8, 2019
I-JA3	Alvin Ja	Email	August 13, 2019
I-JA4	Alvin Ja	Email	August 26, 2019
I-JA5	Alvin Ja	Email	August 26, 2019
I-JA6	Alvin Ja	Email	August 30, 2019
I-JA7	Alvin Ja	Email	September 5, 2019
I-JA8	Alvin Ja	Email	September 7, 2019
I-JA9	Alvin Ja	Email	September 10, 2019
I-JA10	Alvin Ja	Email	September 10, 2019
I-JA11	Alvin Ja	Email	September 11, 2019
I-JA12	Alvin Ja	Email	September 14, 2019
I-JA13	Alvin Ja	Email	September 14, 2019
I-JA14	Alvin Ja	Email	September 16, 2019
I-JA15	Alvin Ja	Email	September 22, 2019
I-JOHNSON	Eric Johnson	Email	September 11, 2019

**TABLE RTC-3**  
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

<b>Commenter Code</b>	<b>Name and Title of Commenter</b>	<b>Format</b>	<b>Date</b>
I-KAUFMYN1	Wynd Kaufmyn	Hearing Transcript	September 12, 2019
I-KAUFMYN2	Wynd Kaufmyn	Email	September 22, 2019
I-KOPP	Quentin Kopp	Email	September 23, 2019
I-KOWALSKI	Kevin Kowalski	Hearing Transcript	September 12, 2019
I-LEGION	Vicki Legion	Email	September 22, 2019
I-LOHR	Janet Lohr	Email	August 10, 2019
I-MAGNUSON	Sally Magnuson	Email	September 23, 2019
I-MARABELLO1	Brian Marabello	Email	September 23, 2019
I-MARABELLO2	Brian Marabello	Email	September 23, 2019
I-MARTINEZ	Anita Martinez	Email	September 23, 2019
I-MARTINPINTO	Stephen Martinpinto	Email	September 23, 2019
I-MAURO	Jacqueline Mauro	Email	September 11, 2019
I-MEDAL	Tomasita Medal	Email	September 23, 2019
I-MUELLER1	Madeline Mueller	Email	September 23, 2019
I-MUELLER2	Madeline Mueller	Email	September 23, 2019
I-MUHLHEIM	Fred Muhlheim	Email	September 23, 2019
I-NGUYEN	Jess Nguyen	Hearing Transcript	September 12, 2019
I-OSAWA	Ed Osawa	Email	September 22, 2019
I-OSTEN	Scott Osten	Email	September 19, 2019
I-PEDERSON1	Christopher Pederson	Hearing Transcript	September 12, 2019
I-PEDERSON2	Christopher Pederson	Email	September 23, 2019
I-RANDOLPH	Yonathan Randolph	Email	September 23, 2019
I-RHINE	Marcie Rhine	Hearing Transcript	September 12, 2019
I-SAPPHIRE	Sophie Sapphire	Hearing Transcript	September 12, 2019
I-SCHNEIDER1	Benjamin Schneider	Email	September 11, 2019
I-SCHNEIDER2	Benjamin Schneider	Hearing Transcript	September 12, 2019
I-SIMON	Leslie Simon	Email	September 17, 2019
I-SMITH	Aaron Smith	Email	September 12, 2019
I-SUBIN	Zack Subin	Email	September 11, 2019
I-T.RANDOLPH	Theodore Randolph	Hearing Transcript	September 12, 2019
I-TARQUINO	Eve Tarquino	Email	September 12, 2019
I-TASSE	Dan Tasse	Email	September 11, 2019
I-TIMA	Etta Tima	Hearing Transcript	September 12, 2019
I-TRIPATHI	Priti Tripathi	Email	September 11, 2019
I-VESELENYI	Hold Sall Vesselenyi	Email	September 23, 2019
I-VICKY	Vicky	Hearing Transcript	September 12, 2019



**TABLE RTC-3**  
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

<b>Commenter Code</b>	<b>Name and Title of Commenter</b>	<b>Format</b>	<b>Date</b>
I-WEIBEL	Christine Martinez Weibel	Email	September 19, 2019
I-WEYER	Andy Weyer	Email	September 20, 2019
I-WHITE	Kathleen White	Email	September 19, 2019
I-WILENSKY	Debra Wilensky	Email	September 23, 2019
I-WORLEY	Jennifer Worley	Email	September 23, 2019
I-ZELTZER	Steve Zeltzer	Hearing Transcript	September 12, 2019
I-ZONTA1	Mike Zonta	Email	August 8, 2019
I-ZONTA2	Mike Zonta	Email	September 3, 2019

**NOTES:**

- <sup>a</sup> The commenter left a copy of materials at the planning commission hearing. These materials were also submitted via email and are addressed in response to Comment I-BERNSTEIN3.
- <sup>b</sup> The commenter left a copy of their comments at the planning commission hearing. The comments were also submitted via email and are addressed in response to Comment I-EVANS2.

# CHAPTER 4

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## Comments and Responses

### Introduction

This section presents the substantive comments received on the draft SEIR and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the draft SEIR, with general comments on the SEIR, including comments on the merits of the proposed project and project alternatives, grouped together at the end of the section. Comments unrelated to a specific impact category are also classified as general comments. Comments on the draft SEIR Summary chapter or on specific mitigation measures are included under the comments regarding the relevant topical section of the draft SEIR. The order of the comments and responses in this section is shown below, along with the prefix to the topic codes (indicated in square brackets):

- CEQA [CEQA]
- Project Description [PD]
- Transportation and Circulation [TR]
- Noise [NO]
- Air Quality [AQ]
- Alternatives [AL]
- Cumulative Impacts [CU]
- Initial Study Topics
  - Plans and Policies [PP]
  - Land Use and Land Use Planning [LU]
  - Population and Housing [PH]
  - Wind [WI]
  - Shadow [SH]
  - Utilities and Service Systems [UT]
  - Public Services [PS]
  - Biological Resources [BI]
  - Geology and Soils [GE]
- General Comments [GC]
- Merits of the Project [ME]

Within each subsection under each topic area, similar comments are grouped together and identified using the topic code prefix and sequential numbering for each subtopic. For example, Project Description comments [PD] are listed as PD-1, PD-2, PD-3, and so on. Each topic code has a corresponding heading that introduces the comment subject; these subsections present quotes of comments and include the commenter's name and the comment code as provided in Attachments 1 and 2 of this RTC document. The reader is referred to Attachments 1 and 2 for the full text and context of each comment letter or email, as well as the public hearing transcript. In those attachments, the comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment and to clarify or augment information in the draft SEIR as appropriate. Response numbers correspond to the topic code; for example, the response to Comment PD-1 is presented under Response PD-1. The responses may clarify the draft SEIR text or revise or add text to the SEIR. Revisions to the draft SEIR are shown as indented text. New or revised text, including text changes initiated by planning department staff, is double underlined; deleted material is shown in ~~striketrough~~.

## 4.A CEQA

The comments and corresponding responses in this section relate to general comments on the draft SEIR. The comments in this section include the following:

- Comment CEQA-1: Type of EIR, Tiering, and Focusing Second-Tier Review
- Comment CEQA-2: Existing Setting and Baseline
- Comment CEQA-3: Administrative Record

### *Comment CEQA-1: Type of EIR, Tiering, and Focusing Second-Tier Review*

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

I-BARISH3-5	I-BIERINGER3-1	I-HEGGIE2-3
I-BARISH3-20	I-E.HANSON-2	I-JA6-1
I-BARISH3-33	I-HANSON2-1	I-JA6-2
I-BERNSTEIN2-1		

### “Effects Found Not to be Potentially Significant (p. B-10)

In some cases, the Initial Study identified mitigation measures in CEQA topic areas that would reduce potentially significant impacts to a less-than-significant level, supporting the conclusion that these topic areas do not need CEQA review under this SEIR.

The Initial Study found that the only effects found to be potentially significant in the Project were Transportation and Circulation; Noise; and Air Quality. All other potential individual and cumulative environmental effects considered in the PEIR were found to be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures in the DSEIR. These impacts that are not studied in this DSEIR are: Land use and land use planning; Population and housing; Cultural resources; Tribal cultural; resources; Greenhouse gas emissions; Wind; Shadow; Utilities and service systems; Public services; Biological resources; Geology and soils; Hydrology and water quality; Hazards and hazardous materials; Mineral resources; Energy; Agricultural and forestry resources; Wildfire.

However, for the reasons set forth below, the basis for these determinations are flawed. The effects below should, in fact, be analyzed in this DSEIR.”

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-5])*

“According to 2.D.1, the area plan PEIR estimated the area plan would result in a net increase of 1,780 residential units, and that as of Sept., 2018, 273 units have been built and excluding the Balboa Reservoir project, an addition 209 units are planned. (P. 2-6) Therefore, of the 1,780 total number of

units, 482 are already accounted for, leaving 1,295 units as the maximum number that could be built at the Balboa Reservoir and still comply with the PEIR. Yet the DSEIR considers one option that would have 1,550 units, 255 more than allowed in the PEIR. A Balboa Reservoir project with more than 1,298 units, therefore, would be inconsistent with the PEIR, and should not be permitted.”

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-20])*

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**“The DSEIR must consider the impact of increasing the number of units from the original recommendation in the PEIR**

The Reservoir Project’s two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR’s Housing option for the Reservoir referred to 425-500 units. From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes ‘substantial unplanned growth.’”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-33])*

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“Can you tell me, is this report going to be an original EIR or will it be based on some other EIR that’s been done elsewhere in the immediate area?”

*(Harry Bernstein, Email, August 11, 2019 [I-BERNSTEIN2-1])*

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“2) The notice did say a 'subsequent EIR'. What is it subsequent to? Does this current analysis take the place of a previous EIR? What is the relationship between the previous one and this subsequent one?”

*(Garry Bieringer, Email, August 16, 2019 [I-BIERINGER3-1])*

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“1. The very fact that this process utilizes a Subsequent EIR is obfuscation. If the project from day 1 started with an impact assessment of 1550 units of housing on such a small footprint of 17 acres than it would be clear that the surrounding environment and neighborhoods would be severely impacted, as it stands the original plan has been expanded within the existing process of a previous EIR as a means to mitigate public concern.”

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-2])*

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“Until the release of the draft SEIR we were told to expect a DEIR.

What is the difference and why has this difference been applied to the Balboa Reservoir project?”

*(Christine Hanson, Email, August 8, 2019 [I-HANSON2-1])*

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“Noise and vibration were not addressed in the PEIR, and we thank the Planning Department for recognizing that the earlier Balboa area plan offered a high level view, not a project view, anticipating that they could not take into account every change to the area before a project is ready for consideration. Since the time the PEIR was developed, many new buildings; educational, service-oriented, commercial and residential; have been constructed near and adjacent to the Balboa Reservoir. At the time of the PEIR, there was an expectation that no more than 500 housing units would be constructed in the Balboa Reservoir.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-3])*

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“The Initial Study discounts almost all environmental factors as needing assessment except for Transportation, Air Quality, and Noise.”

*(Alvin Ja, Email, August 30, 2019 [I-JA6-1])*

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“The Initial Study erroneously carries over the program-level determinations of the Balboa Park Station FEIR/PEIR to the project-level Balboa Reservoir SEIR.”

*(Alvin Ja, Email, August 30, 2019 [I-JA6-2])*

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### **Response CEQA-1: Type of EIR, Tiering, and Focusing Second-Tier Review**

The comments request clarification regarding the type of EIR, disagree with the use of the initial study, and state that the draft SEIR must consider the impact of increasing the number of units from the original numbers analyzed in the PEIR.

The response below is organized by the following subtopics:

- Program EIRs and Tiering
- Use of Program EIR for Purposes of Focusing Second-Tier Review

Regarding the comment that states that increase in units at the project site between the PEIR and the SEIR constitutes substantial unplanned growth, see Response PH-1, Population Growth, on RTC p. 4.H-17.

#### *Program EIRs and Tiering*

The Balboa Reservoir project-level SEIR was appropriately tiered from the Balboa Park Station Area Plan PEIR. Draft SEIR Section 1.B, Type of EIR, discusses the relationship between the project-level SEIR and the PEIR. As stated on draft SEIR pp. 1-2 to 1-3, the area plan PEIR is a program EIR under CEQA Guidelines section 15168. The PEIR provided a first-tier, plan-level analysis of the environmental impacts associated with the development program proposed for the entire plan area,

including the project site. The Public Resources Code allows for the preparation of multiple types of EIRs, based primarily on the level of detail available about the project at the time of an agency's first discretionary decision on the project. An EIR should "be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences."<sup>10</sup> At the same time, the level of detail in an EIR should "correspond" to the "degree of specificity involved in the underlying activity which is described in the EIR."<sup>11</sup> Thus, an EIR for a construction project will necessarily be more detailed than an EIR prepared for a large-scale plan, "because the effects of the construction can be predicted with greater accuracy."<sup>12</sup> As discussed in draft SEIR Section 1.C, the PEIR evaluated the potential environmental effects of development of the 210-acre plan area at a "program" level of detail, based on the plan information available at the time, and thus is described as a "program" EIR.

A program EIR is commonly used in conjunction with "tiering" – "the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussion from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."<sup>13</sup> Tiering is appropriate and agencies are encouraged where an EIR is completed for a large-scale plan at an early stage, and further analyses will be prepared at later stages as individual projects are proposed that implement the plan, enabling the agency to consider broad policy alternatives and cumulative impacts early in the process and to defer analysis of project-level details until specific projects are proposed.

The PEIR analyzed a large-scale area plan, and the department is now analyzing a project with more specific details on one of the sites in the PEIR – the Balboa Reservoir. Thus, the SEIR is an appropriate level of environmental review for the project.

The area plan and the PEIR do not place a cap on the number of housing units within the plan area or the project site. The PEIR acknowledges that aside from the project-level analysis for the Phelan Loop Site and Kragen Auto Parts Site (which are now built as 1100 and 1150 Ocean Avenue), the other sites identified for the plan area, including the Balboa Reservoir site, are "part of the reasonably foreseeable development program for the Area Plan; however, they will be analyzed at a program level of detail because no specific development proposals have been presented."<sup>14</sup> In order to conduct a program-level analysis, the department made appropriate development assumptions at the time of the PEIR. The PEIR analyzed a development program of 500 residential units and 100,000 square feet of open space for the Balboa Reservoir site.<sup>15</sup>

The draft SEIR is a project-level environmental review that includes more details on the currently proposed project at the Balboa Reservoir than were in the PEIR. The purpose of the draft SEIR is to analyze the proposed development at the project site compared to the development assumed in the

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<sup>10</sup> CCR Title 14 Section 15151

<sup>11</sup> CCR Title 14 Section 15146

<sup>12</sup> CCR Title 14 Section 15146

<sup>13</sup> CCR Title 14 Section 15152(a)

<sup>14</sup> City and County of San Francisco Planning, *Balboa Park Station Area Plan Final Environmental Impact Report*, Planning Department File No. 2004.1059E, certified December 4, 2008.

<sup>15</sup> *Ibid.* pages 100, 107.

PEIR to determine whether it would be within the scope of the program-level analysis or whether the project would result in new significant impacts or substantially more severe significant impacts than those identified in the PEIR. The draft SEIR then analyzes the new significant impacts or substantially more severe significant impacts in the PEIR. The use of the PEIR and initial study to focus the second-tier review, and applicable principles in the CEQA Guidelines, are explained below.

#### *Use of Program EIR for Purposes of Focusing Second-Tier Review*

The CEQA Guidelines address how a lead agency is to use a certified first-tier EIR when analyzing a specific development proposal within the area covered by the plan. CEQA Guidelines section 15152 provides general guidance regarding tiering. Section 15152 states in pertinent part:

- d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:
  - (1) Were not examined as significant effects on the environment in the prior EIR; or
  - (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.
- e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.
- f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of section 15070 are met.
  - (1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR, that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.
  - (2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see section 15064(i).
  - (3) Significant environmental effects have been “adequately addressed” if the lead agency determines that:
    - (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or
    - (B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.



CEQA Guidelines section 15168 provides similar guidance regarding the use of a program EIR to focus analysis of a later project carried out under the plan for which the program EIR was prepared. Section 15168 states:

- c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
  - 1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in section 15152.
  - 2) If the agency finds that pursuant to section 15162, subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
  - 3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
  - 4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.
  - 5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.
- d) Use with Subsequent EIRs and Negative Declarations. A program EIR can be used to simplify the task of preparing environmental documents on later activities in the program. The program EIR can:
  - 1) Provide the basis in an Initial Study for determining whether the later activity may have any significant effects.
  - 2) Be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.
  - 3) Focus an EIR on a later activity to permit discussion solely of new effects which had not been considered before.

In response to comments that question the use of an SEIR or claim that the topics in the initial study should be studied in the SEIR, the department appropriately uses the draft SEIR and initial study. All lead agencies may, prior to preparing any type of EIR, prepare an initial study to “[a]ssist in the preparation of an EIR, if one is required, by... [f]ocusing the EIR on the effects determined to be significant ... [and] [e]xplaining the reasons for determining that potentially significant effects would not be significant...” (CEQA Guidelines section 15063(c)(3)(A), (C)). Thereafter, CEQA only

requires the EIR to “contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study” (CEQA Guidelines section 15128).

A later subsequent EIR is required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR (CEQA Guidelines section 15152(f)). In other words, topics found to have less than significant or less than significant impacts with mitigation do not need to be carried forward into the subsequent EIR. In determining the categories of environmental impacts to address in the draft SEIR, the planning department relied on processes and principles drawn from section 15152, section 15168, and section 15180 of the CEQA Guidelines, with the goal of determining whether the proposed project could cause potentially significant effects not adequately addressed in the PEIR. This process is documented in the initial study prepared for the proposed project (SEIR Appendix B).

For each resource topic area, the initial study explains why the PEIR provides an adequate analysis of these issues. In the language of the CEQA Guidelines, second-tier, project-specific review should focus on those impacts that were not “adequately addressed” in the first-tier document (CEQA Guidelines section 15152(f)) or “not examined in the program EIR” (CEQA Guidelines section 15168). The initial study addresses each resource area, and examines whether the PEIR provides an adequate analysis of the project’s impact on that resource area. Where the project might have significant impacts that have not been adequately addressed in the PEIR, either due to the nature of the project, or due to new information that was not previously available, those issues were carried forward for detailed analysis. Where the PEIR provided adequate analysis of a particular resource or the initial study determines that the impacts would be less than significant (with or without mitigation), those issues are “scoped out” from analysis in the SEIR. That is consistent with the scoping process (whether or not the EIR tiers from prior EIRs), and with the approach called for under CEQA Guidelines sections 15152 and 15168.

In draft SEIR Appendix B, the analysis focuses on whether the prior analysis remains valid and whether the proposed project would cause site-specific impacts not anticipated by the previously prepared programmatic analysis in the PEIR. To the extent that the prior “first-tier” analysis (e.g., of the general consequences of developing the overall area plan) remains valid, the planning department concludes that there was no need for additional, duplicative analysis. Where existing analyses or existing standards or mitigation requirements were insufficient to ensure the avoidance of significant effects or the mitigation of such effects to less than significant levels, the planning department address the topics in further detail in the draft SEIR.

As stated on draft SEIR p. 1-3, the planning department determines that one or more of the conditions for a subsequent EIR are met for the proposed project, and that a SEIR is therefore warranted, including the fact that the proposed project would result in new significant impacts and substantially more-severe significant impacts than previously identified in the PEIR for transportation and circulation, air quality, and noise.

SEIR Appendix B determines that the proposed project options would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR on the following resources: Land Use and Land Use Planning (SEIR Appendix B, Section E.1); Aesthetics (Section E.2); Population and Housing (Section E.3); Cultural Resources (Section E.4); Greenhouse Gas Emissions (Section E.9); Wind (Section E.10); Shadow (Section E.11); Recreation (Section E.12); Utilities and Service Systems (SEIR Section E.13); Public Services (Section E.14); Biological Resources (Section E.15); Geology and Soils (Section E.16); Hydrology and Water Quality (Section E.17); and Hazards and Hazardous Materials (Section E.18).

The PEIR did not specifically address impacts associated with tribal cultural resources, mineral resources, agriculture and forest resources, and wildfire, which are included in the planning department's current checklist. Draft SEIR Appendix B determines that the proposed project would result in either no impact, less-than significant impact, or less-than-significant impact with mitigation on these resources: Tribal Cultural Resources (Section E.5); Mineral Resources (Section E.19); Energy (Section E.20); Agriculture and Forest Resources (Section E.21); and Wildfire (Section E.22).

In each of these sections, draft SEIR Appendix B properly explains why the project would not have new significant impacts or substantially more severe significant impacts than those previously identified in the PEIR. The draft SEIR acknowledges the conclusions of the initial study on p. 1-3 and refers to draft SEIR Appendix B, for further details.

The proposed project constitutes a later project within the scope of the PEIR. However, the planning department did not rely on this conclusion to avoid preparing a project-specific EIR for the proposed project or to scope out any impact that remained potentially significant after mitigation identified in the initial study or the PEIR. The preparation of the draft SEIR fully complies with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code.

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### ***Comment CEQA-2: Existing Setting and Baseline***

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

I-BARISH3-15	I-E.HANSON-5	I-RHINE-1
I-BARISH3-21	I-E.HANSON-8	I-SIMON-1
I-BELBIN-1	I-HANSON4-2	I-SIMON-5
I-BELBIN-4	I-JA1-2	I-TARQUINO-3
I-BERNSTEIN1-2	I-JA11-2	I-TIMA-2
I-BERNSTEIN1-4	I-JA12-1	I-VESSELENYI-1
I-BERNSTEIN3-1	I-JA14-1	I-WILENSKY-1
I-BERNSTEIN4-3	I-JA4-1	I-WORLEY-1
I-BERNSTEIN5-2	I-KOPP-3	O-WPA3-4
I-E.HANSON-4		

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"Current Reservoir student parking is an existing physical condition. This physical reality cannot be ignored. Removal of student parking will have significant impact on student enrollment and attendance."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-15])*

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"Project Overview, 2.A

The DSEIR does not conform to California Code of Regulations, Title 14, 15125 (a) and (c).

According to the DSEIR, p. 2-1: The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

This Project Overview is inadequate, and does not conform to California Code of Regulations, Title 14, 15125 (a) which states: An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. . . . The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

City College, Archbishop Riordan High School, and Lick Wilmerding High School are all large institutions in the vicinity of the Project. But the DSEIR does not always consider impacts of the Project on these institutions. Accordingly, the DSEIR is inadequate and must be revised to comprehensively review all the environmental impacts on these locations.

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-21])*

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"An EIR is supposed to give a description of the existing vicinity. Yet the Reservoir EIR Project SEIR's (Subsequent EIR) description limits it to the Reservoir lot/site itself.

This failure to place CCSF in the description will undermine CCSF's future.

Once the Reservoir Project gets built, the City and developers will establish the Project to be the "baseline existing condition." And at that point any future CCSF FMP projects will have to answer for CCSF's adverse impacts on the Reservoir Project.

BOT and Administration need to change its stance of being antagonistic to students, while being servile to the Reservoir Project. BOT and Administration need step up to defend CCSF interests, instead.

During the accreditation crisis many of us fought diligently to restore the BOT to power. Please don't continue to disappoint us.

To address the deliberate exclusion of CCSF from the description of the "Existing Setting", I have submitted the attached written comment. Here are excerpts:

#### INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already stated the following:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

#### Project Description

##### 2.A Project Overview

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

#### California Code of Regulations Title 14 section 15125

California Code of Regulations Title 14 section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the

significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

In order for the public and decision-makers to acquire the “most accurate and understandable picture possible of the project’s impacts”, we are left with the SEIR’s 2.A Project Overview contained in Chapter 2, Project Description. Contrary to § 15125’s requirement for a description of the existing condition “in the vicinity of the project”, SEIR 2.A only provides a description of the project site:

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

THIS FAILS § 15125’s REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.  
requirement

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.”

*(Charles Belbin, Email, September 22, 2019 [I-BELBIN-1])*

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“THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c).”

*(Charles Belbin, Email, September 22, 2019 [I-BELBIN-4])*

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“A separate topic. The description of the project setting baseline existing condition is inadequate. The primary use of the lower reservoir, since 1946, has been parking. Today, it’s spillover student parking. Except for the years 1946 to 1954 and that was the time that the college, itself, occupied the entire Balboa Reservoir site.”

*(Harry Bernstein, CPC Hearing, September 12, 2019 [I-BERNSTEIN1-2])*

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"I'm sorry there was an oversight for my comments. You have an empty lot on the cover of this SEIR. I'd like to give this, copies of this for the record and for the members. If there a possibility to do that?"

*(Harry Bernstein, CPC Hearing, September 12, 2019 [I-BERNSTEIN1-4])*

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"The cover image for the Draft SEIR of the Balboa Reservoir Project, case no. 12018-007883ENV, shows a large and nearly empty lot and thus does not fairly represent the actual usage of the Lower Reservoir site when City College is in session.

To support this contention, I append the following newspaper story from the Guardsman newspaper (CCSF) from September 13, 2017 titled "Parking crisis raises Balboa Reservoir Project concerns." The story was written by Bethaney Lee; photo credits for Otto Pippenger.

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN3-1])*

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"One of the greatest inadequacies of the Draft SEIR is that it is obligated to define existing conditions, not only at the site of the proposed development but also in the vicinity. The description is limited to the physical location and the perimeters of the lower Balboa Reservoir lot. It fails to mention that except for the approximately two years when the Reservoir site was excavated for the purpose of creating a possible reservoir (1956-1958), the land was used by City College since 1946—

From September 13, 1946 to 1954, the College occupied for the site, taking over the former WAVES barracks—this was called West Campus. After being evicted over the years 1954-55, enabling a move to the newly built classroom, Cloud Hall, the existing facilities were razed and the Reservoir site was prepared. Parking was made available to City College again starting in 1958, first in one of the two Reservoir basins and later in both. City College spent considerable money raising the level of what is today the upper Reservoir site and eventually secured ownership of its 10+ acres in a land swap from the Public Utilities Commission. So this historic use of the site, and the impact of its loss should not be ignored in this planning process. More on this further below."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-3])*

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"2) recognition of the College's long-term use of the lower Balboa Reservoir—the proposed development site—since 1946, as either part of the campus ("West Campus") and the 60+ years that the Lower Reservoir site has been used by students as a parking lot. Other factors are impacts on air quality and more pollution during construction."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-2])*

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"The existing condition of the 17 acre PUC owned land is that it is not only surrounded on two sides by educational institutions with more schools located in close proximity, its current use is by City College and has been so since the 1940's. Historically the college has always used this public space and this fact is downplayed in the SEIR restricting the impact on the college to "Areas of Known Controversy and Issues to be Resolved". The historical uses of the site have not been documented in the SEIR in context of historical significance of the site and to the civic functions of the City have been minimized."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-4])*

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"3. The SEIR does not clearly document the existing conditions of parcel sharing between the PUC and CCSF, or the lengthy agreements that went into place to split the lot when CCSF decided to build upon its half of the shared parcel. If the plan is to complete the lot split when the land is transferred to a private developer, then this should be documented with clear reference to the sharing of the parcel in its existing condition, and spell out the consequences of a potential lot split as it constitutes transfer of lands from public to private ownership. In this context there is no analysis of the amount of public lands or other public land projects in the SEIR. Land being something of very limited supply on the peninsula the impacts of public vs. private ownership is of relevance to future potential projects and civic developments."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-5])*

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"6. To be more specific: The law states (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. The current SIER does not do this choosing instead to substitute an analysis restricted to the "project site" this substitution invalidates the impact analysis."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-8])*

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"The SEIR also fails to account for the existing conditions."

*(Christine Hanson, Email, September 23, 2019 [I-HANSON4-2])*

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"Okay, so I'll go to two specifics. One is the environmental setting. Okay, that's critical for CEQA, setting up the environmental baseline setting. The description that's given in the SEIR basically just talks about the plot itself. But CEQA, in terms of the Code of California Regulations, says you have to talk about the vicinity, not just the plot, itself. So, that, already, right there is in violation of CCR 15125. You can look it up, okay."

*(Alvin Ja, CPC Hearing, September 12, 2019 [I-JA1-2])*

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## **“COMMENT ON INITIAL STUDY:**

### **LAND USE**

The Initial Study’s B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*

Going to the referred Ch.2 Project Description produces this:

#### **Project Description**

##### **2.A Project Overview**

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This constitutes the entire description of the Project Setting’s baseline existing condition for the Initial Study/SEIR.

This fails to acknowledge that schools are central feature in the immediate vicinity of the Reservoir: City College, Riordan, Lick Wilmerding.

The Reservoir site has historically been used by City College for decades. The Initial Study/SEIR fail to acknowledge this fact.

City College is the main educational, economic, cultural feature of the immediate Reservoir vicinity. The Initial Study/SEIR fail to acknowledge this fact.

City College, Riordan, Lick Wilmerding are the main target destinations for the immediate Reservoir vicinity. The Initial Study/SEIR fail to acknowledge this fact.

I contend that these facts have been deliberately omitted from the description of the baseline existing condition because it is an inconvenient truth. These facts are inconvenient truths that would inhibit the privatization of public assets (though disguised misleadingly as an affordable housing project).

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

From the Association of Environmental Professional's (AEP) CEQA Portal:

*What Are Baseline and Environmental Setting?*

*Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting.*

#### *Why Is Baseline Important?*

*Establishing an appropriate baseline is essential, because an inappropriately defined baseline can cause the impacts of the project either to be under-reported or over-reported. A considerable number of CEQA documents have been litigated over the choice of a baseline for a given project, and many CEQA documents have been invalidated for the use of an inappropriate baseline (see Important Cases below).*

From 14 CCR 15125:

*(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

**The draft SEIR/Initial Study is fundamentally defective because it fails to recognize the baseline condition of City College's prominence and importance in the immediate vicinity of the Reservoir."**

*(Alvin Ja, Email, September 11, 2019 [I-JA11-2])*

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#### **"INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING**

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already written the following:

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Project Description

2.A Project Overview

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue*

*commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

Chapter 3 is entitled "Environmental Setting, Impacts, and Mitigation Measures." It states: "Sections 3.B through 3.D each includes descriptions of the environmental setting and regulatory framework."

In a careful search for descriptions of the environmental setting within Sections 3.B, 3.C, and 3.D, here are the descriptions provided:

**3.B.4 Existing Conditions:**

*The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land Use Planning, p. B-12.*

**3.C.3: Summary of BPS Area Plan PEIR Noise Section:**

**Balboa Park Station Area Plan PEIR Setting**

*The noise setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan [Program] Environmental Impact Report (PEIR) differs from the existing setting today primarily in terms of the increase in traffic volumes resulting from overall employment growth in the San Francisco area and number of noise sources that exist in the area. However, there was a decrease in annual enrollment at the adjacent City College Ocean Campus of nearly 25 percent between 2008–2009 and 2017–2018, the most recent year for which data are available.<sup>151</sup> In addition, since the December 2008 certification of the PEIR, development has occurred adjacent to the project site. City College filled the east basin of the reservoir site and raised its grade to match surrounding terrain to the east, and constructed the Multi-Use Building.*

**3.C.4 Environmental Setting:**

3.C.4 contains technical information regarding noise. There is no content describing the overall existing setting.

**3.D.3 Summary of BPS Area Plan Quality Section:**

**Balboa Park Station Area Plan PEIR Setting**

*The air quality setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan Program EIR (area plan PEIR, or PEIR) differs from the existing setting today in terms of air quality conditions, the regulatory environment, and in the level of available information with respect to health risks and hazards. Specifically, at the time of the PEIR, localized concentrations of criteria air pollutants were higher than what are monitored today as many of the regulatory improvements implemented since then have improved air quality conditions. As an example, the PEIR reported that particulate emission standards were regularly exceeded in San Francisco. Since 2007, the*

*effect of regulatory changes has resulted in a reduction in the number of violations of the particulate matter standard despite subsequent strengthening (i.e., more health protective) of the ambient particulate standards.*

#### 3.D.4 Environmental Setting:

3.D.4 Environmental Setting contains information regarding climate and meteorology, and pollutants. There is no content describing the overall existing setting.

### California Code of Regulations Title 14 Section 15125

California Code of Regulations Title 14 Section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

*§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

The descriptions of the physical environmental setting in 3.B, 3.C, and 3.D are limited to descriptions involving transportation, noise, and air quality.

Thus, in order for the public and decision-makers to acquire the “most accurate and understandable picture possible of the project’s impacts”, we are left with the SEIR’s 2.A Project Overview contained in Chapter 2, Project Description.

Contrary to § 15125’s requirement for a description of the existing condition “in the vicinity of the project”, SEIR 2.A only provides a description of the project site:

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

### **THIS FAILS § 15125’s REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.**

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

*§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the “public engagement process”, the SEIR fails to adequately address impacts on CCSF and other schools in the “full environmental context.”

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

**Subject:** Input for planning – CCSF must be considered

**Comments:**

**CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.**

**Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!**

**Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!**

**THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c)."**

*(Alvin Ja, Email, September 14, 2019 [I-JA12-1])*

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“The draft EIR for the Reservoir Project provides an example of the deliberate downplaying of City College's position in the vicinity of the Project.

The SEIR's description of the baseline environmental omits any mention of City College. In doing so, the SEIR violates the requirements of 14 CCR 15125 (a).

**MISREPRESENTATION OF THE REQUIREMENTS OF 14CCR 15125(a)**

**The Planning Dept has made what I can only interpret to be a deliberate misrepresentation of the requirements of Title 14, Division 6, Chapter 3, Article 9, Section 15125, “Environmental Setting.”**

**The SEIR substitutes “project site” for “vicinity of the project” when it describes its proclaimed “consistency” with §15125(a).**

**A proclaimed consistency is not the same as compliance with a REQUIREMENT.**

**THE SEIR VIOLATES THE REQUIREMENTS OF §15125(a).**

The SEIR's 3.A.2, *Overall Approach to Impact Analysis* provides the following misrepresentation of §15125(a):

As described in SEIR Chapter 1, Introduction, this SEIR is a project-level EIR that is tiered from a previously certified program-level EIR, namely the PEIR. As a project-level EIR and consistent with CEQA Guidelines section 15125(a), the impact analysis is generally based on potential physical effects of the project compared to existing or baseline conditions of the physical environment at the project site at the time of publication of the NOP, which was in October 2018.

Comment:

- §15125(a) is not just a "CEQA Guideline"; it is the LAW.
- The language of the §15125(a) law uses the term "must", which is a REQUIREMENT.
- The law states: (a) *An EIR must include a description of the physical environmental conditions in the vicinity of the project.*
- The SEIR's substitution of "project site" in place of the required "in the vicinity of the project" invalidates the Balboa Reservoir Impact Analysis.

Here is §15125(a):

- a) *An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

**FAIL AND FUBAR."**

(Alvin Ja, Email, September 16, 2019 [I-JA14-1])

#### "3.B.4 Existing Conditions [Transportation & Circulation]

*The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land Use Planning, p. B-12.*

This description of the existing condition is less than adequate. This description avoids and evades the existing condition of the project site being a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service.

Although 2.D.2, Project Site notes the site's use by CCSF stakeholders, it fails to acknowledge the reality that the current use of the Reservoir serves a public benefit in providing physical access to education.

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

From the Association of Environmental Professional's (AEP) CEQA Portal:

*What Are Baseline and Environmental Setting?*

*Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting.*

*Why Is Baseline Important?*

*Establishing an appropriate baseline is essential, because an inappropriately defined baseline can cause the impacts of the project either to be under-reported or over-reported. A considerable number of CEQA documents have been litigated over the choice of a baseline for a given project, and many CEQA documents have been invalidated for the use of an inappropriate baseline (see Important Cases below).*

**The draft SEIR is inadequate because it fails to recognize the baseline condition of the Reservoir's current use by City College to serve a public benefit for its students."**

*(Alvin Ja, Email, August 26, 2019 [I-JA4-1])*

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"Moreover, if either of those two projects is built, that will constitute the "baseline existing condition". Any future City College facilities must not violate with adverse effect on the so-called reservoir project."

*(Quentin Kopp, Email, September 23, 2019 [I-KOPP-3])*

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"Hello. My name is Marcie Rhine. And I just wanted to say a couple quick things. I wasn't going to talk, but I was so moved by what the City College students had to offer that I wanted to just underscore that I think there is a very critical flaw in this draft EIR that it does not address City College either as a part of the overall setting, or as a vital public service."

*(Marcie Rhine, CPC Hearing, September 12, 2019 [I-RHINE-1])*

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"This letter is to describe an adverse impact on City College of San Francisco (CCSF) of the development in the Balboa Reservoir, which has NOT been addressed by the Draft Subsequent Environmental Impact Report (DSEIR). The Balboa Reservoir Project DSEIR fails to place CCSF as being the main feature of the vicinity's "existing or baseline conditions." Since CCSF is not made the main feature of the baseline condition, the Reservoir's impact on CCSF is discounted and minimized as "less than significant." This is an unacceptable and justifiably illegal consequence of the DSEIR."

(Leslie Simon, Email, September 17, 2019 [I-SIMON-1])

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"The description of the existing condition avoids identifying the project site as a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service.

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed."

(Leslie Simon, Email, September 17, 2019 [I-SIMON-5])

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**"The DRAFT SEIR is inadequate because it fails to recognize the baseline condition of the Reservoir's current use by City College to serve a public benefit for its students."**

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-3])

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"In regards to the history of this lot, I was really disenchanted that your SEIR was showing such a lousy picture to mislead everybody. That's a sales pitch. Can you imagine if you have 1,200 units right at the entrance of freeway 280, and that will not solve apartments for San Francisco. They will all go down to Silicon Valley.

I asked the developer, could he put restrictions on it and he denied my request. He said that would not be possible."

(Hedda Tima, CPC Hearing, September 12, 2019 [I-TIMA-2])

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"The Draft Environmental Impact Report is not valid as it does not include City College as a primary feature of the neighborhood and does not consider the project's impact on student's access to City College."

(Hold Sall Vesselenyi, Email, September 23, 2019 [I-VESSELENYI-1])

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"As a San Franciscan, I of course recognize the need for more housing, especially affordable housing. I am however very concerned about the housing project proposed for the Balboa Reservoir, especially its impact on City College and I am especially concerned that the Draft SEIR fails to recognize CCSF as the main feature of the vicinity's 'existing or baseline conditions'"

(Debra Wilensky, Email, September 23, 2019 [I-WILENSKY-1])

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“The DRAFT SEIR is inadequate because it fails to place CCSF as the main feature of the vicinity’s “existing or baseline conditions”

The DSEIR does not include CCSF as the main feature of the baseline conditions, despite the fact that CCSF abuts the parcel and has utilized it since 1946. CCSF is one of the most treasured institutions in San Francisco, offering higher public education to a wide range of communities, and a life line for many marginal and disenfranchised communities. Its value is incalculable. This omission means that, going forward, CCSF development priorities will become secondary to the interests of the Reservoir Project since the Reservoir Project will be considered the baseline condition.”

*(Jennifer Worley, President, AFT 2121, Email, September 23, 2019 [I-WORLEY-1])*

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“The number of vehicles that currently use the East Basin and West Basin parking lots are not accurately described in the DSEIR. In fact, on the very cover of the DSEIR is a picture of only the lower West Basin with only a few cars present. Attached as Exhibit 2 is an accurate picture of both the East Basin and West Basin taken at a peak period when student classes are in session. As you can see, the parking lots are full, with numerous cars parked in the CCSF parking spaces as well as in the parking lot which is the Project site.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-4])<sup>16</sup>*

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## **Response CEQA-2: Existing Setting and Baseline**

The comments state that the environmental setting and baseline descriptions in the draft SEIR do not sufficiently describe the project site and its vicinity, do not acknowledge current use of the site for parking, and do not describe City College as the main feature of the project vicinity’s existing and baseline conditions.

The response to the existing setting and baseline comments is organized by the following subtopics:

- CEQA Requirements
- Project Site
- Transportation and Circulation
- Noise
- Air Quality
- History of Project Site
- Draft SEIR Cover

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<sup>16</sup> 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.

### *CEQA Requirements*

The draft SEIR meets CEQA requirements for describing the existing or baseline physical conditions. As stated in the CEQA guidelines or statute text from which the commenters quote, the SEIR must include a description of the physical environmental conditions in the vicinity of the project, and these conditions will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. “Environment” in this context means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic significance.<sup>17</sup> A significant effect on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.<sup>18</sup> The draft SEIR evaluates impacts on the environment, including objects of historic significance.

CEQA Guidelines section 15125(a) states that an “EIR must include a description of the physical environmental conditions in the vicinity of the project ... Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published.” Per CEQA Guidelines section 15125(a)(1), the physical conditions existing when the notice of preparation is published was used to establish the baseline for the project-level analysis in the SEIR and initial study. The existing setting in the draft SEIR is therefore reflective of the period on or after the October 10, 2018 notice of preparation publication date.

One commenter notes that any future City College projects will need to address impacts on the project site. As described on draft SEIR p. 3.A-10, City College would act as the CEQA lead agency to conduct the environmental review of the master plan projects. At that time, the City College facilities master plan CEQA process would be required to describe existing physical conditions, and to address cumulative conditions per CEQA Guidelines section 15130. Given future City College projects are not under construction, they are not part of the existing or near-term baseline condition.

Adjacent land uses in the site vicinity, including City College and Archbishop Riordan High School, are described on draft SEIR pp. 2-9 to 2-12. In addition, each draft SEIR section and initial study section describes the existing context of the project site and vicinity relevant to the topic’s impact discussions, consistent with CEQA Guidelines section 15125. **Table RTC-4, Location of Existing Setting Descriptions for Each Topic Area**, provides the location of existing setting discussion in each topic area in the draft SEIR and initial study and page numbers showing where the existing setting is described. The subsections following the table provides a description of the existing setting in response to the comments related to the project site, transportation and circulation, noise, and air quality. The existing setting and baseline conditions are adequately described in the draft SEIR per CEQA Guidelines section 15125.

<sup>17</sup> Public Resources Code Section 21060.5. Aesthetics is removed here from the cited definition because the proposed project meets the criteria set forth Public Resource Code Section 21099(d) and as described in SEIR p. 3.A-3.

<sup>18</sup> Public Resources Code Section 21068, 21083, 21100, and 21151

### *Project Site*

The use of the project site as a parking lot is acknowledged in draft SEIR Section 2.D.2, Project Site (draft SEIR p. 2-7) and as an existing land use on draft SEIR Appendix B, p. B-13 under Impact LU-1. Impact PS-1 also includes a discussion of the loss of parking at the project site, on draft SEIR Appendix B, pp. B-87 to B-90. Refer to Response TR-6: Parking, on RTC p. 4.C-55 and Response PS-2: Public Services and Secondary Impacts, on RTC p. 4.H-59 as it relates to City College.

**TABLE RTC-4**  
**LOCATION OF EXISTING SETTING DESCRIPTIONS FOR EACH TOPIC AREA**

<b>Topic</b>	<b>Location in Draft SEIR</b>
Transportation and Circulation	Draft SEIR pp. 3.B-5 to 3.B-31
Noise	Draft SEIR pp. 3.C-6 to 3.C-11
Air Quality	Draft SEIR pp. 3.D-3 to 3.D-21
Land Use and Land Use Planning	Draft SEIR Appendix B, p. B-13
Aesthetics	Not Applicable. Public Resources Code section 21099(d) provides that aesthetic impacts of a residential mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.
Population and Housing	Draft SEIR Appendix B, p. B-18 (construction jobs) Draft SEIR Appendix B, p. B-19 to B-21 for the Balboa Park Priority Development Area and citywide (population, housing, and employment)
Cultural Resources	Draft SEIR Appendix B, p. B-27 (site history and past reconfiguration) Draft SEIR Appendix B, p. B-28 (archeological resources)
Tribal Cultural Resources	Draft SEIR Appendix B, p. B-34
Greenhouse Gas Emissions	Draft SEIR Appendix B, pp. B-37 to B-28
Wind	Draft SEIR Appendix B, p. B-42
Shadow	Draft SEIR Appendix B, pp. B-46 to B-47
Recreation	Draft SEIR Appendix B, pp. B-52 to B-54
Utilities and Service Systems	Draft SEIR Appendix B, pp. B-59 to B-60 (water supply) Draft SEIR Appendix B, pp. B-73 to 75 (wastewater/stormwater collection and treatment) Draft SEIR Appendix B, pp. B-76 to B-77 (solid waste)
Public Services	Draft SEIR Appendix B, p. B-82 (fire protection services) Draft SEIR Appendix B, p. B-83 (police protection services) Draft SEIR Appendix B, p. B-85 to B-86 (public schools) Draft SEIR Appendix B, p. B-87 (public libraries) Draft SEIR Appendix B, pp. B-87 to B-89 (other public facilities – City College)
Biological Resources	Draft SEIR Appendix B, pp. B-93 to B-94
Geology and Soils	Draft SEIR Appendix B, pp. B-100 to B-101, B-104
Hydrology and Water Quality	Draft SEIR Appendix B, pp. B-108 to B-110
Hazards and Hazardous Materials	Draft SEIR Appendix B, pp. B-121 to B-123
Mineral resources	Not Applicable
Energy	Draft SEIR Appendix B, pp. B-126 to B-127
Agriculture and Forest Resources	Not Applicable
Wildfire	Not Applicable

### *Transportation and Circulation*

Draft SEIR Section 3.B.4, Existing Conditions, defines the study area and describes aspects of the transportation network relevant for the transportation analysis. Draft SEIR pp. 3.B-5 to 3.B-31 describes regional roadways, local roadways, vehicular turning movement counts collected at the 23 study intersections (including five City College driveway locations), walking conditions, bicycle facilities and circulation, public transit conditions, emergency access conditions, vehicle miles traveled, and loading conditions.

### *Noise*

Draft SEIR Section 3.C.4, Environmental Setting, describes existing noise sources, provides short- and long-term ambient noise measurements taken on the project site and vicinity, and describes existing and future sensitive receptors. As shown on draft SEIR pp. 3.C-8 to 3.C-9, seven noise measurements were taken at the project site and surrounding area including at the City College Multi-Use Building to characterize the background noise environment in the project vicinity.

### *Air Quality*

Draft SEIR Section 3.D.4, Environmental Setting, identifies the area relevant for impacts to air quality (the San Francisco Bay Area Air Basin) and describes ambient air quality, existing sources of pollution, and sensitive receptors (draft SEIR pp. 3.D-3 to 3.D-21). The section includes a description of sensitive receptors in the vicinity of the project site. As described on draft SEIR p. 3.D-20, the sensitive receptors include a representative sample of known residents (child and adult) in the surrounding neighborhood, and other sensitive receptors (school children, daycare facilities, etc.) located *in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks within the project vicinity* [emphasis added].

### *History of Project Site*

The history of the project site, starting with purchase of the site by the City in 1930, is described under Impact CR-1 (draft SEIR Appendix B, p. B-27). As noted on draft SEIR Appendix B, p. B-27, a historic resource evaluation for the project site was prepared in October 2018. The historic resource evaluation documents the history of the site focusing on SFPUC's use and ownership of the site (1930-present), including the various reconfigurations the site has undergone over the years. The evaluation and planning department concluded that, based on the evaluation, the project site is not considered a historical resource for purposes of CEQA (draft SEIR Appendix B, p. B-27). As discussed on draft SEIR Appendix B, p. B-23, the City College campus was not evaluated for potential historic significance as part of the PEIR because City College of San Francisco is not under the jurisdiction of the City and County of San Francisco.<sup>19</sup> However, potential historic resources associated with City College are acknowledged on draft SEIR Appendix B, p. B-32, which also notes that the Science Building and Cloud Hall are the only two individually significant historic architectural resources located on the City College Ocean Campus.<sup>20</sup> The nearest potential historic resource (due to the building's age) is the City College Creative Arts

<sup>19</sup> San Francisco Planning Department, *Balboa Park Station Area Plan Final Environmental Impact Report*, pp. 305–307, December 4, 2008.

<sup>20</sup> City College of San Francisco, *CCSF Master Plan Draft EIR*, January 30, 2004.

Extension building, which is approximately 600 feet away from the project site, which is too far away to have an indirect impact on the potential historic resource (refer to draft SEIR Appendix B p. B-32).

Impact CR-1 also acknowledges that the land has been leased to various tenants since the 1950s, including City College, and describes the lot split history. As described on draft SEIR Appendix B, p. B-27, “[b]y 2004 or 2005, the east-west embankment that separated the two basins were removed, and the reservoir was reconfigured as one large basin. In 2008, the eastern half of the reservoir site was filled and raised to the Frida Kahlo Way grade, once again reconfiguring the site into western and eastern portions.” The project site is now a single existing parcel separate from the east basin/City College parcel. Previous actions that have been completed prior to the initiation of the environmental analysis are considered part of the environmental setting, and not required to be analyzed under CEQA.

#### *Draft SEIR Cover*

Several commenters also state that the draft SEIR cover image does not fairly represent the existing land use because the parking lot in the image is empty. The cover image fairly represents existing conditions.

The images provided by the commenters show the parking conditions at the Balboa Reservoir site on August 28, 2017, at 9:30 a.m., 11:30 a.m., and 12:30 a.m. from different vantage points. These images are included in **Figure RTC-1, Parking Occupancy Photos Provided by Commenters**, for reference.<sup>21</sup> These photos were taken within the first week of instruction at City College.<sup>22</sup> It is acknowledged on draft SEIR Appendix B, p. B-88 that campus parking occupancy is highest during the first week of instruction in August and around 11 a.m., with an occupancy range of 78 to 90 percent during the limited peak period. Therefore, the images provided by the commenters are consistent with the occupancy patterns during the first week of instruction and disclosed in the draft SEIR.

As noted on draft SEIR Appendix B, p. B-89, campus parking occupancy during 10 a.m. to 4 p.m. is in the 50 to 60 percent range during other periods of the school year. At other times of the day and year, the existing project site has less parking occupancy. **Figure RTC-2, Parking Occupancy at the Project Site**, is provided for informational purposes to show the occupancy of the parking lot during other periods of the year during regular instruction times<sup>23</sup> (i.e., not during holidays, midterms, or finals), including those periods with less parking occupancy. The cover image is from April 18, 2018, and intended to depict the project site. It is not necessary to depict several different time periods with different parking occupancies on the cover image. Further, the department did not rely upon the cover image alone for the environmental impact analysis, and the comments on the cover image do not raise issues concerning the adequacy or accuracy of the SEIR’s coverage of environmental impacts under CEQA.

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<sup>21</sup> The images provided in the commenters submittal appear to be a black and white scan of a printed article. Figure RTC-1 includes the same photos (in color) obtained from the same article available online.

<sup>22</sup> In 2017, fall instruction began on August 21. [https://www.ccsf.edu/en/educational-programs/class-schedule/fall\\_semester\\_calendar.html](https://www.ccsf.edu/en/educational-programs/class-schedule/fall_semester_calendar.html). Accessed December 22, 2019.

<sup>23</sup> The 2017 and 2018 schedules are available at [https://www.ccsf.edu/en/educational-programs/class-schedule/fall\\_semester\\_calendar.html](https://www.ccsf.edu/en/educational-programs/class-schedule/fall_semester_calendar.html) and [https://www.ccsf.edu/en/educational-programs/class-schedule/spring\\_semester\\_calendar.html](https://www.ccsf.edu/en/educational-programs/class-schedule/spring_semester_calendar.html), respectively.

August 28, 2017 - 9:30 am



August 28, 2017 - 10:30 am



August 28, 2017 - 11:30 am



August 28, 2017 - 12:30 pm



SOURCE: Taken on August 28, 2017 by Otto Pippenger.  
<https://sunnysideassociation.wordpress.com/2017/09/26/guardsman-parking-crisis-raises-balboa-reservoir-project-concerns/>

Case No. 2018-007883ENV: Balboa Reservoir Project

**Figure RTC-1**  
Parking Occupancy Photos Provided by Commenters



Thursday December 7, 2017 - 9 am



Thursday December 7, 2017 - 12 pm



Thursday December 7, 2017 - 4 pm



Thursday December 7, 2017 - 7 pm



Wednesday January 31, 2018 - 9 am



Wednesday January 31, 2018 - 11 am



Wednesday January 31, 2018 - 4 pm



Wednesday January 31, 2018 - 7 pm



Wednesday April 18, 2018 - 9 am



Wednesday April 18, 2018 - 11 am



Wednesday April 18, 2018 - 4 pm



Wednesday April 18, 2018 - 7 pm



SOURCE: AvalonBay Communities + Bridge Housing, July 9, 2018

Case No. 2018-007883ENV: Balboa Reservoir Project

**Figure RTC-2**  
Parking Occupancy at the Project Site

### ***Comment CEQA-3: Administrative Record***

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

I-HANSON1-1

I-HANSON5-1

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“Thank you for your time. My name’s Christine Hanson. And I don’t know if you can see this, but the cars in this lot -- I don’t think you’re showing the picture. I’ll just do my comment, then.

The administrative record and the draft SEIR has little information about the pressure that City agencies have exerted upon the creation of City College’s Facilities Master Plan. The meetings, ongoing today, began during the time of the state takeover of the school. City agencies began meeting then with the state-imposed administration. The administrative record in the draft SEIR makes a very slim mention of those meetings.

A public records search in 2017 showed that by then at least 17 of these private meetings had occurred, mostly at SF Planning. It was news to the board of trustees, and news to Trustee Davila, who sits on the Balboa Reservoir CAC, representing City College.

Kitchell, City College’s facility planners, whose work is included in this SEIR, answers to the question: What is the appropriate place for city agencies to address the Facilities Master Plan was; in public comment.

If you take the administrative record presented in the draft SEIR at face value, you would get the impression that this, indeed, has been the behavior of city agencies. But this is not what the collection of emails, agendas, meetings, and notes surrounding these meetings show. The agendas for those meetings are mostly similar, with the top item being the City College Facilities Master Plan.

Your planner, Jeremy Shaw, even attended one of the consultant job interviews on June 8th, 2015, with the blessing of a former state appointed facilities head at City College. The Facilities Master Plan has been upgraded twice and rebooted once. The intrusion of city agencies into a plan that should have been focused on the school’s Education Master Plan and focused on the needs of students has, instead, been formed around a private development that has literally cost the taxpayers millions in bond money.

The collection will be forwarded to you as written public comment. Thank you.”

*(Christine Hanson, CPC Meeting, September 12, 2019 [I-HANSON1-1])*

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“The Administrative record of the draft SEIR, is incomplete and misleading in regards to a portion of the communications between multiple City agencies and City College Administrative staff. The communications NOT INCLUDED in the draft SEIR were based on multiple subjects including the creation of the City College Facilities Master Plan (FMP), communications around transportation,



parking and the presentation of the City's Transportation Demand Management (TDM) plan. They show that the administrative interaction between City Agencies and City College Administrators has been about the exertion of control upon the school's sovereign process, focusing pressure and attention on a small minority of administrators— most of who were hired by the State imposed Trustee and NONE of whom had any experience or even operational knowledge of the school during its robust days before the accreditation crisis.

The entries INCLUDED in the Administrative record of the draft SEIR in regards to City College consist primarily of more recent communications between City agencies, City College Chancellor Mark Rocha, City College's Facilities planner Kitchell, and consultant Charmaine Curtis. The Facilities Master Planning process at City College which begun during the state takeover of the school, is barely noted in the DSEIR Administrative record even though many meetings were held at that time between City agencies and City College staff.

A public records search by City College Community members in August 2017 showed that by that time at least 17 of these earlier meetings had occurred at SF Planning offices or by phone. The Board of Trustees did not know of these meetings, including Trustee Davila who represents City College on the Balboa Reservoir CAC.

The use and frequent appearance of the City College Facilities Master Plan throughout the draft SEIR cannot be separated from the Administrative record, therefore the Administrative record of transactions between City Agencies and City College staff is INCOMPLETE. Even when considering all of the communications in this public comment the Administrative Record will still fall short of accurately depicting the depth of influence that San Francisco Planning, San Francisco Municipal Transportation Agency, SF Office of Employment and Workforce Development, and San Francisco Public Utilities Commission have inflicted upon the planning for City College in the interests of a private development, in the name of, but instead of, the educational planning needs of the school.

The bottom line is that most of the stakeholders at City College know very little about the true potential impact of this project and when the effects play out it will affect the overall health of the school and the people who support it. **For this reason, Planners evaluating this DSEIR must take a close and careful look at the administrative record and make inquiries into the process that has brought the DSEIR for Balboa Reservoir to this stage because the Administrative record that SF Planning staffers have submitted is incomplete."**

*(Christine Hanson, Letter, September 23, 2019 [I-HANSON5-1])*<sup>24</sup>

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<sup>24</sup> 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.

### **Response CEQA-3: Administrative Record**

The comments state that correspondence regarding development of the City College facilities master plan must be included in the administrative record of the proposed project.

The commenter requests that additional correspondence and meeting materials relevant to a separate project, the City College facilities master plan, be included in the administrative record for the proposed project. Pursuant to Public Resources Code section 21167.6(e), the record of proceedings consists of many project documents and materials, including all written evidence or correspondence submitted to, or transferred from, the respondent public agency with respect to the proposed project, and any other written materials relevant to the respondent public agency's decision on the merits of the proposed project. The administrative record must contain the record of proceedings for a project from the time the project application was deemed complete by the planning department.

The Balboa Reservoir project's administrative record contains the draft SEIR and all other documents submitted to, directly cited by, or relied on by the lead agency and its environmental consultants in the preparation of the draft SEIR following the project's environmental application submittal on May 31, 2018. The planning department consulted with Rueben Smith of City College (Interim Vice Chancellor of Facilities, Planning, and Construction), and relevant communications and reference materials regarding City College cumulative projects are included in the project's administrative record, as appropriate.

The additional correspondence submitted by the commenter do not represent materials relevant to the preparation of the draft SEIR. The planning department and other city agencies regularly collaborate with other agencies that could impact the city. The correspondence and materials related to City College's facilities master plan date back to 2015 through 2017, and occur prior to the proposed project's environmental review. The facilities master plan is a separate project undertaken by a different lead agency (City College) that could impact the city, and has independent utility to the proposed project. Therefore, the materials provided by the commenter are not part of the project's administrative record. The planning department will continue to include materials required under Public Resources Code section 21165.6(e) in the record of proceedings that are relevant to the city's decision on the merits of the proposed project.

These comments do not raise significant environmental points or identify issues related to the adequacy or accuracy of the analysis contained in the draft SEIR.

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## 4.B Project Description

The comments and corresponding responses in this section cover topics in draft SEIR Chapter 2, Project Description. These include topics related to:

- Comment PD-1: Construction Schedule
- Comment PD-2: Project Description

### ***Comment PD-1: Construction Schedule***

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

I-HEGGIE2-11

“9. In the Notes section at the bottom of Table 2-2 on p. 2-38, “Phases 1 and 2 could occur simultaneously for a duration of two years following Phase 0.” But above, in the same table, Phase 1 and Phase 2 are each estimated to have a duration of 2.5 years. Please explain how the condensed schedule would take two years rather than 2.5 years for Phases 1 and 2.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-11])*

### **Response PD-1: Construction Schedule**

The comment requests clarification regarding the compressed construction schedule and why Phases 1 and 2 would be 2.5 years under the six-year scenario, but two years under the compressed schedule.

The construction durations for both scenarios described on SEIR pp. 2-38 to 2-39 are correct and were provided by the project sponsor team. Under the compressed schedule, the vertical construction phases (Phases 1 and 2) would follow Phase 0 and occur concurrently over a shorter period of two years, and assumes weekend work. As acknowledged on SEIR p. 2-39, “a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity.”

The text on SEIR p. 2-39 is revised as follows to clarify the compressed schedule:

As stated in the footnote to Table 2-2, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 under a compressed schedule or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity. Phase 0 would

occur in 2021, followed by Phases 1 and 2 occurring simultaneously for approximately 24 months from 2022 to 2023, and completed by early 2024. The construction analysis in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, is generally based on conservative assumptions where appropriate and described in the “Approach to Analysis” section of the resource topic area.

The above changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

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### ***Comment PD-2: Project Description***

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

I-BARISH3-19  
I-GOMEZ-1  
I-OSAWA-2

I-PEDERSON2-6  
I-PEDERSON2-7

I-PEDERSON2-8  
O-WPA3-14

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“Figures in DSEIR Figures 2-1 through 2-8; Figures 2-9 through 2-12; Figure 2-16; Figures 2-18 through 2-21; Figure 3.B-4; Figures 5-1 through 5-4; Figure 6-1; and Figure 6-2 are inadequate and incorrect. They do not show the alterations to the Upper Lot, where the CCSF Multi Use Building is located, that are included in the Facilities Master Plan, approved by the CCSF Board of Trustees in March, 2018, and the subsequent Plan that was presented to the Board of Trustees for consideration of a San Francisco Bond Measure. Table 3.A-2 describes the New Facilities planned for this area. (P. 3,A-13). Accordingly, these Figures are all misleading and do not accurately represent buildings on the land adjoining the proposed project. The FSEIR must use accurate, updated Figures.”

*(Jean B. Barish, Letter, September 23, 2019 [I-BARISH3-19])*

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“1) I noticed the impact report mentions the decrease in parking needs after the first week of a semester, and the proposal of a new parking lot that accommodates 750 vehicles. How many spaces would be reserved for students as opposed to residents who would live in the new development?”

*(Wilson Oswaldo Gomez, Email, August 28, 2019 [I-GOMEZ-1])*

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“Most critically, according to the proposal the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue. **This would seem to be wholly inadequate.**”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-2])*

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"The Draft is also silent about how the public parking garage will be financed. If the developer will fund the garage with proceeds from the residential development, that raises the question about why those proceeds couldn't instead be used to fund more below-market rate housing. If the public parking garage will be paid for with public funds (either the City's or City College's), that should be disclosed as well. The Draft should address how any subsidy (whether public or private) for the garage would reduce the parking fees and thereby generate additional parking demand, VMT, and GHG emissions.

If the public parking garage will be financed entirely by parking fees paid by users of the garage, the Draft should address whether the garage will be financially viable. Those who currently commute to City College either park for free or pay nominal fees. It is unlikely that they would be willing to pay the kind of substantial fees that would be necessary to pay for construction of a 750-space garage."

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-6])*

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"If the users of the parking garage are instead anticipated to be the residents of the Balboa Reservoir project, that would be an end run around the City's and the developer's agreement that the overall parking ratio for the residential component of the project would be 0.5 parking spaces per residence. Using the public parking garage as residential parking would also mean that the project would exceed the zoning code's maximum 1:1 parking ratio for the site."

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-7])*

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"Finally, the Draft is entirely silent about how the parking rates for the garage would be structured. For example, would the daily rate be lower than 8 hours of the hourly rate? Would weekly, monthly, semester, or annual rates be allowed? If rates for periods longer than one day would be allowed, the Draft should address whether such rates would reduce incentives for commuters to take transit, walk, or bike on days during those periods when the commuter doesn't need to drive. Finally, would the rates and any leasing arrangements be structured so that any employer who pays for spaces within the garage on behalf of its employees would be subject to California's parking cash-out statute? (See Cal. Health & Safety Code, section 43845.) The Draft should address how the fee structure and the applicability of the parking cash-out statute would affect VMT and GHG emissions."

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-8])*

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"A representative of the developer has informed the Chair of the BRCAC that the developer will not develop the 1,550 unit Additional Housing Option. The Planning Department should verify the accuracy of this representation to the BRCAC. If correct, the 1,550 Unit Project option should be added to the list of alternatives considered but rejected by the Planning Department since its development will not be undertaken by the developer."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-14])*

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## **Response PD-2: Project Description Comments and Questions**

This group of comments are regarding the project description, figures, or require clarification of the proposed project.

Regarding the project description figures, Figures 2-1 through 2-12, Figure 2-16, Figures 2-18 through 2-21, Figure 3.B-4, Figures 5-1 through 5-4, and Figures 6-1 through 6-2 in the SEIR depict the plan-view diagrams of the proposed project. As described in Response CEQA-2: Existing Setting and Baseline, on RTC p. 4.A-22, per CEQA Guidelines section 15125(a)(1), the physical conditions existing when the notice of preparation is published was used to establish the baseline for the project-level analysis in the SEIR and initial study. The figures in the SEIR reflect the existing conditions and the proposed project. The commenter's statement that the facilities master plan projects should be shown is incorrect, as the City College projects are considered under cumulative future conditions and do not represent existing or near-term baseline conditions.

The 1,550 Additional Housing Option was developed by the City to fulfill the objectives of the general plan to maximize affordable housing and housing in transit-rich neighborhoods (draft SEIR p. 2-1). The draft SEIR analyzes the environmental impacts of the Developer's Proposed Option and Additional Housing Option as proposed.

One comment incorrectly states that the project would have one vehicular inlet point. The proposed circulation of the project site is described in SEIR Section 2.E.8, Transportation and Circulation Plan (SEIR pp. 2-26 to 2-30). As described in SEIR Section 2.E.8 and as shown in Figure 2-12, Proposed Street Type Plan (SEIR p. 2-27), there would be two access points to the project site. Lee Avenue would provide a vehicle travel lane in each direction from Ocean Avenue, and North Street would provide a vehicle travel lane in each direction from Frida Kahlo Way.

The assertion that the use of the public parking as residential parking would exceed the zoning code's 1:1 parking ratio is incorrect. Residential parking would be provided at a 0.5:1 parking ratio. Vehicle parking is described on draft SEIR p. 2-23, and all residential parking would be unbundled (that is, parking would be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units) with the exception of the townhomes, as required by San Francisco Planning Code section 167. As stated on draft SEIR p. 2-23 and as updated in Chapter 2 of this RTC, up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks A, B, C, D, F, and G and in the townhomes. As described in Chapter 2 of this RTC, the proposed up to 750 public parking spaces could be provided in a garage that would be located under Blocks A and B, or in dedicated public parking areas within several of the residential garages, all of which would be separate from the residential parking. The public parking garage spaces would not be sold or leased to project residents and would instead be available to the public (including students). The use of the proposed public parking garage, like the other components of the proposed project, would be addressed through the special use district and/or conditions of project approval.

Two comments ask about financing of, and parking rates that would be charged at the public parking garage that could be developed as part of the proposed project. Project financing, including financing of any potential parking garage, is not directly related to any potential physical effects of

the project and, therefore, financing of the project, including its components, is not a subject of CEQA analysis.

The following is provided for informational purposes. It is anticipated that the public parking garage would be publicly funded but would be financed based on anticipated parking fees; rather, public subsidies for project development are anticipated to be devoted to the affordable housing component and possibly to infrastructure improvements, such as utilities. Rates charged for use of the public parking garage could also be governed by the special use district and/or conditions of approval; it is noted, for example, that rates for new non-accessory parking garages in and near downtown San Francisco and in mixed-use districts throughout the City are subject to planning code sections 155(g) and 303(t), which requires that the rate charge for four hours of parking duration is no more than four times the rate charged for the first hour, and the rate charge for eight or more hours of parking duration is no less than 10 times the rate charge for the first hour. In addition, discounted parking is not permitted for weekly, monthly or similar time-specific periods. This pricing structure is designed to discourage commuter parking, consistent with the City's Transit First Policy (San Francisco Charter, section 8A.115).

Concerning the recommendation that funds used for the proposed public parking garage be instead directed to more housing, this is not the proposed project that is under analysis in the SEIR. However, the draft SEIR acknowledges that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with such projects that provide more off-street vehicular parking. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90 references research that the availability of parking increases vehicular travel and that parking supply can undermine incentives to use transit. In the case of the proposed project, however, the public parking garage(s) included under the Developer's Proposed Option would provide fewer public parking spaces (750) than currently existing on the site (approximately 1,000), meaning that the garage itself would not increase VMT compared to existing conditions. Because of this, and because of existing travel patterns in the project area and the site's transit proximity, infill nature, and mix of uses, the draft SEIR identifies a less-than-significant impact with respect to VMT (Impact TR-5, p. 3.B-79). To the extent that less parking would be provided on site, VMT effects would likely be reduced per capita and would remain less than significant.

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## 4.C Transportation and Circulation

The comments and corresponding responses in this section cover topics in draft SEIR Section 3.B, Transportation and Circulation. These include topics related to:

- Comment TR-1: Existing Conditions
- Comment TR-2: Travel Demand
- Comment TR-3: Walking and Biking Impacts
- Comment TR-4: Transit Impacts
- Comment TR-5: Loading Impacts
- Comment TR-6: Cumulative Impacts
- Comment TR-7: Parking
- Comment TR-8: Increased Traffic Congestion and Associated Impacts
- Comment TR-9: General Comments

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### *Comment TR-1: Existing Conditions*

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

I-GOODMAN-6  
I-HOUWER-2  
I-KOWALSKI-1  
I-OSAWA-4

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Currently muni buses cannot pull over at Howth to drop passengers and delays in bus services occur regularly at this area. A proposed solution to off-ramp directly into a parking garage on the eastern edge of CCSF could directly alleviate some traffic from heading up Ocean Ave to the existing lots at the reservoir. It should be considered as an alternative, and a feasible solution that lessens the impacts of traffic and on public transit that runs along Ocean Ave.

Please take into consideration the impacts on MUNI systems and the need to address the impacts on transit as a serious concern that garners a broader and possible larger solution or alternative that includes cumulative projects and impacts as the main concern and solution to lessen pedestrian injuries, traffic impacts, and ensuring more rapid flow of public transit systems in this area due to the impacts on the second largest transit hub in SF.”

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-6])*

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“First of all, anyone who lives in the area understands what a nightmare traffic is already in the morning, afternoon and after work. The busses are already overcrowded with students and commuters. Parking is already virtually impossible with the two existing parking lots for the college.”

*(Michell Houwer, Email, September 12, 2019 [I-HOUWER-2])*

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“I live along Plymouth Avenue with my wife of 18 years, between San Ramon and Ocean. I can attest to the situation of the violence level due to the parking and driving situation.

Westwood Park was built for Model T’s and Model A’s. Cars have to pull over all the time. The violence level goes on all the time, day and night.

I leave for work at 4:00 o’clock in the morning. People are going at 40 miles per hour on that street and they’re bypassing the stop signs at San Ramon Way. They’re also running the red light at Ocean Avenue and Plymouth Avenue.”

*(Kevin Kowalski, CPC Hearing, September 12, 2019 [I-KOWALSKI-1])*

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“Ocean Avenue is already beset with heavy traffic at most hours of the day. Traffic is often down to a single lane due to Muni traffic, cars turning left, and double-parked vehicles. This will now become intolerably congested. The existence of several offset intersections (at Ocean/Geneva/Frida Kahlo, Ocean/Brighton, and Ocean/Plymouth) also contributes to poor traffic flow and to vehicular safety issues.”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-4])*

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## **Response TR-1: Existing Conditions**

The comments opine on existing traffic and parking conditions near the project site. These comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comments regarding traffic congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding of the secondary effects of parking conditions with development of the proposed project are addressed in Response TR-7, Parking, on RTC p. 4.C-61.

The response to the existing conditions comments is organized by the following subtopics:

- Existing Conditions
- Parking

### *Existing Conditions*

The draft SEIR adequately and accurately describes the existing traffic, transit, pedestrian, bicycle, loading, and emergency access conditions around the project site in section 3.B.4, Existing Conditions, on draft SEIR pp. 3.B-5 to 3.B-25, and existing conditions on Plymouth Avenue on draft SEIR p. 6-29. Vehicular turning movement counts are presented in Table 3.B-2, Vehicular Counts at Study Intersections on draft SEIR p. 3.B-10. These conditions have been taken into account in the analysis of the proposed project and in the development of mitigation measures.

The transportation study area and study intersections are discussed starting on draft SEIR p. 3.B-5. The transportation study area covers the transportation network within generally two blocks of the project site and includes Ocean Avenue and Plymouth Avenue. The selected 23 intersections within the transportation study area represent access points to the regional highway system, are located along major street corridors serving the project site, and are in the immediate vicinity of the project site. As a result, these locations represent the intersections most likely to be affected by vehicle traffic generated by the project and are representative of impacts that may occur at other locations. These study intersections are identified by number in Table 3.B-2 on draft SEIR p. 3.B-10, and shown on Figure 3.B-1 on draft SEIR p. 3.B-7. Multimodal turning movement counts (i.e., vehicles, pedestrians, and bicyclists) were collected at the 23 study intersections, including existing site driveways, on Wednesday January 31, 2018, and Tuesday August 28, 2018 when City College was in session during the weekday a.m. (7 to 9 a.m.) and weekday p.m. (4 to 6 p.m.) peak periods. Intersection turning movement counts are included in the Transit Assessment Memorandum (see draft SEIR Appendix C2, Attachment A, on pp. 31 to 63).

### *Parking*

As discussed on draft SEIR p. 3.A-3 and p. 3.B-31, the proposed project meets 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, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the draft SEIR presents an analysis of secondary environmental impacts related to City College on draft SEIR Appendix B, pp. B-87 to B-90.

For informational purposes, a discussion of existing and with project parking supply and demand is provided in the Non-CEQA Transportation Analysis, which was made available to the public on August 1, 2019. This report is available as part of the administrative record and also included as RTC Attachment 3, Non-CEQA Transportation Analysis.<sup>25</sup> As presented in the Non-CEQA Transportation Analysis – Parking Analysis Memorandum, the observed maximum combined occupancy of the City College surface parking lots occurred between 11 a.m. and 12 p.m. when there were a total of 1,596 cars parked and 578 spaces available (the lots were 73 percent occupied). There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces were observed to be available on weekdays during a.m., midday, and p.m. periods.

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<sup>25</sup> Balboa Reservoir – Non-CEQA Transportation Analysis, August 1, 2019.  
[http://ab900balboa.com/DEIR\\_to\\_NOD\\_Documents/2019-08-200000401.pdf](http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf)

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### ***Comment TR-2: Travel Demand***

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

I-BARISH3-25  
I-EVANS2-6  
I-HOUWER-6  
I-MUHLHEIM-2  
I-MUHLHEIM-6  
I-OSAWA-7  
O-BRCAC-1

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“The Notice of Preparation states that: “The proposed project would include a transportation demand management (TDM) program that would implement measures to reduce vehicle trips and encourage sustainable modes of transportation. TDM measures may include both physical (e.g., bicycle and carshare parking) and programmatic (e.g., incentives).” (Oct. 10, 2018 NOP, p. 20)

In a December 31, 2017, memo to the Commissioners of the SF County Transportation Authority, Supervisor Norman Yee stated: ‘The TDM Framework is a first step in planning TDM efforts for the Balboa Area. As the Reservoir developer and City College begin to draft implementable plans, community input will continue to play a significant role. Transportation and TDM will be discussed in ongoing public meetings for the City College Facilities Master Plan, Balboa Reservoir and other Community Advisory Committees. Only after further public engagement and exploration of TDM programs will the Reservoir developer and City College draft more detailed, implementable TDM plans.’

Accordingly, the FSEIR must include a completed TDM. A Final SEIR should not be circulated until this completed TDM has been incorporated into the FSEIR.

Project travel demand refers to the number, type, and common destinations of new trips that people would take to and from the project. The memorandum containing the detailed methodology and results for the project travel demand is included in DSEIR Appendix C1, Travel Demand Memorandum.

The TDM Plan that was submitted by Kittelson in Appendix C1 is incomplete. It is a survey of trip generation and parking, but there is no analysis of alternative sources of travel or transit use. This omission is unacceptable. A complete and competent TDM Plan must be included in the FSEIR. Failure to do so would result in an inadequate EIR which should not be certified. Additionally, for the reasons set forth herewith, the Kittelson report is flawed, and does not provide a competent basis for transportation mitigation:

- The Kittelson TDM does not engage with important current transportation characteristics in the project area which would likely be impacted and transformed by the scale and intensity of the proposed development alternatives.

- The report indicates that the trip generation manual being employed is somewhat out of date but the most recent available.
- Recent academic studies in the last year have observed that there has been a very substantial increase in trips and congestion over the past two Years. They estimate that 40% of this increased congestion may be estimated to be attributed to Lyft and Uber car service trips. In the mode choice allocations the report models car service trips are treated as a small segment, less than 10%?
- Even if one estimates that car service trips are both a mode choice switch and a cause of changing traffic through increased trip generation... there are no level of service discussions LOS for morning and afternoon peaks and for off peak mid day... for the main streets serving the project. What is traffic like and what might be the impacts of increased trips on the level of service in the project area and on adjacent arterials serving the project area. And how might one assess the cumulative transportation impacts of this project and planned development adjacent to the project area?
- The expected distribution of trips for residents seems very light for peak period travel. Is there any current transportation trip generation and travel diary data that might be employed to validate the time of day assumptions for residents of the new development?
- The current assumptions for residents are quite variant from the conceptual estimate of student trips that might be estimated from the parking lot driveway analysis... where we see a high density of trips around the morning and afternoon peaks. If the apartment dwellers trip characteristics more clearly follow the patterning of student car trips there may be serious congestion and LOS impacts. How might you assess this possible outcome? Particularly where you don't provide LOS data for main circulation routes."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-25])

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#### "C1 Travel Demand Memorandum

This section refers repeatedly to two sources for trip generation data. One is the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th edition and the other is the *San Francisco Planning Trip Generation Workbook (SF Workbook)*. While the ITE *Trip Generation Manual* is indeed a standard source, it also is recognized as a very flawed source of information due to its reliance on datasets with very little input, generally from suburban, not urban, sources.

The *SF Workbook* is not available on the Planning Department's website nor does it appear to be available elsewhere. We are unable to determine whether it addresses any of the flaws mentioned or simply compounds them. If the SEIR and consultants are referencing this Planning Department *SF Workbook*, it must be made publicly available for review and comment.

We challenge the use of the trip generation data from the *ITE Manual* and we find the use of the *SF Workbook*, which appears not to be available to the public, as inappropriate."

(Rita Evans, Letter, September 23, 2019 [I-EVANS2-6])

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"No doubt techies will uber or lyft to where they need to go; therefore, you will see an influx of additional traffic in our area."

*(Michelle Houwer, Email, September 12, 2019 [I-HOUWER-6])*

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"<!--[if !supportLists]-->2. <!--[endif]--> I find the report's statements regarding transportation and traffic greatly underestimate the impacts of the proposed project. As a transit first person, who has commuted to CCSF on MUNI from Castro and Market for several years, I have had experience with existing delays and trouble spots. Especially troubling are statements where mitigation is not found necessary. I disagree."

*(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-2])*

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"<!--[if !supportLists]--> <!--[endif]--> Many residents in the proposed project will opt for ride sharing services. We are seen the negative effects of this on congestion in other parts of the city."

*(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-6])*

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"The proposed site is indeed closely situated to many public transit options. However, given the proximity to I-280, the uphill walk to BART, and the remoteness from many of the attractions of the city, it is highly optimistic to assume that there will be a mass influx of non-automotive households that would mitigate the traffic and parking burden.

I appreciate the need for more housing in San Francisco, but the current proposals are out of scale for the neighborhood and have not adequately addressed critical deficiencies in traffic flow and parking."

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-7])*

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"Good evening Commissioners. My name's Jon Winston. I have the at large seat on the Balboa Reservoir CAC and I'm also the Chair.

I'm here this afternoon -- this evening, I should say, to talk about transportation and circulation. The impacts I believe will be significant, but I disagree with the report that they will be unmitigable.

Developer mitigation, including the Transportation Demand Management Plan, including measures like giving out a Fast Pass with rental packages to encourage non-car use will play a part. They will pay impact fees, which I believe should be applied at the point of impact in the neighborhood where the impacts actually occur. That's where they're needed the most.

But also, the City can and must do more. Recent San Francisco history is full of projects, like the Metreon Center, the San Francisco Center, the ballpark, the Chase Center, all built without parking and they were all predicted to lead to traffic apocalypse.

But with moonshot level planning, by multiple city agencies, we got great civic and cultural amenities that, despite the naysayers, worked.

This, too, is a project that needs to have proactive planning on the neighborhood and City level to accommodate the influx of new residents in the reservoir and the projected increase in CCSF students.

New housing and businesses, like Whole Foods on Ocean Avenue, also add new car, foot and bike traffic.

SFMTA and other agencies need to begin, now, to be ready with increased transit frequency and have more of the share of the roadway to avoid even worse gridlock and in keeping with the City's transit first policy. That's the first time we've heard the words "transit first" tonight.

In addition to my role on this CAC, I also serve as the Pedestrian Safety Advisor Committee for the SFUSD. From that perch, I can see Ocean, Geneva, San Jose Avenue as vision zero high injury corridors. That means there have been enough deaths and injuries, serious injuries, due to the design of these streets that they're due and fundable for complete redesign.

In short, true transit first reimagining of transportation and circulation for the neighborhood is needed and it has to be implemented.

At our September 30th CAC meeting, the CAC will present their plans for their SFMTA Ocean Avenue Safety Project. I hope to hear about a safe, beautiful, and dignified walk to BART, and better pedestrian bicycle access to CCSF, the reservoir and the Ocean Avenue shopping district.

But in future meetings, I really hope to hear more about a comprehensive, proactive plan. The Balboa Reservoir is really a great opportunity to deal with the problems that have accumulated over many, many years and now, we have a chance to make the needed change to get a livable, sustainable community for future generations. Thank you for your time."

*(Jon Winston, Chair, Balboa Reservoir Community Advisory Committee, CPC Hearing, September 12, 2019 [O-BRCAC-1])*

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## **Response TR-2: Travel Demand**

The comments state that the travel demand analysis is inadequate, disagree with the draft SEIR findings or characterize them differently, and state that transportation network company (TNC) mode choice allocation is underestimated. Comments state that the transportation demand management (TDM) plan is inadequate and that a complete TDM plan should be included in the



draft SEIR. The comments also seek information about the travel demand workbook used to estimate travel demand for the project.

The draft SEIR addresses the relevant CEQA issues in Section 3.B, Transportation and Circulation, under “Transportation Demand Management (TDM) Plan” on draft SEIR p. 3.B-38 and “Project Travel Demand Methodology and Results” on draft SEIR pp. 3.B-40 to 3.B-46. Detailed supporting information is included in SEIR Appendix C1, Travel Demand Memorandum, and Appendix C2, Transit Assessment Memorandum. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

Comments regarding traffic congestion, including intersection delay and level of service, are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding potential impacts of the proposed project on transit operations, and the mitigation measure(s) proposed to address any such impacts, are addressed in Response TR-4, Transit Impacts, on RTC p. 4.C-32. Comments regarding potential impacts of the proposed project in combination with other planned area development are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-45. Comments regarding the secondary effects of parking conditions with development of the proposed project is provided in Response TR-7, Parking, on RTC p. 4.C-61.

The response to the travel demand analysis comments is organized by the following subtopics:

- Project Travel Demand Methodology and Results
- Transportation Network Company (TNC) Mode Share
- Transportation Demand Management (TDM) Plan

#### *Project Travel Demand Methodology and Results*

The San Francisco workbook (workbook) referenced by the commenter implements the travel demand methodology presented in the 2019 San Francisco Transportation Impact Analysis Guidelines for Environmental Review – Update, February 2019 (2019 TIA Guidelines).<sup>26</sup> The transportation analysis for the Balboa Reservoir Project used this workbook to generate the project’s anticipated travel demand.

The travel demand methodology and results are presented in draft SEIR Appendix C1 and on draft SEIR pp. 3.B-40 to 3.B-46 under the heading “Project Travel Demand Methodology and Results.” The analysis for the proposed project follows the methodology presented in the 2019 TIA Guidelines, to the extent applicable. The project travel demand calculations are presented in draft SEIR Appendix C1, Travel Demand Memorandum, on pp. 8-14. The specific approach used for the proposed project is provided in the Travel Demand Assumptions Memorandum, which is included in draft SEIR Appendix C1, pp. 21 to 26. The detailed travel demand calculation worksheets are presented in draft SEIR Appendix C1, Appendix A, on pp. 27 to 39. These calculation worksheets

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<sup>26</sup> San Francisco Transportation Impact Analysis Guidelines for Environmental Review – Update, February 2019. [https://default.sfplanning.org/publications\\_reports/TIA\\_Guidelines.pdf](https://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf). Accessed October 24, 2019.

document the input and show the calculations and distribution assumptions used to develop the travel demand estimates.

The workbook is publicly available. The detailed travel demand calculation worksheets were also made public as part of the draft SEIR's administrative record<sup>27</sup> and the workbook is included as RTC Attachment 4, Travel Demand Workbook. The department website includes a link to a travel demand tool (<https://sftraveldemand.sfcta.org/>) that can be used to calculate daily and weekday p.m. peak hour person trips generation using the 2019 TIA Guidelines rates, which mirrors the data in the workbook.

The travel demand tool was developed as part of the department's 2019 TIA Guidelines update. A consultant, under the direction of the department, collected and analyzed counts, intercept surveys (i.e., intercept people to ask questions), and commercial and passenger loading at San Francisco development sites in 2016 and 2017 and analyzed 2012 California Household Travel Survey data. This collection and analysis led to the 2019 TIA Guidelines travel demand updates including estimates of the number of people taking TNCs. The TIA Guidelines' Summary of Changes memorandum describes the primary changes made in the update compared to prior guidelines.<sup>28</sup>

Regarding the comment seeking information on the use of the ITE's Trip Generation Manual, the 10th Edition of ITE's *Trip Generation Manual* was used to develop a ratio between the Balboa Reservoir Project's a.m. and p.m. peak period trip generation rates rather than to generate an estimate of project travel. Because the 2019 TIA Guidelines provide daily and p.m. peak hour travel demand rates but not a.m. peak hour travel demand rates, the ratio from the ITE *Trip Generation Manual* was applied to p.m. peak hour rates to obtain an estimate of a.m. peak hour rates. This process is explained on draft SEIR Appendix C1, p. 4.

One commenter correctly notes that no analysis is provided in the draft SEIR for the off-peak midday period. For the purpose of environmental review, the transportation analysis is based on the period with the highest traffic volumes; this yields a more conservative or "worst case" scenario to determine project impacts. The p.m. peak hour has the highest traffic volumes when compared to the traffic volumes during the a.m. peak period; the midday period is considered an off-peak period, for which any project impacts or effects would be less acute than the peak period.

#### *Transportation Network Company (TNC) Mode Share*

Transportation network company (TNC) vehicle trips are accounted for in the draft SEIR. TNC mode share is discussed and presented on draft SEIR p. 3.B-43 and Table 3.B-13, Person-Trip Generation Estimates by Mode and Land Use, on draft SEIR p. 3.B-43, and Table 3.B-16, Freight and Passenger Loading Demand by Land Use, on draft SEIR p. 3.B-51.

The comments claim that TNC use is underestimated; however, the comments do not cite references to support their claims. The SEIR analysis employs the best available information

<sup>27</sup> Draft SEIR Appendix C1: Travel Demand Memorandum, April 4, 2019.  
[http://ab900balboa.com/Draft%20EIR,%20Appendices,%20and%20Related/C1\\_TravelDemandMemorandum.pdf](http://ab900balboa.com/Draft%20EIR,%20Appendices,%20and%20Related/C1_TravelDemandMemorandum.pdf)

<sup>28</sup> San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review – Update, October 2019, <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>.

regarding TNC mode share. This information was developed as part of the department's 2019 TIA Guidelines update as described above.

The increasing prevalence of for-hire vehicles like TNCs in San Francisco has changed the way people travel. The department is working with the transportation authority and SFMTA on studies that address TNC activity in San Francisco. The TNC use and passenger loading demand estimates analyzed in the draft SEIR are consistent with 2019 TIA Guidelines and are supported by substantial evidence based on available information.

#### *Transportation Demand Management (TDM) Plan*

One commenter disagrees with the draft SEIR findings that the proposed project's significant and unavoidable transportation and circulation impacts cannot be mitigated to a less-than-significant level and references how the project's TDM plan would reduce vehicle trips. The 2019 TIA Guidelines travel demand data is based on substantial data collection, including at development sites in 2016 and 2017, and is described above. However, the 2019 TIA Guidelines data collection scope did not analyze the effect of development sites' TDM measures on travel demand. Thus, the department does not account for any potential reduction in vehicle trips (e.g., mode split change) that may occur with implementation of a project's TDM plan. This approach results in a conservative estimation of the number of vehicle trips that would be generated by the proposed project. The department is working with other San Francisco agencies to quantify the effects of TDM measures for use in CEQA documents as part of ongoing research in support of San Francisco Planning Code section 169. As of the publication of this RTC document, the results of that research are not available.

Transportation studies within San Francisco typically do not account for any potential reduction in vehicle trips that may occur with implementation of the TDM plan. The department acknowledges that implementation of the TDM plan would improve conditions around the project site; however, the draft SEIR and the department makes its CEQA significance determination without accounting for the implementation of the TDM measures. Aside from referencing the TDM plan, the commenter does not provide substantial evidence demonstrating how a final TDM plan is required to conduct transportation and circulation impact analysis.

It should be noted that the draft SEIR Appendix C1 referenced by the commenter is not the proposed project's TDM plan. Draft SEIR Appendix C1 is a memorandum providing the basis for the draft SEIR's analysis of project transportation impacts. The TDM plan is being developed separately and the decision makers will consider it as part of project approvals.

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#### ***Comment TR-3: Walking and Biking Impacts***

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

A-CALTRANS-1

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### **"Bicycle Considerations**

The Caltrans District 4 Bike Plan identifies a "Top Tier" project at the I-280 and Ocean Avenue/Geneva Avenue interchange that would reconstruct the interchange ramps and stripe Class II buffered bike lanes. Given the anticipated increase in vehicle and bicycle traffic at this location due to the project, the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at this location."

*(Wahida Rashid, Caltrans Acting District Branch Chief, Letter, September 10, 2019 [A-CALTRANS-1])*

### **Response TR-3: Walking and Biking Impacts**

The commenter states that the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at the I-280 and Ocean Avenue/Geneva Avenue interchange.

In accordance with the 2019 TIA Guidelines, the department adequately and accurately assessed if the project would create potentially hazardous conditions for people bicycling. The draft SEIR describes existing bicycling facilities and circulation in the project area on draft SEIR pp. 3.B-14 to 3.B-18. General impediments to existing bicycle travel within the study area, including heavy vehicle traffic volumes and high-speed uncontrolled movements at freeway ramps, are discussed on draft SEIR p. 3.B-16. The effect of the proposed project on conditions for people bicycling is discussed under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70.

Existing bicycle conditions at freeway on- and off-ramps at I-280 and at the Ocean Avenue/Geneva Avenue interchange have been taken into account in the project analysis. This location is farther from the project site than other analyzed locations (e.g., Ocean Avenue/Lee Avenue, Frida Kahlo Way/Access Road, Ocean Avenue/Frida Kahlo Way/Geneva Avenue) and thus represents a location with a smaller share of the distributed project trips. At the analyzed locations in closer proximity to the project site, the draft SEIR concludes that the proposed project would not generate activities that would create potentially hazardous conditions for people bicycling. Thus, significant impacts would not be expected at the Ocean Avenue/Geneva Avenue interchange and no mitigation measures would be required. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

### **Comment TR-4: Transit Impacts**

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

I-BARISH3-27	I-JA8-2	I-MARTINPINTO-3
I-BERNSTEIN5-5	I-JA9-2	I-MUHLHEIM-4
I-COLLINS1-1	I-JA9-3	I-PEDERSON2-3
I-EVANS2-1	I-JA9-4	I-PEDERSON2-9
I-EVANS2-3	I-JA10-1	I-PEDERSON2-10

I-EVANS2-4  
I-GOODMAN-5  
I-JA1-3  
I-JA7-1

I-JA13-1  
I-JA15-1  
I-MARTINPINTO-2

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I-PEDERSON1-3  
I-WORLEY-5

“Public Transit Delay (p. 3.B – 51 et seq)

There are significant and unavoidable cumulative transit impacts identified by the DSEIR.

Impact C-TR-4: *The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. (Significant and Unavoidable with Mitigation)*

Impact C-TR-6b: *Operation of the proposed project, including proposed street network changes, in combination with reasonably foreseeable future projects, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit. (Significant and Unavoidable)*

The DSEIR also states:

Impact TR-4: *Operation of the proposed project would not substantially delay public transit. (Less than Significant)*

However, the DSEIR’s determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence.

The City Charter/SFMTA late criterion is a 4 minute delay relative to the MUNI schedule.

In comparison, the Reservoir late standard as applied for the segment from Monterey/Genessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The DSEIR appropriates a 4-minute delay standard for the each of the 43’s segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus the DSEIR reinterprets the MUNI 4-minute lateness standard to allow the Project itself to independently contribute an additional 4 minutes of transit delay before the Project’s impact “might” be considered significant. This is an invalid, flawed analysis of acceptable transit delays. The FSEIR must recalculate transit delays validly.

Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would also violate the City’s Transit First Policy.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-27])*

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“The impact that the extra traffic would have on buses—one of the common means of reaching the College (other than BART) is expected to be serious. A local retired bus driver has explained that a bus being late on one time point by four minutes results in a serious schedule problem. But for the

no. 43 bus, the only bus running on Frida Kahlo Way, the delay anticipated is more like 12 minutes, not four minutes. This would affect other lines that cross the path of the 43 bus or connect with it. And as for Ocean Avenue, it currently has a number of lines passing within 1-2 blocks of the College—nos. 8, 29, 49 and K.”

(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-5])

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“Hello, Monica Collins, Sunnyside. This is prepared.

The SEIR states that transit delay induced by the Balboa Reservoir Project will be insignificant. But this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The meaning on time performance standards allows for a four-minute delay for an entire route. But the 43 Masonic travels from Balboa Reservoir, along Frida Kahlo Way, to Balboa Park in seven minutes. Using the consultant’s redefinition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of 19 minutes, 171 percent increase. From any perspective, whether legal, ethical, or engineering, this is wrong.

The SEIR is in error in using this faulty, invalid method of determining transit delay.”

(Monica Collins, CPC Hearing, September 12, 2019 [I-COLLINS1-1])

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#### “TRANSIT DELAY

The SEIR states that transit delay induced by the Balboa Reservoir project will be insignificant but this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The MUNI on-time performance standard allows for a 4-minute delay for an entire route. The SEIR instead allows for a 4-minute delay on any segment of a route (i.e., between two stops), a completely invalid assumption, meaning almost no amount of delay would be considered significant.

EXAMPLE: The 43-Masonic travels from the Balboa Reservoir project site on Frida Kahlo Way to the Balboa Park Station in *7 minutes*. Using the consultants’ re-definition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of *19 minutes*, a **171% increase**, is somehow deemed “**insignificant**.” No one riding that 43 would find the delay to be insignificant. And this utterly faulty reasoning is allowed to be presented in the SEIR as justification for a finding of “insignificant delay,” meaning no mitigation is required.

From any perspective, whether legal, ethical or engineering, this is wrong. The SEIR is in error in using this faulty, invalid method of determining transit delay. The transit delays as a result of this

project will be significant and appropriate mitigation must be identified before the SEIR is approved.”

*(Rita Evans, Letter, September 23, 2019 [I-EVANS2-1])*

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## **“TRANSIT ASSESSMENT**

### **C2 Transit Assessment Memorandum**

#### **Transit reentry delay analysis**

According to the SEIR, transit delay is calculated based on empirical data from 2010 *Highway Capacity Manual (HCM)*. Data used in the 2010 *HCM* are at least 15 years old.

In 2016, the *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis (HCM)* was published by the Transportation Research Board. This current manual the consultants should have used as ‘...it serves as a fundamental reference on concepts, performance measures, and analysis techniques for evaluating the **multimodal** operation of streets, highways, freeways, and off-street pathways. The Sixth Edition incorporates the latest research on highway capacity, quality of service, and travel time reliability...’

What justification did the consultants provide for using an outdated *HCM* and its outdated data? Why did they not use the most recent, comprehensive source that addresses the multimodal aspect of street use, a basic component of the area around the Balboa Reservoir project site?

Before the SEIR is adopted, the consultants must explain their data sources and methodology used to reach their conclusion that, ‘Based on the findings from this corridor delay analysis, the project would not result in a substantial delay to public transit along Frida Kahlo Way, Ocean Avenue, or Geneva Avenue.’ The findings and conclusion as presented in the SEIR are erroneous.”

*(Rita Evans, Letter, September 23, 2019 [I-EVANS2-3])*

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#### **“Passenger boarding delay analysis**

What source was used to assume “two seconds per passenger boarding”? Is it again outdated data? Does it include students and instructors carrying books, supplies, and other material? Does it include students traveling with children? Disabled users? Riders carrying shopping bags or using a wheeled cart?

The consultants again are using an arbitrary and likely outdated standard—two seconds of boarding time—that does not equate to actual operating conditions.

Before the SEIR is adopted, data on the actual passenger boarding delay must be gathered and analyzed. Any transit delay analysis must be based on the actual delay experienced by riders in the project area.”

*(Rita Evans, Letter, September 23, 2019 [I-EVANS2-4])*

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“The second one is regarding transit delay. Okay, transit delay is defined in this SEIR with a threshold of significance. And it’s an invented threshold of significance. And what does the SEIR say: The threshold of significance is four minutes. What does that mean in terms of the reservoir? It means that, oh, the reservoir project can contribute four minutes of delay on MUNI without it being considered to be significant. So, it’s BS. Okay, read it carefully before you certify it.”

*(Alvin Ja, CPC Hearing, September 12, 2019 [I-JA1-3])*

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“The transit issue is by far the biggest concern, as was very much ignored as a concern on the SFSU-CSU and Parkmerced and Stonestown redevelopment projects, congestion has worsened along 19th, and with eventual starting of undergrounding of the M-Line, additional concerns will increase on cross-city traffic and transit impacts. It is not possible to force one development to bear the brunt of the costs of public infrastructure, however when multiple sites are involved it is critical to ensure that the public’s interests and impacts are seriously addressed in regards to safety, and continuity of public transit services.”

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-5])*

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#### **“INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY**

The City Charter/SFMTA late criterion is a 4 minute delay relative to MUNI schedule for the 43 Masonic at the Balboa Park Station (BPS). [The 4 minute lateness criterion is relative to MUNI schedule for any particular MUNI time point.]

In comparison, the Reservoir late standard as applied for the segment from Monterey/Genessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The Reservoir Project SEIR, apparently without proper authority, appropriates a 4-minute delay standard for the each of the 43’s segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus giving the Project the privilege of contributing 8 minutes of Reservoir-related delay before its delay is considered significant.

#### **EXAMPLE:**

If a 43 is running on time until the Reservoir Project, but the Project-related delay is allowed to be up to 8 minutes, then instead of 7 minutes to get to BPS, it would be considered by SEIR definition to be insignificant if a 43 gets to BPS in 19 minutes—an additional 12 minutes.



This constitutes a 171% increase over the scheduled running time of 7 minutes between Monterey/Gennessee and Balboa Park Station. Yet the SEIR deems a 171% **increase** (from a scheduled 7 minutes to a travel time of 19 minutes to be insignificant.

SOUTHBOUND 43 MASONIC DELAY:				
MUNI STANDARD v. RESERVOIR STANDARD				
	TIME POINT	ON-TIME	ADDITIONAL DELAY TIME	
		MUNI on-time	MUNI late standard (4 min)	Reservoir Late standard (additional 4 min)
	Monterey/Gennessee	0:00	0:00	0:00
Monterey/Genn to Bookstore	4 min running time	+4 r.t.	+4 r.t. + 4 late	+4 r.t. +4 MUNI
Running time (r.t.)				+4 Reservoir
ELAPSED TIME:	CCSF Bookstore (City College Terminal)	0:04	0:08	0:12
Monterey/Genn to Bookstore				
Bookstore to BPS	3 min running time	+3 r.t.	+3 r.t.	+3 r.t. + 4 Reservoir
Running time			(4 min standard NOT allowed to be cumulative)	(4 min standard construed to accumulate)
ELAPSED TIME:	Balboa Park Station (Geneva/San Jose)	0:07	0:11	0:19
Monterey/Gen to BPS				

The SEIR justifies its arbitrary and capricious use of a generously defined 4-minute delay standard by citing the MUNI on-time performance standard contained in the City Charter:

*The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.<sup>1</sup>*

It is critically important to understand of the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

The SEIR is inadequate and defective in its use of an egregiously generous definition of acceptable Reservoir-related transit delay. The SEIR's "less-than-significant" determination for Impact TR-4, Transit Delay cannot be considered valid.

The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, or by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.

There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay. There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant."

**Footnotes:**

<sup>1</sup> *The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85 [sic--should be 8A.103 (c)1--aj], percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

(Alvin Ja, Email, September 5, 2019 [I-JA7-1])

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"Public Transit Delay (p. 3.B-52)

*The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.<sup>96</sup>*

Footnote 96: *96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85 [sic--should be 8A.103 (c)1--aj], percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

It is critically important to understand the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

Example: The 43 line runs on a 12 minute headway. A four-minute Project-related contribution to delay added to a City Charter defined 4-minute late standard for a MUNI line's on-time performance would create an eight-minute delay. So, for the 43 line, instead of a 12-16 wait, the

Project interprets that a wait of 16-20 minutes at Kahlo/Ocean (City College Bookstore time point) is acceptable and less-than-significant.

NO! It is NOT OK to consider this to be non-significant.

The City Charter's section 8A.103(c)1 does not authorize the Project to impose an additional Reservoir-related 4 minutes of delay at the City College Bookstore time point.

The SEIR's self-defined threshold of significance would grant the Project the privilege of doubling the lateness standard relative to the MUNI schedule from 4 minutes to 8 minutes.

This violates both the language and intent of City Charter Article VIIIA's Section on Service Standards and Accountability--8A.103 (c)1.

**The draft SEIR is fundamentally flawed in highjacking and misapplying the SFMTA/MUNI 4-minute lateness standard. The 4-minute lateness standard is relative to MUNI schedules. The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, and especially by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.**

**There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay.**

**There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.**

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## **Impact Evaluation**

### *Existing plus Project*

*Impact TR-4: Operation of the proposed project would not substantially delay public transit. (Less than Significant)*

### **Transit Delay**

#### *Developer's Proposed Option (p. 3.B-74)*

*As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.*

*The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, the Developer's Proposed Option would result in a less-than-significant impact related to transit delay.*

*The Additional Housing Option would not result in transit delay greater than or equal to four Minutes. 123 Therefore, the Additional Housing Option would result in a less-than-significant impact related to transit delay. [FOOTNOTE 123 refers back to Footnote 122 which then refers to Fire Code 503.2.1 which has nothing to do with transit delay.—aj]*

#### RESERVOIR-RELATED DELAY FOR 43 MASONIC

The SB Kahlo figures of **73 sec** (for Option 1), and **83 sec** (for Option 2 are presented in the SEIR as the applicable 43 delay between Judson and Ocean.

These figures fail to reflect the Transit Delay for the 43 route segment between CCSF Bookstore (Ocean) to Balboa Park Station (Geneva/San Jose). This route segment is located in the Area Plan area and must be included to properly assess Reservoir-related delay for the 43 Masonic.

In order to reflect the full effect of Reservoir-related delay in the Balboa Park Station Area Plan area, another 42 seconds (using Table 3.B-18 Transit Delay Analysis) for the 43's EB Geneva segment must be added to the 73 seconds cited by the SEIR. So instead of just 73 seconds of delay, Reservoir-related delay totals **115 seconds (1.9 min) of for Option 1.**

For Option 2, the 43's delay (using Table 3.B-18 Transit Delay Analysis) should be the sum of SB Kahlo (83 sec) and EB Geneva (58 sec), which totals **141 seconds (2.4 min) of Reservoir-related delay in the BPS Area Plan area.**

The scheduled running time between Monterey/Gennessee to Balboa Park Station is 7 minutes.

Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a **27.4% increase in travel time** for the 7-minute running time segment between Monterey/Gennessee and Balboa Park Station.

Option 2's contribution of 141 seconds (2,4 minutes) of Reservoir-related delay represents a **33.6% increase in travel time** over the scheduled 7 minute running time between Monterey/Gennessee to Balboa Park Station.

A 115-141 second delay for this short 43 segment (from Monterey/Gennessee to BP Station) is substantial. it is NOT insignificant as the SEIR purports. Only with willful disregard for reality could a 27.4% to 33.6% increase in travel time be considered less than significant.

Relative to the City Charter-mandated MUNI on-time standard of 4 minutes:

<!--[if !supportLists]--> <!--[endif]-->Option 1's 115 second contribution to MUNI delay constitutes **48.0%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point;

<!--[if !supportLists]--> <!--[endif]-->Option 2's 141 second contribution to MUNI delay constitutes 58.8% of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point.

Unless willfully blind, a 48.0% or a 58.8% contribution towards a 4-minute late standard is SIGNIFICANT.

The way that the SEIR tries to evade this problem of objectively contributing significantly towards MUNI's 4-minute standard is ingenious.

Incorporating Footnote 96 on p. 3.B-52, the SEIR, **insinuating City Charter and "quantitative" authority, proclaims:**

*The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*

The SEIR blows open a gigantic hole of an extra four minutes for itself before a delay "might" (!) be significant. But contrary to the Project's arrogation to itself of a four-minute privilege to hold up MUNI before its contribution to delay counts to be significant, the City Charter citation of a 4 minute is relative to the MUNI schedule—not relative to the Reservoir Project SEIR's own standard.

So, the "less-than significant impact" to transit delay is a result of an inappropriate definition and standard of "transit delay."

I discuss this in more detail in my 9/5/2019 submission "INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY". Please refer to it.

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### **City College Terminal**

*Given the considerations described above, the Developer's Proposed Option and Additional Housing Option would have a **less-than-significant impact** on transit delay.*

**Mitigation:** None required.

The TR-4 section ends with the pronouncement of less-than-significant impact requiring no mitigation. This overall TR-4 conclusory statement misleadingly follows and is slid into a section that actually discusses City College Terminal.

**This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**

The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:

<!--[if !supportLists]--> <!--[endif]-->It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;

<!--[if !supportLists]--> <!--[endif]-->It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;

<!--[if !supportLists]--> <!--[endif]-->In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.

<!--[if !supportLists]--> <!--[endif]-->The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.

Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

\*\*\*\*\*

#### ***Comparison of Impact TR-4 to PEIR Impact Analysis (p. 3.B-77)***

*As discussed in SEIR Section 3.B.3, Summary of Balboa Park Station Area Plan PEIR Transportation Section, p. 3.B-1, under the 2025 with Area Plan scenario, .... Project operation would result in a less-than significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR.*

The statements that "Project operation would result in a less-than-significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR" is **unsupported by anything contained in SEIR 3.B.3**. It appears out of thin air. In fact, 3.B.3 states the opposite:

<!--[if !supportLists]--> <!--[endif]-->**Transit**

*Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

Furthermore, the claimed L-T-S impact of the Introductory paragraph for this section is contradicted once again in the body on p. 3.B-78:

<!--[if !supportLists]--> <!--[endif]-->The PEIR identified significant impacts to transit delay under the 2025 with Area Plan scenario and project-level analysis of 1150 Ocean Avenue (former Kragen Auto Parts site).

The introductory paragraph expresses a desired outcome of less-than-significant impact on public transit in the form of an unsupported assertion/conclusion. The SEIR is deficient by making unsupported conclusions.

\*\*\*\*\*

*Operation of the Balboa Reservoir Project would result in a less-than-significant impact related to transit delay. Therefore, the proposed project would not have any new or substantially more-severe effects than those identified in the PEIR related to transit delay impacts.*

This concluding paragraph for TR-4 is nothing but a claim unsupported by evidence. It's a tautology: The Reservoir Project results in less-than-significant impact on transit delay.....Therefore (?!!) it will not have new transit delay impacts.

Where is the logic in this conclusion?!!!

The SEIR Significance Criteria states:

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**SEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence. Rather it is based on tautology. FAIL...FUBAR! This SEIR does not qualify for certification."**

*(Alvin Ja, Email, September 7, 2019 [I-JA8-2])*

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#### **2040 Cumulative Conditions** (p. 3.B-91)

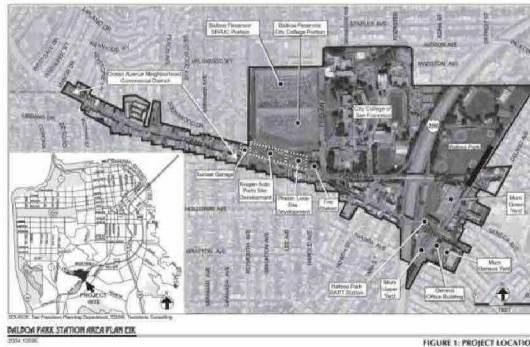
*The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:

*The “Project Area” of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*



The SEIR is deficient in its selection of the parameters of geographic context for analysis.

(Alvin Ja, Email, September 10, 2019 [I-JA9-1], [I-JA9-3])

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**Impact C-TR-4: The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. (Significant and Unavoidable with Mitigation) (p. 3.B-94)**

*In the PEIR, under the 2025 with Area Plan scenario, transit delay impacts were identified at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections. However, as discussed under Impact TR-4, p. 3.B-73, operation of the proposed project would not substantially delay public transit, and this impact would be less than significant.*

In my previous submission of 9/7/2019, I had presented a picture of the real-life impact, based on SEIR/Kittelson’s figures of Reservoir-related delay on the 43 Masonic. Instead of just using the delay figures for the restrictive limits of geographic context in the Figure 3.B-2 map, the submission showed **27.4 to 33.6% increases in Reservoir-related travel time** within the BPS Area Plan “Project Area”.

Relative to the MUNI on-time-performance’s late criterion of 4 minutes, **Reservoir- related delay contributes 48 to 58.8% of the 4 minutes.**



The only way that the SEIR can conclude a less-than-significant transit delay impact is to change the standards.

It did this by creating a quantitative “threshold of significance” of an **additional 4 minutes over and above the SF Charter’s 4 minutes**. Thus, with this this creatively invented threshold of significance that totals 8 minutes, objectively significant delay relative to MUNI schedules are magically transformed into “less-than-significant.”

Here’s copy & paste from my previous submission:

**This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**

**The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project’s contribution to transit delay:**

<!--[if !supportLists]--> <!--[endif]--> **It omits applicability of the PEIR’s analysis of the Lee Extension causing significant impact;**

<!--[if !supportLists]--> <!--[endif]--> **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**

<!--[if !supportLists]--> <!--[endif]--> **In the example of the 43 Masonic, the SEIR’s fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project’s contribution to transit delay.**

<!--[if !supportLists]--> <!--[endif]--> **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--a) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

\*\*\*\*\*

*As discussed in Table 3.B-18, p. 3.B-74, under Impact TR-4, under existing plus project conditions, the increase in transit delay associated with either the Developer’s Proposed Option and the Additional Housing Option would not result in significant transit delay impacts. However, the transit delay contribution from City College’s Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase*

*transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.*

As shown previously, that Reservoir-related delay “would not result in significant transit delay Impacts” has been shown to be objectively false.

After the false assertion that portrays the Reservoir Project as blameless for transit delay, C-TR- 4 then throws the blame for cumulative Transit Delay on City College when its Facilities Master Plan gets up and running in the future. The phrasing of the passage essentially shifts the blame for cumulative transit delay impacts on City College, instead of admitting that the primary/proximate cause for transit delay is the Project itself.

The main error in C-TR-4 is that the Reservoir is presumed to be the baseline condition when in fact City College should be treated as the baseline condition.

Crucially, City College’s Facilities Master Plan is essentially a **renovation and replacement program** for existing deteriorated, end-of-useful life buildings/facilities. Other than normal growth, build-out of the FMP will not generate new, appreciably substantial vehicle trips above what exists today as the existing condition. Furthermore any parking structures in FMP would be a direct result of the Reservoir Project’s elimination of student parking. Although the Planning Dept would want to categorize FMP parking as new, objectively the FMP parking will be replacement parking, not “new.”

In contrast, it is the Reservoir Project’s new residents that will generate new vehicle trips that would cause transit delay.

**The SEIR reverses cause and effect in C-TR-4. It does this by treating the Reservoir Project as if it’s the existing setting in its assessment of cumulative effects and treats CCSF as the new kid on the block. The fact of the matter is that CCSF must be treated as the baseline condition, and the Reservoir Project as the new kid on the block. I offer as an example a critique of a 11/17/2016 Planning Dept letter that was sent to City College authorities:**

#### HYPOCRISY OF BALBOA RESERVOIR PROJECT PLANNERS

In reviewing Sunshine Ordinance documents, I have come across a 11/17/2016 Planning Dept letter addressed to City College BOT signed by its Director, John Rahaim (attached for your convenience).

The 11/17/2016 letter provided the City’s input on the City College draft FMP.

Under the heading of “Access, Parking, and Transportation Demand Management”, the letter states:

*“CCSF has stated that it anticipates maintaining or increasing the number of parking spaces associated with the campus as on-and off-campus surface parking is replaced with buildings. This level of parking provision would have negative consequences for neighborhood congestion...”*

Further down in the letter, under the heading “Balboa Reservoir Development Access & Interface”, the letter states:

*“While the design of the Reservoir site has not yet begun, roadway access to the Reservoir site [cutting through City College property—aj] is a critical element that needs to be considered now as part of CCSF’s master planning process...”*

Back in November 2016 when you first read this letter, I assume that BOT and Administration were able to discern the brazen hypocrisy contained in this letter to SFCCD.

ONE STANDARD FOR CITY COLLEGE.....

The City had the audacity in this letter to blame the FMP for negative consequences of proposed FMP parking. The City shows lack of self-awareness and dishonesty when the reason for needing replacement parking is ultimately the Balboa Reservoir’s own elimination of student parking—parking which constitutes the existing condition.

.....ANOTHER STANDARD FOR BALBOA RESERVOIR PROJECT

The Planning Dept letter raises the importance for SFCCD to provide roadway access for the Reservoir Project. The letter says “roadway access is a critical element that needs to be considered now...”

Since the City planners say that the parking needs of CCSF stakeholders can be resolved with TDM, the TDM solution should obviate the need for roadway access for the Reservoir Project, too, doncha think?

But, no. A double standard applies.

Did you notice that the City’s concern for “negative consequences for neighborhood congestion” only applied to City College, but not to the Reservoir Project? FYI, throughout the “public engagement process”, Reservoir Project has not shown serious concern for its own negative consequences.

If BOT and Administration allow the City to abuse the City College stakeholders whose interests you are supposed to represent, you are failing in your compliance with Accreditation Standard IV.C4.

--aj 10/9/2017

.....  
*To reduce the project’s considerable contribution, implementation of Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures to keep transit travel times within four minutes of existing levels.*  
.....

**Mitigation Measure M-C-TR-4: Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay.** The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.

**Transit Travel Time Performance Standard.** Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4. The routes and study segments shown in Table M-C-TR-4 represent routes and study segments most likely to have a cumulative impact to which the project would have a considerable cumulative contribution.

What is the “transit travel time performance standard” that is to be met?

The SEIR presents Table M-C-TR-4 Transit Travel Time Performance Standard that, by appearance looks oh, so impressive and credible, and “quantitative”! The Table presents “Existing Transit Travel Time” and “Performance Standard.” And it looks SOOO legitimate and objective!

But the key is literally in the fine print of Performance Standards’ Footnote “b”.

Footnote “b” states: b The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

As presented in earlier submissions this Performance Standard of “existing travel time plus four minutes” is based on the misappropriation and misuse of the Charter section 8A.103(c)1.

Here I present some examples of the increase in travel time that results from the generous “plus four minutes” Performance Standard based on figures from Table MC-TR-4:

Transit Line	Study Segment	Existing Transit Travel Time–PM	Performance Standard–PM	Percent Increase in Travel Time
K/T	Jules Ave/Ocean Ave to Balboa Park BART	8:42	12:42	46.0%
29	Mission St/Persia Ave to Plymouth Ave/ Ocean Ave	9:55	15:10	52.9%
43	Genessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance	4:23	8:23	91.3%
49	Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave	10:04	14:04	39.7%

The Planning Dept-created threshold of significance of an additional 4 minutes results in increases in Reservoir-related travel times of 46%, 52.9%, 91.3%, and 39.7% respectively for the K-T, 29, 43, and 49 line segments in the Table. By any objective measure, these would be extremely substantial contributions to transit delay.

The only legitimate standard to be used to comply with the Transit First Policy is: four minutes late as measured against a MUNI time point.....Not a “plus 4” creatively designed qualitative threshold of significance.

Regarding Mitigation Measure M-C-TR-4’s *“The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments.... the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

ARE YOU KIDDING ME?!! Monitor and implement “feasible” measures?!!

Once the Project has been approved and built, monitoring will only confirm what people who have actual ground-level, real-life based experience in the area have been saying all along about traffic issues that would ultimately cause severe MUNI delay.

And at that point, there will be no **feasible** measures to implement because the damage will have already been done. There will be no feasible measures because the Reservoir Project the project area is characterized by streets that cannot be widened. There will be no feasible way to effectively reduce transit delay. A 2012 Haas School of Business study about a possible Reservoir Project recognized the difficulties of “... *limited access points and large influx of new residents*”. for such a project.

To think that monitoring transit delay and implementing “feasible” measures such as TDM will be able to satisfactorily mitigate the impact of the Reservoir would be ludicrous.

**Thankfully, the SEIR arrives at a realistic determination (except for the undue blame given to a City College contribution to future transit delay) for C-TR-4:**

*In consideration of the uncertainty surrounding the development at City College’s Ocean Campus, the uncertainty of the Balboa Reservoir Project’s TDM measure effectiveness, and the uncertainty of SFMTA approval of other measures under their jurisdiction, the impact of the proposed project options would remain **significant and unavoidable with mitigation**, even with implementation of Mitigation Measure M-C-TR-4.*

*Significance after Mitigation: Significant and Unavoidable.”*

*(Alvin Ja, Email, September 10, 2019 [I-JA9-2], [I-JA9-4])*

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“I had sent in a comment regarding the geographic context for analysis of transit delay yesterday, 9/9 /2019.

I said that the appropriate geographic context would be the BPS Area Plan’s “Project Area.”

However, on closer examination, I realized that the BPS Project Area's northern boundary was Judson and Havelock, and did not even include Riordan.

The geographic context for analysis needs to extend beyond the BPS Area Plan's northern boundary of Judson to include Monterey Blvd.

Although not inside the BPS Area Plan's boundaries, the Reservoir Project will impact areas north of the Reservoir lot itself and north of Judson."

(Alvin Ja, Email, September 10, 2019 [I-JA10-1])

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"CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY

The "less-than-significant" determination for Impact TR-4 is invalid. It is invalid because its 4-minute threshold of significance/Performance Standard is arbitrarily high and has been arrived at with neither proper authority nor substantial evidence.

Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would violate the Transit First Policy.

Although the SEIR finds potentially significant impact for C-TR- 4, the potential impact is unfairly attributed to City College's FMP.

The actual real-world impact will be from the Reservoir Project; not City College. As such, the Reservoir Project's true impact to Transit Delay has been covered up by an egregiously liberal 4-minute threshold of significance. As such, the LTS determination for Impact TR-4 should objectively be invalid.

City College's future plans are fundamentally renovation projects to replace worn-out facilities. These renovation projects will not, in and of themselves—unlike the Reservoir Project—induce substantially greater demand for education services and resultant travel demand.

The SEIR blames the victim in its discussion of Impact C-TR-4.

I wish to reinforce my earlier analysis of the inappropriateness of using a 4-minute threshold of significance in reaching a "less-than-significant" determination for Impact TR-4.

I have already provided several critiques of various aspects of the SEIR's analyses contained in Section 3.B, Transportation & Circulation.

I have already compared the numbers for "Project-Related Increase in Delay" provided in Table 3.B-18, *Transit Delay Analysis*. I compared the Project-Related Delay to scheduled MUNI running times for the 43 line.

My analysis showed:

*Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a 27.4% increase in travel time for the 7-minute running time segment between Monterey/Gennessee and Balboa Park Station.*

*Option 2's contribution of 141 seconds (2.4 minutes) of Reservoir-related delay represents a 33.6% increase in travel time over the scheduled 7 minute running time between Monterey/Genessee to Balboa Park Station.*

I have analyzed the latest MUNI schedule information. I have attached a Table entitled "Reservoir-Related Delay in Relation to Reservoir Area MUNI Characteristics."

The Table compiles information gathered from official MUNI scheduling documents. The documents are "Rotations" and "Trains" that contain information on headways and timepoints.

The Table shows the percentage contribution of real-world Reservoir-related delay relative to current MUNI timepoint-to-timepoint running times, using the SEIR's 4-minute threshold of significance.

Percentage of increase in travel time over the existing MUNI running times are:

<!--[if !supportLists]--> <!--[endif]-->K Ingleside (between Geneva/San Jose and St. Francis Circle):  
23.5% to 30.8%

<!--[if !supportLists]--> <!--[endif]-->8/ 8BX Bayshore/ Bayshore Express (Geneva/Mission-Unity Plaza) 50.0% to 66.7%

<!--[if !supportLists]--> <!--[endif]-->29 Sunset (19th/Holloway –Ocean/BART) 25.0% to 33.3%

<!--[if !supportLists]--> <!--[endif]-->43 Masonic (Monterey/Genessee – Geneva BART) 44.4% to 57.1%

<!--[if !supportLists]--> <!--[endif]-->49 Van Ness (Mission/Ocean – Unity Plaza) 50.0% to 57.1%

**The lowest end of the range of Reservoir-related delay "authorized" by the SEIR is 23.5% increase over the K segment between Balboa Park Station and St. Francis Circle.**

**A threshold of significance that would allow 23.5% to 66.7% increases over existing running times is an egregiously poor threshold. FAIL and FUBAR."**

*(Alvin Ja, Email, September 14, 2019 [I-JA13-1])*

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"What I was trying to, but failed to get across in the original version was that the determinations for TR-4 and C-TR-4 were reversed.....That the C-TR-4 significant impact finding should have been for TR-4; and that the CCSF FMP cumulative contribution to transit delay was being blamed disproportionately for contributions to transit delay.

C-TR-4 obscures the reality that most of the transit delay will be generated by the Reservoir Project, as opposed the City College's FMP which is mainly a renovation and replacement program."

*(Alvin Ja, Email, September 22, 2019 [I-JA15-1])*

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"Another significant impact to public services is in public transit, i.e. MUNI. Currently, according to city charter, if a MUNI vehicle is 4 or more minutes late to any timepoint, it is considered late. A timepoint is a MUNI passenger stop with a specific time of MUNI vehicle arrival tied to it. For

example, if a bus is scheduled to arrive at the intersection of Market and Castro Sts. at 0700 hrs, it is not considered late until it arrives after 0704 hrs.

A 4 minute delay on a bus route such as the 43 Masonic, which is a 9 mile cross town bus route will have effects that resonate throughout the entire bus line. If the 43 northbound is delayed by 4 minutes arriving to Balboa Park BART station, it would be considered significantly late by city charter standards. However, the SEIR doesn't consider MUNI to be late through the Balboa Reservoir project zone unless it is delayed by 4 minutes, independent of the city charter. Thus, if the 43 Masonic was late to Balboa Park BART station by 3 minutes and further delayed through the BR Project zone by another 3 minutes, it would not be considered significant by SEIR standards, but it would be considered significant by city charter standards. Thus the allowable delay of 4 minutes through the BR project zone could be in violation of city charter standards."

*(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-2])*

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"What does the project propose to do to expedite bus service"

*(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-3])*

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"<!--[if !supportLists]--> <!--[endif]-->The central islands on Ocean Avenue are dangerous. Undergrounding the K line on Ocean would help in many areas, but is this a realistic possibility?"

*(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-4])*

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"and it does not adequately address potential impacts to public transit"

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-3])*

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"C. The Draft does not adequately address the impacts of the project on transit.

The Draft does not adequately explain how the City determined that an additional four minutes of delay for Muni routes in the vicinity of the project should be the threshold of significance for transit delays. Muni currently experiences significant delays related to traffic congestion when City College is in session and to congestion caused by drivers attempting to turn at the intersection of Ocean and Brighton, where the entrance to the Whole Foods parking garage is located. In light of already existing delays for Muni service, the threshold of significance for additional transit delays should be less than four minutes."

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-9])*

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"In addition, in order to minimize VMT and GHG emissions associated with the project and with reasonably foreseeable development and expansion at City College, the City should implement transit improvements prior to occupancy of the project. Appropriate prior-to-occupancy mitigation measures include:

- <!--[if !supportLists]-->1. <!--[endif]-->Restrict left turns at the intersection of Ocean and Brighton.
- <!--[if !supportLists]-->2. <!--[endif]-->Install transit signal preemption or priority at all traffic lights on Ocean between San Jose and Junipero Serra and on Geneva between San Jose and Ocean. (Preemption is preferable, though priority might be acceptable at intersections with major cross streets such as Frida Kahlo and Junipero Serra.)
- <!--[if !supportLists]-->3. <!--[endif]-->Give Muni lines higher priority at St. Francis Circle and West Portal. (Although St. Francis Circle and West Portal are a fair distance away from the project, delays there significantly degrade the speed and reliability of the K.)
- <!--[if !supportLists]-->4. <!--[endif]-->Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.
- <!--[if !supportLists]-->5. <!--[endif]-->Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full. (This could potentially be done as part of an enforcement action to address Whole Foods' violation of loading requirements.)"

(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-10])

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"Finally, the transit improvement mitigation measures identified in the draft should not be deferred until after the project is shown to have an adverse impact on transit service. Congestion when City College is in session and congestion associated with the Whole Foods Grocery Store are already impeding transit service. So, the project proponents should be working with MUNI, now, to implement transit improvement measures up front without waiting for proof of additional adverse impacts in the future. Thank you very much."

(Christopher Pederson, CPC Hearing, September 12, 2019 [I-PEDERSON1-3])

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*"The DRAFT SEIR is inadequate because it fails to consider the impact on public transit and recommend that public transit capacity be expanded*

The Developer is counting on a 15% reduction in City College student parking in order to achieve a special project status under AB 900. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate already unreliable and inadequate transit service. **However, the SEIR fails to mandate improvements in infrastructure for public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation."**

(Jennifer Worley, Email, September 23, 2019 [I-WORLEY-5])

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## Response TR-4: Transit Impacts

The comments opine on the transit delay significance criteria used in the draft SEIR, disagree with the draft SEIR's transit delay impact conclusion, disagree with the geographic study area used to evaluate transit delay impacts, and suggest mitigation measures to reduce transit delay.

This response provides clarification and background information related to the transit impact analysis presented in the draft SEIR. The impacts are determined to be less than significant under existing plus project conditions and significant and unavoidable under 2040 cumulative conditions.

- The significance criteria are presented on draft SEIR p. 3.B-35, and the transit analysis methodology is discussed on draft SEIR p. 3.B-52.
- Transit impacts are covered under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99.
- Additional discussion of the transit delay assessment is provided in draft SEIR Appendix C2, Transit Assessment Memorandum, and SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum. A discussion of existing conditions related to walking access to transit is provided on draft SEIR p. 3.B-11, and a discussion of the existing transit boarding islands on Ocean Avenue is presented on draft SEIR p. 3.B-21.
- An evaluation of potentially hazardous conditions for people walking to/from transit is provided under Impact TR-2 on draft SEIR p. 3.B-65.

Comments regarding project improvements that benefit public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation (i.e., transportation demand management measures) are addressed in Response TR-2, Travel Demand, on RTC p. 4.C-10. Comments regarding the inclusion of the City College facilities master plan in the cumulative conditions analysis are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-55.

The response to transit impacts analysis comments is organized by the following subtopics:

- Transit Significance Criteria Used in the Transit Delay Analysis
- Existing Plus Project Conditions Transit Delay
- Cumulative Conditions Transit Delay
- Potentially Hazardous Conditions – Transit
- Geographic Study Area for Transit
- Mitigation Measures

### *Transit Significance Criteria Used in the Transit Delay Analysis*

As stated on draft SEIR p. 3.B-35, with respect to transit impacts, a project would have a significant effect on the environment if it would substantially delay public transit. In particular, the proposed project could have a significant transit impact if transit travel time increases on a specific route would be greater than, or equal to, four minutes or half of the existing headway for Muni service,

whichever is less. The threshold for transit impacts is based on the adopted City Charter section 8A.103 (c)1, which established an 85 percent on-time performance service standard for Muni, which considers vehicles arriving more than four minutes beyond a published schedule time late, and the potential secondary impacts on the physical environment associated with riders who switch to automobile- based modes when transit becomes less convenient.

The 2019 TIA Guidelines indicate that a significant impact could occur if a project would result in transit delay greater than or equal to four minutes. This criterion is based on substantial evidence provided in Appendix I of the 2019 TIA Guidelines (p. I-26) and is explained in a July 20, 2018, SFMTA memorandum included as RTC Attachment 5. The commenters provide no substantial evidence to demonstrate that the information used to develop the criterion is flawed or inadequate.

The department applies this transit delay threshold of significance to each transit route within the study area. If the project adds four additional minutes of total additional delay from the existing condition along an individual transit route, then the project's impact to that transit route could be significant. This application accounts for sources of delay along the transit route within the study area.

Several commenters state that the department's threshold of significance is four minutes in between individual transit line stops; these comments are incorrect. The threshold is four minutes of additional delay to an individual transit line *within* the study area boundaries, which is a more stringent threshold than only *between* individual transit line stops.

For example, there are nine stops within the transit delay study area boundary for the 29 Sunset outbound route (i.e., between Plymouth Avenue/Ocean Avenue and Mission Street/Persia Avenue). Under existing conditions, the 29 Sunset (outbound) takes 12:09 minutes to travel from Plymouth/Ocean Avenue to Mission Street/Persia Avenue. The transportation analysis adjusts travel times to account for the Developer's Proposed Option trips; it is anticipated that the 29 Sunset (outbound) would take 13:07 minutes to travel from Plymouth/Ocean Avenue to Mission Street/Persia Avenue. The difference between 12:09 minutes under existing conditions and 13:07 minutes with the Developer's Proposed Option is 58 seconds. The 58 seconds difference in transit travel time between these nine stops is the total additional delay attributable to the Developer's Proposed Option; this difference is then compared to the four-minute threshold of significance. In the case of the 29 Sunset (outbound), the 58 seconds delay is not above the four-minute threshold of significance and the Developer's Proposed Option would not result in a significant delay to the 29 Sunset under existing plus project conditions.

A commenter correctly notes that footnote 96 on draft SEIR p. 3.B-52 includes a typo reference to City Charter section 8A.103. The following edit clarifies the draft SEIR text by providing reference to the City Charter statute that establishes the 85 percent on-time performance service standard. Footnote 96 on draft SEIR p. 3.B-52 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

% The threshold uses the adopted the Transit First Policy, City Charter section 8A.103(c)1, 85, percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.

### *Existing plus Project Conditions Transit Delay*

As described on draft SEIR p. 3.B-52, the analysis methodology assesses three sources of project-related transit delay: traffic congestion delay; transit reentry delay; and passenger boarding delay. Changes in transit travel times were estimated to determine if the proposed project would increase existing transit travel times on individual routes so that additional transit vehicles would be required to maintain the frequency of service.

Transit impacts are discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99. Additional discussion of the transit delay assessment is provided in Appendix C2, Transit Assessment Memorandum. The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) is evaluated for transit routes operating along Frida Kahlo Way and Ocean Avenue within the transportation study area. The routes and study segments represent routes and study segments to which the project would increase vehicle trips and passenger boarding/alighting events, thereby resulting in potential increased transit delay (traffic congestion, transit reentry delay, and passenger boarding delay). As shown in Table 3.B-18, Transit Delay Analysis on draft SEIR p. 3.B-74, the proposed project would not increase transit delays by more than four minutes within the study area and, therefore, would result in a less-than-significant impact related to transit delay under existing plus project conditions.

One commenter erroneously states that the draft SEIR uses the 2010 Highway Capacity Manual and that the data are at least 15 years old. First, the draft SEIR uses the 2000 Highway Capacity Manual, not the 2010 Highway Capacity Manual, for reentry delay to transit vehicles. The draft SEIR is consistent with the guidelines in Appendix I: Public Transit, of the 2019 TIA Guidelines Update.<sup>29</sup> The 2000 Highway Capacity Manual includes empirical data that provides transit reentry delay times based on adjacent lane traffic. These data represent the likelihood a bus can find gaps to reenter into traffic based on the frequency of adjacent vehicle arrivals. This relationship is not expected to have changed substantively since the data were collected and published because driver acceptance of critical gaps in traffic is a constant variable and has not changed over time. Explanation of this analysis is provided under Impact TR-4 on draft SEIR p. 3.B-52.

One commenter notes that the transit delay analysis does not consider the 43 Masonic line segment between the City College Bookstore and the Balboa Park Bay Area Rapid Transit (BART) Station. The transit delay analysis has been clarified to include the segment between the City College Bookstore (50 Frida Kahlo Way) and the Geneva Avenue/Howth Street stop in both directions, which captures the geographic extent of project-related transit delays to the 43 line. The *Project-Related Change* data presented in draft SEIR Table 3.B-18 below thus accounts for this extended segment through the Ocean Avenue/Geneva Avenue/Frida Kahlo Way intersection. The *Existing Conditions, Transit Travel Times* data presented in the same table were based on travel time runs for the former analysis segment beginning or ending at the City College Bookstore and have not been reconstructed to match. Thus, the *Existing Conditions, Transit Travel Time* and *Project-Related Changes* columns in Table 3.B-18 represent the 43 line between Foerster Street/Monterey Boulevard and the City College South Entrance, with a *lower* estimate of existing travel times and thresholds than if

<sup>29</sup> <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>.

they represented the segment extending to Geneva Avenue/Howth Street. The *Project-Related Change* columns in Table 3.B-18 represent increases for the whole segment and are sufficient to reach a conclusion. The revised analysis does not change the draft SEIR analysis conclusions.

At the time the transit analysis commenced in 2018 for the draft SEIR, the department was still developing the 2019 TIA Guidelines. The average per passenger boarding delay number used for the project analysis was two seconds per passenger, as identified under Impact TR-4 on draft SEIR p. 3.B-52. Subsequently, the 2019 TIA Guidelines were published and now recommend using an average of 2.5 seconds of boarding delay per passenger. This 2.5 seconds represents the average per-passenger boarding/alighting time; individual times may vary depending on passenger characteristics, the total number of passengers boarding and alighting, and the distribution within the bus of boarding and alighting events. The 2.5 seconds uses empirical data from the SFMTA's evaluation of all-door-boarding policy implementation.

For consistency with now-published guidance, the passenger boarding delay numbers are reapplied to proposed project transit delay and are represented in the revised draft SEIR Table 3.B-18, Transit Delay Analysis. The change in assumption from using 2 seconds per passenger to 2.5 seconds per passenger increased the estimated delay as presented in the modified Table 3.B-18 below.

The following clarifies the transit travel times in the draft SEIR in response to the comments and to revise the passenger boarding times. The following clarifications do not change conclusions regarding the level of significance of the project-level and cumulative transit impacts.

The text on draft SEIR pp. 3.B-22 to 3.B-23 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

Muni transit operations in the study area were evaluated using transit delay analysis. The transit delay analysis presents the delay associated with traffic congestion, transit reentry, and passenger boarding along the following ~~corridors and Muni lines~~ for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
- K/T Third/Ingleside:
  - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)

- Genessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (inbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (outbound)

The results of the transit delay analysis are summarized in ~~Table 3.B-8, Existing Transit Delay~~ Existing Transit Travel Times, and provided in Attachment C, Corridor Delay Analysis Synchro Worksheets, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations, of SEIR Appendix C2, Transit Assessment Memorandum. Transit ridership and capacity analysis are provided in Attachment F (transit ridership and capacity analysis) of SEIR Appendix C2 for informational purposes. Table 3.B-8 presents the estimated ~~seconds of delay a transit vehicle encounters~~ travel times during the a.m. and p.m. peak hours ~~along each of the study corridors.~~

**TABLE 3.B-8**  
**~~EXISTING TRANSIT DELAY~~**

Corridor	Weekday a.m. Peak Hour (seconds of delay)		Weekday p.m. Peak Hour (seconds of delay)	
	Northbound/ Eastbound	Southbound/ Westbound	Northbound/ Eastbound	Southbound/ Westbound
Frida Kahlo Way	3	12	3	25
Ocean Avenue	110	132	113	133
Geneva Avenue	70	48	66	41

SOURCE: Kittelson & Associates Inc., 2018.

NOTES:

Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.

**TABLE 3.B-8**  
**EXISTING TRANSIT TRAVEL TIMES**

<u>Transit Line</u>	<u>Study Segment</u>	<u>Existing Transit Travel Time<sup>a</sup></u>	
		<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>
<u>K/T</u>	<u>Jules Ave/Ocean Ave to Balboa Park BART (outbound)</u>	<u>3:30</u>	<u>8:42</u>
	<u>San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave (inbound)</u>	<u>3:28</u>	<u>10:03</u>
<u>29</u>	<u>Plymouth Ave/Ocean Ave to Mission St/Persia Ave (outbound)</u>	<u>8:01</u>	<u>12:09</u>
	<u>Mission St/Persia Ave to Plymouth Ave/Ocean Ave (inbound)</u>	<u>7:10</u>	<u>9:55</u>
<u>43</u>	<u>Geneva Avenue/Howth Street to Foerster St/Monterey Blvd (inbound)</u>	<u>4:20</u>	<u>4:37</u>
	<u>Genessee St/Monterey Blvd to Geneva Avenue/Howth Street (outbound)</u>	<u>4:16</u>	<u>4:23</u>
<u>49</u>	<u>Frida Kahlo Way/City College South Entrance to Mission St/Persia Ave (outbound)</u>	<u>5:39</u>	<u>10:04</u>
	<u>Mission St/Ocean Ave to Frida Kahlo Way/City College South Entrance (inbound)</u>	<u>7:18</u>	<u>11:25</u>

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

**NOTES:**

<sup>a</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

As shown in Table 3.B-8, the ~~highest transit delays~~ most variability in transit travel times are experienced along Ocean Avenue ~~between Plymouth Avenue and Judson Avenue in the westbound direction where there is a difference in travel times of over 6.5 minutes between the weekday a.m. and p.m. peak hours.~~ This is primarily caused by the vehicular traffic at the Ocean Avenue/San Jose Avenue intersection during the weekday p.m. peak hour, which operates with an average intersection delay above 100 seconds. Additionally, as a result of the high volume of vehicle traffic ~~volumes~~ in the curbside travel lane on westbound Ocean Avenue (between 900 and 930 vehicles per hour) transit vehicles ~~in this corridor~~ typically experience transit reentry delays of around 11 seconds.

The text on draft SEIR pp. 3.B-73 to 3.B-74 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) was evaluated along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~

- K/T Third/Ingleside:
  - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Genessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (outbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (inbound)

The results of the transit delay analysis are summarized in **Table 3.B-18, Transit Delay Analysis**, ~~and Synchro travel time calculation worksheets presenting transit delay along the corridors~~ are provided in Attachment C, Corridor Delay Analysis Synchro Worksheets, ~~and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations~~, of SEIR Appendix C2, Transit Assessment Memorandum and supplementary transit analysis is provided in the SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.



**TABLE 3.B-18**  
**TRANSIT DELAY ANALYSIS**

Corridor	Weekday a.m. Peak Hour (seconds of delay)		Weekday p.m. Peak Hour (seconds of delay)	
	Northbound/ Eastbound	Southbound/ Westbound	Northbound/ Eastbound	Southbound/ Westbound
<b>Transit Delay</b>				
<b>Existing Conditions</b>				
Frida Kahlo Way	5	15	5	28
Ocean Avenue	121	143	124	144
Geneva Avenue	79	53	75	46
<b>Existing plus Developer's Proposed Option</b>				
Frida Kahlo Way	18	74	29	101
Ocean Avenue	187	182	182	244
Geneva Avenue	99	127	117	127
<b>Existing plus Additional Housing Option</b>				
Frida Kahlo Way	21	87	46	111
Ocean Avenue	183	207	208	272
Geneva Avenue	109	137	133	137
<b>Project Related Increase in Delay</b>				
<b>Developer's Proposed Option</b>				
Frida Kahlo Way	13	59	24	73
Ocean Avenue	66	39	58	100
Geneva Avenue	20	74	42	81
<b>Additional Housing Option</b>				
Frida Kahlo Way	16	72	41	83
Ocean Avenue	62	64	84	128
Geneva Avenue	30	84	58	91

SOURCE: Kittelson &amp; Associates, Inc. 2018.

## NOTES:

Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.

**TABLE 3.B-18**  
**TRANSIT DELAY ANALYSIS**

Transit Line	Study Segment	Transit Travel Time		Project-Related Change		Exceeds Four-Minute Threshold? <sup>a</sup>	
		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period
Existing Conditions <sup>b</sup>							
K/T	Jules/Ocean to Balboa Park BART (outbound)	3:30	8:42	==	==	==	==
	San Jose/Geneva to Dorado/Ocean (inbound)	3:28	10:03	==	==	==	==
29	Plymouth/Ocean to Mission/Persia (outbound)	8:01	12:09	==	==	==	==
	Mission/Persia to Plymouth/Ocean (inbound)	7:10	9:55	==	==	==	==
43	Geneva/Howth to Monterey/Foerster <sup>c</sup> (inbound)	4:50 <sup>c</sup>	5:07 <sup>c</sup>	==	==	==	==
	Gennessee/Monterey to Geneva/Howth <sup>c</sup> (outbound)	4:27 <sup>c</sup>	4:46 <sup>c</sup>	==	==	==	==
49	Frida Kahlo/City College South to Mission/Persia (outbound)	5:39	10:04	==	==	==	==
	Mission/Ocean to Frida Kahlo/City College South (inbound)	7:18	11:25	==	==	==	==
Existing Conditions + Developer's Proposed Option							
K/T	Jules/Ocean to Balboa Park BART (outbound)	4:36	9:40	1:06	0:58	No	No
	San Jose/Geneva to Dorado/Ocean (inbound)	4:07	11:43	0:39	1:40	No	No
29	Plymouth/Ocean to Mission/Persia (outbound)	9:07	13:07	1:06	0:58	No	No
	Mission/Persia to Plymouth/Ocean (inbound)	7:49	11:35	0:39	1:40	No	No
43	Geneva/Howth to Monterey/Foerster <sup>c</sup> (inbound)	5:04 <sup>c</sup>	5:33 <sup>c</sup>	0:14	0:26	No	No
	Gennessee/Monterey to Geneva/Howth <sup>c</sup> (outbound)	5:37 <sup>c</sup>	5:50 <sup>c</sup>	1:10	1:04	No	No
49	Frida Kahlo/City College South to Mission/Persia (outbound)	6:45	11:02	1:06	0:58	No	No
	Mission/Ocean to Frida Kahlo/City College South (inbound)	7:57	13:05	0:39	1:40	No	No
Existing Conditions + Additional Housing Option							
K/T	Jules/Ocean to Balboa Park BART (outbound)	4:32	10:06	1:02	1:24	No	No
	San Jose/Geneva to Dorado/Ocean (inbound)	4:32	12:11	1:04	2:08	No	No
29	Plymouth/Ocean to Mission/Persia (outbound)	9:03	13:33	1:02	1:24	No	No

<u>Transit Line</u>	<u>Study Segment</u>	<u>Transit Travel Time</u>		<u>Project-Related Change</u>		<u>Exceeds Four-Minute Threshold?<sup>a</sup></u>	
		<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>	<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>	<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>
	<u>Mission/Persia to Plymouth/Ocean (inbound)</u>	<u>8:14</u>	<u>12:03</u>	<u>1:04</u>	<u>2:08</u>	<u>No</u>	<u>No</u>
<u>43</u>	<u>Geneva/Howth to Monterey/Foerster<sup>c</sup> (inbound)</u>	<u>5:07<sup>c</sup></u>	<u>6:07<sup>c</sup></u>	<u>0:17</u>	<u>1:00</u>	<u>No</u>	<u>No</u>
	<u>Gennessee/Monterey to Geneva/Howth<sup>c</sup> (outbound)</u>	<u>5:39<sup>c</sup></u>	<u>6:07<sup>c</sup></u>	<u>1:12</u>	<u>1:21</u>	<u>No</u>	<u>No</u>
<u>49</u>	<u>Frida Kahlo/City College South to Mission/Persia (outbound)</u>	<u>6:41</u>	<u>11:28</u>	<u>1:02</u>	<u>1:24</u>	<u>No</u>	<u>No</u>
	<u>Mission/Ocean to Frida Kahlo/City College South (inbound)</u>	<u>8:22</u>	<u>13:33</u>	<u>1:04</u>	<u>2:08</u>	<u>No</u>	<u>No</u>

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

**NOTES:**

<sup>a</sup> The threshold is calculated as the existing transit travel time plus four minutes.

<sup>b</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

<sup>c</sup> The Transit Travel Time column for existing conditions represents the 43 line between Geneva Avenue/Howth Street and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), with collected transit travel time data along the route segment between Frida Kahlo Way/Geneva Avenue/Ocean Avenue and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), plus the Synchro estimated delay at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The Project-Related Change columns in Table 3.B-18 represent Synchro-estimated increase for the 43 line between Foerster Street/Monterey Boulevard and Geneva Avenue/Howth Street.

### *Developer's Proposed Option*

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). 1 minute and 40 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 6 seconds along Ocean Avenue to the 29, 49, and K/T in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, ~~t~~The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, ~~t~~The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, based on the established thresholds

of significance, the Developer's Proposed Option would result in a *less-than-significant* impact related to transit delay.

#### *Additional Housing Option*

As shown in Table 3.B-18, vehicle and transit generated by the Additional Housing Option would increase transit delay by a maximum of ~~83 seconds along Frida Kahlo Way, (southbound direction, weekday p.m. peak hour), a maximum of 128 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 91 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 2 minutes and 8 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 2 seconds along Ocean Avenue to the 29, 49, and K/T in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, ~~t~~The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Additional Housing Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, ~~t~~The Additional Housing Option would not result in transit delay greater than or equal to four minutes.<sup>423</sup> Therefore, based on the established thresholds of significance, the Additional Housing Option would result in a *less-than-significant* impact related to transit delay.

<sup>423</sup> ~~Ibid~~

#### *Cumulative Conditions Transit Delay*

As discussed on draft SEIR p. 3.B-95, the transit delay contribution from the project, City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the threshold of significance for individual Muni routes. As a result, the proposed project, in combination with cumulative projects, could result in a significant cumulative public transit delay impact. Based on a review of the project-related increase in delay under existing plus project conditions and the potential for increased delay under cumulative conditions, the proposed project options could have a cumulatively considerable contribution to transit impacts.

The draft EIR identified a significant cumulative impact to the following transit lines: the K/T Third/Ingleside, the 29 Sunset, 43 Masonic, and the 49 Van Ness/Mission. However, upon further review of the project's contribution to cumulative transit impacts, the project would not make a considerable contribution to transit delay for the 49 Van Ness/Mission route in the study area. The contribution of project vehicle trips along the 49 Van Ness/Mission segment from the study area boundary of San Jose/Ocean avenues up to the 49 Van Ness/Mission's terminus at the City College Loop would result in a maximum increase of 13 seconds of delay with the Developer's Proposed

Option and a maximum increase of 24 seconds of delay with the Additional Housing Option.<sup>30</sup> This does not meet the two-minute threshold for a considerable contribution. As such, the proposed project would not result in a substantial transit delay to the 49 Van Ness/Mission and no mitigation is required. Text edits have been made to the draft SEIR to revise the conclusion related to the 49 Van Ness/Mission.<sup>31</sup>

To mitigate the project's considerable contribution to transit delay under cumulative conditions, the draft EIR identified Mitigation Measure M-C-TR-4. This mitigation measure requires that the project sponsor monitor and report cumulative transit travel times for the impacted route segments. The mitigation measure identifies transit travel performance standards for the impacted routes and further states that if the performance standard is not met, the project sponsor shall implement feasible measures to reduce the transit delay and meet the performance standard. The mitigation measure identifies potential measures to reduce transit delay including off-site capital improvements such as turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects.

During the preparation of the RTC, the planning department, in consultation with the SFMTA, identified specific capital improvements that would reduce transit travel time to impacted routes. These capital improvements would reduce the project's contribution to cumulative transit delay below the two-minute threshold, and as such, the project's contribution would no longer be considerable. The methods, data collection, and results of this analysis, including discussion of secondary construction and operational effects of implementing the capital improvements, are included in RTC Chapter 5 and SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.

The project sponsor would commit funding to the capital improvements that would reduce the project's cumulatively considerable contribution to transit delay. The construction of these improvements negates the need for ongoing monitoring and reporting as the project's cumulatively considerable contribution would be reduced; therefore, this component has been removed from the mitigation measure. However, given the uncertainty of SFMTA approval of these capital improvements measures, the impact of the proposed project options would remain

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<sup>30</sup> During the weekday a.m. peak hour the Developer's Proposed Option would increase delay for the 49 Van Ness/Mission by 5 seconds in the eastbound direction and 13 seconds in the westbound direction from the study area boundary of San Jose/Ocean avenues up to the 49 Van Ness/Mission's terminus at the City College Loop. During the weekday p.m. peak hour the Developer's Proposed Option would increase delay by 2 seconds in the eastbound direction and 9 seconds in the westbound direction. During the weekday a.m. peak hour the Additional Housing Option would increase delay for the 49 Van Ness/Mission by 6 seconds in the eastbound direction and 17 seconds in the westbound direction from the study area boundary of San Jose/Ocean avenues up to the 49 Van Ness/Mission's terminus at the City College Loop. During the weekday p.m. peak hour the Additional Housing Option would increase delay by 1 second in the eastbound direction and 24 seconds in the westbound direction.

<sup>31</sup> For informational purposes, the project team, in consultation with the SFMTA, examined potential improvements to reduce transit travel time to the 49 Van Ness/Mission route. On Ocean Avenue, between Frida Kahlo Way and Howth Avenue, the team identified there could be potential transit time savings to the 49 Van Ness/Mission route by moving the bus stop nearest to City College into the streetcar track lane. This is a policy decision that the SFMTA is currently investigating that would not require a financial commitment from the project sponsor.

*significant and unavoidable with mitigation*, even with implementation of Mitigation Measure M-C-TR-4.

The following edits update draft SEIR pp. 3.B-95 to 3.B-98, including **Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay**, to reflect the impact conclusion updates regarding the 49 Van Ness/Mission and transit capital improvements (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

**Mitigation Measure M-C-TR-4: ~~Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay~~**. The project sponsor, under either project option, shall ~~monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.~~

**Transit Travel Time Performance Standard Routes and Study Segments**. Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M C TR 4. The following routes and study segments shown in Table M C TR ~~represent routes and study segments~~ would most likely ~~to have a~~ experience cumulative transit delay impact to which the project would have a considerable cumulative contribution.

- K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)
- K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue
- 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue
- 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue
- 43 Masonic (outbound): Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street
- 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard

**TABLE M-C-TR-4**  
**TRANSIT TRAVEL TIME PERFORMANCE STANDARD**

Transit Line	Study Segment	Existing Transit Travel Time <sup>a</sup>		Performance Standard <sup>b</sup>	
		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period
K/T	Jules Ave/Ocean Ave to Balboa Park BART	3:30	8:42	7:30	12:42
	San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave	3:28	10:03	7:28	11:28
29	Plymouth Ave/Ocean Ave to Mission St/Persia Ave	8:01	12:09	12:01	16:01
	Mission St/Persia Ave to Plymouth Ave/Ocean Ave	7:10	9:55	11:10	15:10
43	Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd	4:20	4:37	8:20	8:37
	Genessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance	4:16	4:23	8:16	8:23
49	Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave	5:22	10:04	9:22	14:04
	Mission St/Ocean Ave to Frida Kahlo Way/CCSF South Entrance	7:18	11:25	11:18	15:25

SOURCE: Kittelson & Associates, Inc., 2019; SFMTA Automatic Vehicle Location Data, 2019.

**NOTES:**

<sup>a</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.

<sup>b</sup> The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

**Monitoring and Reporting.** The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.

**Timing.** The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building<sup>32</sup> at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.

<sup>32</sup> A new major building is City College of San Francisco Ocean Avenue campus construction post 2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.

The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets its terms for this measure.

*Collection and Reporting Details.* For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.

For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).

**Implement Fair Share of Capital Improvement Measures.** If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the The project sponsor shall implement contribute funds for the following capital improvement measures that reduce transit travel times. These measures are subject to agency approval and could include:

1. Signal Timing Modifications at Ocean Avenue/Brighton Avenue. The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
2. Signal Timing Modifications at Ocean Avenue/Plymouth Avenue. The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
3. Bus Boarding Island on Southbound Frida Kahlo Way. The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.

The cost of these capital improvement measures is \$200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment) and shall be considered



the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA<sup>33</sup>, shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay \$110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and \$90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2.

If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA.

The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.

- ~~1. Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.~~
- ~~2. Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.~~
- ~~3. Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may include off-site capital improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.~~

~~**Term Condition A:** The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.~~

~~**Term Condition B:** The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.~~

~~In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and~~

<sup>33</sup> Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

Implementation of these capital improvement measures would reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. Payment of the fair share contribution levels would mitigate the project's contribution to the cumulative impacts of the estimated transit delay added by full development of the proposed project options, City College facilities master plan, and other cumulative projects. However, given the uncertainty of SFMTA approval of other measures under their jurisdiction, of these capital improvement measures, the impact of the proposed project options would remain significant and unavoidable with mitigation, even with implementation of Mitigation Measure M-C-TR-4.

**Significance after Mitigation:** Significant and Unavoidable.

#### *Potentially Hazardous Conditions – Transit*

The draft SEIR includes an evaluation of potentially hazardous conditions for people accessing transit under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. As discussed on draft SEIR p. 3.B-67, under existing conditions, people walking to/from the K/T Third/Ingleside transit boarding island on Ocean Avenue at Lee Avenue were observed to cross the rightmost travel lane to access the boarding island or sidewalk instead of crossing at the crosswalk. People waited for gaps in vehicle and bicycle traffic before crossing the travel lane, and vehicles and bicycles were generally traveling slowly with sufficient gaps in traffic for people to cross. While some of the project-generated transit riders would be expected to use the crosswalk at Lee Avenue to access the boarding island, it is likely that people would continue to cross the rightmost travel lane to access the boarding island.

Several factors are considered in the evaluation of the proposed project's potential to result in potentially hazardous conditions for people walking to/from the K/T Third/Ingleside boarding island. Such factors include the presence of an existing protected crossing at Lee Avenue, that the project would add a maximum of 132 vehicles during the weekday p.m. peak hour under the Additional Housing Option, and that the anticipated vehicle speeds of project traffic approaching the Lee Avenue intersection to turn right would be less than 15 miles per hour. Based on these considerations, the proposed project options would not create potentially hazardous conditions for people walking to/from the K/T Third/Ingleside boarding island. Because the proposed project would not result in a significant impact related to conditions for people walking, no mitigation is required.

#### *Geographic Study Area for Transit*

One commenter seeks clarification on how the draft SEIR geographic study area for transportation and circulation was developed. The geographic study area analyzed for the proposed project includes the overall vehicular roadway network that residents, employees, and visitors would use in traveling to and from the project site generally within 0.25 miles of the center of the project site. As described in Section 3.B.4, Existing Conditions, on draft SEIR p. 3.B-5, the transportation study area was selected to include elements of the network that:

- Represent access points to the regional highway system (e.g., freeway on- and off-ramps);

- Are located along major street corridors serving the project site (e.g., Ocean Avenue and Frida Kahlo Way); or
- Are located in the immediate vicinity of the project site (e.g., San Ramon Way/Southwood Drive/Plymouth Avenue).

Pertaining to transit, the geographic boundary of the study area includes the closest transit stops to the project site for the relevant Muni lines and includes the intersections and street segments along which project traffic would be most concentrated. Outside the geographic study area, project vehicle traffic would be more dispersed, thereby lessening the potential for impacts.

### *Mitigation Measures*

Comments include recommendations for additional mitigation measures to reduce transit delay. Section 15126.2 of the CEQA Guidelines states that “[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment ... the EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected.” Mitigation measures in the draft SEIR are provided only for impacts found to be significant (CEQA Guidelines section 15126.4). Under CEQA, mitigation measures in an EIR must have an essential nexus (i.e., connection) between the mitigation measure and the significant impact and the mitigation must be “roughly proportional” to the significant impacts of the project (CEQA Guidelines section 15126.4(a)(4)(a) and (b)). Mitigation measures are not required for effects which are not found to be significant (CEQA Guidelines section 15126.4(a)(3)). The draft SEIR adequately and accurately addresses public transit impacts and presents applicable mitigation measures, as appropriate.

As discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79, the proposed project options would result in a less-than-significant impact related to transit delay and no mitigation would be required under existing plus project conditions.

As discussed under Impact C-TR-4 on SEIR pp. 3.B-94 to 3.B-99, the proposed project may result in a cumulatively considerable contribution related to transit delay. To reduce the project’s considerable contribution, implementation of Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay, was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures (e.g., modifying signal phasing or restricting certain movements for general traffic that delay transit vehicles at locations along given routes) to maintain transit travel times. for each individual transit route within the study area to, within four minutes of existing levels.

While the proposed mitigation measure and the timing of the mitigation measure is appropriate and meets CEQA requirements, the project sponsor worked with SFMTA and planning department staff to identify treatments that could be implemented in the short term to prevent a cumulatively significant contribution and reduce potential for project-related transit delay impacts.

As documented in the revised Mitigation Measure M-C-TR-4 shown on RTC p. 4.C-45, the project applicant would fund the design and construction of the following capital improvement measures:

- Modification of the existing traffic signal at Ocean Avenue/Brighton Avenue to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
- Modification of the existing traffic signal at Ocean Avenue/shall to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
- Bus boarding island on southbound Frida Kahlo Way.

As documented in the Transit Delay Analysis and Capital Improvements Memorandum in RTC Chapter 5 and as new SEIR Appendix C4, these capital improvements would reduce delay and prevent a cumulatively significant project contribution to cumulative impacts on the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.

As previously discussed on RTC p. 4.C-43, upon further review of the project's contribution to cumulative transit impacts, the project would not make a considerable contribution (defined as two minutes or more under cumulative conditions) to transit delay for the 49 Van Ness/Mission route in the study area and no mitigation measures are required.

One commenter proposes a series of mitigation measures to reduce the project's impact to transit delay; responses to each are provided below. The responses are provided for informational purposes, because as described above, feasible project measures were identified for the project's considerable contribution to the significant cumulative transit delay impact. However, the impact remains significant and unavoidable due the uncertainty in the SFMTA adopting such measures.

- **Restrict left turns at the intersection of Ocean Avenue and Brighton Avenue.** Eastbound left turn prohibitions are included as a capital improvement measure in the revised Mitigation Measure M-C-TR-4 to reduce transit delay for routes operating along Ocean Avenue.
- **Install transit signal priority at all traffic lights on Ocean Avenue between San Jose Avenue and Junipero Serra Boulevard and on Geneva Avenue between San Jose Avenue and Ocean Avenue.** The draft SEIR identified capital improvement measures that would reduce the project's considerable contribution to transit delay under cumulative conditions; no additional measures are necessary. As described above in Mitigation Measure M-C-TR-4, should the SFMTA adopt a strategy to reduce transit travel times to the impacted routes that does not involve the proposed signal timing modifications or bus boarding islands identified, the project's fair share contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed by the SFMTA.
- **Give Muni lines higher priority at St. Francis Circle and West Portal to improve speed and reliability of the K/T line.** CEQA requires that mitigation measures proposed for a project have a nexus to the physical environmental effect that occurs as a result of the project. Transit operations and any transit delays at these locations and associated delay are outside of the study area and reflect existing conditions. The commenter does not provide substantial evidence demonstrating a nexus between the Balboa Reservoir Project and measures proposed at the St. Francis Circle and West Portal.

- **Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.** Modifying stops (i.e., extending boarding islands) to accommodate two-car boarding would allow for enhanced passenger boarding and alighting but would not address the more substantive causes of transit delay (i.e., additional vehicles in the study area) as a result of the project. The proposed project would also not have significant impacts related to potentially hazardous conditions that would necessitate this is a mitigation measure.
- **Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full.** The Whole Foods grocery store on Ocean Avenue is part of the existing condition and is not under the purview of the proposed project.
- **Undergrounding the K Muni line.** This measure would represent a significant infrastructure project. The City is currently undertaking a transit corridors study as part of ConnectSF.<sup>34</sup> The study will develop and prioritize initial concepts for subways, bus rapid transit lines, and other improvements to create a rapid, reliable transit network. The results of this study are not yet known, and, thus, the feasibility of a project that undergrounds the K Muni line is unknown as of the publication of this document. Further, this sort of mitigation would not be roughly proportional to the project's considerable contribution to a significant cumulative transit delay impact.

### ***Comment TR-5: Loading Impacts***

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

I-OSAWA-3  
I-PEDERSON2-12

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*"Most critically, according to the proposal the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue. This would seem to be wholly inadequate. Additionally, that single lane on Lee will also be potentially occupied by truck loading activities for Whole Foods and neighboring businesses."*

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-3])*

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*"The Draft should clarify why potential loading impacts caused by Whole Foods' failure to comply with permit requirements are treated as impacts caused by the Balboa Reservoir project. The City could resolve those impacts by simply requiring Whole Foods to comply with existing legal requirements."*

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-12])*

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<sup>34</sup> City and County of San Francisco, ConnectSF, <https://connectsf.org/about/components/studies/>, accessed March 27, 2020.

## **Response TR-5: Loading Impacts**

One commenter incorrectly characterizes the project's vehicular access points and further states that existing loading operations on Lee Avenue would affect the vehicular inlet to the project. Another commenter requests that the draft SEIR clarify why the freight loading impacts identified on Lee Avenue are treated as impacts caused by the proposed project.

Comments regarding specific elements of the project description are addressed in Response PD-2, Project Description, on RTC p. 4.B-4.

### *Project Description Clarification*

In addition to Lee Avenue, vehicular access to the project site would also be provided via an access road that would connect to the north end of the project site via Frida Kahlo Way as discussed on draft SEIR p. 2-26. As discussed on draft SEIR p. 2-26 and shown in Figure 2-13a on draft SEIR p. 2-28, the proposed project would include a 10-foot-wide northbound lane and would reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one 10-foot-wide southbound through/right-turn lane and one 10-foot-wide southbound left-turn lane. This change from two to three travel lanes would preclude the continued use of curb space along Lee Avenue for freight loading because trucks stopped for loading would obstruct one of the travel lanes.

### *Existing Freight Loading on Lee Avenue*

Project-related freight loading analyses are typically limited to an evaluation of the effects of project-related loading demand on loading conditions within the study area. However, the proposed project includes the extension of Lee Avenue with resulting changes to the areawide on-street loading supply. Therefore, the analysis looks beyond the project-related loading demand and evaluates secondary effects on areawide loading resulting from proposed streetscape modifications and access to the project site. This analysis of the effect of the proposed project on off-site loading activities is presented under Impact TR-6b, on draft SEIR pp. 3.B-85 to 3.B-91; a brief summary of the discussion is provided below as well.

As discussed under Impact TR-6b, under existing conditions, Lee Avenue is a dead-end street with no through traffic. In its current condition, Lee Avenue functions as a loading zone that provides convenient on-street loading to meet Whole Foods' loading demand and accommodate deliveries and passenger loading activity related to other nearby businesses along Ocean Avenue. The proposed project would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area. The proposed project would thereby reduce the supply of on-street loading available to Whole Foods and nearby land uses, creating a loading deficit, which is determined to result in secondary effects on people bicycling and public transit delay. For these reasons, the draft SEIR identifies a significant and unavoidable impact related to freight loading that is attributable to the project.

As stated on draft SEIR p. 3.B-88, in recognition that the Balboa Reservoir would change the conditions of Lee Avenue, the 1150 Ocean Avenue property owner is working with Whole Foods to internalize loading demand to the extent possible.

Furthermore, as acknowledged on draft SEIR p. 3.B-88 and further restated by the commenter, the planning department has the authority to enforce the 1150 Ocean Avenue conditions of approval. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

### ***Comment TR-6: Cumulative Impacts***

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

O-WPA1-2  
O-WPA3-6  
I-JA9-1

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“Second, we will discuss the failure to properly take into consideration the cumulative transportation impacts of the projected increase in City College enrollment. There’s an increase, as the DSEIR correctly notes, by I think 26 to 56 percent over the next few years, and it fails to take that into consideration.”

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-2])*

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### **“CCSF Enrollment Increase**

CCSF has stated that the need for upgraded facilities is based on an approximately 55% increase in anticipated enrollment by 2026 but the cumulative transportation impact discussion is projected to year 2040. The additional enrollment between 2026 and 2040 for CCSF is not discussed. It can be assumed that the annual increase hence forth would be substantially greater than the annual percentage increase used by the Department based on a citywide average. The extraordinary growth in the student enrollment at CCSF as a consequence of free tuition mandates a cumulative analysis that accurately reflects the impacts of the cumulative growth of CCSF on transportation. We believe the DSEIR impact analysis is understated.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-6])*

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### ***“2040 Cumulative Conditions (p. 3.B-91)***

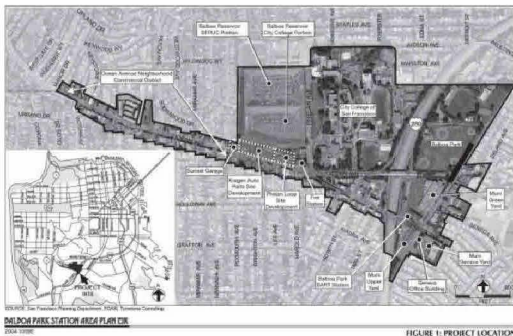
*The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a part.

**The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:**

*The “Project Area” of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*



<!--[if !vml]--><!--[endif]-->

**The SEIR is deficient in its selection of the parameters of geographic context for analysis.”**

*(Alvin Ja, Email, September 10, 2019 [I-JA9-1])*

## **Response TR-6: Cumulative Impacts**

The comments allege that City College growth impacts are not adequately addressed in the cumulative impact analysis and that the cumulative impact analysis geographic study area is inadequate.

The draft SEIR describes 2040 cumulative conditions on draft SEIR pp. 3.B-55 to 3.B-60 and the cumulative impact analysis on draft SEIR pp. 3.B-91 to 3.B-102. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

The cumulative conditions analysis for transportation topics accounts for active development and transportation projects in the vicinity of the project site in various stages of planning, design, or construction. As explained on draft SEIR p. 3.B-56, the City College Board of Trustees published



its facilities master plan in March 2019 and presented an update at a May 30, 2019, Board of Trustees meeting related to a bond measure that may fund identified projects.<sup>35</sup>

The draft SEIR is consistent with CEQA guidance on level of detail necessary to discuss cumulative impacts. CEQA Guidelines section 15130(b) states that, “The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness...”

As of publication of the notice of preparation and the draft SEIR, City College had not conducted CEQA analysis for the proposed projects, and these projects may change or be further refined. Therefore, the cumulative analysis in the draft SEIR and discussed in this document qualitatively assesses impacts of the facilities master plan projects in the study area using the best available information, consistent with CEQA. It is not practical or reasonable for this SEIR to expand the analysis, based on available information. As a result, the cumulative analysis, as described in under Impact C-TR-4 on draft SEIR p. 3.B-56, adequately and accurately identifies cumulative impacts to public transit delay.

The geographic context for cumulative transportation analysis generally includes the transportation network within 0.5 mile of the project site. This radius accounts for the area in which project-related travel would be most concentrated; beyond this area, trips are more dispersed and the likelihood of any impacts that the project could combine with are diminished.

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### ***Comment TR-7: Parking***

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

O-WPA1-1	I-BARISH3-26	I-KAUFMYN2-3
O-WPA3-1	I-BARISH3-38	I-LOHR-1
O-WPA3-2	I-BERNSTEIN5-6	I-PEDERSON2-5
O-WPA3-3	I-HONG-3	I-PEDERSON1-2
O-WPA3-5		

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“Good afternoon. My name is Michael Ahrens. I am President of the Westwood Park Association, Homeowners Association. I am also a member of the Balboa Citizens Advisory Committee, sometimes called the CAC. And thank you for hearing our comments.

On behalf of the Board of Directors of the Westwood Park Association, the neighborhood that is most affected by this whole development, I’m glad to tell you I will be brief. We will put our comments on the DSEIR in writing.

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<sup>35</sup> The City College Facilities Bond (Measure A) passed on March 3, 2020.

But I will say this that the DSEIR is severely flawed and we will tell you why in writing.

I will outline, now, only a series of some of the flaws, and you've heard some of the hints of these things from other speakers tonight. First, we will discuss the failure of the DSEIR to accurately address the cumulative secondary parking impacts caused by the loss of existing parking, including the impacts on transit, Lyft and Uber drivers."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-1])*

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"Most significant impact of project is the loss of parking for City College. Although parking not an environmental impact under CEQA, SEIR must include analysis of secondary impacts caused by loss of existing parking, including impacts on public transit, and private ride share. Explain where the secondary impact of elimination of virtually all existing available parking on east and west basins on public transit and local traffic is analyzed and why the impact on SFMTA ridership and capacity analysis are presented in the appendices "for information" only. Secondary impacts related to City College on transit and transit delay are not based on most recent information related to foreseeable FMP projects prior to SEIR publication."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-1])*

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"SEIR doesn't analyze secondary impacts of elimination of parking as part of cumulative impacts on transportation. Non-CEQA parking study by Kittelson anticipates parking shortages caused by project and City College development will lead to increased reliance on public transportation and increase in drivers looking for parking spaces in adjacent residential neighborhoods."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-2])*

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"Many of the streets within Westwood Park provide on-street parking that results in narrowing the effective roadway width and making two-way vehicle traffic difficult. (DSEIR, p. 6-34) This potentially hazardous condition would be exacerbated by additional vehicles looking for parking due to the shortage created by cumulative development. This is a potentially significant secondary transportation impact that is not adequately addressed in the DSEIR."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-3])*

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"The developer has stated on its website that there will be a public garage on the site "sized to meet City College demand". The number and location of the replacement parking spaces should be discussed as should the elimination of the off-street parking spaces from the CCSF Master Plan development."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-5])*

- There is an aerial analysis of parking lot volumes by time of day. But there is no assessment of the current on-street parking supply. It is known from other campuses and from parking lots serving rail transit like Bart and Cal Train or from light rail in other cities that campuses and large developments put pressure on parking supply, particularly when TOD seeks to provide less parking to support alternative mode choice and to lower development costs. The scoping section has no assessments of the interactive impacts of the college, new apartments and regional parking supply/demand on neighborhood parking conditions post-Development.”

*(Jean Barish, Letter, September 23,2019 [I-BARISH3-26])*

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*“The DSEIR must consider the impact of reduced parking without first putting viable transportation options in place*

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school.

The goal of increasing ridership levels on the nearby public transportation services is laudable but not realistic. Both MUNI and BART have problems with capacity. They have more riders than they can handle. Regular riders of the 43 and 29 will be able to recount stories of crowded conditions and being passed up by buses. New Reservoir residents will only aggravate unreliable service on public transit.

Although reducing car usage in general is a commendable goal, the Reservoir Project’s elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.”

*(Jean Barish, Letter, September 23,2019 [I-BARISH3-38])*

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“5) The question of having a shuttle provided for City College students and others needing access for that last mile from the BART station has been raised repeatedly at public meetings, such as the Balboa Reservoir CAC. The idea has consistently met with resistance. It’s not considered to be a bad idea per se, but it appears to be a financial challenge. Representatives from the City and from the developer have dutifully written the suggestion on white boards but have never embraced it or advocated it. YET THERE HAS TO BE MITIGATION FOR THE IMPACTS ON THE EXISTING CONDITION OF ESSENTIAL PARKING FOR STUDENTS AND FACULTY —for parking which may become unavailable due to a housing development. If there is a development, there will be impacts and consequences which can’t just be ignored.”

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-6])*

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“2. We need to address the parking for the college.”

*(Dennis Hong, Email, September 11, 2019 [I-HONG-3])*

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"The Draft SEIR speculates that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." The assumption that those students and contingent faculty will transition to public transportation services is not realistic as both MUNI and BART have capacity issues. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate the already unreliable service."

*(Wynd Kaufmyn, Email, September 22, 2019 [I-KAUFMYN2-3])*

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"I am shocked that the report does not take into account the need for parking at CCSF. There are no dorms at City College. Everyone needs transportation to get there. Muni service is inadequate, especially for night classes. Students and teachers need to be able to park. The loss of this much parking will be devastating to City College."

*(Janet Lohr, Email, August 10, 2019 [I-LOHR-1])*

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"B. The Draft fails to identify and evaluate the environmental impacts of the proposed public parking garage.

The Draft's assertion that the public parking garage included in the Developer's Proposed Option will not have any environmental impacts because it is replacing parking that already exists is fundamentally flawed.

According to the City College of San Francisco Transportation Demand Management (TDM) and Parking Plan (March 15, 2019), City College currently has excess parking even during the peak parking demand period of the first week of each semester. It has almost 1,000 excess parking spaces on typical semester days. It has an excess supply even though City College provides parking for free to its employees and at very low cost to its students (\$40 per semester, \$20 per semester for those receiving financial aid, or \$3 for a daily pass).

In light of its glut of free or low-cost parking, it is unsurprising that City College has very high rates of commuting by solo drivers. 66 percent of City College employees drive alone to the Ocean campus. This is almost double the citywide average of 34% (Metropolitan Transportation Commission data for 2018). Similarly, only 5 percent of City College employees walk or bike to the Ocean campus in comparison to the citywide average of 10%, even though a substantial portion of City College employees and students live within three miles of the Ocean campus. A lower percentage of students drive alone to campus (33%), but the TDM and Parking Management Plan concludes that student drivers are especially likely to switch modes of transportation if parking is restricted or becomes more expensive.

Projecting into the future, assuming 25% growth in student enrollment, the TDM and Parking Management Plan projects that a robust TDM program would be sufficient to avoid any parking shortfall on a typical semester day even if the Balboa Reservoir is developed without any replacement parking. If the Performing Arts and Education Center (PAEC) is constructed on an existing City College-owned parking lot, there might be unserved parking demand of up to 415 spaces on a typical semester day, but that assumes no shift in parking demand due to limited supply. According to surveys of employees and students, up to 60% of drivers are likely to shift modes if parking becomes more difficult to obtain. Adding that shift in demand, the unserved parking demand if the Balboa Reservoir is developed without replacement parking, the PAEC is constructed, and enrollment increases by 25% is only 166 spaces.

The Draft has no discussion whatsoever about how construction of a 750-space public parking garage would affect parking demand or the effectiveness of City College's TDM program. Given that the availability of parking encourages more people to drive, the Draft should be revised to address how the proposed public parking garage is likely to result in more VMT and GHG emissions than if it weren't included in the project.

The Draft is also entirely silent about the rationale for the size of the public parking garage. Even if both the Balboa Reservoir project and the PAEC are constructed and the student body increases by 25%, the unserved parking demand on a typical semester day (either 415 spaces or 166 spaces, depending on how supply constraints affect demand) would be far less than 750 spaces if City College implements a robust TDM program. Given that the peak parking demand during the first week of each semester occurs only about 20 hours each year, the peak parking demand hardly seems a plausible rationale for the size of the garage. The only remaining rationale would appear to be a desire to perpetuate current commute patterns and parking demands despite the VMT and GHG emissions that those generate. The Draft should be revised to explain the reason for the size of the proposed public parking garage, the environmental impacts of a garage of that size (e.g., increased VMT and GHG emissions), and whether those environmental impacts could be reduced by shrinking or eliminating the public parking garage."

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-5])*

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"To reduce the amount of housing would increase pressure on housing in areas that are more automobile dependent and have more extreme climate. To provide more public parking would undercut efforts to address climate change by reducing automobile use.

That said, this draft fails to evaluate how the developer's proposed public parking garage would undercut City College's efforts to reduce automobile use. The College's 2019 Transportation Demand Management and Parking Plan concludes that TDM measures would be sufficient to address the loss of parking spaces caused by this project. The only exception will be during a few hours of the first week of each semester. Even then, the shortfall would be less than one-third of the 750 spaces proposed in the public parking garage.

There is, therefore, no need for such a large public parking garage. It would undercut the City's and the College's efforts to respond to the climate crisis by reducing automobile use."

*(Christopher Pederson, CPC Hearing, September 12, 2019 [I-PEDERSON1-2])*

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## **Response TR-7: Parking**

The comments state that the draft SEIR does not adequately analyze the primary and secondary impacts of parking, and that the draft SEIR does adequately analyze the impacts of the up to 750-space public parking garage.

The draft SEIR covers the topic of parking on draft SEIR pp. 3.A-3 and 3.B-31 and draft SEIR Appendix B, Section E.14, on p. B-87. A discussion of the effect of construction of a public parking garage with up to 750 vehicle parking spaces on parking demand and the City College sustainability plan is provided on draft SEIR Appendix B, p. B-90. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comments regarding project travel demand and the project analysis approach to TNCs as they relate to the proposed project are addressed in Response TR-2, Travel Demand, on RTC pp. 4.C-6 and 4.C-9. Comments regarding transit delay associated with project vehicle trips are addressed in Response TR-4, Transit Impacts, on RTC p. 4.C-33. Comments regarding the cumulative conditions analysis are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-55. Comments regarding vehicle congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71.

The response to parking comments is organized by the following subtopics:

- Approach to Analysis
- Parking Supply and Utilization

### *Approach to Analysis*

As discussed on draft SEIR pp. 3.A-3 and 3.B-31, the proposed project meets 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, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the SEIR presents an analysis of secondary environmental impacts of potential parking shortages as related to City College in draft SEIR Appendix B on p. B-87. For informational purposes, a discussion of existing and project parking supply and demand within the site and within the neighborhood, is provided on RTC Attachment 3, pp. 1 to 3.

### *Parking Supply and Utilization*

As discussed on draft SEIR Appendix B p. B-90, under the Developer's Proposed Option, up to 750 public parking spaces would be constructed near the southern end of the project site or at the northern end of the project site under Variant 2. Alternatively, public parking spaces could be provided in dedicated public parking areas within several of the proposed residential garages. Given that the proposed parking garage would replace an existing 1,007-space surface parking lot, the project would reduce the amount of parking available on site by a total of at least 257 parking spaces. Based on the parking supply and utilization data collected and provided on draft SEIR Appendix C1, p. 12, the east basin parking lot would be able to accommodate the combined number of vehicles in both the project site and east basin during most periods throughout the weekday, with the exception of the peak period of demand during which there would be a maximum shortfall of 239 spaces. This shortfall would be accommodated within the proposed public parking spaces on the site under the Developer's Proposed Option. As discussed on draft SEIR Section 3.A.6, Approach to Cumulative Impact Analysis, p. 3.A-8, the cumulative conditions scenario assumes construction of projects identified in Table 3.A-2 collectively as the "City College Facilities Master Plan," which include potential development on the east basin parking lot.

One commenter asserts that the analysis of secondary effects related to the up to 750 public parking spaces is inadequate and argues that the secondary effects would be greater than the effects of a version of the project without public parking. The analysis of secondary impacts related to parking, as with other environmental analysis topics, compares the proposed project and project variants to existing conditions and also evaluates whether the proposed project and variants would be in conflict with plans and policies adopted for the purpose of mitigating an environmental effect. No significant impacts were identified and, pursuant to CEQA, no alternative garage sizes are necessary to explore.

Further, the VMT impact analysis on pp. 3.B-79 and 80 also found less-than significant impacts for the proposed project and public parking garage. As stated on p. 3.B-80, this conclusion was because, in part, the public parking garage "would replace an existing facility and would not increase the amount of parking available." The discussion above compares effects relative to existing conditions. A discussion of whether the proposed project and variant would conflict with plans and policies adopted for the purpose of mitigating an environmental effect is discussed below, following the text change.

A typo was identified on draft SEIR p. 3.B-79. The last sentence on draft SEIR p. 3.B-79 is revised as follows (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

The Developer's Proposed Option would construct an up to 650~~650~~750-space public parking garage to partially replace the existing 1,007-space surface parking lot on the project site.

As discussed on draft SEIR Appendix B, p. B-90, the City College Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. Studies show that the removal of parking would likely cause some drivers to shift to another mode of travel. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90, and included in the project's administrative record: City and County of San Francisco,

*Transportation Demand Management Technical Justification*, June 2016 (updated January 2018), references research that the availability of parking increases vehicular travel and that parking supply can undermine incentives to use transit. Additionally, this document summarizes research conducted in San Francisco that found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar context that provide more off-street vehicular parking.

For informational purposes, a discussion of existing and with project parking supply and demand is provided starting on RTC Attachment 3, pp. 1 to 3. As presented in RTC Attachment 3, the observed maximum combined occupancy of the City College surface parking lots occurred between 11 a.m. and 12 p.m. when there were a total of 1,596 cars parked and 578 spaces available (the lots were 73 percent occupied). During the weekday midday peak hour of parking demand, assuming parking was available only at the East Basin (Upper Lot), there would be a shortfall of up to 239 parking spaces. There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces were observed to be available on weekdays during any given time period (a.m., midday, and p.m.). Therefore, the potential parking shortfall for City College students could be accommodated within available on-street parking spaces within the study area without construction of a public parking garage on the project site. The projected parking use generated by the Developer's Proposed Option could be met within available on-site parking spaces during all time periods of the day. With the Additional Housing Option, there would be an approximately 101-space parking shortfall during the overnight period.

One commenter proposes a shuttle to address first- and last-mile connectivity between the proposed project site and the Balboa BART station. The provision of a shuttle would not reduce the project's significant and unavoidable transportation impacts and is therefore, not a CEQA issue. RTC Attachment 3 included analysis of potential shuttle operations and feasibility, indicating that a shuttle would provide limited utility not already provided by Muni service for people traveling to and from the project.<sup>36</sup>

As described in RTC Chapter 5, Draft SEIR Revisions, the Balboa Reservoir project sponsor may fund a portion of a study addressing the potential City College garage on the east basin, if the college decides to consider pursuing such a project.

### ***Comment TR-8: Vehicle Traffic Congestion and Associated Impacts***

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

A-CALTRANS-2	I-HONG-4	I-MUHLHEIM-7
I-AISSA-1	I-JA3-4	I-OSAWA-6
I-BARISH3-24	I-JA8-1	I-SIMON-6
I-BERNSTEIN5-4	I-MUELLER1-4	I-TARQUINO-6

<sup>36</sup> Balboa Reservoir – Non-CEQA Transportation Analysis, August 1, 2019, [http://ab900balboa.com/DEIR\\_to\\_NOD\\_Documents/2019-08-200000401.pdf](http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf)



I-COLLINS3-7  
I-EVANS2-5  
I-HANSON4-3

I-MUHLHEIM-3  
I-MUHLHEIM-5

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I-ZELTZER-5

#### **“Construction-Related Impacts**

Potential impacts to the I-280 from project-related temporary access points should be analyzed. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.”

*(Wahida Rashid, Caltrans Acting District Branch Chief, Letter, September 10, 2019 [A-CALTRANS-2])*

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“We are already dealing with tremendous congestion on a daily basis. Our street [Plymouth] cannot tolerate the additional traffic that will be created by the plan proposed. Parking is impossible for existing residents now. Please do not allow the proposed opening of San Ramon!”

*(Sharon Aissa, Letter, September 13, 2019 [I-AISSA-1])*

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#### **“Transportation Demand Management (TDM) Plan (-p. 3B-38)**

The Project will significantly impact transportation and traffic in the neighborhood. The EIR must include a comprehensive traffic study of trip generation and parking supply, and evaluate the indirect and cumulative impact of the Project on transportation and traffic impacts on the people living in and traveling to both the Project as well as City College of San Francisco. The DSEIR must also consider these substantial impacts on lower income students who likely reside further away and must use automobiles. This study must also include the impact of increased traffic on congestion and parking in the neighborhoods impacted by the Project, and propose feasible alternative to these impacts.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-24])*

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“4) Also related to access is further traffic congestion. Circulation and congestion would be worse than they are today because of the impact of the approximately 2500-3000 additional people, the access to the development through only to entrances, one coinciding with the road just south of Riordan High School—unless this is reconfigured—and the other via the extension of Lee Avenue. The interference of a through Lee Street extension with the operations of Whole Foods egress could become quite a serious problem. The extra cars and people from the development will likely make traffic on Ocean Avenue considerably worse.”

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-4])*

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“16. The effects on the neighborhood would be horrifying and ridiculous. As written Frida Kahlo Way is jammed on school days and nights now. Add thousands of residents (who will lack infrastructure, decent grocery and other shopping- prepare for tons of catering vans, Amazon vans, also Uber/Lyft as parking is limited on development). You will see, as a firefighter friend points out, that the firefighters and EMS or SFPD can't reach the housing development let alone reach other blocks nearby. They can't FLY over traffic that's jammed. Please don't do this to us.”

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-7])*

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### **“City College Loop analysis**

The consultant concludes that despite increases in traffic volume, no additional delay will be generated. Consultant makes repeated reference to “existing signal timing coordination and optimization.” As anyone who travels these corridors knows, having actuated signals and having those signals actually work are two different things. Broken and mis-timed signals have plagued traffic on Phelan/Frida Kahlo for years and the city has either ignored the problems or addressed them only after years of complaints.

There is no assurance that the signal timing problems experienced on Frida Kahlo Way will not recur. We have no reason to believe the city will be more responsive to addressing timing and optimization problems in the future than they have been in the past.

It is erroneous for the SEIR to assume that the presence of actuated signals and signal optimization will address traffic delay in the project area. A firm commitment from the city for regular, scheduled monitoring and maintenance of the traffic signals in the area is a necessary component of addressing transportation issues in the project area. Such a commitment must be in place before the SEIR is approved.”

*(Rita Evans, Letter, September 23, 2019 [I-EVANS2-5])*

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“The current plan for the proposed development will access Lee Avenue, which serves as a route to Ocean Avenue. Within 100 feet of Ocean Avenue, traffic on Lee Avenue will pass the outlet of the parking lot for Whole Foods. Data from Kittelson’s queue analysis and intersection total delay analysis on pages 10-13 in Appendix C of the SEIR shows The SEIR states:

During the weekday p.m. peak hour, the greatest increase in total delay would occur for southbound movements on Lee Avenue, increasing by 91.3 seconds. This increase in delay would not directly impact transit, as the southbound approach on Lee Avenue is not a transit route.

The data collected by Kittelson however took place on January 31, 2018 which is at least 6 months before Whole Foods began offering 2 hour free delivery to Amazon Prime customers and the traffic passing through the Whole Foods parking lot increased, especially during the evening rush hour which showed 100 cars traveling South on Lee Avenue—presumably cars leaving Whole Foods parking lot since there are no residences or through ways currently connected to Lee Avenue. Now

however, periodically throughout the day and week, traffic is so bad in the Whole Food lot that employees must direct traffic using walkie-talkies. Even with this extra help at times there is not enough parking to accommodate the cars trying to park, and so the cars back up at the entrance all the way out to Ocean Avenue. Because there is a Muni stop near the entrance to Whole Foods in the left lane, the cars in the right lane cannot pass and so all traffic stops in the right lane until the traffic inside the parking lot begins to move.

The entrance to Whole Foods is one half block from Lee Avenue. Because no traffic comes from residences on Lee Avenue now the cars leaving the Whole Foods parking lot are only delayed by their own burgeoning numbers, but if traffic is added from the proposed Reservoir development this parking lot traffic will have to wait for the reservoir traffic to pass in order to leave the parking lot and create space for more cars waiting out on Ocean avenue (headed south) to turn right into the parking lot. The queue on Lee Avenue as shown in the DSEIR completely blocks the driveway from the parking lot.

This will back up the cars further attempting to enter the Whole Foods lot a half block away and so this combination will create its own gridlock and subsequent nuisance.

**In fact it will be beyond a nuisance because when the anticipated 91.3 second delay happens on Lee Avenue South, the cars heading into and out of Whole Foods parking lot will be stuck and create a blockage which will indeed affect the transit system behind it."**

*(Christine Hanson, Email, September 23, 2019 [I-HANSON4-3])*

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"3. I'm concerned with the traffic exiting this site on to Ocean Ave. and how it may impact this retail section."

*(Dennis Hong, Email, September 11, 2019 [I-HONG-4])*

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From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.

*(Alvin Ja, Email, August 8, 2019 [I-JA2-2])*

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### "3.A.2 Overall Approach to Impact Analysis

*As a subsequent EIR to the PEIR certified in 2008, this SEIR, including the initial study, identifies and considers all mitigation measures that were identified in the PEIR and determines their applicability to the currently proposed project.*

Considering mitigation measures contained in the PEIR is insufficient. The Initial Study and DEIR has failed to identify and consider the PEIR rejection of the Lee Extension that had been proposed by CCSF.

**The fact that the PEIR had rejected the Lee Extension has direct relevance and “applicability to the currently proposed project.”**

Here’s what the PEIR says about the Lee Extension (westbound Ocean onto northbound Lee into Reservoir):

*Access Option #1: Under this option, CCSF would be allowed westbound right-turn-only ingress on Lee Avenue.*

*It should also be noted that Option #1, the provision of westbound right-turn-only ingress to CCSF, would be expected to result in secondary design and operational issues at the Ocean/Lee intersection. With access provided into CCSF from Lee Avenue, it would not be possible to fully restrict access from other directions, such as the eastbound left-turn movement or the northbound through movement. As a result, vehicles would be unable to directly access the Phelan Loop or the Balboa Reservoir development sites from the west. Instead, these vehicles (approximately 44 vehicles during the weekday PM peak hour) would be required to divert into the residential neighborhood south of Ocean Avenue to be able access Lee Avenue from the south or the west. In addition, approximately 75 vehicles destined to CCSF during the weekday PM peak hour are anticipated to come from the west. With the restriction of the eastbound left-turn movement, it is likely that a portion of these vehicles would also divert into the residential neighborhood south of Ocean Avenue instead of using the Phelan Avenue access. The prohibition of the eastbound left turn movement would affect the access and circulation patterns of residents and visitors of the Phelan Loop and Balboa Reservoir development sites. In*

*addition, the rerouted traffic from these two projects and CCSF would noticeably increase traffic volumes on the adjacent neighborhood streets, potentially affecting access into individual residences and resulting in other secondary impacts.*

*To discourage these vehicles from using neighborhood streets as a means to enter Lee Avenue, the northbound and southbound approaches to the Ocean/Lee intersection would need to be reconfigured to provide left-turn and right-turn movements only, precluding northbound through movements altogether. This would require the installation of a physical barrier (such as a channelizing island) at both approaches. Conversely, it may be possible to turn the south leg of the Ocean/Lee intersection into a right-in/right-out configuration. By prohibiting these through movements on Lee Avenue, it would no longer be advantageous for CCSF-destined vehicles to cut through the neighborhood south of Ocean Avenue. However, such a restriction in access would negatively affect access and circulation for the adjacent residences and would further complicate access routes for the Phelan Loop Site and Balboa Reservoir development traffic from the west by requiring these vehicles to cut further into the neighborhood south of Ocean Avenue to make a northbound left turn from Harold Avenue, and enter the westbound right-turn queue at 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.*

### 3.B.3 Summary of Balboa Park Station Area Plan PEIR

#### Transportation Section

#### **Balboa Park Station Area Plan PEIR Impacts and Mitigation**

#### **Measures**

#### **Program-Level Impacts**

#### **Transit**

*Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

The BPS Area Plan PEIR contains a comprehensive analysis of the Lee Extension. The Lee Extension analysis is directly applicable to the Balboa Reservoir Project.

Crucially, all Lee Extension options were eliminated from the BPS Area Plan.

Although the Lee Extension is referenced in the “Traffic” Section, the “Transit” Section only mentions Ocean/Geneva/Kahlo and the two Geneva/I-280 on/ off ramps.

It is only with willful disregard for objectivity that the BPS Final EIR’s rejection of a Lee Extension has not been incorporated into the Reservoir SEIR and Initial Study as it relates to transit delay.

The Kittelson Memorandum pales in comparison to the analysis that had been contained in the BPS PEIR.

**The Lee Extension analysis contained in the PEIR cannot be legitimately omitted from Transit Delay analysis. Thus the SEIR/Initial Study is defective and inadequate.”**

*(Alvin Ja, Email, September 13, 2019 [I-JA3-4])*

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**“Operation (p. 3.B-35)**

#### **Approach to Analysis**

#### Roadway Network Features (p. 3.B-36)

*Circulation changes implemented by the proposed project include the extension of Lee Avenue...*

The operational impact analysis includes the following significance criteria:

<!--[if !supportLists]--> <!--[endif]-->Cause substantial additional VMT or substantially inducing additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network;...

<!--[if !supportLists]--> <!--[endif]-->Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit

Despite the fact that the Lee Extension would induce "additional automobile travel by increasing physical roadway capacity in a congested area" and would substantially delay many MUNI lines on Ocean Avenue, no mention is made here regarding impacts on these significance criteria. (And as mentioned before, the PEIR had already rejected a Lee Extension from being included in the BPS program-level FEIR because its adverse impact on transit. The PEIR's discussion regarding the Lee Extension is brought up in 3.B.3. Yet, its relevance and applicability to the Reservoir Project's Lee Extension is omitted.)"

(Alvin Ja, Email, September 7, 2019 [I-JA8-1])

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"Plus, traffic gridlock in an area, already at the most negative level possible, would with a large additional population pose tremendous problems (and dangers!) to both the college and all of the surrounding neighborhoods. The area is not "transit rich", it is 'transit gridlocked'."

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-4])

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"<!--[if !supportLists]--> 3. <!--[endif]-->Here are some areas where I find mitigation will be necessary if based on the already overburdened streets and transit options. It is my fear that in many of these cases, satisfactory mitigation is not feasible.

<!--[if !supportLists]--> <!--[endif]-->Over the last year my commute has frequently gone from 35 minutes to over an hour.

<!--[if !supportLists]--> <!--[endif]-->Heading to CCSF I can take the Muni K directly from Castro and Market to Lee Avenue station or transfer at Forrest Hill to the 43.

Unfortunately K cars frequently stop for up to 10 minutes at St Francis Circle to reconfigure and even during non peak times, the ride down Ocean Avenue is very slow. Also there are frequent delays in the tunnel. Busline 43 has its own set of issues. Scheduled busses frequently fall out. Much of the route is on curvy or very narrow streets and traffic on Frida Kahlo way can pack up to the point that walking from the Judson/Kahlo stop to the Bookstore stop can be faster than staying on the bus."

(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-3])

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“<!--[if !supportLists]-->· <!--[endif]-->When I walk past Lee Ave, it is clear to this non-professional eye that entry to the housing project via Lee Ave. extension will be a disaster. Traffic and loading in and out of the Parking lot off Lee is already problematic. Vehicular entry onto Ocean Ave. off neighboring side streets is also already difficult.”

*(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-5])*

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“To date there is not a plan in place to provide mitigation for exacerbated traffic and transportation conditions that will be caused by construction of a project that is many times denser than the surrounding neighborhoods.”

*(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-7])*

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“There will also be significant impact to freeway traffic. Even today, the off-ramp from NB280 to Geneva is frequently backed up well onto the main traffic of NB280, resulting in extremely hazardous traffic conditions. It is noted that most of the exiting cars are turning east onto Geneva away from the proposal site, as this ramp is the primary access to the Outer Mission and Cow Palace areas – with the project site added as a destination in the westbound direction from the ramp, one can expect a bad situation to grow much worse. The off-ramp from SB280 to Ocean is likewise backed up onto the freeway proper during most commute hours.”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-6])*

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“In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways.

From the beginning of the Reservoir Project’s public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.”

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-6])*

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“2. It is already almost impossible to get home to Westwood Park, get into City College Ocean Campus as the traffic is already impacted by new growth. There is usually stopped traffic, sometimes backed up onto the 280 south bound freeway going to the Ocean Ave. exit. With any more than the original 425 -500 units, it will be a more dangerous and frustrating situation.”

*(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-6])*

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“So, we say to the public of San Francisco, stop this corrupt, rotten development, the more gridlock on Ocean Avenue. There’s no way of getting mass transportation out there. The MTA has said they can’t provide the extension of the Ocean Avenue, which means there will be gridlock. There is gridlock now, and you want to encourage more gridlock for the people of San Francisco.”

*(Steve Zeltzer, CPC Hearing, September 12, 2019 [I-ZELTZER-5])*

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### **Response TR-8: Vehicle Traffic Congestion and Associated Impacts**

The comments discuss existing traffic congestion and opine on the primary and secondary effects that vehicles trips associated with the construction and operation of the Balboa Reservoir Project will have on traffic congestion.

Many comments regarding vehicle traffic congestion identify secondary issues as a result of traffic congestion such as freight loading or emergency access impacts.

The draft SEIR concluded the proposed project would have a less-than-significant transportation impact related to construction; potentially hazardous conditions for walking, bicycling, driving, and public transit operations; accessibility or emergency vehicle access; and freight loading within the site, and no mitigation measures would be required for these topics. The draft SEIR concludes that the proposed project would have a significant and unavoidable impact related to off-site freight loading on Lee Avenue between Ocean Avenue and the project site. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

Comments regarding existing conditions are addressed in Response TR-1: Existing Conditions, on RTC p. 4.C-2. Comments regarding the project’s contribution to transit delay are addressed in Response TR-4, Transit Impacts, on RTC pp. 4.C-33 and 4.C-33. Comments regarding the impact to loading conditions associated with the Lee Avenue extension are addressed in Response TR-5, Loading Impacts, on RTC p. 4.C-53. Comments regarding parking conditions and the secondary effects of project parking are addressed in Response TR-7, Parking, on RTC pp. 4.C-61 and 4.C-61. Comments regarding the relationship between program and subsequent EIRs are addressed in Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. 4.A-3.

The response to vehicle traffic congestion and associated impacts topics is organized by the following subtopics:

- Existing Conditions
- Automobile Delay and Parking
- Lee Avenue Extension



- City College Loop Analysis
- Emergency Vehicle Access
- Construction-Related Transportation Traffic

### *Existing Conditions*

The draft SEIR adequately and accurately described existing conditions surrounding the project site. Further, CEQA requires analysis of the significant effects of the proposed project on the environment. This includes the significant environmental effects the project might cause or risk exacerbating.<sup>37</sup> A project cannot be required under CEQA to mitigate conditions that the project does not connect to or is not roughly proportional to the impact of the project.<sup>38</sup> Thus, the proposed project can't through CEQA mitigate existing conditions or existing system deficiencies unless it exacerbates such existing significantly environmentally affected conditions.

Regarding the comment seeking information for how existing signals are monitored and maintained, the following is provided for informational purposes. The SFMTA routinely monitors traffic signal operations throughout the city and makes adjustments where warranted and possible. These reviews occur as part of transportation projects, through routine transit and signal operational review, and in response to community comments. This is expected to include review during upcoming safety and transit reliability projects planned along the Ocean Avenue corridor. When reviewing traffic signal timing, the SFMTA balances multiple needs, including meeting required pedestrian crossing time, prioritizing transit and minimizing congestion, which may reduce the opportunities for changes.

### *Automobile Delay and Parking*

Automobile delay and parking shall not be considered as significant impacts on the environment pursuant to CEQA. 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.<sup>39</sup>

Comments include mention of project-related congestion and possible hazards. Potential project-related transit delay is discussed in the following locations: Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79, Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99, and Response TR-4: Transit Impacts, on RTC p. 4.C-33.

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<sup>37</sup> CCR Title 14 Section 15126.2.

<sup>38</sup> CCR Title 14 Section 15126.4.

<sup>39</sup> 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.

With respect to potential vehicle hazards, the draft SEIR finds that the proposed project would not result in potentially hazardous conditions to people driving, walking, bicycling, or public transit operations. This finding is discussed in Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70.

As discussed on draft SEIR pp. 3.A-3 and 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area; therefore, parking shall not be considered a significant impact on the environment pursuant to CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the secondary environmental impacts related to City College are addressed in draft SEIR Appendix B, Section E.14, Public Services. For informational purposes, a description of existing and with project parking conditions is provided on RTC Attachment 3, pp. 1 to 3.

Regarding the comment that the draft SEIR must evaluate impacts on lower-income City College students who likely reside further away and must use automobiles, the commenter does not provide evidence of this general statement. Further, socioeconomic effects are generally beyond the scope of the CEQA. An exception is if a link can be established between anticipated socioeconomic effects of a proposed action and adverse *physical environmental impact* [emphasis added] (CEQA Guidelines section 15131(a), CEQA section 21082.2). The comment does not provide evidence showing such a link.

#### *Lee Avenue Extension*

Project vehicle trip assignment at the Ocean Avenue/Lee Avenue intersection is illustrated in Figure 3.B-6a and Figure 3.B-7a on draft SEIR pp. 3.B-47 and 3.B-49, respectively. The effect of project-generated vehicle traffic along Lee Avenue and Ocean Avenue/Lee Avenue intersection operations are discussed under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. As discussed in this section, proposed project would not increase the frequency, duration, or length of queues along westbound Ocean Avenue such that it would increase instances of blockages at the City College Terminal or fire department station 15, or substantially delay transit. Intersection operations analysis is summarized in draft SEIR Appendix C2, Transit Assessment Memorandum, and Synchro operations worksheets are provided on draft SEIR Appendix C2, Attachment E, pp. 87 to 142.

The project proposes to reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one southbound through/right-turn lane and one southbound left-turn lane. This reconfiguration of Lee Avenue would increase the space for vehicle queue storage on the southbound approach, thereby increasing the capacity of the intersection on the southbound approach and reducing the southbound queue lengths under project conditions relative to existing conditions. Proposed additional loading spaces along Ocean Avenue would alleviate the associated reduction in loading spaces along Lee Avenue with this proposed reconfiguration.

Discussion of the impact to loading conditions associated with the Lee Avenue extension are included in the following locations: Impact TR-6b, on draft SEIR pp. 3.B-85 to 3.B-91, Impact C-TR-6b, on draft SEIR pp. 3.B-101 to 3.B-102, and Response TR-5, Loading Impacts, on RTC p. 4.C-53.

The PEIR's conclusion regarding Lee Avenue is relevant to the proposed project in that CEQA allows subsequent project-level analyses to tier off of previous general-level analysis. The PEIR analysis is at an area plan level, with different details than are available for the present project-level analysis. For example, the draft SEIR analysis uses more recent traffic counts to reflect existing baseline conditions than the PEIR, which was certified in 2009. Using newer and more relevant information allows for more accurate analysis and is consistent with the tiering approach for environmental analysis. Decision makers did not make any approval or take any action that prevented future extensions of Lee Avenue when they certified the PEIR and adopted the area plan.

The commenter correctly states that data collection took place on January 31, 2018 prior to Whole Foods offering two-hour free delivery to Amazon Prime customers. However, intersection turning movement counts at Ocean Avenue/Brighton Avenue, the ingress to the Whole Foods parking lot, were also collected on Tuesday August 28, 2018 (see draft SEIR Appendix C2, pp. 32–33 of Attachment A, Intersection Turning Movement Volumes), after Whole Foods began offering two-hour free delivery to Amazon Prime customers. Loading data along Lee Avenue was collected on Tuesday March 26, 2019 (see draft SEIR Appendix C3).

Existing freight loading conditions are discussed on draft SEIR p. 3.B-27, and the effect of project-generated vehicle traffic on Whole Foods operations (including freight loading and garage egress) is discussed under Impact TR-6b on draft SEIR pp. 3.B-85 to 3.B-91. As discussed in these sections, under existing conditions Lee Avenue is a dead-end street with no through traffic. In its current condition, Lee Avenue functions as a loading zone that provides convenient on-street loading supply to meet Whole Foods' loading demand and accommodate deliveries and passenger loading activity related to other nearby businesses.

Based on field observations, the existing freight loading operations at Whole Foods do not fully adhere to the measures outlined in the 1150 Ocean Avenue project conditions of approval that requires Whole Foods to utilize the off-street area for all loading activity. The proposed project would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area for passengers and freight deliveries. The project also proposes to reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one southbound through/right-turn lane and one southbound left-turn lane. This reconfiguration of Lee Avenue would reduce the supply of on-street loading available to Whole Foods and nearby land uses and increase vehicle storage on the southbound approach. As stated on draft SEIR p. 3.B-90, the off-site loading impact of the proposed project would be significant and unavoidable.

### *City College Loop Analysis*

Regarding the comments on the City College Loop analysis that no delay would be generated and that a nuisance will be generated around the Whole Foods parking lot causing delay, transit delay is considered for potential significant impacts on the environment and are evaluated for potential impacts. As further explained in Impact TR-4 on SEIR pp. 3.B-73 to 3.B-79, the proposed project

would not cause significant transit delays, but as described in Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99, may contribute to transit delays in the cumulative condition.

The City College Loop (also referred to as City College Terminal) analysis is presented on draft SEIR Appendix C2, pp. 7 to 13. The evaluation assesses the change in queue lengths at Ocean Avenue/Lee Avenue and Ocean Avenue/Frida Kahlo Way/Geneva Avenue and potential for queues to spillback and block transit vehicle access or egress to the terminal. As discussed in this analysis, the increase in queue lengths would not result in queue spillback such that access/egress to the terminal would be blocked. The intersection operations analysis was performed using Synchro software and conducted using the planning department's Transportation Impact Analysis Guidelines for Synchro Intersection LOS Analysis. The Synchro model was calibrated to existing conditions based on observations conducted in the field. The signal timing cards were provided by SFMTA, and the analysis results and Synchro inputs and assumptions, including signal timing coordination and optimization, were reviewed by the department and SFMTA.

#### *Emergency Vehicle Access*

A discussion of emergency vehicle access is provided under Impact TR-3 on draft SEIR pp. 3.B-71 to 3.B-73. The nearest fire department station (station 15) is located approximately 350 feet east of the Ocean Avenue/Lee Avenue intersection. As discussed in this section, under existing conditions, vehicle queues were observed to occasionally partially block the fire station driveway. With the addition of vehicle trips, the proposed project would not be expected to increase the frequency or duration of vehicles blocking the fire department station 15 entrance or result in inadequate emergency access. Synchro operations worksheets are provided on draft SEIR Appendix C2, Attachment E, pp. 87 to 142.

#### *Construction-Related Transportation Traffic*

Construction-related transportation impacts are analyzed under Impact TR-1 starting on draft SEIR p. 3.B-60. As stated on draft SEIR p. 3.B-64, construction activities would be conducted in accordance with the public works code, public works department orders, and the blue book, as applicable, to minimize the potential for hazardous conditions and to ensure safe travel in and around the site. At this time, it is not anticipated that the project would require movement of oversized or excessive load vehicles. However, should project work require movement of oversized or excessive load vehicles on state roadways, the project sponsor would obtain a transportation permit from Caltrans.

As a result, SEIR section 2.I.1, State and Regional Agencies on SEIR p. 2-50 is revised as follows:

##### California Department of Transportation

- Transportation permit for oversized or excessive load vehicles

### ***Comment TR-9: General Comments***

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

I-COLLINS3-3  
I-GOODMAN-1  
I-OSAWA-1

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"4. Frida Kahlo/ Phelan is a one way street, which like many regular streets in our city, such as Bernal Cut or Teresita, connect two parts of town. Our city not being flat, doesn't have a lot of rectangular grid, which means that one street is the one direction to get from one neighborhood to another.

5. No one wants to have to depend on cars! However we depend on reasonable, viable, practical alternatives. Muni can be a mess and too many buses zoom by at rush hour. "Road diets" converting two lanes down to one, create MORE traffic jams that confuse desperate motorists stuck in traffic, filling up crosswalks, endangering pedestrians and cyclists. You'd punish the wrong people and create angry cross traffic that can't move, and more calamities

6. Buses are full of wonderful environmentally conscience non drivers who also get stuck in horrid traffic. Don't punish them!"

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-3])*

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"My concerns have always focused on the concerns about capacity, and if we are really seeing significant transit infrastructural planning to deal with the capacity concerns of growth and growth population impacts including traffic, pedestrian, and multi-modal concerns. Safety is also another major concern due to the concerns of schools and traffic injuries in and around the Balboa Park Station area."

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-1])*

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"The SEIR acknowledges that for all options there will be 'significant and unavoidable negative impact to traffic that cannot be mitigated'. While this statement is diluted in the SEIR by other boilerplate environmental analyses, and while the CEQA guidelines have unfortunately replaced 'automotive delay' with a less-meaningful 'vehicular miles traveled' (VMT) metric, it is undoubtedly the greatest single impact to the environment and to the safety of the neighborhood of the proposed site."

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-1])*

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## Response TR-9: General Comments

The comments disagree with or mistakenly describe the draft SEIR's findings, state there is a need to redesign the area as a transit first corridor which minimizes pedestrian injuries, discuss existing conditions on Frida Kahlo and within the project study area, and express concern regarding transit capacity.

Comments regarding transit impacts are addressed under Response TR-4, Transit Impacts, on RTC pp. 4.C-33 to 4.C-33. Comments regarding automobile delay (traffic) and its evaluation in the SEIR are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-72.

The response to general transportation comments is organized by the following subtopics:

- Draft SEIR Analysis and Findings
- Redesign of Roadways Within and Nearby to Balboa Station Area Plan
- Existing Conditions
- Transit Capacity

### *Draft SEIR Analysis and Findings*

One commenter states the draft SEIR identified the project would have, "significant and unavoidable negative impact to traffic that cannot be mitigated." Automobile delay (traffic), by itself, is not a significant impact on the environment pursuant to CEQA (for more information, refer to Response TR-7, Parking, on RTC p. 4.C-61). The draft SEIR finds significant and unavoidable project-level and cumulative impacts related to freight loading operations on Lee Avenue and a significant and unavoidable cumulative impact to transit. The draft SEIR found all other transportation impacts to be less than significant.

Regarding traffic and for informational purposes, a discussion of existing and with project vehicle operations and delay is provided in RTC Attachment 3.

### *Redesign of Roadways Within and Nearby to Balboa Station Area Plan*

An evaluation of potentially hazardous conditions for people walking to/from transit is provided under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. The draft SEIR concludes that the project would not generate activities that would create potentially hazardous conditions for people walking, bicycling, driving or public transit operations, and that impacts of the proposed project would be less than significant.

### *Existing Conditions*

The draft SEIR describes local roadways on p. 3.B-8. The existing plus project impact evaluation is presented in the draft SEIR on pp. 3.B-60 to 3.B-91. The 2040 cumulative conditions impact evaluation is presented in the draft SEIR on pp. 3.B-91 to 3.B-102. The effect of the proposed project options on transit are discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those

identified in the draft SEIR. One comment incorrectly states that Frida Kahlo Way is a one-way street. As shown in draft SEIR Table 3.B-1, Roadway Facilities in the Study Area, Frida Kahlo Way is a two-way, two-lane street (one lane in each direction) with Class II bicycle facilities.

The comment regarding viable transportation options is acknowledged. As described on draft SEIR p. 3.B-38, the proposed project would include a TDM plan that would implement measures to reduce vehicle trips and encourage sustainable modes of transportation.

#### *Transit Capacity*

Pursuant to the 2019 TIA Guidelines Update, transit capacity for environmental review is no longer an analysis criterion. This change is consistent with guidance from the Governor's Office of Planning and Research, which recommends not treating the addition of new users on a transit system as a significant impact. Transit analysis instead considers potentially hazardous conditions for public transit operations as separate transit significance criteria. San Francisco also considers transit delay as a separate transit significance criterion. Transit impacts are presented and discussed in the following locations: Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79; Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99; and Response TR-4, Transit Impacts, on RTC p. 4.C-33.

For informational purposes, the draft SEIR provides, in Appendix C2, Transit Assessment Memorandum, a discussion of project ridership and capacity. As shown there, all Muni routes, except for the K, would operate below 85 percent capacity utilization during the weekday p.m. peak hour. The project (both options) would contribute less than 35 riders to either direction for that route.

## 4.D Noise

The comments and corresponding responses in this section cover topics in draft SEIR section 3.C, Noise. These include topics related to:

- Comment NO-1: Noise Baseline
  - Comment NO-2: Methodology
  - Comment NO-3: Construction Noise Impacts
  - Comment NO-4: Construction Vibration
  - Comment NO-5: Operational Noise Impacts
  - Comment NO-6: Noise Mitigation Measure
  - Comment NO-7: Cumulative Noise
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### *Comment NO-1: Noise Baseline*

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

I-HEGGIE1-2  
 I-HEGGIE1-3  
 I-HEGGIE2-4  
 I-HEGGIE2-7

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“My focus today is going to be on noise.

Noise effects on residents and childcare centers in adjacent Sunnyside have been ignored, although they are located within the 900-foot zone of the project noise considerations. Two childcare centers and preschools were identified in the EIR, in this east side of the project.

The sensitive receptors are closer to parts of the development than the studied 24-hour LT.3 location in Westwood Park. And Sunnyside sites lie in an area that is typically downwind of the construction site.

Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way -- I’ve forgotten the name of the mini location. It’s for children. Serves as a residence, as well as childcare center and preschool center. It needs a 24-hour noise study.”

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [I-HEGGIE1-2])*

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“Additionally, we suggest noise testing at the corner of Judson and Frida Kahlo Way, formerly Phelan Avenue, where a replacement City College daycare center is planned for the future.”



*(Jennifer Heggie, CPC Hearing, September 12, 2019 [I-HEGGIE1-3])*

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“1. Noise effects on residences and child care centers in adjacent Sunnyside have not been tested although they are located within the 900 foot zone of project noise consideration. Two childcare centers and preschools were identified in the EIR in this area Northeast of the project. The sensitive receptors in this area are closer to some parts of the development than the studied 24-hour LT-3 location in Westwood Park, and the Northeast sites lie in an area that is typically downwind of the construction site. Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way Mighty Bambini location at the border of Sunnyside and Westwood Park appears to be a residence as well as childcare and preschool center. Like other childcare centers in surrounding residential neighborhoods, it deserves a 24-hour noise study. Additionally, noise testing will be needed at the corner of Judson and Frida Kahlo Way (formerly Phelan Avenue) where a replacement City College childcare center is planned within the construction timeframe, according to Dr. James Sohn of the City College of San Francisco.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-4])*

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“5. Additional noise studies need to be made to create a noise baseline at all noise monitoring sites. Long term (24-hr) sound assessments were made on the Western side of the project. Only short-term sound assessments were made on the East side at the City College MUB and Riordan High School, which is also a boarding school, and that testing was for a short period, less than half an hour before 9:30am. Not only will 24-hour noise monitoring enable an apples to apples comparison with the other 24-hour noise tests, 24-hour monitoring should be included to take into account the wide variation in sound levels as the City College lot fills, empties, and refills at different times of the day.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-7])*

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### **Response NO-1: Noise Baseline**

The comments express concern that the noise analysis of the draft SEIR did not specifically address the potential noise impacts at childcare facility receptors to the northeast of the project site and that additional 24-hour measurements should be taken at all noise monitoring sites.

The construction noise impacts of the proposed project are analyzed on draft SEIR pp. 3.C-23 through 3.C-31. Table 3.C-8 on draft SEIR p. 3.C-27 presents the predicted construction-related noise levels at the nearest sensitive-receptor locations to the project site where the maximum combined noise levels from construction equipment would occur.

As described on draft SEIR p. 3.C-25, the closest sensitive receptors to the project site are: residences along Plymouth Avenue and San Ramon Way approximately 50 feet from the west side of the proposed buildings; Archbishop Riordan High School approximately 80 feet from the eastern property line; and the 1100–1150 Ocean Avenue residences approximately 50 feet from the Lee

Avenue extension area and the Phase 0 demolition activity area. The predicted construction-related noise levels at sensitive receptors are evaluated to determine whether the project would result in: (1) an increase in sustained noise levels that are 10 dBA above the ambient background noise levels over a substantial period of time, or (2) noise levels above the Federal Transit Administration's limit of 90 dBA. The analysis and disclosure of maximum potential project-specific increases over existing ambient environments (i.e., a "worst-case" assessment) follows standard methodology for the evaluation of noise impacts.

Mighty Bambinis Childcare and Preschool and the future City College daycare planned near Judson Avenue and Frida Kahlo Way were not included in this impact table because they are substantially more distant than the receptors shown in Table 3.C-8 of the draft SEIR; thus, impacts would be less than those used to identify noise impacts.

In response to these comments, **Table RTC-5, Estimated Daytime Construction-Related Noise Levels at Offsite Receptor**, presents the resultant construction noise levels at Mighty Bambinis Childcare receptor, which is approximately 560 feet from the project boundary. As shown in Table RTC-5, construction-related noise levels at the Mighty Bambinis Childcare facility would be less than the FTA's limit of the most stringent daytime standard of 90 dBA, which applies to residential uses. The resultant noise level increase at this receptor would also be less than the "Ambient + 10 dBA" standard applied for this analysis. Consequently, construction noise impacts for the existing northeasterly childcare receptor would be less than significant. Nevertheless, **Mitigation Measure M-NO-1: Construction Noise Control Measures**, identified to address significant impacts to other, closer receptors, would further reduce the construction noise impact at this receptor and other receptors more distant from construction activities.

**TABLE RTC-5**  
**ESTIMATED DAYTIME CONSTRUCTION-RELATED NOISE LEVELS AT OFFSITE RECEPTOR**

Construction Phase and Noisiest Combined Construction Activities	Hourly Leq in dBA at 50 Feet <sup>a</sup>	Minimum Distance between Receptor and Closest Equipment (feet)	Project Noise Level (Leq) Adjusted for Distance <sup>b</sup>	Daytime FTA Standard at Residential Uses (dBA)	Does Noise Level Exceed FTA Standard?	Ambient (62 dBA) + 10 dBA Standard <sup>c</sup> at Closest Receptor	Does Noise Level Exceed Ambient + 10 dBA Standard?
<b>Existing Noise Receptor: Mighty Bambinis Childcare at Phelan and Staples avenues</b>							
Phase 0 – Surface Preparation and Demolition	85	560	65	90	No	72	No
Phase 1 Building Construction	81	560	60	90	No	72	No
Phase 2 Building Construction	81	560	60	90	No	72	No

SOURCE: ESA, 2019.

NOTES:

dBA = A-weighted decibel; FTA = Federal Transit Administration; noise levels in **bold** exceed the indicated standard.

<sup>a</sup> As calculated with the RCNM model with no attenuation for intervening berms or buildings.

<sup>b</sup> Combined hourly noise levels were attenuated 6 dB for every doubling of distance from the source.

<sup>c</sup> People often perceive 10 dBA as a doubling of loudness. The daytime ambient noise levels of 62 dBA were estimated using roadway noise modeling data for Judson Avenue between Frida Kahlo Way and Genessee Street.

**Table RTC-6, Estimated Daytime Construction-Related Noise Levels at Cumulative Offsite Receptor**, presents the resultant construction noise levels the future City College daycare receptor as an extension of the cumulative construction noise analysis on draft SEIR pp. 3.C-38 and 3.C-39. This future receptor would be located approximately 750 feet from the project boundary. As shown in Table RTC-6, construction-related noise levels at the future City College daycare receptor would be less than the FTA's limit of the most stringent daytime standard of 90 dBA, which applies to residential uses. The resultant noise level increase at this receptor would also be less than the "Ambient + 10 dBA" standard applied for this analysis. Consequently, construction noise impacts for the future northeasterly childcare receptors would be less than significant.

**TABLE RTC-6**  
**ESTIMATED DAYTIME CONSTRUCTION-RELATED NOISE LEVELS AT CUMULATIVE OFFSITE RECEPTOR**

Construction Phase and Noisiest Combined Construction Activities	Hourly Leq in dBA at 50 Feet <sup>a</sup>	Minimum Distance between Receptor and Closest Equipment (feet)	Project Noise Level (Leq) Adjusted for Distance <sup>b</sup>	Daytime FTA Standard at Residential Uses (dBA)	Does Noise Level Exceed FTA Standard?	Ambient (62 dBA) + 10 dBa Standard <sup>c</sup> at Closest Receptor	Does Noise Level Exceed Ambient + 10 dBba Standard?
<b>Future City College daycare receptor at Judson Avenue and Frida Kahlo Way</b>							
Phase 0 – Surface Preparation and Demolition	85	750	63	90	No	72	No
Phase 1 Building Construction	81	750	58	90	No	72	No
Phase 2 Building Construction	81	750	58	90	No	72	No

SOURCE: ESA, 2019.

NOTES:

dBA = A-weighted decibel; FTA = Federal Transit Administration; noise levels in **bold** exceed the indicated standard.

<sup>a</sup> As calculated with the RCNM model with no attenuation for intervening berms or buildings.

<sup>b</sup> Combined hourly noise levels were attenuated 6 dB for every doubling of distance from the source.

<sup>c</sup> People often perceive 10 dBA as a doubling of loudness. The daytime ambient noise levels of 62 dBA were estimated using roadway noise modeling data for Judson Avenue.

Traffic noise impacts to these northeasterly childcare uses are addressed on draft SEIR pp. 3.C-36 through 3.C-38. Specifically, Table 3.C-11 on draft SEIR p. 3.C-37 presents the roadside noise level increases on Judson Avenue resulting from the proposed project operations. As can be seen from this table, noise levels at receptors along Judson Avenue would increase by 0.4 dBA or less, which would not be a perceptible increase and would be a less-than-significant operational noise impact. Traffic noise impacts to the future childcare use may be also be assessed using this same table which shows the increases along Frida Kahlo Way to also be less than significant (0.6 dBA or less).

The commenter also suggests that long-term (24-hour) noise monitoring should be conducted at receptor locations on the east side of the project site, as was done for the receptors on the west side of the project site and included in the draft SEIR Noise setting discussion.

No long-term noise monitoring is required for off-site locations east of the project site under CEQA. The long-term noise monitoring cited in the draft SEIR is not used for the CEQA noise analysis but instead provides planners with information to understand the compatibility of the project's proposed land use with the current long-term (DNL) noise environment set forth in the Environmental Protection Element of the San Francisco General Plan, which is a non-CEQA noise assessment.

As stated on draft SEIR p. 3.C-23, construction activity would generally occur during daytime hours. Nighttime construction noise is not expected to occur frequently or regularly. As stated on draft SEIR p. 3.C-23, while certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, construction activities would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

The text on draft SEIR p. 3.C-23 is revised as follows to clarify nighttime noise-generating activity (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

Construction activities would generally occur between the hours of 7 a.m. and 8 p.m., up to seven days a week. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity ~~and would not occur during nighttime hours.~~ Consequently, construction activities would be consistent with San Francisco Police Code section 2908.

### Construction-Related Noise Sources

Project implementation would result in operation of heavy equipment on the project site for the demolition of the west side berm, and north and east embankments, construction of new structures and associated infrastructure, and open space improvements. Construction activities would occur intermittently on the project site over the six-year construction duration and could expose nearby existing and future sensitive receptors to temporary increases in noise levels substantially in excess of ambient levels. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity. ~~Construction activity is only proposed to occur during daytime hours and nighttime construction noise impacts would not occur and are not assessed herein. While c~~Certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, and could include one concrete pour per building, which could occur a total of 12 times throughout the project construction period. Such construction activities ~~that extend beyond normal hours have not been specifically identified by the applicant and~~ would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

The above changes and additional analysis do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

### ***Comment NO-2: Methodology***

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

I-HEGGIE2-2

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“In addition, some of the testing reports appear to provide inconsistent testing. This makes it difficult for non-professionals to compare apples to apples, track the meaning of the data and encourages misinterpreting possibly impactful conclusions. For example, adding a note below the Balboa Reservoir truck Roadway Noise Analysis on Page 1of 2, in Appendix D2, would provide clarification of why the numbers of road segments tested differ depending on whether the test is for the existing environment, the existing plus developer's project, the existing plus additional housing scenario, or the cumulative plus developer's project.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-2])*

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### **Response NO-2: Methodology**

The commenter requests clarification regarding the difference in the number of roadway segments analyzed in the traffic modeling spreadsheets between the various scenarios in Appendix D2 of the draft SEIR.

Page 1 of Appendix D2 of the draft SEIR contains the inputs and results for the roadway noise analysis. Operational traffic noise impacts are addressed on draft SEIR pp. 3.C-36 through 3.C-38 while the cumulative traffic noise impacts are addressed on draft SEIR pp. 3.C-40 through 3.C-41. The differences in the number of roadway segments analyzed depends on several factors, including whether sensitive receptors are present along a given roadway and whether the extent of traffic distribution warrants an analysis of a roadway segment. Draft SEIR p. 3.C-36 states that “[n]oise modeling was completed to estimate existing (baseline) and future (with the proposed project) traffic noise levels along seven street segments that have sensitive receptors in the project area based on traffic volumes presented in SEIR Section 3.B, Transportation and Circulation.” The seven road segments are shown on Table 3.C-11 on draft SEIR p. 3.C-37.

Initially, two segments of Ocean Avenue extending in either direction from the access point were included in the analysis. These two roadway segments were included in an initial draft of the analysis but were removed because existing roadway noise rendered the project contribution negligible. The traffic model spreadsheet inadvertently retained rows for the two Ocean Avenue segments in the appendix even though the analysis for this roadway were not included in the draft SEIR. Pages 1 and 2 of draft SEIR Appendix D2 have been revised to reflect the deletion of these roadway segments from the analysis.

Therefore, cumulative line items have been deleted from Appendix D2 as shown below and are not cited in the draft SEIR. The appendices serve as supporting information to the draft SEIR and the relevant data and analysis are presented in the draft SEIR; therefore, additional clarification



within the appendices is not necessary. The clarifications to the appendices have been shown below (deleted text is shown in ~~strike through~~ and new text is shown in double underline). These changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

Pages 1 and 2 of SEIR Appendix D2 are revised as follows:

Existing		TOTAL			VEHICLE TYPE %			VEHICLE SPEED			NOISE LEVEL (dBA)			CALCULATED	Receptor	Adjusted	Distance	Distance		
ROAD SEGMENT		# VEHICLES	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	NOISE LEVEL	Dist. from Roadway	Noise Level	from Roadway to 65 dBA	from Roadway to 65 dBA	
Calvano Peak															15 meters from roadway center	Center (m.)	(dBA)	(m.)	(ft)	
F. Kahlo	from: to:	%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7	
F. Kahlo	Ocean Cloud	1179	67	1143.8	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	914	67	889.58	2	18.28	1	9.14	25	40	25	40	58.6	54.4	59.0	63.0	40	58.7	9.4	30.8
Lee	Ocean Site	187	67	181.99	2	3.54	1	1.87	25	40	25	40	52.2	47.0	51.6	55.5	40	51.3	1.7	5.6
Lee	Ocean Holoway	186	67	181.02	2	3.52	1	1.86	25	40	25	40	52.2	47.0	51.6	55.5	40	51.3	1.7	5.6
Plymouth	Ocean S.Wood	177	67	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.6	1.8	6.0
City Coll N	F. Kahlo Site	323	67	313.31	2	6.46	1	3.23	25	40	25	40	55.1	49.9	54.5	59.4	40	54.2	3.3	10.9
Judson	F. Kahlo Ganassas	870	67	849.3	2	13.4	1	6.7	25	40	25	40	58.2	53.0	57.7	61.6	40	57.4	8.9	22.6
Occom	Plymouth-Nassau	429	67	420.9	2	9.5	1	4.75	25	40	25	40	56.9	50.9	54.7	59.9	40	55.9	4.0	13.0
Occom	F. Kahlo L200	4079	67	4019.7	2	97.4	1	49.7	25	40	25	40	62.7	57.5	62.1	66.1	40	62.1	10.0	32.9
Assumptions: PM peak hour traffic data from Kittleson																				
Existing + Developer's Project		TOTAL			VEHICLE TYPE %			VEHICLE SPEED			NOISE LEVEL (dBA)			CALCULATED	Receptor	Adjusted	Distance	Distance		
ROAD SEGMENT		# VEHICLES	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	NOISE LEVEL	Dist. from Roadway	Noise Level	from Roadway to 65 dBA	from Roadway to 65 dBA	
Calvano Peak															15 meters from roadway center	Center (m.)	(dBA)	(m.)	(ft)	
F. Kahlo	from: to:	%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7	
F. Kahlo	Ocean Cloud	1179	67	1143.8	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	997	67	967.09	2	19.94	1	9.97	25	40	25	40	60.0	54.8	59.4	63.3	40	59.1	10.2	33.6
Lee	Ocean Site	387	67	375.59	2	7.74	1	3.87	25	40	25	40	55.8	50.6	55.3	59.2	40	55.0	4.0	13.0
Lee	Ocean Holoway	209	67	202.73	2	4.18	1	2.09	25	40	25	40	53.2	48.0	52.6	56.6	40	52.3	2.1	7.0
Plymouth	Ocean S.Wood	177	67	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.6	1.8	6.0
City Coll N	F. Kahlo Site	358	67	350.98	2	7.35	1	3.68	25	40	25	40	55.6	50.4	55.1	59.0	40	54.7	3.8	12.4
Judson	F. Kahlo Ganassas	700	67	679	2	14	1	7	25	40	25	40	58.4	53.2	57.9	61.8	40	57.5	7.2	23.9
Assumptions: PM peak hour traffic data from Kittleson																				
Existing + Additional Housing Scenario		TOTAL			VEHICLE TYPE %			VEHICLE SPEED			NOISE LEVEL (dBA)			CALCULATED	Receptor	Adjusted	Distance	Distance		
ROAD SEGMENT		# VEHICLES	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	NOISE LEVEL	Dist. from Roadway	Noise Level	from Roadway to 65 dBA	from Roadway to 65 dBA	
Calvano Peak															15 meters from roadway center	Center (m.)	(dBA)	(m.)	(ft)	
F. Kahlo	from: to:	%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7	
F. Kahlo	Ocean Cloud	1179	67	1143.8	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	1063	67	1031.1	2	21.26	1	10.63	25	40	25	40	60.2	55.0	59.7	63.6	40	59.4	10.9	35.8
Lee	Ocean Site	434	67	420.98	2	8.68	1	4.34	25	40	25	40	56.3	51.1	55.8	59.7	40	55.5	4.5	14.6
Lee	Ocean Holoway	226	67	219.22	2	4.52	1	2.26	25	40	25	40	53.5	48.3	52.9	56.9	40	52.6	2.3	7.6
Plymouth	Ocean S.Wood	177	67	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.6	1.8	6.0
City Coll N	F. Kahlo Site	479	67	464.83	2	9.58	1	4.79	25	40	25	40	56.8	51.6	56.2	60.2	40	55.9	4.9	16.1
Judson	F. Kahlo Ganassas	733	67	711.01	2	14.88	1	7.33	25	40	25	40	58.8	53.4	58.1	62.0	40	57.7	7.5	24.7
Assumptions: PM peak hour traffic data from Kittleson																				
Cumulative + Developer's Project		TOTAL			VEHICLE TYPE %			VEHICLE SPEED			NOISE LEVEL (dBA)			CALCULATED	Receptor	Adjusted	Distance	Distance		
ROAD SEGMENT		# VEHICLES	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	Auto	MT	HT	NOISE LEVEL	Dist. from Roadway	Noise Level	from Roadway to 65 dBA	from Roadway to 65 dBA	
Calvano Peak															15 meters from roadway center	Center (m.)	(dBA)	(m.)	(ft)	
F. Kahlo	from: to:	%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7	
F. Kahlo	Ocean Cloud	4244	67	4154.0	2	92.99	1	46.44	25	40	25	40	62.1	56.9	61.6	66.1	40	62.1	10.0	32.9
F. Kahlo	C. Coll N. Judson	4259	67	4169.3	2	93.44	1	46.74	25	40	25	40	62.1	56.9	61.6	66.1	40	62.1	10.0	32.9
Lee	Ocean Site	950	67	920.44	2	7.434	1	3.717	25	40	25	40	56.6	51.4	56.0	60.0	40	55.8	4.7	15.4
Lee	Ocean Holoway	499	67	482.59	2	9.034	1	4.517	25	40	25	40	54.9	49.6	54.0	57.9	40	53.9	4.0	13.0
Plymouth	Ocean S.Wood	468	67	450.59	2	9.034	1	4.517	25	40	25	40	54.9	49.6	54.0	57.9	40	53.9	4.0	13.0
City Coll N	F. Kahlo Site	506	67	488.49	2	10.17	1	5.087	25	40	25	40	57.0	51.8	56.6	60.4	40	56.2	5.2	17.1
Judson	F. Kahlo Ganassas	820	67	792.44	2	17.43	1	8.716	25	40	25	40	56.4	51.2	56.0	60.0	40	55.8	5.0	16.4
Occom	Plymouth-Nassau	4044	67	3903.9	2	90.39	1	45.14	25	40	25	40	61.9	56.7	61.4	65.9	40	61.4	9.9	32.6
Occom	F. Kahlo L200	4079	67	4019.7	2	97.4	1	49.7	25	40	25	40	62.7	57.5	62.1	66.1	40	62.1	10.0	32.9
Assumptions: PM peak hour traffic data from Kittleson																				

Page 2 of 2

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

There's a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It's a specialized designed learning area for

students with diagnosed learning needs that they can't -- we can't move them elsewhere in the building.

So, we're worried that there's not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don't have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can't go elsewhere to receive this help."

*(Andrew Currier, PhD, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-ARHS-1])*

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"So, we need more information about the noise impact. How is this all -- how is the hammering, the excavation, the drilling, all of that noise, all of that disruption, the trucks when they're beeping to back up, the backhoes, all that noise, how is that going to impact -- is that going to be two years lost on 170 students' education, who are trying despite learning needs and differences, to prepare themselves for college.

They're paying, in some cases, \$60,000 a year to attend Riordan for this specialized care. That's all going to be disrupted for two plus years? That's unacceptable to us. So, we need more detail on this."

*(Andrew Currier, PhD, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-ARHS-2])*

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"One example. The draft SEIR fails to include the City College multi-use building as a sensitive receptor, which I think is a euphemism for young kids, okay.

The multi-use building is 150 feet from the construction site and is used for childcare classes, for children and classes on the site.

The short term measurement location information in the SEIR, which is on page 3, section C.9, notes that, and I quote from the DEIR: The college campuses are generally not considered a noise-sensitive receptor.

The MUB has been used for childcare classes, for children on site for years and will continue to be used that way. Therefore, it qualifies as a noise-sensitive receptor. And the DEIR completely ignores that, as they ignore the impact to City College, and the impact on Riordan College."

*(Garry Bieringer, CPC Hearing, September 12, 2019 [I-BIERINGER1-3])*

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"4. The draft SEIR fails to include the City College Multi-Use Building (MUB) as a sensitive receptor. MUB is approximately 150 feet from the construction site (per the scale of Figure 2-1, p. 2-2) and is used for childcare classes where children attend classes on site. The short-term measurement location information in the SEIR for ST-3 (page 3.C- 9) notes that "The Multi-Use Building is the nearest City College building to the project site; however, college campuses are generally not considered a noise-sensitive receptor." The MUB has been used for childcare classes for children on site for several years and is expected to continue to be used for that purpose and therefore needs to be recognized as a noise-sensitive receptor site that qualifies as such for noise testing."

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-6])*

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"6. During Phase 0 of construction, there will be up to 200 one-way trips per day during peak activity, and the noisiest period will continue for two months (page 3.C-26). 22 truck trips are anticipated per hour. This is a truck trip every two to three minutes between the hours of 7am and 4pm. The noisiest period in Phase 1 would last four months. There is no school vacation that lasts for four months; so, even without including the seven-month noisiest period of Phase 2, during Phases 0 and 1, the level of truck hauling activity will occur during class hours and disturb classes as well as access to classes due to equipment VMT."

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-8])*

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"10. We would appreciate a clear understanding of the noise impact of cutting the construction period from six to three (or four) years. Would the noisiest period of construction occur in the first two or three (or four) years whether the time period of the project is three (to four) or six years?"

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-12])*

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"11. We understand the same equipment will be used whatever the time schedule. But will a compressed time schedule mean more equipment will need to be operated simultaneously, increasing the noise level at certain times? It is to be expected that construction compressed into two phases would increase the level of disruption along community streets due to more frequent construction truck hauling near multiple sensitive receptors, residences, and education institutions."

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-13])*

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"12. If the construction schedule is compressed, please address the likelihood of the need for additional hours of work per day or night required to meet the compressed timeframe. Will compressing the time frame into three years increase the risk of emergency requests for special permits for night work?"

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-14])*

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“13. If the City grants special work permits for periods outside of the standard allowable 7 am to 8 pm construction hours, boarding school students at Riordan HS and residents living along Plymouth, Ocean, Lee and on the Northeast side of the development in Sunnyside and Westwood Park, will likely experience sleep disturbance. The SEIR leaves open the possibility for special night permitting. This will affect the health, wellbeing and productivity of all concerned, and negative night permitting impacts should not be acceptable in this residential area.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-15])*

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“15. In general, although SF Planning doesn't include City College students in their learning environment as sensitive receptors in noise assessments, due to the type of activity and the duration and amount of noise exposure, they should be considered in this category. Per the World Health Organization, as stated in the SEIR document, a known health effect from noise is decreased performance on complex cognitive tasks (reading, attention, memorization and problem solving.)”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-17])*

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“Consideration must be given to the impact of construction noise on the classrooms at Riordan High, as work will be done during school hours.”

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-11])*

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### **Response NO-3: Construction Noise Impacts**

The comments express concern regarding noise impacts to sensitive receptors, hauling trips along North Access Road, nighttime construction, and the compressed construction schedule.

Comments regarding noise monitoring at childcare facility receptors are addressed in Response NO-1, Noise Baseline, on RTC p. 4.D-2.

The response to the construction noise impacts analysis is organized by the following subtopics:

- City College Multi-Use Building
- Archbishop Riordan High School
- North Access Road
- Nighttime Construction
- Compressed Construction Schedule

### *City College Multi-Use-Building*

Commenters expressed concern that the City College Multi-Use-Building is not identified and analyzed as a sensitive receptor because the commenter states the child care classes would include child care and the presence of children. As stated on draft SEIR p. 3.C-4, the planning department defines noise-sensitive receptors as occupants of residences, schools, daycare centers, hotels, hospitals, places of worship, and nursing homes. Although not cited in the draft SEIR, the planning department uses the Governor's Office of Planning and Research's *General Plan Guidelines 2017* for defining noise-sensitive uses.<sup>40</sup> The guidelines identify noise-sensitive receptors to include residential land uses, hospitals, convalescent homes, schools, churches, and sensitive wildlife habitat, including the habitat of rare, threatened, or endangered species. The guidelines define noise-sensitive uses. The guidelines do not define uses such as City College classes as a noise-sensitive receptor. Thus, the draft SEIR does not include City College as a noise-sensitive receptor.

The planning department consulted with City College regarding the classes identified by the commenter.<sup>41</sup> Based on information from City College, these classes are child behavior observation classes. The classes at the Multi-Use Building are three hours in duration and are offered daily. However, parents may opt to bring their child once a week, or up to five times a week. There is no outdoor space for children associated with the Multi-Use Building. Locations where a land use is designed for children to receive instruction on a regular basis (i.e., are enrolled) such as an elementary or pre-school are typically considered to be noise-sensitive.

In an effort to disclose potential construction noise impacts at the exterior of the Multi-Use Building, an analysis of the construction noise impacts at the exterior of the Multi-Use Building is provided in **Table RTC-7, Estimated Daytime Construction-Related Noise Levels at the Multi-Use Building**. As can be seen from this table, exterior noise levels would be below the 90 dBA standard applicable to residential uses but would exceed the applicable 65 dBA "Ambient + 10 dBA" standard for this location by 10 dB during Phase 0 and 5 dB during Phases 1 and 2. As stated above, there are no outdoor space for children associated with the Multi-Use Building, and construction noise heard inside the building would be further attenuated by the building which is of recent construction. Additionally, **Mitigation Measure M-NO-1: Construction Noise Control Measures** would further reduce the construction noise impact heard inside the building at this receptor. Nevertheless, as stated on draft SEIR p. 3.C-31, the overall construction noise impact of the proposed project is significant and unavoidable with mitigation.

<sup>40</sup> Governor's Office of Planning and Research, *State of California 2017 General Plan Guidelines*, 2017, p. 136. Available at: [http://opr.ca.gov/docs/OPR\\_COMPLETE\\_7.31.17.pdf](http://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf)

<sup>41</sup> Rosario Villasana, Department Chair of Child Development and Family Studies, City College. Phone correspondence with Jeanie Poling, San Francisco Environmental Planning, on October 1, 2019.

**TABLE RTC-7**  
**ESTIMATED DAYTIME CONSTRUCTION-RELATED NOISE LEVELS AT THE MULTI-USE BUILDING**

Construction Phase and Noisiest Combined Construction Activities	Hourly Leq in dBA at 50 Feet <sup>a</sup>	Minimum Distance between Receptor and Closest Equipment (feet)	Noise Level (Leq) Adjusted for Distance <sup>b</sup>	Daytime FTA Standard at Residential Uses (dBA)	Does Noise Level Exceed FTA Standard?	Ambient + 10 dBA Standard <sup>c</sup> at Closest Receptor	Does Noise Level Exceed Ambient + 10 dBA Standard?
<b>Existing Noise Receptor: City College Multi-Use Building</b>							
Phase 0 – Surface Preparation and Demolition	85	175	75	90	No	65	<b>Yes</b>
Phase 1 Building Construction	81	175	70	90	No	65	<b>Yes</b>
Phase 2 Building Construction	81	175	70	90	No	65	<b>Yes</b>

SOURCE: ESA, 2019.

NOTES:

dBA = A-weighted decibel; FTA = Federal Transit Administration; noise levels in **bold** exceed the indicated standard.

<sup>a</sup> As calculated with the RCNM model with no attenuation for intervening berms or buildings.

<sup>b</sup> Combined hourly noise levels were attenuated 6 dB for every doubling of distance from the source.

<sup>c</sup> People often perceive 10 dBA as a doubling of loudness. The daytime ambient noise levels of 62 dBA were estimated using roadway noise modeling data for Judson Avenue.

### *Archbishop Riordan High School*

One commenter expresses concern about construction noise impacts to students at Archbishop Riordan High School. As discussed on draft SEIR p. 3.C-25, Archbishop Riordan High School would be the receptor nearest to the project site's eastern property line. The receptor is actually located along the northern property line of the project site. The text on draft SEIR p. 3.C-25 is revised as follows to correct the location of this receptor (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

Archbishop Riordan High School would be the receptor nearest to the ~~eastern-northern~~ property line. Archbishop Riordan High School would be located approximately 80 feet from Phase 0 demolition activities which would last approximately two months.

The high school is a land use designed for children to receive instruction on a regular basis and is therefore considered a noise-sensitive receptor for the analysis. Impacts from fugitive dust generated during construction are addressed under Impact AQ-1 on draft SEIR pp. 3.D-44 to 3.D-45. The construction noise impact analysis applies three separate noise criteria.

Archbishop Riordan High School would be located approximately 80 feet from Phase 0 demolition activities, which would last approximately two months. The high school is also about 80 feet from the peak construction haul truck activity along North Access Road, which would occur over a four-month period. During Phase 1 and Phase 2, the high school would be approximately 50 feet from standard construction activities for Lee Avenue and Block G, respectively. Construction noise

impacts are identified as a significant impact in the draft SEIR based on the increase of noise levels over existing ambient levels and the duration of the overall construction period.

Predicted noise levels are conservative in that they assume activity at the closest point to each sensitive receptor, which would occur for only a fraction of the entire duration of demolition and construction activity. As demolition progresses away from the receptor location, noise levels experienced by the closest receptor would be less than the noise levels in draft SEIR Table 3.C-8, which reflect demolition activity as a worst-case analysis.

**Mitigation Measure M-NO-1, Construction Noise Control Measures**, is identified in the draft SEIR to reduce the severity of construction noise impacts to the degree feasible. This mitigation includes measures that would be directly applicable to reducing noise impacts at Archbishop Riordan High School, such as locating noisy activities as far from receptors as feasible, shielding noisy stationary equipment, and erecting temporary plywood noise barriers around the construction site, particularly where a site adjoins noise-sensitive uses such as Archbishop Riordan High School. The required project-specific noise control plan would also include identification of a community liaison to address noise complaints and preparation of a weekly noise monitoring log reports for any noise complaints received. The report must document noise levels, exceedances of threshold levels, if reported, and corrective action. However, even with implementation of this mitigation measure, given the extended duration of construction phases and given that noise levels would substantially exceed existing noise levels at Archbishop Riordan High School, the construction noise impact is identified in the draft SEIR as significant and unavoidable with mitigation.

#### *North Access Road*

A comment expressed concern that the frequency and duration of truck hauling trips along North Access Road would extend beyond potential summer break periods and disturb classroom operations at Archbishop Riordan High School. The SEIR identified the impact as significant and unavoidable with mitigation.

The commenter is correct that during Phase 0 of construction, there would be up to 200 one-way trips per day during peak activity, and the noisiest period would continue for two months. As further stated on draft SEIR p. 3.C-26, 22 truck trips are anticipated per hour during peak demolition periods with a frequency of a truck trip every two to three minutes between the hours of 7 a.m. and 4 p.m. Table 3.C-8 on draft SEIR p. 3.C-27 presents the contribution of both haul trucks and equipment during each phase of construction, and shows that the contribution of haul trucks to hourly noise levels would be 63 dBA at Archbishop Riordan High School, which is approximately 6 dBA greater than existing noise levels. However, as indicated in this same table, the noise contribution from demolition equipment would be up to 82 dBA when occurring at the nearest point to Archbishop Riordan High School, which would have the greater potential for causing temporary increases in noise levels that could be disturbing to classes. As stated above, predicted off-road equipment noise levels are conservative in that they assume activity at the closest point to each sensitive receptor, which would occur for only a fraction of the entire duration of demolition and construction activity. This impact would primarily occur during demolition and excavation in Phase 0, when on-road trucks would be travelling on North Access Road. (The

permanent relocation of North Access Road is described in Variant 4: North Street Extension on draft SEIR p. 5-22 and depicted in Figure 5-4 on draft SEIR p. 5-20.)

To further address this comment with respect to potential noise impacts to Riordan High School and a temporary or permanent relocation of North Street, the text of Mitigation Measure M-NO-1 on draft SEIR p. 3.C-30 is modified, as indicated in Response NO-6: Noise Mitigation Measure, on RTC p. 4.D-21, below.

Mitigation Measure M-NO-1, Construction Noise Control Measures, is identified in the SEIR to implement all feasible mitigation to reduce the severity of construction noise impacts to the degree feasible as required by CEQA Guidelines section 15126.4(a)(1). Mitigation includes preparation and implementation of a project-specific noise control plan. Even with implementation of this mitigation measure, the project as analyzed in the draft SEIR and as revised above, given the extended duration of construction phases and given that noise levels would substantially exceed existing noise levels at Archbishop Riordan High School, the construction noise impact is identified in the draft SEIR as significant and unavoidable with mitigation. These revisions do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

#### *Nighttime Construction*

One comment raises concerns regarding potential impacts to sleep disturbance from nighttime construction work. As stated on draft SEIR p. 3.C-23, construction activity would generally occur during daytime hours. Nighttime construction noise is not expected to occur frequently or regularly. Accordingly, no hauling of materials, equipment warm-up, or any other activity is anticipated during nighttime hours except in unusual circumstances such as large concrete pours, which may require earlier start or later finish times, as explained on draft SEIR p. 2-39. The project sponsor has indicated that each building would require one concrete pour. If nighttime work after 8 p.m. were needed, a special nighttime construction permit would be required and subject to review, permitting, and approval by the San Francisco Department of Building Inspection. Mitigation Measure M-NO-1 also includes a requirement for the project sponsor to notify the planning department's development performance coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred. The text on draft SEIR p. 3.C-23 is modified as indicated in Response NO-1, Noise Baseline, on RTC p. 4.D-2, to clarify nighttime work. As noted in Response NO-1, the text changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

#### *Compressed Construction Schedule*

Several comments express concerns that a compressed schedule would result in increased intensity of construction and therefore greater construction noise levels. Compression of the construction schedule from six to three years would increase the intensity of construction and may result in more individual pieces of equipment operating simultaneously than under the proposed six-year construction period.

Under the compressed scenario, Phase 0 would occur over a 12-month period, the same as under the six-year construction scenario; therefore, the construction noise impacts for Phase 0 would be the same. Under the compressed scenario, Phases 1 and 2 would be constructed simultaneously after Phase 0 and would involve more equipment operation but not at the same location, as Phase 1 and Phase 2 are in separate geographic areas of the project site. Consequently, construction noise impacts at Archbishop Riordan High School as assessed in Table 3.C-8 of the draft SEIR would increase by 3 dBA and only if development of Blocks G and TH2 would occur simultaneously (see Figure 2-18, draft SEIR p. 2-40). Other Phase 1 development would be over 300 feet away from Archbishop Riordan High School, such that construction noise would be attenuated by distance so as not to contribute considerably to construction noise from concurrent development of Phase 2 area under the compressed schedule.

Additionally, because construction noise analysis involves consideration of the simultaneous operation of the two noisiest pieces of equipment, the compressed construction scenario would not appreciably result in a change in the character of the significant and unavoidable construction noise impact identified in the draft SEIR. Therefore, due to the attenuation between the project construction and nearest sensitive receptors, the compressed construction scenario would have a potential for only a modest increase in noise levels over those predicted for the proposed schedule.

Similar to the proposed six-year schedule, the truck trips would be phased over the duration of the planned construction activities but compressed into three years. As described in Section 3.B, Transportation and Circulation, draft SEIR pp. 3.B-60 to 3.B-61, under the compressed schedule, the average number of construction-related truck trips would increase by approximately 20 percent. Therefore, the peak volume of truck trips under the compressed schedule would also occur over four months in 2022 and would be 1.2 times greater than the six-year schedule due to the simultaneous construction of Phase 1 and 2. As indicated in Table 3.C-8 on draft SEIR p. 3.C-27, the noise contribution of truck trips would be much less than that of off-road construction equipment. As for the proposed construction schedule and as acknowledged on draft SEIR p. 3.C-29, the compressed construction schedule would result in a construction noise impacts from off-road equipment and haul trucks that would be *significant and unavoidable*. There would not be a substantial increase in the severity of construction noise impacts under the compressed schedule compared to that of the proposed project.

The text on draft SEIR p. 3.C-29 is revised as follows to clarify the noise analysis under the compressed construction schedule (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

As stated in the footnote to Table 2-2, p. 2-38, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity.

Compression of the construction schedule from six to three years would increase the intensity of construction and may result in more individual pieces of equipment operating simultaneously than under the proposed six-year construction period of the project. Under the compressed scenario, Phase 0 would occur over a 12-month period, as under the six-year construction scenario; therefore, the construction noise impacts for Phase 0 would be the same.

Under the compressed scenario, Phases 1 and 2 would be constructed simultaneously after Phase 0 and would involve more equipment operation but not at the same location, as Phase 1 and Phase 2 are in separate geographic areas of the project site. Consequently, construction noise impacts at Archbishop Riordan High School as assessed in Table 3.C-8 would increase by 3 dBA and only if development of Blocks G and TH2 would occur simultaneously (see Figure 2-18). All other Phase 1 development would be over 300 feet away, such that construction noise would be attenuated by distance so as not to contribute considerably to construction noise from concurrent development of Phase 2 area under the compressed schedule. Additionally, because construction noise analysis involves consideration of the simultaneous operation of the two noisiest pieces of equipment, the compressed construction scenario would not appreciably result in a change in the character of the significant and unavoidable construction noise impact identified. Therefore, due to the distances involved, the compressed construction scenario would only have a potential for a modest increase in noise levels over those predicted for the proposed schedule.

The peak volume of truck trips under the compressed schedule would also occur over four months in 2022 and would be 1.2 times greater than the six-year schedule due to the simultaneous construction of Phase 1 and 2. As indicated in Table 3.C-8 on SEIR p. 3.C-27, the noise contribution of truck trips would be much less than that of off-road construction equipment. There would not be a substantial increase in the severity of construction noise impacts under the compressed schedule compared to that of the proposed project. The same pieces of equipment would be operating under a compressed construction schedule. Therefore, the maximum noise level would not change based on the methodology above combining the operation of the noisiest pieces of equipment with each phase. Under the compressed construction schedule, the construction noise impact from off-road equipment would be significant.

These changes and additional analysis do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

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#### ***Comment NO-4: Construction Vibration***

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

I-HEGGIE2-16  
I-TIMA-6

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“14. Construction-related vibration impacts were not addressed in the PEIR. Studies do not include an evaluation of the vibration impact of construction equipment although as noted on p. 3.C-32, equipment used for demolition, site preparation and excavation activities, including the hoe ram and vibratory roller/compactor, which will be used, could generate varying degrees of temporary groundborne vibration.

Per Table 3.C-6 on page 3.C-14, older buildings may be damaged at .1 PPV (in/sec) if they are fragile though old buildings or residential structures would normally be able to withstand a maximum of 0.25 to 0.3 PPV when subjected to continuous or frequent intermittent sources. The Vibratory Roller/Compactor, a piece of equipment that will be used, creates 0.21 PPV (in/sec) at 25 feet. Although it may not be likely, it is possible there are homes along Plymouth Avenue that are in close enough proximity and fragile enough to be damaged by vibration. Have the homes along Plymouth been evaluated for their distance and fragility for possible vibration impacts?”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-16])*

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“And in regards to building, the shaking of the construction element way above the viability demands of construction. And my house is old and I do not want to have cracks in my stucco. Thank you.”

*(Hedda Tima, CPC Hearing, September 12, 2019 [I-TIMA-6])*

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#### **Response NO-4: Construction Vibration**

The comments express concern that the project could result in construction-related vibration impacts that may cause damage to structures. The commenter is correct that construction vibration was not analyzed in the Balboa Park Station Area Plan PEIR, and this is acknowledged on draft SEIR p. 3.C-2.

The draft SEIR did, however, analyze construction-related vibration impacts under Impact NO-2 on draft SEIR pp. 3.C-32 to 3.C-33. The methodology is provided on draft SEIR pp. 3.C-20 to 3.C-21 and 3.C-32 to 3.C-33, and is based on the California Department of Transportation and Federal Transit Administration guidance. Table 3.C-6, Vibration Guidelines for Potential Damage to Structures, on draft SEIR p. 3.C-14, identifies the vibration level at which different structure types (i.e., from “extremely fragile historic buildings, ruins, ancient monuments” to “modern industrial/commercial buildings”) would be subject to potential damage.

As noted on draft SEIR p. 3.C-22, construction equipment such as hoe rams and bulldozers could generate temporary groundborne vibration. As shown in Table 3.C-9 on draft SEIR p. 3.C-33, vibration levels at the Plymouth Avenue residences would be expected to be 0.21 in/sec peak particle velocity (PPV), which is below the 0.5 in/sec PPV standard for structural damage applicable to modern buildings. The Plymouth Avenue residences are considered older residential structures; therefore, the 0.3 in/sec PPV standard should be applied. Even with the 0.3 PPV standard, the Plymouth Avenue residences 25 feet away from the project site would experience less-than-significant vibration levels.

The second paragraph of draft SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

This analysis evaluates the significance of construction-related vibration on structures and people (receptors), specifically cosmetic damage effects on structures and sleep disturbance and associated health effects on people. For building damage, the threshold limit depends on the architectural characteristics of the potentially affected structure (see Table 3.C-6, p. 3.C-14), ~~but, for modern residential, industrial and commercial buildings,~~ a standard of 0.5 in/sec PPV is applied, while for older residential structures, a standard of 0.3 in/sec PPV is applied. Potential nighttime concrete pours would not involve the use of vibration-generating equipment. The potential for sleep disturbance vibration effects are evaluated only when construction activities are proposed during the nighttime hours, which would not occur under the proposed project, therefore, there would be no sleep disturbance vibration impacts.

The fourth paragraph of SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

As shown in Table 3.C-6, p. 3.C-14, depending on the type of vibration (transient versus continuous), groundborne vibration generated by project-related demolition and construction activities above ~~0.5~~0.3 in/sec PPV could cause cosmetic damage to new or older nearby structures. As shown Table 3.C-9, estimated vibration levels of PPV's would be ~~well below the 0.5~~below the 0.3 in/sec threshold and this impact would be *less than significant*.

These changes and additional analysis do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

### ***Comment NO-5: Operational Noise Impacts***

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

I-MUELLER1-3

"It should be obvious that proposing an unsafe density of housing units next to one of the largest and most successful Community Colleges in the State is not appropriate. It was wrong 30 years ago and it's wrong now. The sheer noise factor of thousands of new residents warehoused next to a college with a daily enrollment the size of a small city makes the educational environment totally compromised."

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-3])

### **Response NO-5: Operational Noise**

This comment expresses concern that operational noise from the proposed dense residential uses would be incompatible with the adjacent community college.

Operational noise impacts of the proposed project are assessed on draft SEIR pp. 3.C-33 to 3.C-38.

Impact NO-3 discusses the potential for the project to generate operational noise from fixed mechanical equipment. **Mitigation Measure M-NO-3, Fixed Mechanical Equipment Noise Controls**, on draft SEIR p. 3.C-36, is identified to reduce this potentially significant operational noise impact to a less-than-significant level by establishing a performance standard consistent with the noise limits established in section 2909(a) and (d) of the San Francisco Noise Ordinance.

The operational noise analysis in Impact NO-3 of the draft SEIR uses the noise exposure limits established in section 2909(a) and (d) of the San Francisco Noise Ordinance, which are land use based. Figure 3.C-3 on draft SEIR p. 3.C-16 presents the land use compatibility chart from the City and County of San Francisco General Plan Noise Element. As shown on this chart, the normally acceptable noise environment for residential uses within the City is up to 60 dBA, Ldn, while the normally acceptable noise environment for a school use is up to 65 dBA. Consequently, the Noise Element of the San Francisco General Plan considers multifamily residential uses to be compatible with the same noise environment as for educational uses, and the operational noise analysis and mitigation of the draft SEIR would be applicable to both residential and school land uses.

Impact NO-4 presents the operational traffic analysis associated with implementation of the proposed project. As can be seen from Table 3.C-11 on draft SEIR p. 3.C-37, there would not be a significant traffic noise increase along any roadways adjacent to sensitive land uses. Therefore, operation of the proposed project would not have a significant operational noise impact or land use compatibility impact with respect to noise exposure to adjacent school and collegiate land uses.

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### ***Comment NO-6: Noise Mitigation Measure***

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

I-HEGGIE1-4  
I-HEGGIE2-5

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“The first mitigation measure for noise recommends selecting truck haul routes that, quote: Avoid the north access road and adjacent Riordan High School and residential uses along Lee Avenue.

But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, the Harmony Family Childcare. A high school, nursery schools and daycare centers are located at or near all of the identified possible entrances and exit site points.

The Lee Avenue alternative is already identified in the Cumulative Transportation Items 4 and 6.B, as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation.

Mitigation measure for Noise Number 1 would only exacerbate another unmitigatable project issue. The first mitigation of the report also recommends undertaking the noisiest activities during times of least disturbance to surrounding residents and occupants, which are identified as 9:00 a.m. to 4:00 p.m. This coincides with the period when daycare centers and nursery schools are in session. Riordan High School holds classes and afterschool activities. And the majority of City College classes, including child development classes in the multi-use building, are in session.

The times of least disturbance need to be redefined.”

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [I-HEGGIE1-4])*

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“2. The first Mitigation Measure for noise recommends selecting truck haul routes that “avoid the North Access Road and adjacent Riordan High School and residential uses along Plymouth Avenue.” But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, Harmony Family Childcare. A high school, nursery schools and daycare centers are located at, or near, all the identified possible entrance and exit points of the project. The Lee Avenue alternative is already identified in Cumulative Transportation Items 4 and 6b [C-TR-4 and C-TR- 6b] as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation. It appears that the mitigation measure for noise #1 would exacerbate another unmitigatable project issue.

3. The first mitigation measure of the Report also recommends undertaking the noisiest activities during “times of least disturbance” to surrounding residents and occupants which are identified as from 9am-4pm [per page 3.C-30], a period prior to the maximum existing use of the adjacent land at City College, which is between 11am and 1pm. This coincides with the period when daycare centers and nursery schools are in session, Riordan HS holds classes and after school activities, and the majority of City College classes, including child development classes in the Multi-Use Building, are in session. The times of least disturbance needs to be redefined. There may be no time of least disturbance for the many diverse uses of the area, and if that is the case, that should be noted.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-5])*

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## **Response NO-6: Noise Mitigation Measure**

Comments regarding construction impacts on sensitive receptors and potential impacts to childcare classes in the Multi-Use Building are addressed above in Response NO-3, Construction Noise Impacts, on RTC p. 4.D-11.

The comment expresses concern regarding the haul truck route cited in Mitigation Measure M-NO-1. The commenter also raises concerns that the identified times of least disturbance

suggested in Mitigation Measure M-NO-1 on SEIR p. 3.C-30 may not be appropriate for surrounding land uses near the Lee and Ocean avenue intersection.

The commenter is correct that if Lee Avenue were to be used as an alternative route, truck travel on this roadway could be a potentially significant impact to existing receptors along Lee Avenue. Lee Avenue already accommodates truck deliveries for the adjacent Whole Food Market, is adjacent to sensitive receptors with no setback, and is limited in width; thus, Lee Avenue does not represent a viable alternative as an alternate route for construction haul trucks. The draft SEIR identifies construction-related noise impacts as significant and unavoidable with mitigation, and Mitigation Measure M-NO-1 is intended to provide consideration to construct a temporary roadway to and from Frida Kahlo Way to avoid such impacts. The sixth bullet of Mitigation Measure M-NO-1 on draft SEIR p. 3.C-30 is modified as follows:

- Undertake the noisiest activities (e.g., demolition using hoe rams) during ~~times of least disturbance to surrounding residents and occupants the hours of (9 a.m. to 4 p.m.); and~~ select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street.

The feasibility of implementing either a temporary or permanent North Street extension is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College. Consequently, the second full paragraph on draft SEIR p. 3.C-31 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

**Significance after Mitigation:** Significant and Unavoidable. Implementation of construction-related noise control measures in Mitigation Measure M-NO-1 would reduce the project's temporary or periodic increases in ambient noise levels. However, given that there would still be periods of peak construction activity exceeding the "Ambient + 10 dBA" standard at the nearest sensitive receptor locations for occasional periods when activity would be conducted at the property lines nearest to receptors, these occurrences would occur in all three phases of construction over an extended period of up to six years.

Plywood barriers or moveable sound barrier curtains can provide, at best, 10 to 15 dBA of sound attenuation but would not be effective for elevated receptors in the 1100–1150 Ocean Avenue residences. The feasibility of implementing either a temporary or permanent North Street extension is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College.

If construction were to be conducted under the compressed schedule and be complete as early as 2024, a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity. Therefore, in either case the construction noise impacts would be significant and unavoidable with mitigation.

This would not change the conclusions of the draft SEIR as the draft SEIR identified this impact as significant and unavoidable with mitigation.

The modifications to Mitigation Measure M-NO-1 clarify that the project sponsor should select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street; the permanent relocation is described in Variant 4: North Street Extension on draft SEIR p. 5-22 and depicted in Figure 5-4 on draft SEIR p. 5-20. The feasibility of implementing the North Street extension, as envisioned in Variant 4, is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College.

As the commenter states, there is likely no set period where all noise-sensitive receptors would be unlikely to be present. Mitigation Measure M-NO-1 would require that the noisiest activities be conducted during daytime hours, and the intent of this mitigation is to restrict the noisiest activity to hours when a majority of receptors such as residential uses along Plymouth Avenue may be less impacted by construction noise. With respect to alternative hours of hauling, it is infeasible to assign truck trip hauling activities during nighttime periods when residents are more likely to be asleep. It is also infeasible to shorten or require different daytime hour of hauling, as they would not align with contractor worker hauling schedules, or such hours would prolong the construction period such that noise impacts may be prolonged too.

Notwithstanding these efforts, the construction noise impact is identified as significant and unavoidable with mitigation.

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### ***Comment NO-7: Cumulative Noise***

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

I-HEGGIE2-18

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“16. As you note, because City College has been making changes to their master plan, checking in with them for their most current plans for development in the areas closest to the Balboa Reservoir is an ongoing process. A recent plan calls for constructing a Performing Arts Education Center building twice as tall as the one indicated in the DEIR on the City College-owned “upper reservoir.” Please take into account the cumulative impact to noise of new plans.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-18])*

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### **Response NO-7: Cumulative Noise**

As discussed on draft SEIR p. 3.C-40, although City College adopted a facilities master plan in March 2019, this facilities master plan does not provide adequate information to develop a quantitative cumulative impact analysis as part of the draft SEIR. The approach to the cumulative impact analysis with respect to City College is also described on draft SEIR pp. 3.A-10 to 3.A-14. This section describes the available information of the facilities master plan projects and the potential bond measure, and acknowledges that the facilities master plan projects may change depending on funding availability. The draft SEIR noise section qualitatively assesses the impacts of the various City College Ocean Campus projects.

The cumulative construction noise impacts are analyzed based on the closest cumulative project where concurrent construction would have the potential to cumulatively increase noise levels at existing sensitive receptors. Archbishop Riordan High School is the closest sensitive receptor to the project site and east basin where some City College facilities master plan projects could be constructed (see draft SEIR p. 3.C-38). As described in the draft SEIR, on p. 3.A-14, the City College bond measure project list presented to the City College Board of Trustees in 2019 does not include the East Basin Parking Garage. The garage is the closest cumulative project to Archbishop Riordan High School but may not be constructed concurrently with the proposed project. The new Diego Rivera Theater and a smaller STEAM building, which were identified as potential bond-funded projects when presented to the City College Board of Trustees in 2019, replaced the Performing Arts Education Center on the east basin. These projects would be approximately 300 feet from Archbishop Riordan High School. The analysis in the draft SEIR is therefore conservative, in that it assumed that City College would construct the East Basin Parking Garage concurrent with the Balboa Reservoir project, and that it would be the closest cumulative project to a sensitive receptor at 80 feet away. Therefore, the cumulative analysis appropriately considers the growth and development information available for the City College Ocean Campus at the time of the draft SEIR preparation.

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## 4.E Air Quality

The comments and corresponding responses in this section cover topics in draft SEIR Section 3.D, Air Quality. The comments are further grouped according to the following air quality issues that the comments raise:

- Comment AQ-1: Sensitive Receptors
  - Comment AQ-2: Construction Schedule
  - Comment AQ-3: Mitigation Measure
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### *Comment AQ-1: Sensitive Receptors*

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

O-ARHS-1  
I-HANSON3-1  
I-HEGGIE2-19  
I-MARABELLO1-1

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“Good afternoon. That’s a tough one to follow, but I’ve got a few concerns. My name’s Dr. Andrew Currier. I’m representing Archbishop Riordan High School, as its President.

There’s a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It’s a specialized designed learning area for students with diagnosed learning needs that they can’t – we can’t move them elsewhere in the building.

So, we’re worried that there’s not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don’t have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can’t go elsewhere to receive this help.”

*(Andrew Currier, PhD, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-ARHS-1])*

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“The Draft SEIR discusses risks in the APEZ, which is the Air Pollutant Exposure Zone. The risk is highest for children, referred to as “sensitive receptors,” at Childcare Centers, and the SEIR identifies Childcare Centers in the area and their distance to the construction zone. The Childcare Center at City College, located in the bungalows is identified and though it is not the closest in



proximity it is the only center noted that lies within the APEZ, sits to the East and is in the prevailing path of the wind.

The draft SEIR fails to note the Childcare classes that are centered in the City College Multi-Use Building (MUB), which teaches classes with children on site. Though these children are not playing outside of the building, the MUB sits approximately 150 feet away from the proposed development (per figure 2-3) is to the East of the construction site, and downwind.

Because of the proximity of the MUB to the construction site, its location is comparable to the planned childcare site within the proposed construction area. The SEIR classifies the danger to those children for future health impacts as being significant but says that because the development's future daycare centers won't be up and running during construction this isn't likely to be an issue as follows:

From the draft SEIR page 3.D-71: 'in the unlikely event that the daycare would be completed in Phase 1 and be operational during Phase 2 construction, the potential for future health risk impacts from exposure of daycare receptors to Phase 2 construction TAC emissions would be potentially significant, especially given the potential that the project could be developed under an accelerated construction schedule of as little as three years' duration, increasing the DPM exposure of daycare receptors.'

The proposed project must study the potential danger to the children who participate in the classes in City College's MUB. The data shows that they are not included in this study. Because the draft SEIR identifies significant health impacts for children at the future daycare centers located within the construction area, those concerns must be addressed as well with the children in the MUB whose proximity and direction of location put them at similar risk. These children in the MUB are within the APEZ and the building they are in is to the East, and downwind of the proposed project. The danger to these children is also increased with the potential for an accelerated construction schedule for both alternatives, **after studying the impacts**; the SEIR must offer mitigations for these children for all of the alternatives studied in the draft SEIR."

*(Christine Hanson, Email, September 11, 2019 [I-HANSON3-1])*

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"Please include the sensitive receptors identified above for noise in assessments of air quality as appropriate, although air travels farther than noise." <sup>42</sup>

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-19])*

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#### **"FAILURE TO INCLUDE A SIGNIFICANT SENSITIVE RECEPTOR — STUDENT-ATHLETES**

1. Both the PEIR (page 251) and BAAQMD guidelines (<http://www.sparetheair.org/understanding-air-quality/air-pollutants-and-health-effects/whos-at-risk>) include persons engaged in strenuous exercise as sensitive receptors.

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<sup>42</sup> The comment is referring to Mighty Bambini, childcare classes at the Multi-Use Building, and the future City College replacement childcare center.

The SEIR does not do so similarly for a sizable group that exercises routinely and strenuously adjacent to the project area — CCSF athletes. It does not designate them, many of whom train and compete outdoors within 1/4 mile of the BR, as sensitive receptors. It fails to mention this significant group altogether. Thus they were not included in any of the analyses, including the Health Risk Assessment.

This is a violation of San Francisco Administrative Code chapter 31.

There are hundreds of CCSF student-athletes exercising strenuously, outdoors and indoors, who need to be factored in to required air quality analyses.

Plus there are many more who are strenuously exercising in CCSF Ocean Campus physical education courses that should be accounted for.

Also, if health risk assumptions used in the SEIR's air quality analyses are different for athletes than they are for students, and they probably are, then the athletes among the student body at Archbishop Riordan should be their own receptor type in the analyses."

*(Brian Marabello, Email, September 23, 2019 [I-MARABELLO1-1])*

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### **Response AQ-1: Sensitive Receptors and Construction**

The comments relate to concerns about construction-related air quality impacts, and request that additional sensitive receptor locations and types of sensitive receptors be included in the air quality analysis.

Comments regarding noise impacts to sensitive receptors are addressed in Response NO-1, Noise Baselines, on RTC p. 4.D-2 and Response NO-3, Construction Noise Impacts, on RTC p. 4.D-11.

The response to the sensitive receptors and construction analysis comments is organized by the following subtopics:

- Sensitive Receptors Included in the Analysis
- City College Multi-Use Building Occupants as Sensitive Receptors
- Additional Sensitive Receptors
- Student Athletes as Sensitive Receptors

#### *Sensitive Receptors Included in the Analysis*

As described on draft SEIR p. 3.D-20, some population groups are more susceptible to adverse health effects from air quality than others. These sensitive groups are known as "sensitive receptors." As stated on draft SEIR p. 3.D-20:

"More sensitive population groups include: the elderly and the young; those with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and those with other environmental or occupational health exposures (e.g., indoor air

quality) that affect cardiovascular or respiratory diseases. The air district defines sensitive receptors as children, adults, and seniors occupying or residing in residential dwellings, schools, daycare centers, hospitals, and senior-care facilities.”

The health risk assessment (HRA) prepared for the draft SEIR includes all sensitive receptor locations within 1,000 meters of the project boundary. These include residential areas (based on residential land use and/or zoning data), daycares, and schools (for children under 16 years of age). As discussed on draft SEIR p. 3.D-20, sensitive receptors include a “representative sample of known residents (child and adult) in the surrounding neighborhood, and other sensitive receptors (school children, daycare facilities, etc.) located in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks within the project vicinity.” Table 9 on draft SEIR Appendix E, p. 20, presents the location of daycares and schools within 1,000 meters of the project site, and whether each receptor is located within the Air Pollutant Exposure Zone (APEZ).

Comments state that the air quality analysis should include children present at childcare classes at the City College Multi-Use Building as sensitive receptors in the HRA. The commenter claims that due to the Multi-Use Building’s proximity to the site and its location in the APEZ, and because the draft SEIR finds a significant impact for new onsite daycare receptors that would be comparable to the Multi-Use Building receptors, receptors at the Multi-Use Building should be evaluated in the draft SEIR. Another comment requests that planned sensitive receptor locations at City College be included in the air quality analysis. A City College childcare center is proposed to be located at the corner of Judson Street and Frida Kahlo Way. Another childcare/nursery school, the Mighty Bambini childcare/nursery school, is located at the corner of Staples and Frida Kahlo Way.

The potential presence of children in a given land use does not necessarily indicate that such a land use is a sensitive receptor for TAC emissions. Locations where a land use is designed for children to receive instruction on a regular basis (i.e., are enrolled) such as an elementary or pre-school are considered to be sensitive receptors, and are analyzed as such in the draft SEIR. Adult education facilities, such as City College, are not considered to be sensitive receptors with the exception of dedicated childcare facilities that may be present on such uses. This is because dedicated childcare facilities may have children present for many hours each day over five to seven days per week, and children are considered sensitive receptors due to their elevated breathing rates and susceptibility to TAC emission exposure.

#### *City College Multi-Use Building Occupants as Sensitive Receptors*

The commenter is correct that the Multi-Use Building is in the APEZ. The draft SEIR p. 3.D-66, notes that the only APEZ locations in the study area (1,000-meter radius of the proposed project boundary) are receptor locations within 500 feet of I-280. However, since publication of the draft SEIR, the San Francisco Department of Public Health issued an updated APEZ map and health risk assessment database. Based on these new data, the Multi-Use Building is located within the 2020 APEZ.<sup>43</sup>

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<sup>43</sup> San Francisco Planning Department, San Francisco Property Information Map, <https://sfplanninggis.org/PIM/>, accessed April 2020.

The commenter is also correct that the childcare center in the bungalows at City College is in the 2020 APEZ.

The commenter states that child attendees at the Multi-Use Building childcare classes would be present long enough in the building to be exposed to significant TAC emissions from project construction and operation. The planning department consulted with City College regarding the classes.<sup>44</sup> Based on information from City College, these classes are child behavior observation classes. The classes at the Multi-Use Building are three hours in duration and are offered daily. However, parents may opt to bring their child once a week, or up to five times a week. The children are only brought in for the duration of the class. Thus, the presence of children at the Multi-Use Building would not occur for extended periods of time (i.e., eight hours per day, seven days per week, as do typical daycare and school receptors). Even if the children attended these classes five days a week, their time spent in the Multi-Use Building (e.g., 15 hours per week) would be much less than the time children would spend at the daycare locations evaluated in the SEIR (e.g., 56 hours per week). Thus, the exposure duration of potential children who participate in the classes at the Multi-Use Building would be much lower than the exposure duration for the daycare, school, and residential receptors included in the draft SEIR.

For daycare uses, the draft SEIR assumes exposure to project-generated TACs would occur eight hours per day, seven days per week (250 days per year). For schools, the SEIR assumed eight hours per day, five days per week (180 days per year). For residents, the SEIR assumed 24 hours per day, seven days per week (350 days per year).<sup>45</sup> Children who participate in the classes at the Multi-Use Building would be expected to be exposed to project-generated TACs a maximum of three hours per day, five days per week (180 days per year). On an annual basis, this is 73 percent less than the exposure currently modeled for daycare receptors, 63 percent less than the exposure currently modeled for school receptors, and 94 percent less than the exposure currently modeled for residential receptors. In addition, childcare classes at the Multi-Use Building would not last more than a year, and any children present at the Multi-Use Building would only be exposed to a fraction of the entire six-year construction period. Therefore, the exposure for potential Multi-Use Building children receptors would be substantially lower than what was modeled in the draft SEIR for receptors located at a similar distance from the proposed project's boundaries.

Further, the Multi-Use Building daycare receptors are located farther from the project site than four daycare locations evaluated in the draft SEIR. The Multi-Use Building is approximately 175 feet from the project site boundary. The HRA modeled 16 offsite daycare sensitive receptor locations, four of which are located within 160 feet of the project site, including Shining Stars Family Child Center, Harmony Family Childcare, Blooming Child Care, and Cel Coalition Center (see Table 9 on draft SEIR Appendix E, p. 20). Four of the 16 nearby daycares are located in the APEZ (Star Sky Childcare and Preschool, Harmony Family Childcare, Cel Coalition Center, and the City College of San Francisco Ocean Campus Child Development Lab School) along with the Multi-Use Building.

<sup>44</sup> Rosario Villasana, Department Chair of Child Development and Family Studies, City College. Phone correspondence with Jeanie Poling, San Francisco Environmental Planning, on October 1, 2019.

<sup>45</sup> See Table 10 on draft SEIR Appendix E, pp. 21 to 23.

In an effort to disclose potential health risk impacts for a child attendee at the Multi-Use Building, maximum mitigated lifetime excess cancer risk and annual average PM<sub>2.5</sub> concentrations were estimated for a child attendee. The results of this analysis are presented in **Table RTC-8, Mitigated Lifetime Excess Cancer Risk for the Multi-Use Building Child Attendee and Select Daycare, School, and Residential Sensitive Receptors for the Additional Housing Option**, and **Table RTC-9, Mitigated Annual Average PM<sub>2.5</sub> for the Multi-Use Building Child Attendee and Select Daycare, School, and Residential Sensitive Receptors for the Additional Housing Option**. For comparative purposes, the lifetime excess cancer risk at similar nearby sensitive receptor locations, as analyzed in the SEIR, are also presented in the table below. Results are presented for the Additional Housing Option because TAC emissions and health risks are greater for the Additional Housing Option than for the Developer's Proposed Option. It should also be noted that the background and total background plus project risk values in the tables below have been updated to reflect the update to the Citywide Health Risk Assessment database conducted in February 2020 by the City.<sup>46</sup> The key health risk results using the 2020 APEZ database are provided as new SEIR Appendix I, Updated Health Risk Assessment for the Balboa Reservoir Project, and included in RTC Chapter 5, *Draft SEIR Revisions*.

**TABLE RTC-8**  
**MITIGATED LIFETIME EXCESS CANCER RISK FOR THE MULTI-USE BUILDING CHILD ATTENDEE AND SELECT DAYCARE, SCHOOL, AND RESIDENTIAL SENSITIVE RECEPTORS FOR THE ADDITIONAL HOUSING OPTION**

Receptor	Location Relative to the Proposed Project	Mitigated Lifetime Excess Cancer Risk for the Additional Housing Option (in One Million) <sup>a,b</sup>			RTC Chapter 5, <i>Draft SEIR Revisions</i> , Table Source
		Project	Background <sup>c</sup>	Total	
Multi-Use Building child attendee <sup>d</sup>	140 feet east <sup>e</sup>	4.9	37.8	42.7	n/a
Archbishop Riordan High School	30 feet north	1.9	28.0	29.9	3.D-13b
Shining Stars Family Child Center	30 feet west	12.8	62.0	74.8	3.D-13b
Harmony Family Childcare	50 feet southeast	4.2	123.9	128.1	n/a
Mighty Bambinis Childcare & Preschool	750 feet northeast	1.0	29.6	30.6	n/a
Residential	directly west/south	9.4	49.8	59.1	3.D-13b

SOURCE: ESA 2020

NOTES:

SEIR = Subsequent Environmental Impact Report; n/a = not applicable (not presented in the draft SEIR tables).

<sup>a</sup> Cancer risks are presented for the construction plus operational emissions scenario (Scenario 3), as this exposure scenario results in the highest risks. These values are all for receptors not located in the APEZ.

<sup>b</sup> Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

<sup>c</sup> Background values have been updated using the 2020 City of San Francisco Citywide Health Risk Assessment database.

<sup>d</sup> Cancer risks for the Multi-Use Building child attendee were calculated assuming a child is present three hours per day, five days per week (180 days per year), for the full six years of project construction, from birth (age zero) through age six. All other exposure and risk parameters are the same as the daycare receptors analyzed in the draft SEIR and detailed in draft SEIR Appendix E.

<sup>e</sup> Although the westernmost façade of the Multi-Use Building is approximately 175 feet from the project site's eastern boundary, the receptor grid was extended slightly westward as a conservative analysis.

<sup>46</sup> San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020.

**TABLE RTC-9**  
**MITIGATED ANNUAL AVERAGE PM<sub>2.5</sub> FOR THE MULTI-USE BUILDING CHILD ATTENDEE AND SELECT DAYCARE, SCHOOL, AND RESIDENTIAL SENSITIVE RECEPTORS FOR THE ADDITIONAL HOUSING OPTION**

Receptor	Location Relative to the Proposed Project	Mitigated Annual Average PM <sub>2.5</sub> Concentration for the Additional Housing Option (µg/m <sup>3</sup> ) <sup>a,b</sup>			SEIR Appendix I <sup>c</sup> Table Source
		Project	Background <sup>d</sup>	Total	
Multi-Use Building child attendee	140 feet east <sup>e</sup>	0.07	8.74	8.81	n/a
Archbishop Riordan High School	30 feet north	0.03	8.29	8.32	5
Shining Stars Family Child Center	30 feet west	0.04	8.92	8.96	5
Harmony Family Childcare	50 feet southeast	0.02	9.72	9.74	n/a
Mighty Bambinis Childcare & Preschool	750 feet northeast	<0.01	8.32	8.32	n/a
Residential	directly west/south	0.04	9.19	9.23	5

SOURCE: ESA 2019 and 2020

NOTES:

PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; HRA = health risk assessment; n/a = not applicable (not presented in the HRA tables).

<sup>a</sup> PM<sub>2.5</sub> concentrations are presented for the construction plus operational emissions scenario (Scenario 3), as this exposure scenario results in the highest annual average PM<sub>2.5</sub> concentrations. These values are all for receptors not located in the APEZ.

<sup>b</sup> Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

<sup>c</sup> From SEIR Appendix I, *Updated Health Risk Assessment Memorandum*.

<sup>d</sup> Background values have been updated using the 2020 City of San Francisco Citywide Health Risk Assessment database.

<sup>e</sup> Although the westernmost façade of the Multi-Use Building is approximately 175 feet from the project site's eastern boundary, the receptor grid was extended slightly westward as a conservative analysis.

As described on draft SEIR p. 3.D-66, a project would result in a significant health risk impact if a receptor point meets the APEZ criterion<sup>47</sup> that otherwise would not meet the criterion without the project, and if the project would contribute to PM<sub>2.5</sub> concentrations at or above 0.3 µg/m<sup>3</sup> or result in an excess cancer risk at or greater than 10.0 per one million persons exposed. In addition, a project would result in a significant health risk impact for receptors currently located in areas that meet the APEZ criteria if the project would contribute to PM<sub>2.5</sub> concentrations at or above 0.2 µg/m<sup>3</sup> or result in an excess cancer risk at or greater than 7.0 per one million persons exposed.

As shown in Table RTC-8, the maximum mitigated lifetime excess cancer risk at the Multi-Use Building child attendee receptor location is 4.9 per million from the Additional Housing Option (less for the Developer's Proposed Option). When combined with the background risk of 37.8 per million, the cumulative total mitigated risk is 42.7 per million. Therefore, because the cumulative total risk is less than the APEZ criterion of 100 per million, the impact at the Multi-Use Building child attendee receptor would be less than significant with mitigation. Also as shown in Table RTC-8, none of the nearby receptors analyzed in the draft SEIR are placed into the APEZ with the project's mitigated contribution, nor does the cumulative total mitigated risk for any of these receptors exceed the APEZ criterion of 100 per million, with the exception of the Harmony

<sup>47</sup> The APEZ criterion for this location is based on: (1) cumulative PM<sub>2.5</sub> concentrations greater than 10 µg/m<sup>3</sup>, and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population. See draft SEIR pp. 3.D-39 to 3.D-40 for more detail.

Family Childcare which is already in the APEZ (and the project's contribution at this location is 4.2 cancers per million, which is also less than the threshold of 7.0 cancers per million).

As shown in Table RTC-9, the maximum mitigated annual average PM<sub>2.5</sub> concentration at the Multi-Use Building child attendee receptor location is 0.07 µg/m<sup>3</sup> from the Additional Housing Option (less for the Developer's Proposed Option). When combined with the background annual average PM<sub>2.5</sub> concentration of 8.74 µg/m<sup>3</sup>, the cumulative total maximum mitigated annual average PM<sub>2.5</sub> concentration is 8.81 µg/m<sup>3</sup>. Therefore, because the cumulative total concentration is less than the APEZ criterion of 10.0 µg/m, the impact at the Multi-Use Building child attendee receptor would be less than significant with mitigation. Also as shown in Table RTC-9, none of the nearby receptors analyzed in the draft SEIR is placed into the APEZ with the project's contribution, nor does the cumulative total risk for any of these receptors exceed the APEZ criterion of 10.0 µg/m<sup>3</sup>.

The commenter states that the draft SEIR finds significant health impacts for new onsite daycare receptors, and because the Multi-Use Building receptors are similar to these onsite receptors, the SEIR must study the Multi-Use Building. The draft SEIR concludes on p. 3.D-70 that without mitigation, "the impact with regard to increased cancer risk would be significant for onsite receptors not located in the APEZ," which includes the new onsite daycare receptors. To address this impact, the draft SEIR identifies Mitigation Measures M-AQ-4a (Diesel Backup Generator Specifications), and M-AQ-4b (Install MERV 13 Filters at the Daycare Facility), which would "reduce impacts related to TAC emissions at the daycare facility to a less-than-significant level" (draft SEIR p. 3.D-73). In addition, Mitigation Measure M-AQ-2a (Construction Emissions Minimization) would reduce TAC emissions from construction and therefore also the impact on these receptors. The draft SEIR concludes on p. 3.D-72 that with implementation of Mitigation Measures M-AQ-2a, M-AQ-4a, and M-AQ-4b, "Even with worst-case construction phasing assumptions for the onsite daycare receptor... health risks to onsite daycare sensitive receptors would be less than significant." Thus, while the impact to onsite receptors is determined to be significant without mitigation, the impact on new daycare receptors sited by the project would be less than significant with mitigation measures identified in the SEIR. Mitigation Measures M-AQ-2a and M-AQ-4a would similarly reduce TAC exposure at the Multi-Use Building receptor location.

The draft SEIR concludes that all impacts for sensitive receptors not located in the APEZ, including impacts under the compressed three-year construction schedule, would be less than significant (see draft SEIR pp. 3.D-69 to 3.D-71 for cancer risk impacts and pp. 3.D-76 to 3.D-77 for PM<sub>2.5</sub> impacts). The draft SEIR concludes that impacts would be significant and unavoidable only for those sensitive receptors already located in the APEZ under the compressed three-year construction schedule. As stated on draft SEIR p. 3.D-78, "the health risks to existing offsite sensitive receptors [located in the APEZ] may exceed the cancer risk thresholds under the worst-case three-year construction phasing scenario, as presented in draft SEIR Table 3.D-12a and Table 3.D-11b; therefore, this impact would be significant and unavoidable with mitigation." As discussed above, the Multi-Use Building receptor is now located in the 2020 APEZ. However, the project's maximum contribution of 4.9 cancers per million at the Multi-Use Building receptor is less than 7.0 cancers per million. Additionally, although the Multi-Use Building is in the APEZ, the background cancer risk value of 37.8 is well below the APEZ criteria of 100 cancers per million, and therefore this receptor does not technically meet the criteria for the APEZ and the project would not substantially increase the severity of the cancer risk

for this receptor even under the worst-case three-year construction phasing scenario, nor does the project expand the geography of the APEZ.<sup>48</sup> As such, even under the compressed three-year construction schedule, the impact at the Multi-Use Building receptor would be less than significant.

Mitigation measures that would reduce TAC emissions from construction and therefore also the impact on these receptors would be enforced through a mitigation monitoring and reporting program (MMRP). In addition, certain mitigation measures have reporting and monitoring components to ensure their implementation. For example, Mitigation Measure M-AQ-2a (Construction Emissions Minimization) requires the project sponsor to submit a construction emissions minimization plan to the Environmental Review Officer (ERO) on a quarterly basis demonstrating how Mitigation Measure M-AQ-2a and Mitigation Measure M-AQ-2c (On-Road Truck Emissions Minimization for the Compressed Construction Schedule) are implemented at the site.

#### *Additional Sensitive Receptors*

A commenter requests that the air quality analysis include additional sensitive receptor locations, including where the future City College replacement childcare center is planned at the corner of Judson Street and Frida Khalo Way and the Mighty Bambini childcare/nursery school at the corner of Staples and Frida Kahlo Way.

With regard to the future City College replacement childcare center, the HRA includes this location as a residential sensitive receptor in the analysis. In addition, the HRA includes daycare receptors at Little Lemon nursery school, which is located 200 feet west of the corner of Judson Street and Frida Khalo Way, at the corner of Judson Street and Genessee Street. The maximum lifetime excess residential cancer risk at the corner of Judson Street and Frida Khalo Way was estimated to be 1.1 per million from the project, and the maximum lifetime excess school cancer risk at the Little Lemon nursery school was estimated to be 0.35 per million from the project. Therefore, the daycare risk at the corner of Judson Street and Frida Khalo Way for the future City College replacement childcare would be equal to or lower than these values.

Regarding the Mighty Bambini childcare/nursery school at the corner of Staples and Frida Kahlo Way, the HRA does include this childcare/nursery school as a sensitive receptor; see Table 9 on draft SEIR Appendix E, p. 20. Also see Table RTC-8 and Table RTC-9, above. Therefore, additional analysis at these potential receptor locations is not warranted.

In summary, the draft SEIR adequately evaluates all sensitive receptor locations within 1,000 meters of the project site. The Multi-Use Building, if treated as a sensitive receptor, would have much lower exposure to project-generated TAC emissions and a lower health risk than the nearby daycare receptors evaluated in the SEIR, as presented in Table RTC-8 and Table RTC-9. The Multi-Use Building is located farther away from the project boundary than a number of daycare receptors

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<sup>48</sup> The 2020 APEZ at this location is determined at the parcel level. If any receptor point within a parcel meets the APEZ criteria of 100 cancers per million or 10.0 µg/m<sup>3</sup> annual average PM<sub>2.5</sub> concentration, the entire parcel is classified as within the APEZ. In addition, if any receptor point within a 20-meter “buffer” of the parcel meets the APEZ criteria, the entire parcel is also classified as within the APEZ. In the case of the Multi-Use Building, there are no receptor points within this parcel that meet the APEZ criteria. However, because there are receptor points within the 20-meter “buffer” on the south side of the parcel near Ocean Avenue that exceed the APEZ criteria, the entire parcel is classified as within the APEZ.



identified in the draft SEIR, including new onsite daycare receptors, and the draft SEIR concludes a less-than-significant impact with mitigation for all of these sensitive receptors. In addition, although the Multi-Use Building is located in the 2020 APEZ, because the background cancer risk values are well below the APEZ criteria of 100 cancers per million, the project would not substantially increase the severity of the cancer risk for this receptor even under the worst-case three-year construction phasing scenario. The draft SEIR adequately analyzes impacts on nearby sensitive receptors for the proposed project and alternatives and includes all feasible mitigation measures to address these impacts. No additional analysis or mitigation measures are necessary.

#### *Student Athletes as Sensitive Receptors*

A commenter states that the air quality analysis should include student athletes at Archbishop Riordan and City College as sensitive receptors in the health risk assessment (HRA). The commenter cites the Area Plan PEIR and the air district's "Spare the Air" website as evidence that student athletes should be considered sensitive receptors in the HRA. The draft SEIR appropriately analyzes the impacts to sensitive receptors.

The air district's "Spare the Air" website is not the air district's guidelines for CEQA analysis. The Spare the Air website describes people most at risk for the general impacts of air pollution, and includes children, seniors, and active adults. These receptor types are specifically identified as more susceptible to *acute* and *short-term* health effects due to elevated concentrations of ozone and particulate matter.

The HRA evaluates lifetime cancer risk and annual average particulate matter concentrations, per the air district's thresholds and CEQA Guidelines, and does not evaluate acute and short-term health effects. The air district's CEQA guidelines define sensitive receptors as "facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas."<sup>49</sup> The air district's CEQA Guidelines further describes sensitive receptors as the following:

*Sensitive individuals refer to those segments of the population most susceptible to poor air quality: children, the elderly, and those with pre-existing serious health problems affected by air quality (ARB 2005). Examples of receptors include residences, schools and school yards, parks and play grounds, daycare centers, nursing homes, and medical facilities. Residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers. (BAAQMD CEQA Guidelines, page 5-8)*

The ARB 2005 source cited by the air district states, "Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are

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<sup>49</sup> BAAQMD, *California Environmental Quality Act Air Quality Guidelines*, May 2017, [http://www.baaqmd.gov/-/media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/-/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en), accessed February 2019.

most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).”<sup>50</sup>

In order to evaluate nearby student children as sensitive receptors, the HRA evaluates student receptors at Archbishop Riordan High School, which is located immediately adjacent to the project site boundary to the north, approximately 30 feet away (see Table 9 on draft SEIR Appendix E, p. 20). The HRA also evaluates eight additional school and 16 daycare locations as sensitive receptors, including the City College Child Development Lab School. See Table RTC-8 and Table RTC-9 above. Therefore, the HRA already assesses health risks at nearby schools with children receptors.

The commenter states that the PEIR also states that persons engaged in strenuous exercise are sensitive receptors. The PEIR states on p. 251 that certain land uses, including “schools, children’s day care centers, playgrounds, hospitals, and convalescent homes” are considered “more sensitive than the general public to poor air quality.” The PEIR also states on p. 251, “Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality.”

Increased sensitivity to poor air quality is not the sole criterion for what defines a sensitive receptor, as discussed above with regard to the air district’s CEQA Guidelines. The air district does not consider adult or student athletes as sensitive receptors for purposes of the CEQA analysis. The PEIR goes on to state on p. 251, “Residential areas are considered more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with associated greater exposure to ambient air quality conditions.” The HRA includes residential receptor locations within 1,000 meters of the project site, in addition to schools and daycares within the same radius.

The commenter accurately claims that strenuous activities, such as those conducted by student athletes, would result in higher exposure to air pollution than the general student population. Exercise raises an individual’s breathing rate, and a higher breathing rate means a higher exposure to air pollution. Age plays a significant role in the impacts of air pollution on health; the younger a student or child, the higher the exposure to air pollution and the higher risk of cancer or other health effects.<sup>51</sup> For example, children age 0 to 2 have an “age sensitivity factor” of 10, which means their risk of cancer from the same TAC exposure is ten times higher than an adult receptor; children age 2 to 16 have an age sensitivity factor of three. At age 16, the age sensitivity factor is one, because the student is considered an adult. Younger receptors also have higher average breathing rates, increasing their exposure as compared to older receptors with lower average breathing rates.

Because of this age sensitivity in younger populations, the HRA conservatively characterizes school receptors as within the 2- to 16-year age group, including high school receptors at Archbishop Riordan High School. This is conservative from an exposure perspective because the breathing rate used in the HRA for these receptors is the average breathing rate for children ages

<sup>50</sup> CARB, *Air Quality And Land Use Handbook: A Community Health Perspective*, April 2005, <https://ww3.arb.ca.gov/ch/handbook.pdf>, accessed October 2019.

<sup>51</sup> California Environmental Protection Agency (CalEPA), Office of Environmental Health Hazard Assessment (OEHHA), *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessment*, February 2015, <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, accessed March 26, 2018.

2 to 16, and most or all high school students would be ages 13 to 18; the average breathing rate for children ages 13 to 18 is much lower.

In addition, the HRA assumes that school receptors would be exposed to 14 years of construction and operational TAC emissions, representing the full age group duration from ages 2 to 16. Again, this is conservative because no individual student receptor at Archbishop Riordan High School would likely be exposed to the project's TAC emissions for greater than four years. These exposure parameters are consistent with BAAQMD HRA guidelines.<sup>52</sup> Refer to Table 10 on draft SEIR Appendix E, p. 21, for additional discussion of the exposure parameters used in the HRA.

The City College student athlete receptor would be potentially exposed to 4 to 6 years of construction and/or operational emissions during the ages of 18 to 24, which represents a lower exposure than the current school and daycare receptors included in the HRA due to the age difference (as discussed above). Although breathing rates are greater for individuals engaged in exercise or other strenuous activities, the breathing rates for young adults engaged in strenuous activities are *lower* than the breathing rates used for the Archbishop Riordan High School receptors. See Table RTC-10, **Daily Breathing Rates for Sensitive Receptors at Schools**, for a comparison of breathing rates.

**TABLE RTC-10**  
**DAILY BREATHING RATES FOR SENSITIVE RECEPTORS AT SCHOOLS**

Receptor Type	Daily Breathing Rate (L/kg-8hrs)	Age Group	Activity Type
Student – Used in draft SEIR <sup>a,b</sup>	520	2 to <16 years	moderate intensity
Male Student – High School Athlete	456	11 to <16 years	high intensity
Male Student – College Athlete	341	16 to <21 years	high intensity

**SOURCES:**

BAAQMD, *Air Toxics NSR Program Health Risk Assessment Guidelines*, December 2016, [http://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra\\_guidelines\\_12\\_7\\_2016\\_clean-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en), accessed October 2019.

U.S. EPA, *Metabolically Derived Human Ventilation Rates: A Revised Approach Based Upon Oxygen Consumption Rates*, May 2009, EPA/600/R-06/129F, <https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=202543>, accessed December 2019.

ESA 2019

**NOTES:**

L = liter; kg = kilogram; hrs = hours; DSEIR = Draft Supplemental Environmental Impact Report;

<sup>a</sup> This breathing rate was used in the DSEIR for all student receptors, including those at the Archbishop Riordan High School.

<sup>b</sup> The reason the moderate-intensity activity average breathing rate for the 2<16 age group is 520 L/kg-8hrs, which is higher than the age-specific high-intensity activity average breathing rates for the 11<16 and 16<21 age groups presented here, is because of the very high breathing rates for younger children. For example, the high-intensity activity average breathing rates are 1,387 L/kg-8hrs for age 2, 1,041 L/kg-8hrs for age 3<6, and 677 L/kg-8hrs for age 6<11.

<sup>c</sup> Female breathing rates are lower than male breathing rates; to be conservative, the male breathing rates were used in this document. For reference, the female breathing rates are 422 for 11 to <16 years (high school athlete) and 336 for 16 to <21 years (college athlete).

<sup>52</sup> BAAQMD, *Air Toxics NSR Program Health Risk Assessment Guidelines*, December 2016, [http://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra\\_guidelines\\_12\\_7\\_2016\\_clean-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en), accessed October 2019.

As presented above, the HRA uses an average breathing rate of 520 liters per kilogram body weight per eight-hour period (L/kg-8hrs) (the time period during which the student receptor is present), as recommended by BAAQMD.<sup>53</sup>

Males ages 11 to 16 who are engaged in high-intensity activities have a breathing rate of approximately 456 L/kg-8hrs, which would represent a high school student engaged in strenuous activities. Males age 16 to 21 have a breathing rate of approximately 340 L/kg-8hrs, which would represent a college student engaged in strenuous activities. When compared with the exposure duration of 14 years and a breathing rate of 520 L/kg-8hrs used in the HRA for all school receptors, a college-age student athlete exposed for five years would have an exposure that is approximately ten percent of the exposure than the school receptors included in the draft SEIR would have (i.e., 90 percent less exposure).<sup>54</sup> Therefore, the general exposure assumptions used in HRA for school receptors are already more conservative than age-specific exposure assumptions for potential high school and college student athletes engaged in strenuous activities.

In addition, the City College student receptor would likely be located at the Community Health and Wellness Center, the swimming pool, or the track, which are approximately 1,150 feet, 1,000 feet, and 1,300 feet east of the project site, respectively. For comparison, the closest school receptor included in the HRA is 30 feet north of the site (Archbishop Riordan High School) and the closest daycare receptor included in the HRA is 30 feet west of the site (Shining Stars Family Child Center). Therefore, the TAC concentrations at the City College athlete receptor would be much lower than the concentrations at the receptor locations currently analyzed because concentrations decline substantially with distance, and health risks correlate directly with TAC concentrations for the same age groups and other exposure parameters.

The commenter's assertion that not including City College athletes in the HRA is a violation of San Francisco Administrative Code chapter 31 is incorrect. Chapter 31 of the San Francisco Administrative Code consists of implementing procedures for the City and administrative actions to be performed by the San Francisco Planning Department. As described above, the air quality and HRA analysis have been conducted in accordance with the CEQA Guidelines and the air district's CEQA Guidelines.

For these reasons, the HRA conservatively estimates health risks at sensitive receptor locations most susceptible to the project's TAC emissions, and any health risks for a City College student athlete receptor would be lower than those already reported in the HRA and draft SEIR for school and daycare receptors.

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<sup>53</sup> BAAQMD, *Air Toxics NSR Program Health Risk Assessment Guidelines*, December 2016, [http://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra\\_guidelines\\_12\\_7\\_2016\\_clean-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en), accessed October 2019.

<sup>54</sup> Based on a breathing rate that is 88 percent of a school receptor (456 vs. 520), total hours that are 36 percent of a school receptor (7,200 vs. 20,160), and an age sensitivity factor that is 33 percent of a school receptor (1 vs. 3).

### ***Comment AQ-2: Construction Schedule***

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

I-HEGGIE2-20

I-MARABELLO2-1

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“The EIR construction modeling of air quality in Appendix D assumes three years. Again, six years is the Developers Option and should be the default, not three years which is not recommended due to air quality and other impacts.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-20])*

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### **“INADEQUACY OF ESTIMATED NUMBER OF CONSTRUCTION WORKING DAYS PER YEAR**

To calculate Average Daily Emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, the SEIR’s analyses use a multiplier of 260-262 days. This would grossly underestimate the emissions in the very likely scenario where construction happens on more than 262 days per year. Commercial construction sites all around the city are routinely working 6 or even 7 days a week.

And this project will be no different. As you know, the developer is allowed to construct seven days a week, which is consistent with San Francisco Police Code section 2908.

And to keep this project on schedule and keep costs in line, the developers will work many weekends.

Thus, the estimates for emissions and necessary mitigation offsets should account for more working days.

If construction happens on just an additional 27 Saturdays and/or Sundays, this will increase all emissions by 10%. If developers average 6 construction days a week, this will inflate emissions by 19.8%. That percentage doubles if construction averages 7 days a week.

Let’s assume a very likely average of construction occurring 6 days a week. This would cause the NO<sub>x</sub> levels to cross the significance threshold for both the Developers Proposed Option and the Additional Housing Option under both the six-year and compressed three-year schedules. As well, PM<sub>10</sub>, and PM<sub>2.5</sub> will increase significantly. Thus, all lifetime excess cancer risks should be adjusted.

All four of the proposed option-schedule scenarios would trigger the implementation of Mitigation Measure M-AQ-2d. Thus, mitigation offsets would need to increase dramatically.

It’s deceptive to use an unrealistic construction working days per year. Why not use a more realistic number so the developer and the public know the maximum or at least truer impacts? Should they

come in under the number of estimated days, great. The monitoring will support them and they'll save money and lives."

*(Brian Marabello, Email, September 23, 2019 [I-MARABELLO2-1])*

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## **Response AQ-2: Construction Schedule**

The comments opine on the construction schedule assumptions in the air quality modeling, state that the analysis should account for weekend construction, and that the analysis underestimates air quality impacts.

The response to the construction schedule and air quality analysis is organized by the following subtopics:

- Construction Schedule Analyzed in the Draft SEIR
- Emissions Associated with Weekend Construction Activities
- Construction Emissions Impacts in the Draft SEIR

### *Construction Schedule Analyzed in the Draft SEIR*

One comment states that the air quality analysis should have assumed six years in the emissions modeling, not three years. The air quality analysis includes both a six-year and a three-year construction schedule; the results for both schedules are presented in the draft SEIR. Regarding the six-year construction schedule, as stated on draft SEIR p. 3.D-45, "With regard to construction schedule and phasing, the analysis assumed that Phase 0 (site preparation and grading) would require a full year, followed by Phase 1 construction for 30 months, followed by Phase 2 construction for 30 months, for a full construction duration of six years." Regarding the three-year construction schedule, this option represents the shortest possible construction schedule for the project.

The project sponsor developed a detailed construction schedule based on the number of anticipated work days and the equipment fleet necessary for construction. This schedule and total equipment hours are based on an average of five days of construction during the week, and conservatively lasts for a total of six years. According to the project sponsor, the vast majority of construction would occur five days per week, with occasional work on Saturdays. However, weekend days are rarely full eight to 10 hour days of activity and are more typically two to six hours of activity. The draft SEIR assumes that soil export would occur six days per week for two months during excavation activities. This includes some weekend activity.

Air quality impacts are also shown assuming that the project could be constructed over three years instead of six years. The draft SEIR estimates emissions and health risks under the three-year construction schedule, which includes weekend days of construction, and represents the shortest possible construction schedule. This compressed schedule was developed in consultation with the project sponsor and includes the amount of construction activity required to build the project in three years, which would require more weekend work than assumed under the six-year construction schedule. Impacts are based on both weekday and weekend days of construction.

### *Emissions Associated with Weekend Construction Activities*

One comment states that the air quality analysis should have accounted for weekend days of construction, instead of the 260 to 262 annual construction work days assumed in the analysis, which represents weekdays only. The commenter claims that if construction occurred six or seven days per week to include weekend work, emissions would increase by 10 to 40 percent from what was reported in the draft SEIR, and NO<sub>x</sub> would likely exceed the significance thresholds. If construction would occur six or seven days per week, the total number of equipment hours would not change; either 1) the average daily construction equipment hours would decline and the total duration would remain the same, or 2) the average daily construction equipment hours would remain the same and the total duration of construction would decrease. In the first case, the average daily emissions would *decrease* from what was analyzed in the draft SEIR, because average daily equipment hours would decrease. In the second case, average daily and total construction emissions would not change; only total annual emissions may increase for the years when construction occurs, which would be less than six years for the reasons identified above. Neither case would result in increased criteria air pollutant or health risk impacts presented in the draft SEIR.

### *Construction Emissions Impacts in the Draft SEIR*

As stated on draft SEIR pp. 3.D-50 to 3.D-51 with regard to criteria pollutant impacts, “because the construction schedule could be compressed into three years, average daily combined construction and operational emissions could increase substantially, increasing the reactive organic gas (ROG) and nitrous oxide (NO<sub>x</sub>) emissions. It is estimated that this shortened construction schedule could result in average daily criteria pollutant emissions that are 1.5 to 2.5 times greater than those presented in draft SEIR Table 3.D-8a. Therefore, the potential condensed project construction schedule and phasing would likely increase the NO<sub>x</sub> impact.” With regard to health risk impacts, the draft SEIR states on pp. 3.D-75 to 3.D-76 that under the three-year construction schedule, “the excess lifetime cancer risk at offsite sensitive receptor locations would increase” and the “the annual average PM<sub>2.5</sub> concentrations at offsite sensitive receptor locations would increase, contributing further to the impact.”

To mitigate impacts associated with the three-year construction schedule, Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) requires NO<sub>x</sub> offsets based on the amount of NO<sub>x</sub> that exceeds the air district’s threshold of 54 pounds per day over the duration when this threshold is exceeded. As explained on draft SEIR pp. 3.D-53 to 3.D-56, this measure would require a one-time reduction of 2.0 tons per year of ozone precursors for the Developer’s Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. This calculation assumes 260 to 262 work days of construction per year. However, emissions are based on total equipment hours, not work days (as discussed above). Additional weekend days of construction would not increase the equipment hours, it would only reduce the number of equipment hours occurring per day (e.g., fewer hours on weekdays, more hours on weekend days). In this event, average daily emissions would go *down*, not up, and Mitigation Measure M-AQ-2d would be sufficient to reduce ozone precursor emissions to less than the threshold of significance as long as an offset project to reduce these emission is identified and implemented prior to or during the period in which the impact occurs. However, as stated on draft SEIR p. 3.D-56, this Impact AQ-2a is conservatively considered significant and unavoidable with

mitigation because implementation of the emissions offset project would be outside the jurisdiction and control of the City, no specific emission reduction project has been identified, and the project may be constructed over a much shorter timeframe resulting in higher ozone precursor emissions.

The commenter further claims that if construction occurs over six or seven days per week, the total amount of PM<sub>10</sub> and PM<sub>2.5</sub> would increase, and health risks would also increase. As discussed above, construction activities on weekends would not increase total emissions, it would only change when the emissions occur throughout the construction period (i.e., more emissions over a shorter overall duration with the same number of workdays). The total TAC emissions for the project would remain approximately the same. This could mean, however, that more TAC emissions could occur during more susceptible sensitive receptor age groups, such as the 0 to 2 age group. Thus, the draft SEIR conservatively assumes that construction could occur over a compressed three-year period with regard to health risks, which would already account for this shift in emissions timing. As stated on draft SEIR p. 3.D-80, "... the project may be constructed over a shorter timeframe than assumed in this analysis. This could result in increased cancer risks to offsite receptors as well as increased PM<sub>2.5</sub> concentrations for both offsite and onsite receptors. Therefore, potential changes in the construction schedule could result in a significant and unavoidable impact."

In order to present the maximum impact of the proposed project, the three-year construction schedule was used to determine air quality impacts. Because this is a possibility due to the unknowns associated with construction phasing depending on market conditions and other unanticipated factors, the draft SEIR conservatively uses this scenario to determine the air quality impacts of the proposed project. The draft SEIR concludes on pp. 3.D-56 and 3.D-80 that both criteria air pollutant impacts and health risk impacts would be significant and unavoidable with mitigation under the compressed three-year construction schedule. Therefore, construction occurring six or seven days per week would not result in a new NO<sub>x</sub> exceedance or a new impact. Thus, the draft SEIR finds a significant and unavoidable impact due to the uncertainty associated with the construction schedule, and this uncertainty incorporates the potential for accelerated construction activities that may include weekend construction.

Mitigation measures that would reduce criteria pollutant emissions from construction and operations that exceed any thresholds of significance will be enforced through the MMRP. In addition, certain mitigation measures have reporting and monitoring components to ensure their implementation. For example, Mitigation Measure M-AQ-2d, Offset Construction Emissions for the Compressed Schedule, requires that the project sponsor must either submit the offset project to the ERO for approval prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, or provide the offset agreement to the ERO prior to issuance of the first site permit. However, this measure may not be feasible if an adequate offset project is not identified and implemented, as discussed above and as stated on draft SEIR p. 3.D-56; therefore, the impact is conservatively considered significant and unavoidable with mitigation.



### ***Comment AQ-3: Mitigation Measure***

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

A-BAAQMD-1

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“However, even with these Project design features and on-site mitigation measures, the DSEIR finds that air quality impacts from the Project still exceed the City’s thresholds of significance for the compressed schedule. Therefore, Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule (M-AQ-2d) proposes that the Project applicant provide funds to achieve additional emission reductions to reduce air emissions below the thresholds of significance. To this end, M-AQ-2d states that the Project applicant would provide funding to the Air District to fund emissions reduction projects in the region in order to offset the remaining criteria pollutant emissions generated by construction during the compressed schedule.

Please be aware that the Air District does not currently have a fee program for offsetting emissions. These are occasionally conducted on a case-by-case basis based on available projects. We recommend that M-AQ-2d replace “Air District” with “governmental entity.” This will allow the project applicant to seek additional options if the Air District has no available projects at the time.”

*(Greg Nudd, Deputy Air Pollution Control Officer, BAAQMD, Letter, September 23, 2019 [A-BAAQMD-1])*

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### **Response AQ-3: Mitigation Measure**

The City incorporated the air district’s Clean Air Foundation into Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule), like the City has presented as mitigation for other projects in San Francisco, including the Potrero Power Station Mixed-use Project (Mitigation Measure M-AQ-2f), the Golden State Warriors Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 (Mitigation Measure M-AQ-2b), and the Seawall Lot 337 and Pier 48 Mixed-Use Project (Mitigation Measure M-AQ-1.5). All of these mitigation measures reference the air district’s Clean Air Foundation and ozone precursor emissions offsets projects. In addition, based on correspondence with the air district, the air district provided the City with an “Offsite Mitigation Program Questionnaire” for the City to complete and submit to the air district.<sup>55</sup> Upon submitting the questionnaire, the air district indicated that they would follow up with a “fee calculation analysis, should the program be administered through our Clean Air Foundation,” and that their “offsite mitigation program” could also include PM emission offsets if needed.

In addition, in 2016, the air district issued a mitigation project agreement for the Faria Preserve Residential Development and VTM 9342, through the Clean Air Foundation, with the purpose of assisting “Faria Preserve in satisfying the requirements of Mitigation Measure 3.3-l(b),” which is the EIR’s ozone precursor offsets mitigation measure. The agreement would also “ensure the proper funding and management of an emissions reduction program to offset ozone precursor

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emissions attributable to construction of the Faria Preserve Residential Development” to address Faria Preserve’s obligation to satisfy the requirements of Mitigation Measure 3.3.l(b).

Based on this correspondence, it was the City’s understanding at the time it prepared the draft SEIR that the air district had a grant program for offsetting ozone precursor emissions. However, in response to the air district’s request, acknowledging that the air district’s emissions reduction grant program is evolving, and because individual emission reduction projects needed to support the ozone precursor offsets required by Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) have not yet been identified, Mitigation Measure M-AQ-2d is revised as follows (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

**Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule.** Under the compressed three-year construction schedule for either the Developer’s Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, the project sponsor, with the oversight of the Environmental Review Officer (ERO), shall either:

1. *Directly fund or implement a specific offset project within San Francisco if available* to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer’s Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or
2. *Pay mitigation offset fees to the Bay Area Air Quality Management District Bay Area Clean Air Foundation or other governmental entity or third party.* The mitigation offset fee, ~~currently estimated at approximately \$30,000 per weighted ton, plus an administrative fee of no more than 5 percent of the total offset,~~ shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the ~~planning department ERO, the project sponsor, and the air district governmental entity or third party responsible for administering the funds,~~ and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer’s Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions below significance levels after implementation of other identified mitigation measures as currently calculated.

The agreement that specifies fees and timing of payment shall be signed by the project sponsor, the governmental entity or third party responsible for administering the funds ~~air district~~, and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer’s Proposed Option or 3.2 tons per year of ozone precursors for the

Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c.

The total emission offset amount ~~is presented above~~ was calculated by summing the maximum daily construction emissions of ROG and NO<sub>x</sub> (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated construction-related ROG and NO<sub>x</sub> emissions offsets required. No reductions are needed for operations or overlapping construction and operations.

The second paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:

Mitigation Measure M-AQ-2d would offset emissions of ROG and NO<sub>x</sub> that would exceed the respective thresholds of significance for these pollutants. Thus, these offsets, if implemented, would reduce impacts to less-than-significant levels. The measure allows the project sponsor to directly fund or implement an offset project; however, no such project has yet been identified. Additionally, implementation of the emissions reduction project could be conducted by the ~~air district governmental entity or third party responsible for administering the funds~~ and is outside the jurisdiction and control of the City and not fully within the control of the project sponsor. Therefore, the residual impact of project emissions during construction is conservatively considered *significant and unavoidable with mitigation*, due to some limited uncertainty in its implementation. This finding does assume that the project sponsor would implement Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c, in addition to Mitigation Measure M-AQ-2d. Although the specific offset projects are not known, it is anticipated that implementation of this mitigation measure would not result in any adverse environmental effects.

The last paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:

The Developer's Proposed Option would be *less than significant* under the assumed six-year construction schedule. The Additional Housing Option under the assumed six-year schedule would be reduced to *less than significant with mitigation* through the implementation of Mitigation Measure M-AQ-2a and M-AQ-2b. Given the potential that the project could be developed under an accelerated construction schedule of three years' duration, the potential exists that construction emissions of NO<sub>x</sub> would exceed the daily and annual significance thresholds even with mitigation, which would be a *significant impact* (see Table 3.D-8b). Therefore, in the case of the Developer's Proposed Option or the Additional Housing Option under the compressed three-year construction schedule, the project sponsor would also be required to implement Mitigation Measure M-AQ-2c, which requires that all heavy-duty trucks greater than 19,500 pounds must have model year 2014 or newer engines, and Mitigation Measure M-AQ-2d, which requires the project sponsor to implement emission offsets. However, because implementation of the emissions offset project would be conducted by the ~~air district governmental entity or third party responsible for administering the funds~~ and would be outside the jurisdiction and control of the City and not fully within the control of the project sponsor, because no specific emission reduction project has been identified, and because the project may be constructed

over a much shorter timeframe resulting in higher NO<sub>x</sub> emissions than presented above, the impact with respect to criteria air pollutants is conservatively considered *significant and unavoidable with mitigation*. These conclusions are summarized in **Table 3.D-9, Summary of Construction Criteria Pollutant Impacts (Impact AQ-2)**.

With these changes, Mitigation Measure M-AQ-2d has the same effect as before on the project's construction emissions impact. Whether the emissions offset program is implemented by the air district or another governmental agency has no effect on the actual emission reductions, as long as the offset program complies with Mitigation Measure M-AQ-2d as worded above. Mitigation Measure M-AQ-2d would still offset emissions of ROG and NO<sub>x</sub> that would exceed the respective thresholds of significance for these pollutants. Further, even with implementation of this mitigation measure, the draft SEIR determines that the air quality impact would be significant and unavoidable. Therefore, no changes to impacts would result from this change to Mitigation Measure M-AQ-2d. These changes and do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft SEIR pursuant to CEQA Guidelines section 15088.5 is not required.

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## 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

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### *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

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“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])*

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“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])*

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## “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])*

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## “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])*

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“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])*

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*“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])*

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*“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])*

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“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])*

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“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])*

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“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])*

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

I strongly urge the Planning Commission to adopt recommoendation A, which is to scrap the entire projoect, 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])*

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"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])*

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"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])*

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"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 Eobuoma, Email, September 19, 2019 [I-EVBUOMA-3])*

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"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])*

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“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])*

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“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])*

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“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])*

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“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])*

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“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])*

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“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])*

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“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])*

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

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

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“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])*

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“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])*

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"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])*

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"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])*

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"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])<sup>56</sup>*

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"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

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<sup>56</sup> 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])*<sup>57</sup>

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“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])*

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<sup>57</sup> 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])*

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**“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])*

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

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

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“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])*

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“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])*

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“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])*

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“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])*

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*“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](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])*

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"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])*

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### **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. 4.H-59. 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. 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 City 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 is 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.<sup>58</sup>

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 development. Due to the uncertainty surrounding the development at City College's Ocean Campus and the uncertainty of SFMTA approval of other measures under its 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 reasonable range of alternatives consistent with CEQA Guidelines section 15126.6(a). CEQA does

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<sup>58</sup> The development agreement 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. 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.

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.

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### ***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

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#### **“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])

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“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])*

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“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](http://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])*

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## **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 on 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.

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***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

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"Please adopt Alternative A."

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

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"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 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.

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### ***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

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### **“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])*

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"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])*

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"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])*

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“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])*

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

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

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“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])*

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#### **Response AL-4: Alternative B, Reduced Density Alternative**

The comments state that the draft SEIR 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.

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 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 would 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 includes measures that are intended to buffer or place distance between the construction noise sources and nearby sensitive receptors. 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 that would develop 800 units, or approximately 33 to 40 percent less gross square footage than the proposed project options. The draft SEIR does not consider a further reduced density alternative because it would not meet most of the basic project objectives.

A further reduced alternative of 350 or 400 units **would not meet** or **would partially meet** the following project objectives, but to a lesser extent than the proposed options and Alternative B:

- Implement the goals of the City’s 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, 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.
- Implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.
- 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 in close proximity to local and regional public transportation by maximizing the number of housing units in the project.

- Build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.
- Build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.

It is **unknown** if a further reduced alternative of 350 or 400 units would meet the following project objectives related to infrastructure or financing, but it is less likely to meet or fully meet them:

- Replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.
- Establish pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.
- As stated in the City's Balboa Reservoir Request for Proposals, work with City College to address parking needs by identifying substitute parking and transportation solutions.
- Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.
- Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the city's charter and applicable law.

Thus, such an alternative is considered, but rejected.

The following construction and operation analysis of a further reduced alternative is provided for informational purposes.

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.

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.”

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 would increase transit delay and may exceed the four-minute transit delay threshold. The project traffic volumes would be reduced under a further reduced density alternative, but it was not estimated if it would contribute considerably to significant cumulative transit impacts related to transit delay because this alternative was considered, but rejected. Given the potential for exponential delay under cumulative conditions (refer to draft SEIR p. 3.B-95), a further reduced density alternative could contribute considerably. Therefore, a further reduced density alternative in combination with cumulative projects could result in significant cumulative transit impacts related to transit delay.

Under a further reduced density alternative, the Lee Avenue extension would still provide an access point to the site. Similar to Alternative B and as discussed under Impact C-TR-6b on draft SEIR p. 3.B-101, this reconfiguration of Lee Avenue would reduce the supply of on-street loading available to Whole Foods and nearby land uses. A further reduced alternative would reduce project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection, however, it would affect existing freight loading activity and passenger loading/unloading, and could create potentially hazardous conditions to people bicycling or significant delay that may affect transit. Under a further reduced density alternative, operations could contribute considerably to significant cumulative secondary impacts with respect to loading. Therefore, a further reduced alternative in combination with cumulative projects could result in a significant cumulative impact with respect to loading along Lee Avenue between Ocean Avenue and the project site.

Thus, the significant and unavoidable construction-related noise and air quality impacts would occur, and cumulative transit delay and Lee Avenue loading impacts identified in the draft SEIR could occur.

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

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"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])*

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"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])*

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**"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])<sup>59</sup>*

### **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 that was submitted in response to the original SFPUC request for proposals for development of the project site (the proposal is included in its entirety in RTC Attachment B).

The commenters assert that because Related California submitted a 680-unit proposal for the SFPUC’s request for proposals, a reduced density alternative by the Reservoir Community Partners, LLC, would 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 proposals 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 meets most of the basic project objectives, and it lessens the project’s significant environmental effects. The draft SEIR concludes on pp. 6-27 to 6-28 that the reduced

<sup>59</sup> 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.

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 SEIR if they determine that the SEIR 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 SEIR certification. The planning commission may consider non-environmental information in making the actual feasibility determination, such as an economic/financial feasibility analysis.

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***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

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“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])*

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"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.'<sup>1</sup>

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, 1955<sup>2</sup> 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:**

- <sup>1</sup> Memorandum from AECOM to the SF Planning Dept about Balboa Reservoir existing conditions, dated March 17, 2015. <http://default.sfpplanning.org/~plans-and-programs/planning-for-the-city/public-sites-balboareservoir/Balboa-Reservoir-Study-Existing-Conditions-Transportation.pdf>.
- <sup>2</sup> See attached conveyance from the SF Assessor’s.

*(Amy O’Hair, Board Member, Sunnyside Neighborhood Association, Letter, September 12, 2019 [O-SNA2-1])*<sup>60</sup>

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“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])*

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“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 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

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<sup>60</sup> 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.

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 allocations for any available parking space 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 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])*

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“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])*

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"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 Burgggraf, Email, September 23, 2019 [I-BURGGRF-3])*

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"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])*

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"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])*

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"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])*

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"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])*

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"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.

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.

Plymouth Avenue is 24-feet wide. Between Ocean and Greenwood avenues (just north of Archbishop Riordan campus), Plymouth Avenue includes approximately 118 on-street parking spaces along both sides of the street. Collected data show 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.), midday (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 Table 3.B-2 on draft SEIR p. 3.B-10).

While responding to this comment, a typo was identified in Table 3.B-2 on draft SEIR p. 3.B-10. The following edit corrects the draft SEIR text. Table 3.B-2 on draft SEIR p. 3.B-10 is revised as follows (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

**TABLE 3.B-2  
VEHICULAR COUNTS AT STUDY INTERSECTIONS**

Number	Intersection	Number of Vehicles <sup>a,b</sup>	
		A.M. Peak Hour	P.M. Peak Hour
1	Ocean Avenue/Miramar Avenue	1,833	1,876
2	Ocean Avenue/Lee Avenue	1,898	2,021
3	Ocean Avenue/Frida Kahlo Way/Geneva Avenue	2,090	2,293
4	Ocean Avenue/San Jose Avenue	1,376	1,413
5	Ocean Avenue/Plymouth Avenue	1,841	1,866
6	San Ramon Way/Southwood Drive/Plymouth Avenue	<del>422</del> 268	<del>409</del> 226
7	Greenwood Avenue/Plymouth Avenue	430	397
8	Geneva Avenue/San Jose Avenue	2,590	2,485
9	Judson Avenue/Frida Kahlo Way	1,030	1,040
10	Judson Avenue/Hazelwood Avenue	437	341
11	Judson Avenue/Genessee Street	851	780
12	Monterey Boulevard/Genessee Street	1,684	1,636
13	Cloud Circle (N)/Frida Kahlo Way	750	923
14	Cloud Circle (S)/Frida Kahlo Way	1,074	1,210
15	City College Upper Reservoir Lot (N)/Frida Kahlo Way	750	923
16	City College Upper Reservoir Lot (S)/Frida Kahlo Way	1,074	1,210
17	I-280 SB Off Ramp/Ocean Avenue	1,505	1,509
18	I-280 SB Ramps/Geneva Avenue	2,463	2,590
19	I-280 NB Ramps/Geneva Avenue	2,653	2,642
20	I-280 NB Ramps/Ocean Avenue	1,101	1,207
21	Ocean Avenue/Brighton Avenue	1,708	1,846
22	Ocean Avenue/Harold Avenue	1,905	1,981
23	Holloway Avenue/Lee Avenue	440	378

SOURCE: Quality Counts, 2018.

**NOTES:**

<sup>a</sup> Vehicle volume (number of vehicles) reflects the sum of all turning movements at the intersection.

<sup>b</sup> The weekday a.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 7 a.m. and 9 a.m. The weekday p.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 4 p.m. and 6 p.m.

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 use 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.

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 space for vehicles to pass side-by-side. The frequent curb cuts and low vehicular volumes would continue to provide opportunities for drivers to pull over and let oncoming traffic pass without resulting in potentially hazardous conditions. However, the SFMTA could eliminate on-street parking on one side of Plymouth Avenue, instead of its current configuration of parking on both sides. This would result in the removal of approximately 60 spaces between Ocean and Greenwood avenues. With parking confined to one side of Plymouth Avenue, the street would provide additional clearance for two-way operation of vehicles without the need for drivers to pull over to let oncoming traffic pass.

It is possible that the project's new connection to Plymouth Avenue via San Ramon Way could encourage some existing drivers to use this new connection to avoid traveling on portions of Ocean Avenue. However, it is unlikely that this 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. For existing eastbound Ocean Avenue drivers that continue north on Frida Kahlo Way, the 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 vehicles on Frida Kahlo Way that continue west on Ocean Avenue, the new connection route would include traveling through the proposed project's roadway network and turning left onto Plymouth Avenue from San Ramon Way. Furthermore, even if some drivers chose to utilize this new connections route, a low number of trips would not change impact conclusions.

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.<sup>61</sup>

Additionally, 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.<sup>62</sup>

### *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 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.

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<sup>61</sup> Balboa Reservoir – Non-CEQA Analysis, August 1, 2019.  
[http://ab900balboa.com/DEIR\\_to\\_NOD\\_Documents/2019-08-200000401.pdf](http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf)

<sup>62</sup> 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-29, the planning commission will certify the SEIR if it determines that the SEIR has been completed in compliance with CEQA, including that it describes a reasonable range of *potentially* feasible alternatives. The planning commission and other approval agencies will determine the *actual* feasibility of the alternatives after and separate from SEIR certification. The decision makers are required to take into consideration, as applicable, non-environmental information such as the economic, legal, social, technological considerations in determining whether alternatives are feasible (CEQA Guidelines section 15091).

### ***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 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.

## 4.G Cumulative Impacts

The comments and corresponding response in this section relate to the cumulative analysis in the draft SEIR:

- Comment CU-1: Cumulative Analysis

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### *Comment CU-1: Cumulative Analysis*

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

O-WPA1-3  
O-WPA3-7  
I-BARISH3-22  
I-BARISH3-23  
I-BELBIN-3  
I-GOODMAN-2

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“Next, the DSEIR fails to mention that City College has an agreement and will undertake to have 500 units of student housing developed on what’s called the East Basin. That is not taken into consideration.

In addition, the consideration of the building of the PAEC, and the STEAM building, is going to go on simultaneously and the DSEIR does not take into consideration the tremendous environmental problems caused by a simultaneous construction on the East Basin and the West Basin, which will result in virtually no parking remaining.”

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-3])*

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### “CCSF Student Housing Project

The DSEIR fails to mention in the cumulative analysis that CCSF will proceed with the construction of 500 units of student housing on the campus which was discussed at a Balboa Reservoir CAC meeting on June 10, 2019. Such a project would only exacerbate the lack of adequate parking, as well as creating additional secondary impacts on transportation, air quality and noise. The related impacts from this foreseeable Project should be included in the cumulative impact analysis.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-7])*

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“Further, *Antioch v. Pittsburg* (1986) 187 Cal. App. 3d 1325 ([http://resources.ca.gov/ceqa/cases/1986/antioch\\_121686.html](http://resources.ca.gov/ceqa/cases/1986/antioch_121686.html)) Stands for the proposition that an EIR must consider cumulative impacts on



future projects. CCSF is planning to do additional construction on the upper parking lot adjacent to the Project, namely a Performing Arts Education Center and a STEAM building. But the DSEIR failed to consider the impact of the Project on this future construction. The FSEIR must review and evaluate this impact.

Further, California Code of Regulations, Title 14, 15125 (c) states: *Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a unique educational institution that provides services for tens of thousands of students daily, and employment for many more thousands. It is the only Community College in San Francisco, with a long and storied history of serving the entire City of San Francisco. There is no question that the Project will impact City College. The DSEIR is inadequate since it fails to comprehensively consider the environmental impacts of the Project on City College. The FSEIR must rigorously review all the substantial environmental impacts on City College in accordance with CEQA. Failure to do so would result in a flawed and inadequate FSEIR.”

(Jean Barish, Letter, September 20, 2019 [I-Barish-22])

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“Approach to Cumulative Impact Analysis (p. 3.A-8) The DSEIR states: *At the time of this DSEIR preparation, the project description detail for the facilities master plan projects for the Ocean Campus is limited, City College may change those projects or their details depending on funding availability, and City College has not conducted CEQA analysis for those projects. Therefore, the cumulative analysis for this SEIR will qualitatively assess the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the “City College Facilities Master Plan” using best available information at the time of this SEIR preparation.* (p. 3.A-14)

An analysis based on “best available information” is inadequate. CEQA reviews should not be based on speculation, but on quantifiable, objective data. The fact that the City College FMP is ambiguous and uncertain at this time raises serious questions about the validity of any conclusions about Cumulative Impact Analyses.”

(Jean Barish, Letter, September 20, 2019 [I-BARISH3-23])

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“Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!”

(Charles Belbin, Email, September 22, 2019 [I-BELBIN-3])

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"I had attended many of the Reservoir project meetings providing comment and concerns on the proposals. Also indicating the joint/dual nature of the Balboa Reservoir and CCSF planning efforts and that they should not be looked at independently, but jointly as cumulative impacts on an area.

This is very similar to the growth impacts of SFSU-CSU and Parkmerced and Stonestown. The growth and impacts of institutions in the areas and the flow of traffic along ocean ave is directly impacted by the ongoing developments and the increased traffic which will occur with this development. The City College masterplan is underway but does not indicate the fact that they have considerable land to redevelop, and this includes the eastern edge of their property which abuts the freeway and can easily be transformed vertically into parking with buildings above using a layering concept to allow joint use of the parking for the CCSF and other adjacent parking needs for BART, LWHS, and even the Balboa Park, and Police station across the freeway."

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-2])*

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### **Response CU-1: Cumulative Analysis**

Comments state that the draft SEIR cumulative analysis is inadequate because it is not based on quantifiable data, and does not analyze the proposed project's cumulative impacts on City College. The comments also state that the cumulative analysis does not take into consideration other potential City College projects such as student housing, the City College Performing Arts Education Center, and the STEAM building.

The cumulative impact analysis in the draft SEIR is consistent with CEQA. Cumulative impacts, as defined in CEQA Guidelines section 15355, refer to two or more individual effects that, when taken together, are "considerable" or that compound or increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project added to the impacts of other closely related past, present, or reasonably foreseeable future projects.

Two approaches to an adequate discussion of cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1): (a) the analysis can be based on a list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts; or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The projections model includes individual projects and applies a quantitative growth factor to account for other growth that may occur in the area. The analyses in the SEIR employ both the list-based approach and a projections-based approach, depending on which approach best suits the individual resource topic being analyzed. The cumulative impact analysis in the draft SEIR is consistent with CEQA Guidelines section 15130.

Based on review of the June 10, 2019, meeting audio recording of City College's update<sup>63</sup> and draft meeting notes,<sup>64</sup> the concept of additional housing on the east basin has been discussed at previous board meetings, but further action has not been taken to study the potential east basin housing (such as in the facilities master plan or environmental review), or to undertake or implement this project; thus this concept of additional housing is speculative and not reasonably foreseeable in the cumulative analysis. Even if this proposal were reasonably foreseeable, the cumulative impacts from this proposal would likely be covered by the draft SEIR cumulative analysis, as explained below.

Potential cumulative impacts of the facilities master plan projects construction on the east basin are considered in the draft SEIR. Section 3.A.6, Approach to Cumulative Impact Analysis on draft SEIR pp. 3.A-10 and 3.A-14, describes the recommendations for the Ocean Campus in the facilities master plan, as well as projects that could be funded by a bond measure, which passed on March 3, 2020. Because of the differences between the facilities master plan and the bond measure projects, the cumulative analysis qualitatively assess "the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the 'City College Facilities Master Plan' using best available information at the time of this SEIR preparation."

The draft SEIR appropriately considers the facilities master plan projects in its cumulative analysis. At the time the Notice of Preparation was published in October 2018, the facilities master plan had not been adopted by the City College Board of Trustees. The draft SEIR acknowledges on p. 3.A-10 that the facilities master plan was adopted in March 2019. As stated on draft SEIR p. 3.A-14 (and as updated in RTC Chapter 5), "[a]t subsequent 2019 Board of Trustees meetings, City College staff presented a facilities planning update on a potential bond measure that would be anticipated to fund construction of the facilities master plan projects...[i]n that update, a number of the facilities master plan projects were included in the list of potential bond-funded improvements. However, the East Basin Parking Garage was no longer included, the Performing Arts and Education Center was replaced by a new Diego Rivera Theater and a smaller STEAM building (both on the east basin), and a Student Development Building was proposed at the location of the existing Creative Arts Extension Building."

The bond measure, which passed on March 3, 2020, listed a range of project types that could be funded by the bond for the City College campus system: "the types of authorized projects of the measure also include...facility master plan preparation and updates, environmental studies...[i]n addition to the projects listed above, repair, renovation and constructions may include, but not be limited to, some or all of the following:...build new or renovate existing facilities such as a Science, Technology, Engineering Art and Math (STEAM) building... fine and theater arts and visual arts and performing arts facilities ...construct parking facilities"<sup>65</sup> At the time of this RTC document publication, the City College Board of Trustees are still required to allocate and authorize bond

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<sup>63</sup> Balboa Reservoir Community Advisory Committee City & County of San Francisco, Item 4-Updates from City College (audio), [https://media.sfplanning.org/audio/cac/balboareservoir\\_CAC\\_Audio-061019-04.mp3](https://media.sfplanning.org/audio/cac/balboareservoir_CAC_Audio-061019-04.mp3), accessed January 7, 2020.

<sup>64</sup> Balboa Reservoir Community Advisory Committee City & County of San Francisco, Meeting Minutes, June 10, 2019, [https://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir\\_CAC\\_Unapproved\\_Meeting\\_Minutes-06102019\\_revised.pdf](https://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir_CAC_Unapproved_Meeting_Minutes-06102019_revised.pdf), accessed January 7, 2020.

<sup>65</sup> City and County of San Francisco Department of Elections, *City College Job Training, Repair and Earthquake Safety Measure*, March 3, 2020, <https://voterguide.sfelections.org/en/city-college-job-training-repair-and-earthquake-safety-measure>, accessed March 26, 2020.

funding towards specific projects, including potentially those identified in the facilities master plan at the Ocean Campus. As noted on draft SEIR p. 3.A-14, the projects identified in the facilities master plan are still required to undergo a separate CEQA review process. The cumulative analysis in the draft SEIR is conservative in that it identifies potential facilities master plan projects or bond measure projects where appropriate. The draft SEIR acknowledges that there is no quantifiable data available from City College related to the facilities master plan projects; therefore, the analysis is based on conservative assumptions regarding what is reasonably foreseeable, and the analysis does not engage in speculation. CEQA Guidelines section 15130(b) states that the discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project along. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.”

The cumulative transportation-related construction impacts are discussed under Impact C-TR-1 on draft SEIR p. 3.B-91 and states that “construction of the proposed project or variant may overlap with construction of other cumulative development and transportation infrastructure projects, *including new development and/or modernization of existing buildings as part of the City College Facilities Master Plan ...* although the City College facilities master plan projects would not be required to comply with all of the city’s requirements, they would be required to adhere to the blue book regulations addressing transportation-related circulation, access, staging and hours of delivery when working on city streets.”

Cumulative transportation-related operational impacts are discussed under Impacts C-TR-4 to C-TR-6b on draft SEIR pp. 3.B-92 to 3.B-102. The analysis under each cumulative transportation-related operational impact qualitatively assesses the potential impacts of the facilities master plan projects. As stated on draft SEIR p. 3.B-95, “the transit delay contribution from City College’s Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.” The analysis concludes that cumulative transit delay would be significant even with the implementation of Mitigation Measure M-C-TR-4.

The cumulative air quality-related construction impacts are discussed under Impact C-AQ-2 on draft SEIR p. 3.D-92. As stated on draft SEIR p. 3.D-92, the cumulative projects “could include the City College Performing Arts Center... and is anticipated to be under construction for 24 months from 2021 to 2023.” The cumulative air quality analysis states that new sensitive receptors “could potentially be exposed to the project’s construction and operational toxic air contaminant emissions if the new receptors are present in the near future.” The project-level health risk assessment identified sensitive receptors that are close to where the new City College facilities master plan projects might be located, and acknowledges that possibility that these projects could generate construction-related toxic air contaminant emissions at the same time as the proposed project. The analysis concludes that the proposed project in combination with nearby cumulative projects

would result in significant health risk impact on offsite and onsite sensitive receptors with respect to increased cancer risk, even with the implementation of Mitigation Measures M-AQ-2a, M-AQ-4a, and M-AQ-4b.

The draft SEIR noise section qualitatively assesses the impacts of the facilities master plan projects including the potential Performing Arts and Education Center building on the east basin under Impact C-NO-1 on draft SEIR pp. 3.C-38 to 3.C-39. As stated on draft SEIR p. 3.C-39, “with respect to existing offsite receptors, the closest cumulative project where concurrent construction would have the potential to cumulatively increase noise levels at existing sensitive receptors would be the City College East Basin Parking Structure, although the Performing Arts Center is also in the same campus area, which is located approximately 80 feet south of Archbishop Riordan High School.” The cumulative noise analysis is conservative in which it considers the worst-case scenario (i.e., the East Basin Parking Structure being the closest facilities master plan project) would be constructed near Archbishop Riordan High School (sensitive receptor). The analysis concludes that the proposed project in combination with nearby cumulative projects would result in significant construction-related noise impacts on sensitive receptors, even with the implementation of Mitigation Measure M-NO-1.

As described above, where the draft SEIR determines cumulative impacts to be significant, mitigation measures to reduce those cumulative impacts to the extent feasible are identified. Therefore, the cumulative analysis appropriately considers the growth and development information available for the City College Ocean Campus at the time of the draft SEIR preparation.

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## 4.H Initial Study Topics

The comments and corresponding responses in this section cover topics in the initial study (draft SEIR Appendix B). These topics are related to:

- Plans and Policies [PP]
- Land Use and Land Use Planning [LU]
- Population and Housing [PH]
- Wind [WI]
- Shadow [SH]
- Utilities and Service Systems [UT]
- Public Services [PS]
- Biological Resources [BI]
- Geology and Soils [GE]

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### Plans and Policies

The comments and corresponding responses in this section cover topics in initial study Section C, Compatibility with Existing Zoning and Plans (draft SEIR Appendix B). These include topics related to:

- Comment PP-1: General Plan, Zoning Controls, Height Limits, Balboa Park Station Area Plan; SFPUC Land Use Framework

#### *Comment PP-1: General Plan, Zoning Controls, Height Limits, Balboa Park Station Area Plan, SFPUC Land Use Framework*

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

I-ADAMS-2	I-BARISH3-41	I-JA11-5
I-BARISH3-2	I-BARISH3-6	I-JA11-6
I-BARISH3-3	I-BERNSTEIN4-1	I-TARQUINO-11
I-BARISH3-36	I-HANSON4-1	I-TARQUINO-12
I-BARISH3-37	I-JA5-1	I-TARQUINO-8
I-BARISH3-4	I-JA11-4	I-WORLEY-4
I-BARISH3-40		

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“We’ve heard remarks about zoning. This project’s going to require a zoning change. Spot zoning is the substance of federal lawsuits. When a neighborhood is zoned a certain way and people,

developers, come in and capture a spot, and create a spot zone exception to the normal asset value of a consistently zoned neighborhood, that's lawsuit material."

(Michael Adams, CPC Hearing, September 12, 2019 [I-ADAMS-2])

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"This DSEIR is a project-level EIR that is tiered from a previously certified program-level EIR ("PEIR")

The Project is a portion or sub-set of the Balboa Park Station Area Plan (the "Plan"). To better understand some of the defects with the DSEIR, it is important to refer to the Plan and several of its Objectives and Policies.

([http://generalplan.sfplanning.org/Balboa\\_Park\\_Station.htm#BPS\\_HSG](http://generalplan.sfplanning.org/Balboa_Park_Station.htm#BPS_HSG))

Policy 1.4.2 states: *If the PUC should decide that the west basin is not needed for water storage, it should consider facilitating the development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. The development on the site should recognize the opportunity to knit the surrounding neighborhoods together through the creation of a community open space and pedestrian connections.*

Policy 1.4.2, therefore, states that at best, only part of the west basin would be used for housing. The development of a project with up to 1,550 units goes far beyond partial development of the reservoir. It should be scaled back to be compliant.

Policy 4.4.1 states: *"If the PUC should decide that the west basin is not needed for water storage, it should consider development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. Affordable housing should be considered a high priority per Policy 4.5.1."*

and

Policy 4.5.1 states: *"...Where publicly-owned parcels are being developed, ... city policy directs that surplus public property be considered for development of affordable housing. Thus, when offering their 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.*

Since the Project only requires the developer to provide less than 1/3 affordable units, it is not compliant with the Plan policies. This must be considered when the Final SEIR ("FSEIR") is prepared.

Policy 6.4.1 states: *Regardless of scale, new development should add to the district's character, create a human scale public realm, and fit within the city's traditional fabric; regardless of architectural style. Larger-scale development efforts must take great care to not overwhelm the scale of the area and to positively establish a pedestrian-scale pattern. Urban design guidelines have been developed for the plan area and compliance with the guidelines is mandatory.*

The Project is massive and out of scale with the surrounding neighborhoods. It will have buildings up to 8 stories high, casting shadows on public open space and Archbishop Riordan High School. It will dwarf the single family homes surrounding it, and it will remove open space that is used by City College of San Francisco ("City College") for both parking and recreational purposes. A Feasible Alternative must be considered. In view of the foregoing, the Project is not in accord with the Plan and needs to be revised accordingly."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-2])*

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"Balboa Park Station Area Plan (p. B-3)

The area plan's land use map designates the site's land use as P (Public), and the height map indicates a 40-foot height limit (Maps 3 and 6). However, the Project will include buildings up to 78 feet in the Developer's Proposed Option and up to 88 feet in the Additional Housing Option. (B-4) The FSEIR must provide substantial evidence explaining why this increase in height limit will not have an unanticipated and significant environmental impact."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-3])*

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"The Accountable Planning Initiative (p. B-5)

Under Proposition M, planning policies must include conservation and protection of existing housing and neighborhood character (B-5). The DSEIR fails to discuss how the will impact neighborhood character. In accordance with Proposition M, the FSEIR must provide substantial evidence explaining this analysis."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-4])*

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"Land Use Impacts

*Impact LU-2: No conflict with applicable land use plans (p. B-14)*

According to this section, the proposed project would require rezoning to permit structures up to 88 feet tall. It would appear, therefore, that any significant land use conflict can simply be mitigated by rezoning the land. This appears to be an abuse of legislative discretion. The FEIR must consider the appropriateness of this rezoning option."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-6])*

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*"The DSEIR must consider the impact of the change of zoning*



The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of “affordable housing” when, in reality, most of the units will be market-rate housing.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-36])*

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*“The DSEIR must consider the option of leaving open space*

The Balboa Reservoir is currently open space that allows for vistas of the Pacific Ocean to the Farralones from the CCSF Science Building. The BPS Area Plan contains a Streets and Open Space Element. Why is this consideration left out?”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-37])*

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*“The DSEIR must consider the option of leaving open space*

The BPSAP contains a Streets and Open Space Element. Why is this left out?”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-40])*

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*“Objective 1.4 of the Balboa Park Station Area Plan, regarding Land Use--*

*‘This Plan encourages the owners of this site-to develop the reservoir in a manner that will best benefit the neighborhood, the city, and even the region as a whole.’*

Housing is one recommendation, along with this excerpt from the Streets and Open Space Element of the Balboa Park Area Station Plan, p. 30:

*‘A number of open spaces are proposed in the plan area, including the Phelan Loop Plaza, the Geneva Plaza, open space associated with the proposed freeway deck, Brighton Avenue, the Library playground and the proposed Balboa Reservoir open space.’*

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-1])*

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*“Summary of Land Use Impacts in the PEIR (p. B-12)*

This section omits the fact that a zoning change from P (Public) to a Special Use District is A BIG DEAL. Privatizing public land by a private developer is A BIG DEAL.

Since the certification of the BPS Final EIR, there has been a major change in the housing development environment for surplus public sites.

At the time of the PEIR, only non-profit agencies were able to buy and build on public surplus lands.

2015 Prop K Public Land for Housing ended the restriction that only non-profit builders could use public lands for housing. With the passage of Prop K, private for-profit developers were allowed to cash in on a bonanza to privatize public lands.

**The change of zoning from P to SUD to enable privatization of public land is a new condition that did not exist at the time of the PEIR. A LTS determination based on conditions that did not exist at the time of the PEIR requires fresh treatment in SEIR."**

*(Alvin Ja, Email, September 11, 2019 [I-JA11-4])*

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**"\* The DRAFT SEIR must consider the impact of the change of zoning"**

*(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-8])*

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**"The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing."**

*(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-11])*

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***"The DRAFT SEIR is inadequate because it fails to consider the impact of the zoning change***

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE with no analysis of the impact this would have. The change is justified by the fiction of offering "affordable housing" when, in reality, most of the units will be market-rate housing."

*(Jennifer Worley, Email, September 23, 2019 [I-WORLEY-4])*

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**"The entire Reservoir Project process has avoided discussion or application of the State Surplus Property Statute:**

#### **STATE SURPLUS PROPERTY STATUTE**

The State Surplus Land Statute 54222 says:

*Any local agency disposing of surplus land shall send, prior to disposing of that property, a written offer to sell or lease the property as follows:*

*(c) A written offer to sell or lease land suitable for school facilities construction or use by a school district for open-space purposes shall be sent to any school district in whose jurisdiction the land is located.*

PUC's principle of market rate return is not absolute. SF Administrative Code 23 for Real Property Transactions calls for:

SF Administrative Code 23.20 states

*Transfers of Real Property pursuant to this Article shall be paid for no less than 100% of the appraised value, except where the Board of Supervisors determines by resolution that a lesser sum will further a proper public purpose, and provided that the Public Utilities Commission shall be paid at least the historical cost of such Real Property.*

SF Administrative Code 23.3 for Real Property Transactions calls for:

*'... sales price of at least 100% of the appraised value of such Real Property, except where the Board determines either that (a) a lesser sum will further a proper public purpose, or...'*

The Balboa Park Station Area Plan had called for developing the Reservoir to 'best benefit the Neighborhood, City, Region as a whole.' Yet any analysis of what constitutes 'best benefit' has been bypassed. Instead, by fiat, the City declared that the Reservoir would be used for housing to be developed by private developers. And despite the teacher shortage, consideration for teacher housing by school has been minimized.

**The Reservoir Project has apparently ducked the State Surplus Property Statute's requirement that the property be offered for school facilities construction. This omission should trigger treatment in the SEIR."**

*(Alvin Ja, Email, September 11, 2019 [I-JA11-6])*

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## **SFPUC Land Use Framework**

*"The DSEIR must consider the impact of creating a nuisance*

The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that *Land may be sold or transferred when...Use of the land sold is not to result in activities creating a nuisance.*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-41])*

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“This section of the SEIR provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site.

3.B.5 as it is written in the SEIR, critically omits the Land Use Framework that was adopted by the San Francisco Public Utilities Commission in 2012. The lease and sale of PUC property is governed by this SFPUC document, ‘FRAMEWORK FOR LAND MANAGEMENT AND USE.’ The document lays down conditions for sale of SFPUC land to include Economic, Environmental, and Community criteria.

Here is the excerpt from the SFPUC Land Use Framework:

4. Use of the land sold will not to result in activities creating a nuisance.

The Balboa Reservoir Project fails enormously to uphold Condition 4 of ‘Community Criteria.’”

(Christine Hanson, Email, September 23, 2019 [I-HANSON4-1])

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### “3.B.5 Regulatory Framework

*This section provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site. No federal regulations, plans, or policies are relevant to the project.*

3.B.5 critically omits the Land Use Framework that was adopted by the Public Utilities Commission in 2012, attached (PUC Resolution 12-0044).

### **Balboa Reservoir in context of PUC’s Land Use Framework**

The lease and sale of PUC property is governed by the PUC document, ‘FRAMEWORK FOR LAND MANAGEMENT AND USE.’

The document lays down conditions for sale of PUC land to include economic, environmental, and community criteria.

The Balboa Reservoir Project has been promoted as part of the Public Land for Housing Program whose purpose is to build affordable housing.

Public Land for Housing in the context of Balboa Reservoir, will fail its overarching goal of affordability. Instead, Balboa Reservoir will achieve 67% unaffordable housing, in exchange for 33% affordable housing.

The PUC Land Use document states:

*COMMUNITY CRITERIA: Land may be sold or transferred when:*

1. *The sale or transfer is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.*
2. *The sale or transfer would not significantly adversely affect the implementation of an adopted resource agency plan for the area.*
3. *The sale would not increase the risk of loss, injury or death to SFPUC employees or others on or near the parcel.*
4. *Use of the land sold will not result in activities creating a nuisance.*

The Balboa Reservoir Project fails Condition 4 of 'Community Criteria.'

The current plan removes existing parking for City College students. It deliberately limits parking within the Reservoir to 0.5 parking spaces per residential unit in the unrealistic expectation that this will discourage car ownership by new Reservoir residents.

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance that would inhibit student enrollment and attendance at City College [The word 'nuisance' understates the problem].

The Balboa Reservoir Project fails to comply with PUC's 'Framework for Land Management and Use.'

The sale of Balboa Reservoir to private developers would provide a short-term cash infusion to PUC Water Enterprise. However the short-term gain of quick cash doesn't justify losing this valuable piece of public land in perpetuity to private developers in the guise of 'affordable housing.'

**The draft SEIR is deficient in its omission of the PUC Land Use Framework within the Regulatory Framework."**

*(Alvin Ja, Email, August 26, 2019 [I-JA5-1])*

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*"Impact LU-2: The proposed project would not conflict with any applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)*

The Initial Study fails to assess the PUC Land Use Policy. The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states: 'Use of the land sold is not to result in activities creating a nuisance.'

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa

Reservoir Project will result in creating a substantial traffic and parking nuisance [The word 'nuisance' understates the problem].

From earlier submission to the Reservoir CAC and City Team:

#### **PUC LAND USE POLICY**

1. The RFQ's section on Applicable Land Use Policies makes no reference to the PUC's own 'Framework for Land Use and Management.'
2. From the PUC website: By adoption of the Framework, the Commission is seeking to advance the analytical and decision-making process surrounding the administration of real estate assets under the SFPUC's exclusive jurisdiction.
3. PUC's Land Use Framework policy allows sale only if: *'Use of the land sold will not result in creating a nuisance.'*
4. Even though the PUC Land Use Framework was formulated to focus on 'Land Management Guidance for...Disposition of SFPUC Lands,' The City Team has dismissed the importance of this policy document: *'It is not necessary, or feasible, for an RFQ to name all of the City policies and procedures that apply to the project.'* [from Staff Response to *'Why doesn't the RFQ discuss the SFPUC Land Use Framework?'*]

Importantly, Staff misstated the essence of the question. **The real question was whether or not the intended disposition of the PUC Reservoir property complies with PUC's policy on 'Disposition of SFPUC Lands'; the question was not whether the Land Use Framework policy is 'named.'**

**The PUC Land Use Framework was adopted post-PEIR. Its requirement that use of the Reservoir not result in a nuisance should be enforced."**

*(Alvin Ja, Email, September 11, 2019 [I-JA11-5])*

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**"\* The DRAFT SEIR must consider the impact of creating a nuisance**

**The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that Land may be sold or transferred when....Use of the land sold is not to result in activities creating a nuisance.**

**Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word 'nuisance' understates the problem]. Please listen to the people of S.F. and this neighborhood."**

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

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### **Response PP-1: General Plan, Zoning Controls, Height Limits, Balboa Park Station Area Plan, SFPUC Land Use Framework**

Comments state that the project is not consistent with a number of plans, policies, and regulations including, but not limited to the Balboa Park Station Area Plan, zoning, disposition of surplus property, and SFPUC's "Framework for Land Management". Other comments also state that the draft SEIR did not evaluate impacts from rezoning and impacts on neighborhood character with respect to building scale and height.

Comments regarding shadow on public open space and non-public open space (such as Archbishop Riordan High School) are addressed in Response SH-1, Shadow Impacts, on RTC p. 4.H-21, and Response SH-2, Non-CEQA Shadow Effects, on RTC p. 4.H-23, respectively.

Concerning parking and traffic generally, refer to Response TR-7, Parking, on RTC p. 4.C-61 and Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding City College parking are addressed in Response PS-2, Public Services and Secondary Impacts, on RTC p. 4.H-59.

The response to plans and policies comments is organized by the following subtopics:

- General Plan, Zoning Controls, Height Limits
- Balboa Park Station Area Plan
- Disposition of Surplus Property

An EIR is required to discuss inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans; the EIR need not resolve them though.<sup>66</sup> The draft SEIR is compliant with these CEQA requirements.

#### *General Plan, Zoning Controls, Height Limits*

Draft SEIR Appendix B, Section C, Compatibility with Existing Zoning and Plans, discusses potential inconsistencies of the proposed project with applicable local plans and policies, as well as conflicts with regional policies. The draft SEIR acknowledges that the proposed project would not be consistent with the site's current P (Public) zoning and would require rezoning to a new Balboa Reservoir Special Use District. As stated on draft SEIR Appendix B, pp. B-14 to B-15, inconsistencies with existing plans and policies do not, in and of themselves, indicate a significant physical environmental effect. To the extent that adverse physical environmental impacts may result from such inconsistencies, the draft SEIR evaluates the environmental impacts resulting from such inconsistencies in draft SEIR Chapter 3 and draft SEIR Appendix B. To the extent that such substantial physical environmental impacts may result from such conflicts, the draft SEIR discloses and analyzes the physical impacts under the relevant topic sections, including, but not limited to, draft SEIR Section 3.B, Transportation and Circulation; draft SEIR Appendix B Section E.10, Wind and Section E.11, Shadow.

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<sup>66</sup> CCR Title 14 section 15125

Changes to neighborhood character are not considered significant environmental effects under CEQA unless the changes would result in a substantial adverse physical change in the environment. Physical environmental effects related to building height, such as wind and shadow, are discussed in the draft SEIR Appendix B, Sections E.10 and E.11, respectively. Concerning aesthetic impacts, including views and vistas, draft SEIR Appendix B, Section E.2, Aesthetics (B-16), explains that, pursuant to CEQA section 21099, “aesthetic impacts of a residential or mixed-use residential project on an in-fill site in a transit priority area *shall* not be considered significant impacts on the environment.” [Emphasis added.] Therefore, the draft SEIR does not evaluate the effects on neighborhood character or scale. It is acknowledged that the Balboa Park Station Area Plan includes language accompanying Policy 6.4.1 stating that “new development should add to the district’s character, create a human scale public realm, and fit within the city’s traditional fabric.” This policy consideration may be evaluated by the decision-makers, including the planning commission and board of supervisors, along with other policy matters—including those set forth by Proposition M—in their deliberations on the project.

Concerning the allegation of “spot zoning,” a zoning change cannot, in itself, result in physical change. As stated above, to the extent that physical environmental effects could result from the proposed rezoning, these effects are analyzed in the applicable topic sections of the draft SEIR.

Concerning the comment that a “significant land use conflict can simply be mitigated by rezoning,” thereby resulting in “an abuse of legislative discretion,” this statement is incorrect. As discussed above, a project’s inconsistency with an applicable plan or policy does not, in itself, lead to a significant impact under CEQA unless the conflict would result in adverse changes in the physical environment. It is also within the purview of the board of supervisors, as the City and County of San Francisco’s legislative body, to make changes to various laws governing San Francisco, including the San Francisco Planning Code.

#### *Balboa Park Station Area Plan*

Regarding the statement that the Balboa Park Station Area Plan called for the SFPUC to consider, if water storage at the site were determined not to be needed, “development of a mixed-use residential neighborhood” on only “part of” the Balboa Reservoir west basin (Plan policy 1.4.2). The project would not be inconsistent with this policy. The proposed project is a mixed-use residential project on part of the site.

Concerning the area plan’s Streets and Open Space section, the area plan identifies anew open space to be created on the project site (“the western portion of the Balboa Reservoir”). The area plan also identifies housing on the project site (“Policy 4.4.1—Develop housing on the West basin if it is not needed for water storage”), and therefore it cannot reasonably be assumed that the area plan proposed that the entire project site would be devoted to open space. The proposed project would include approximately 4 acres of publicly accessible open space, as stated on draft SEIR p. 2-21, including an approximately 2-acre park in the center of the site. The project would also include three pedestrian connections from and through the site to Ocean Avenue and pedestrian access to Unity Plaza, Frida Kahlo Way, and San Ramon Way.



Regarding the statement that the project site “is currently open space,” no portion of the project site is formally designated by San Francisco Recreation and Parks Department or other city agencies as open space under existing conditions. As described on draft SEIR p. 2-7, a large portion of the project site is occupied by an asphalt-paved 1,007-space parking lot. The parking lot is surrounded on three sides by sloping western, northern, and eastern edges. Much of the northern and western slopes are concrete-covered or, in the case of the access road to the parking lot, paved with asphalt. The tops of the northern and western slopes contain a paved pathway that is used for informal recreational purposes, while the eastern slope contains pathways and stairs that provide access to the parking lot. Further, as noted above, the proposed project would provide approximately 4 acres of publicly accessible open space as well as pedestrian connections to and through the site.

### *Disposition of Surplus Property*

The proposed project would not be inconsistent with Proposition K, approved by San Francisco voters in 2015, which states that “surplus property developments with 200 or more units would allow mixed-income projects and would also require at least 33 percent of the housing in each such development to be made permanently affordable to low- and moderate-income households.” As stated on draft SEIR p. 2-13, up to 50 percent of the residential units to be developed pursuant to the project would be income-restricted; that is, affordable to persons earning between 55 and 120 percent of the area median income. As defined by the Mayor’s Office of Housing and Community Development, based on state and federal guidelines, families earning up to 80 percent of area median income are classified as “low income,”<sup>67</sup> while those earning between 80 percent and 120 percent of area median income are classified as “moderate income.” Therefore, the proposed project would exceed Proposition K’s requirement with respect to affordable housing.

Regarding the potential change in ownership of the project site from a public agency to a private entity, a transfer of ownership would not, in itself, result in any physical environmental impacts. Likewise, the nature of the developer—non-profit or for-profit or, as here, a combination thereof—has no bearing on a project’s physical environmental impacts.

Concerning state law governing disposition of surplus property, California Government Code section 54221(f)(1)(F)(ii) exempts from the definition of surplus property a “mixed-use development that is more than one acre in area, that includes not less than 300 housing units, and that restricts at least 25 percent of the residential units to lower income households ... for a minimum of 55 years for rental housing and 45 years for ownership housing.” This statute’s definition of “lower income households” is the same as low income households discussed above—those earning less than 80 percent of area median income. Regardless, this comment does not raise specific environmental issues about the adequacy or accuracy of the draft SEIR’s analysis of physical environmental impacts that require a further response.

Regarding the provisions in the San Francisco Administrative Code concerning the sales price of land disposed of by the City and County of San Francisco, the SFPUC and the board of supervisors, in considering the sale of the project site to the project sponsor, would be bound by law to follow

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<sup>67</sup> This category is further subdivided into “very low income,” meaning families earning less than 50 percent of area median income. For 2019, 80 percent of area median income for a family of four was \$98,500, while 120 percent of area median income was \$147,800.

the administrative code. Regardless, the comment does not raise any issue with respect to the project's potential physical environmental impacts or the draft SEIR's analysis thereof, and no further response is required.

Finally, concerning the SFPUC Framework for Land Management and Use ("land use framework"), this document was adopted by the SFPUC in 2012 by Resolution 12-0042 (not the Resolution 12-0044 cited by the commenters; that resolution dealt with an agreement between the SFPUC and the San Francisco Unified School District for the installation of solar photovoltaic systems on school district sites). The analysis in the draft SEIR does not support the commenter's statement that the project's impact on traffic and parking, including elimination of the existing parking lot on the project site that is used by City College students, faculty, and others, would create a nuisance.

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## Land Use and Land Use Planning

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B, section E.1, Land Use and Land Use Planning. These include topics related to:

- Comment LU-1: Cumulative Land Use

### *Comment LU-1: Cumulative Land Use*

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

I-BARISH3-7

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*"Impact C-LU-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative impacts to land use. (Less than Significant) (p. B-15)*

There is no objective data to support this conclusion. Rather, the DSEIR simply states that in combination with reasonably foreseeable future projects, the Project would have less-than-significant cumulative land use impacts. But absent a quantitative analysis of all the CEQA environmental impacts, it is improper to reach such a conclusion. The FSEIR must provide substantial evidence to support its conclusion. Absent an analysis of the substantial evidence, the FSEIR will be insufficient."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-2])*

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### **Response LU-1: Cumulative Land Use**

The commenter states that the final SEIR must provide substantial evidence to support the conclusion that the project would not result in significant cumulative impacts to land use.

The physical environmental effects of the project are evaluated in the draft SEIR. As discussed in Response PP-1 on RTC p. 4.H-10, the project would have a significant land use impact if the project physically divides an established community or substantially conflicts with a land use plan or policy that was adopted for the purpose of avoiding or mitigating an environmental effect, such that a substantial adverse physical change in the environment related to land use would result. The initial study concluded that the project would not create physical barriers that would divide the Plan area; rather, the project would extend a network of pedestrian and bicycle facilities through the project site (see draft SEIR Appendix B, p. B-14). The draft SEIR did not identify any conflict with a land use plan or policy that was adopted for the purpose of avoiding or mitigating an environmental effect associated with cumulative development.

Regarding the comment that a quantitative analysis of all environmental impacts is required to determine that cumulative land use effects would be less than significant, the questions to be answered by the analysis are whether the project, along with cumulative development, would physically divide an established community or cause a significant effect due to a conflict with policies adopted to avoid environmental effects. With respect to the former, the draft SEIR states on draft SEIR Appendix B, p. B-15, that cumulative development, like the proposed project, would be infill development. Therefore, neither the project nor any of the cumulative projects would divide an established community. Regarding the latter, potentially significant physical environmental effects that may result from the project along with cumulative development are discussed in each topic's relevant cumulative scenario. The commenter does not provide evidence supporting the claim that the draft SEIR's less-than-significant cumulative land use conclusion is incorrect.

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## Population and Housing

The comments and corresponding response in this section cover draft SEIR Appendix B, Section E.3, Population and Housing:

- Comment PH-1: Population Growth

### *Comment PH-1: Population Growth*

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

I-BARISH1-4  
I-BARISH2-6  
I-BARISH3-8

I-JA11-1  
I-JA11-3

I-SIMON-14  
I-TARQUINO-7

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"The initial study says there would be a population increase of over 100 percent in the plan area, but then concludes there would be no significant cumulative population impacts because this is just a tiny increase compared to the total population of the City as a whole. This is a flawed apples and oranges comparison and should not be accepted."

*(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-4])*

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"2) The Initial Study says there would be a population increase of over 100% in the plan area, but concludes there would be no significant cumulative population impact because this is a tiny increase compared to the population of the City as a whole. This is a flawed apples and oranges comparison, and should not be accepted."

(Jean Barish, Letter, September 12, 2019 [I-BARISH2-6])

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"Population and Housing Impacts

*Impact C-PH-1 The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative population and housing impacts. (Less than Significant) (p. B-21)*

The Developer's Proposed Option and Additional Housing Option would increase the onsite residential populations by 2,530 and 3,565 respectively. Compared to the increase in population analyzed in the PEIR or 1,150 residents (Table 1, p. B-19) this is an increase of over 100% in the plan area. Yet, despite this significant increase in population compared to the PEIR, the DSEIR concludes it is not significant. It justifies this decision by saying it would not be substantial for the City as a whole. While that may be true, it improperly fails to consider the impact on the immediate neighborhood. The FEIR must thoroughly analyze this population increase within the Area Plan, not within the entire City."

(Jean Barish, Letter, September 23, 2019 [I-BARISH3-8])

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"I have added the following addition to "Comment on Initial Study: Land Use":

**The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review."**

(Alvin Ja, Email, September 11, 2019 [I-JA11-1])

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"Summary of Land Use Impacts in the PEIR (p. B-12)

*The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR.*

For this to be accurate, the following question would have to be answered in the negative:

*Would the project result in potentially significant effects not identified in the prior EIR? This question examines whether or not the proposed project would result in new significant or potentially significant environmental effects that were not identified in the PEIR. This could include significant effects that are due to:*

Project-specific features of the proposed project.

Substantial changes with respect to the circumstances under which the project would be undertaken, such as real estate development trends in the surrounding area or major projects that were previously unanticipated.

I contend that the answer to the question is YES, thus triggering Impact treatment in the SEIR.

The section acknowledges: *The project site was located within the Balboa Reservoir Subarea and was assumed to include up to 500 residential units.*

A later paragraph states: *The PEIR concluded that implementation of the area plan would not result in significant land use impacts and did not require any mitigation measures.*

SF Planning Dept professionals are aware that a program-level determination is not the same as a project-level determination. Otherwise, the BPS FEIR would not have necessitated project-level reviews of the Kragen Project and the Phelan Loop Project within the FEIR.

It is professionally dishonest for the Planning Dept to pretend that the BPS FEIR's program-level determination for an BPS Area Plan **area-wide** target of 1,780 units could be legitimately used to insinuate that the Reservoir Project current numbers of 1,100-1,550 units had already gotten the thumbs-up from the PEIR.

Did you forget the earlier quote of the Reservoir sub-area "*assumed to include up to 500 residential units*"?

In the context of "Project-specific features of the proposed project", by any objective measure, jumping from 500 units in the program-level PEIR to 1,100-1,550 units in the current two Reservoir options is a big increase of 120% and 210% respectively.

The area-wide target of 1,780 units is shown on the Area Plan Development Status Sept 2018 Update pdf. It consists of 790 Tier 1 (0-5 yrs) units and 990 Tier 2 ( 5-20 yrs) units. The pdf shows 482 units built or underway. This leaves an area-wide shortfall of 1,298 units.

Although I can understand the desire to achieve this area-wide target, forcing a square peg into a round hole out of desperation will not succeed without imposing adverse impacts onto the Reservoir vicinity. Trying to force the Reservoir Project-- targeted for 500 units in the PEIR--in order to fulfill the 1,298 unit area-wide shortfall is an objectively significant Reservoir impact.

**The approval and certification of the program-level BPS Final EIR with an area-wide target of 1,780 units does not equate with a LTS determination for a project-level 1,100-1,550 Reservoir units. The Initial Study merely manipulates words and paragraphs to imply and assert, without evidence, that:**

*"The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR."*

The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review."

*(Alvin Ja, Email, September 11, 2019 [I-JA11-3])*

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"The DRAFT SEIR does not consider the impact of increasing the number of units from the original recommendation in the PEIR. The Reservoir Project's two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR's Housing option for the Reservoir referred to 425-500 units.

From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-14])*

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"From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR.

The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

*(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-7])*

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## **Response PH-1: Population Growth**

Comments state the cumulative population impacts analysis is flawed and inappropriately compares population growth citywide as opposed to plan area. Comments also state the current proposal increasing the number of units between the PEIR and draft SEIR constitutes substantial unplanned growth.

As noted in Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. 4.A-3, the area plan does not place a cap on the number of units within the plan area or at the project site. The PEIR assumed 500 units at the project site for purposes of program-level analysis and this SEIR is evaluating, among other things, the potential impacts associated with the greater number of units than assumed in the PEIR. The purpose of the SEIR is to provide project-level environmental review and analyze whether the proposed development at the project site (compared to the 500 residential units and 100,000 square feet of open space assumed in the PEIR) would be within the scope of the program-level analysis or if the project would result in new significant impacts or substantially more severe significant impacts identified in the PEIR. For topic areas where the increased number of units could cause environmental impacts not adequately covered by the PEIR, the SEIR analyzes those impacts. The use of the PEIR to focus the second-tier

review and applicable principles in the CEQA Guidelines are further explained in Response CEQA-1.

The analysis relies in part on the citywide projections provided in the Plan Bay Area 2040 Final, which serve as *planned* City growth. Impact PH-2 (draft SEIR Appendix B, pp. B-19 to B-21) and draft SEIR Section 4.A, Growth-Inducing Impacts, evaluates whether the project would directly or indirectly induce substantial *unplanned* growth in the area. As discussed there, the Association of Bay Area Governments' (ABAG) population growth projection for the Balboa Park Priority Development Area is 9,855 by 2040, and the proposed project's maximum population increase would represent approximately 36 percent of this planned growth within the Balboa Park Priority Development Area during that period. The ABAG growth projections for the Balboa Park Priority Development Area represent planned growth in the area because Priority Development Areas are locally designated areas within existing communities that have been identified and approved by local cities or counties for future growth. The proposed project would result in a higher portion of anticipated growth to occur at the project site, which is within a designated regional Priority Development Area, rather than elsewhere in the city. Consistent with Plan Bay Area, development under the project would accommodate a portion of the city's share of anticipated regional growth.

Impact C-PH-1 (draft SEIR Appendix B, pp. B-21 to B-22) and draft SEIR Section 4.A, Growth-Inducing Impacts (draft SEIR pp. 4-1 to 4-3), provides an evaluation of potential cumulative growth-inducing impacts. The SEIR determines that the proposed project would not result in a significant growth-inducing impact, either directly or indirectly.

As stated on draft SEIR pp. 4-2 to 4-3, "[t]he increase in the residential and employment population on the project site would not result in a substantial or unplanned increase in the population of the project vicinity or the city because it would be located on an infill site in an urbanized area. Growth associated with the project site would be consistent with the City's identification of Balboa Park as an area of San Francisco where future growth will be focused." The proposed project would not result in substantial unplanned growth because while the project would increase the residential population on the site, this growth is accounted for within the planned growth for San Francisco.

Further, the purpose of the question is if such unplanned growth could result in physical environmental impacts. As addressed under their respective topics in the draft SEIR and draft SEIR Appendix B, this project-related growth would be served by existing infrastructure, and public services. The proposed project also would not indirectly result in growth inducement because it would be located on an infill site in an urbanized area. Although the proposed project would involve extensions of Lee Avenue and other infrastructure, such facilities would not enable additional development in other currently undeveloped areas. The project also would not remove any existing barriers to growth in the surrounding area. Thus, for the reasons summarized above and described in the draft SEIR, the project's growth inducement impacts would be less than significant.

## Wind

The comments and corresponding response in this section cover draft SEIR Appendix B, topic E.10, Wind:

- Comment WI-1: Wind Impacts

### *Comment WI-1: Wind Impacts*

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

I-HEGGIE2-23

I-MUELLER2-4

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“20. Wind Impacts:

The creation of wind tunnels is a risk of constructing buildings up to or over 80 feet. But the DEIR indicates there is no significant impact from wind. To anyone who lives, studies or works in the area, the power of the wind coming off the ocean is already well known. To mitigate the risk of tunneling already strong winds into educational and residential communities, no new building should exceed 79-80 feet. The developers' option does not exceed 80 feet, but the additional housing option is likely to create wind tunnels. If San Francisco wants to sweep the many young children who congregate in the area off their feet, the additional housing option will do it.”

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-23])*

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“Also, the particular situation of the land under consideration for this extremely dense proposed housing development was not fully researched in conjunction with the high wind velocity coming directly from the ocean to that property through what is commonly called The Gap. In this DSEIR, the only comments about wind concerned the effects that may be generated involving tall buildings. It did not describe the actual complex wind situation in this particular land area.”

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-4])*

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### **Response WI-1**

The comments state that existing conditions in the project vicinity are windy and that the proposed project, particularly the Additional Housing Option, would result in adverse wind conditions.

The draft SEIR Appendix B, p. p. B-42, describes the existing wind environment at the project site, making specific reference to the fact that historical wind data from Fort Funston (generally due west, and thus upwind, of the site) “show that there is reasonable consistency between the Civic Center and the Fort Funston meteorological stations, regardless of their substantially different locations. Similar to Civic Center, the majority of strong winds at Fort Funston were recorded as



blowing from the south-southwest through the north-northwest.” This is relevant because San Francisco’s most complete wind record is from the Civic Center meteorological station, and it is based on the Civic Center data that the initial study generally describes as the existing wind environment in San Francisco.

The question is whether the project would result in adverse changes to existing conditions. Thus, the draft SEIR Appendix B explains on p. B-42 that wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented so that a large, unarticulated wall catches a prevailing wind. In general, as noted above, new buildings less than 80 feet in height above ground surface are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Under both project options, development would result in buildings up to five or six stories (up to about 65 feet) taller than most structures west of the project site. Project buildings would step up in height from west to east, in line with the prevailing westerly winds. As a result, upwind portions of the project would therefore provide some wind shelter to the taller downwind buildings. Thus, under the Developer’s Proposed Option and as stated on draft SEIR Appendix B, p. B-42, “the greatest difference in height between adjacent blocks, moving with the prevailing wind from west to east, would be less than 35 feet. This means that no portion of the proposed project, under the Developer’s Proposed Option, would present a wall into the prevailing winds at a height greater than about 35 feet, which is comparable to a three-story residential building.” The Additional Housing Option would add one more story, for a maximum unobstructed building wall about 45 feet tall. The design of the project under either option, with heights stepping up from west to east, would serve to limit the project’s potential effects on ground-level (pedestrian) winds. Therefore, wind effects of the proposed project, under either option, would be less than significant.

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## Shadow

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B topic E.11, Shadow. These include topics related to:

- Comment SH-1: Shadow Impacts
- Comment SH-2: Non-CEQA Shadow Effects

### *Comment SH-1: Shadow Impacts*

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

I-BARISH1-3  
I-BARISH2-5  
I-BARISH3-9

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“There are numerous flaws in the draft SEIR. I’d like to highlight a few that are just representative of the problem in this document.

In the initial study, Appendix B, of the draft SEIR, these are just three examples of many problems with the SEIR.

The study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25 percent of the year and there would be significant shadow on Riordan High School. No significant effect.”

*(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-3])*

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“1) The DSEIR Initial Study eliminated many environmental impacts for review by concluding they were not potentially significant. But these conclusions are flawed. The Study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25% of the year, and there would be significant shadow on Riordan High School.”

*(Jean Barish, Letter, September 12, 2019 [I-BARISH2-5])*

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#### “Shadow Impacts

*Impact SH-1 The proposed project would not create shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces (Less than Significant) (p. B-46)*

The DSEIR states that there would be new shadow between May 1 and August 15 (B-47-50). Fig. 3 illustrates this new shadow. These are the warmer, drier summer months, when people are more likely to be outside closer to sunrise and sunset. Yet, despite any objective measure of significance and any substantial evidence, the DSEIR states that any new shadow would not be significant. The FSEIR must provide substantial evidence that such an increase in shadow is not significant.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-9])*

#### **Response SH-1: Shadow Impacts**

The comments take issue with the draft SEIR’s conclusion that project shadow effects would be less than significant with respect to Unity Plaza and Riordan High School. In particular, the commenter states that Unity Plaza would be newly shaded for “over 25 percent of the year.” Concerning shadow on Riordan High School, refer to Response SH-2, Non-CEQA Shadow Effects, on RTC p. 4.H-23.

The commenter’s assertion that new shadow would reach Unity Plaza for more than one-fourth (25 percent) of the year over-represents the proposed project’s impact. The project would add new shadow to the plaza about 29 percent of the number of days per year, but the project would not continuously add new shadow during the sunlight hours of those days.

As stated on draft SEIR Appendix B, p. B-50, the project would cast new shadow on Unity Plaza from about May 1 through August 15. The project would cast no new shadow on Unity Plaza for about 37 weeks of the year. When considering the hours analyzed under San Francisco Planning

Code section 295, which considers times between one hour after sunrise and one hour before sunset, the project would cast new shadow on Unity Plaza for fewer days of the year—about 10 weeks between mid-May and late July.<sup>68</sup> As stated on initial study p. B-47, project shadow would not reach Unity Plaza until shortly before 7:30 p.m. This means that the project would add new shadow to Unity Plaza for a maximum of a few minutes per day during the period governed by section 295 (and for a maximum of just over one hour per day overall, including non-section 295 hours of sunlight). Therefore, project shadow would fall on Unity Plaza during less than 0.5 percent of the yearly hours governed by section 295, which is far less than 25 percent of the year.<sup>69</sup> And because the area shaded at any given minute would be no more than 20 percent of the plaza, the total shadow as a percentage of theoretical annual available sunlight on the plaza would be far less—on the order of 0.05 percent.

As stated on draft SEIR Appendix B, p. B-46, the significance of shadow impacts is evaluated based on whether a project would “create shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces.” Draft SEIR Appendix B, concludes on p. B-50:

Given that the project would add net new shadow on Unity Plaza for a limited time of the day—early evening, during approximately the last hour or less before sunset—and limited period of the year—May through mid-August—the proposed project would not substantially affect the use of Unity Plaza, and the shadow impact would be considered *less than significant*.

The foregoing further substantiates the draft SEIR Appendix B conclusion of a less-than-significant shadow impact on Unity Plaza.

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### ***Comment SH-2: Non-CEQA Shadow Effects***

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

O-ARHS-4  
I-BARISH3-10

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“The other thing is there’s not nearly enough detail about the blockage of light into our building. It was designed to have natural light coming in to warm the building, to enhance the culture of learning for our students in the classrooms. That’s all going to be blocked.”

*(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-ARHS-4])*

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<sup>68</sup> In early May and early August, project shadow would not reach Unity Plaza until a few minutes before sunset, outside the hours governed by section 295.

<sup>69</sup> Calculation: 10 weeks per year x 7 days per week = 70 total days of shading during section 295 hours. At a conservative average of 15 minutes per day, this would represent a total of 17.5 hours of new shadow per year, which is just under 0.5 percent of the 3,721.4 hours in the section 295 year.

*"Impact C-SH-1 The proposed project ... would not result in cumulatively considerable impacts related to shadow. (Less than Significant) (p. B-50)*

The DSEIR discloses that the project would cast new shadow on the athletic field at Archbishop Riordan High School Athletic Field. (p. 51) But it appears this shadow is not subject to CEQA analysis since it is not a publicly accessible open space. That, however, is a technicality which should not justify disregarding this significant shadow impact on a high school adjacent to the project. The FSEIR should evaluate and determine if the shadow on Archbishop Riordan High School's Athletic Field is a significant environmental impact."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-10])*

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## **Response SH-2: Non-CEQA Shadow Effects**

The comments state that the project would cast shadow on the Archbishop Riordan High School athletic field, that such shadow is not subject to CEQA because of the "technicality" that the field is not publicly accessible open space, and that this shadow impact should be significant. The comments also state that the project would block natural light from entering the Archbishop Riordan High School building.

The draft SEIR appropriately analyzes shadow impacts consistent with city guidelines. The CEQA Guidelines does not include a reference to shadow as a potential physical environmental effect. The City and County of San Francisco analyzes shadow impacts under CEQA, partially based on the City's history of concern regarding the shading of publicly accessible space, as evidenced by voter passage of Proposition K, which added section 295 to the San Francisco Planning Code in 1985. The shadow analysis is consistent with the planning department's shadow analysis guidance and Chapter 31 of the San Francisco Administrative Code. As explained on draft SEIR Appendix B, p. B-46, the planning department's criterion for determining whether a project in San Francisco would result in a significant shadow impact is whether the project would "create shadow that substantially and adversely affects the use and enjoyment of *publicly accessible open spaces*" (emphasis added). There is no CEQA requirement in San Francisco, or elsewhere in California, for analysis of effects with respect to shadow on private property. As indicated on draft SEIR Appendix B, p. B-51, this discussion is provided under the separate heading of "Supplemental Information." This is precisely because, as explained above, effects on non-publicly accessible spaces and on private buildings are not subject to CEQA.

City decision-makers may consider the project's shadow on Archbishop Riordan High School and other adjacent or nearby private properties during their deliberations on whether to approve the project.

## Utilities and Service Systems

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B, Section E.13, Utilities and Service Systems. These include topics related to:

- Comment UT-1: Utilities and Service Systems – Water Supply
- Comment UT-2: Stormwater and Sewer
- Comment UT-3: Other Utilities and Service Systems Comments

### ***Comment UT-1: Utilities and Service Systems - Water Supply***

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

I-BARISH3-11  
I-FREY1-2  
I-FREY2-2

I-HEGGIE2-22  
I-MARTINPINTO-5  
I-MUELLER1-1

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I-MUELLER2-2  
I-MUELLER2-3  
I-TIMA-4

#### **“Utilities and Service Systems Impacts**

*Impact UT-1 Sufficient water supplies are available to serve the proposed project ... unless the Bay Delta Plan Amendment is implemented ... Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term ... (Less than Significant) (p. B-59)*

According to the DSEIR, page B-57, SFPUC Resolution 02-0084 determined that there was sufficient water supply to serve expected development projects in San Francisco through the year 2020, and the implementation of the Area Plan was not expected to have any substantial impact on water supply. Since the Project will not be completed until approximately 2027, it appears this projection is obsolete. Please explain.

Further, in the Conclusion on page B-73, the DSEIR states that there is too much uncertainty related to the possible implementation of the Bay-Delta Plan Amendment to identify environmental effects, and such effects are, therefore, speculative at this time. Please explain how an informed decision regarding the availability of an adequate water supply for the Project can be determined in view of these uncertainties, and why, in view of these uncertainties, the DSEIR states the environmental impact is less than significant.

Further, according to a September 22, 2019 article in the *San Francisco Examiner*, a recent civil grand jury report, “Act Now Before It Is Too Late: Aggressively Expand and Enhance Our High-Pressure Emergency Firefighting Water System,” raised the alarm about the lack of coverage for western San Francisco neighborhoods. According to the report, The City’s high-pressure emergency water supply system “does not cover large parts of Supervisorial Districts 1, 4, 7 and 11, roughly one-third of the City’s developed area,” the report said. “As a result, these districts are not adequately protected from fires after a major earthquake.”

([https://www.sfexaminer.com/news/report-large-parts-of-sf-not-adequately-protected-from-firesafter-major-earthquake/?fbclid=IwAR145KV4GH\\_CNfBJvCogj0bPF\\_\\_iAYdlgyWcrmV5PyZkhjN995GTKpG6AOc](https://www.sfexaminer.com/news/report-large-parts-of-sf-not-adequately-protected-from-firesafter-major-earthquake/?fbclid=IwAR145KV4GH_CNfBJvCogj0bPF__iAYdlgyWcrmV5PyZkhjN995GTKpG6AOc))

The Project is in D 7. In view of the grand jury's report, the DSEIR is inadequate for not reviewing the environmental impact of building a massive development on a reservoir that could serve the area in case of an emergency. The DSEIR must provide substantial evidence that covering the Balboa Reservoir will not significantly impact Utilities and Service Systems."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-11])*

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"My second issue is density. This is a downtown style project, without the downtown style streets. And as Hedda mentioned, the firefighting infrastructure, water pipes that accommodate the dense housing in the other parts of the City that have dense housing, their water structure is totally different than what we have in this area. And that lack of firefighting infrastructure would be a hazard to the residents of the development itself, but it would also be a hazard to all of the surrounding neighborhoods."

*(Laura Frey, CPC Hearing, September 12, 2019 [I-FREY1-2])*

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"Second issue is density. This is a very high density project--without the large streets or the firefighting infrastructure/water pipes to accommodate dense housing. (The fire-fighting infrastructure in dense parts of the City is different than in this area.) The lack of a sufficient fire-fighting infrastructure would be a hazard for the residents of any new dense housing project at Balboa Reservoir and for the residents in the surrounding areas."

*(Laura Frey, Email, September 22, 2019 [I-FREY2-2])*

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"19. San Francisco ensures fire safety primarily through provisions of the building code and fire code. Do those codes take into account the lack of a water supply for emergencies for the western part of the City and any need for water storage? The City has been through many fire emergencies, and it would be irresponsible to take these issues lightly. Ignoring or postponing the issue of a water supply for emergencies is not going to help us during an emergency. The potential housing loss due to a fire could be much greater than the housing gain from any one development. Is there a need for water storage for fire emergencies, and if so, there needs to be an evaluation of possible sites while they still exist, including at the Balboa Reservoir."

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-22])*

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"The loss of the 17.6 acre reservoir space will present a lost opportunity to store drinking water during an emergency, as was originally intended in 1957 when it was constructed. In San Francisco,

there are three terminal reservoirs; the Sunset Reservoir, the University Mound Reservoir, and the Merced Manor Reservoir. Together, they contain about 327 000 000 gallons of water, which represents 79% of all the water in San Francisco Reservoirs. According to the November 2018 issue of the *Westside Observer*, only 33% of this water belongs to San Francisco. State Water Code 73503 states that the water is jointly owned by San Francisco and the 27 wholesale water customers (cities on the Peninsula). This means when a disaster occurs, San Francisco is legally obligated to share the water equitably with Peninsula cities. According to the August 12, 2003 minutes of the SF Public Utilities Commission, after a major Earthquake, San Francisco could have as little as 86 000 000 gallons of water to serve a 900 000 population, or slightly less than 100 gallons of water per person.

It is important to remember that our water comes to San Francisco from Hetch Hetchy reservoir, approximately 170 miles away via transmission lines, which must cross four significant faults in the SF Bay Area alone (the Calaveras, Greenville, Hayward, and San Andreas). If a 9.0 earthquake were to occur, which is the theoretical maximum magnitude of Earthquake to occur in San Francisco, it would be about 10 times stronger than the 1906 earthquake and 100 times stronger than the 1989 earthquake. This has the potential to sever all transmission of water from Hetch Hetchy to San Francisco.

The Balboa Reservoir represents an opportunity to store an additional 110 000 000 gallons approximately (based on 17 acres x depth of 20 feet). This water storage capacity is not insignificant.

What does the project propose to do to increase our water storage when it comes to firefighting capacity?"

*(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-5])*

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"San Francisco is listed as a city with housing more dense than Tokyo and Hong Kong. In America, San Francisco is second in density only to New York City. The proposed housing project for the lower Balboa Reservoir would have housing five times more dense than the surrounding area.

Thirty years ago a similar proposal involving a smaller number of housing units on the Reservoir site was rejected by San Francisco voters. One of the major concerns for housing at the site came from the fire department. The Chief had many reasons to not recommend housing in the Balboa Reservoir, citing conditions which have become even more dangerous over the years.

Increasing drought and the extreme winds coming through the reservoir gulch make a perfect storm for the type of fires that we now see devastating entire towns in California. The situation was dire before and now it's impossible to overstate the fire danger involving that particular basin (and all surrounding neighborhoods), a basin which is being proposed for impossibly dense housing. The lack of immediate water sources made and still makes the situation very bad. We've all seen what fires fed by strong horizontal winds, minus enough water, can do to houses and buildings."

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-1])*

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"In particular, the areas of water supply and safety have been largely ignored.

Appendix F: Water Supply Assessment contains the report given at a PUC hearing some months ago concerning the availability of water for the proposed development. I was at that hearing and clearly understood that such a supply was not actually assured except perhaps under the somewhat mythical consideration: "during normal years". However, it is pretty apparent that with climate change reality upon us, we cannot consider anything in the future to be 'normal years' (!)"

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-2])*

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"At that hearing and in appendix F, it was also made clear that detailed research into water safety and the potential for urban fires was not addressed. Reports of lack of appropriate water supplies in the western half of San Francisco, should there be fires, has been reported as recently as a few days ago."

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-3])*

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"Then, you need emergency water in case we have an earthquake to kill the fires. There is no emergency water supply for the west and south area of San Francisco. Would you please get busy before you start building and get that done?"

*(Etta Tima, CPC Hearing, September 12, 2019 [I-TIMA-4])*

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### **Response UT-1: Utilities and Service Systems - Water Supply**

Commenters state that the draft SEIR must provide substantial evidence that the project would not significantly impact utilities and service systems, specifically as it relates to the availability of water and emergency water supplies. Several comments express concern regarding the density of the project and state that there is lack of emergency water storage and supplies in the south and west side of the city, and question how an informed water supply decision can be determined in view of uncertainties regarding the Bay Delta Plan Amendment. One comment states that the project will present a lost opportunity as a reservoir to store drinking water.

Impact UT-1 (draft SEIR Appendix B, pp. B-59 to B-73) provides background information about water supply reliability and drought planning for the city, along with three potential water supply scenarios that are evaluated in the project's water supply assessment. Updated water supply and demand projections, extending to 2040, are discussed in Impact UT-1.

In summary, the analysis on draft SEIR Appendix B, p. B-67, determines that sufficient water supplies would be available to serve the proposed project options and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. If the Bay-Delta Plan Voluntary Agreement is implemented, the resulting regional water system supply shortfalls during dry years would be less than those under the Bay-Delta Plan



Amendment and would require rationing of a lesser degree and closer in alignment to SFPUC's adopted level of service goal of no more than 20 percent system-wide during dry years (draft SEIR Appendix B, p. B-68). If the Bay-Delta Plan Amendment is implemented, the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years, but this would occur with or without the proposed project.

The analysis concludes that construction and/or operation of new or expanded water supply facilities could result in a significant cumulative impact. However, the proposed project would not contribute considerably as it would represent 0.17 percent of the total water demand in San Francisco in 2040. Thus, new or expanded dry-year water supplies would be needed under the Bay-Delta Plan Amendment regardless of whether the proposed project is constructed. Any physical environmental impacts related to the construction and/or operation of new or expanded water supplies would occur with or without the proposed project.

The analysis also acknowledges on draft SEIR Appendix B, p. B-71 that given the long lead times associated with developing additional water supplies, the SFPUC would likely address supply shortfalls through increased rationing for the next 10 to 30 years (or more). The higher levels of rationing on a citywide basis could result in significant cumulative effects, but the proposed project would not make a considerable contribution to impacts from increased rationing. Therefore, regardless of whether the Bay-Delta Plan Amendment is implemented, the conclusion in the initial study that the proposed project would result in less-than-significant water supply impacts, both individually and cumulatively, remains the same.

Comments expressing concern regarding firefighting water supply infrastructure are noted. There is a well-established regulatory framework and permitting process in place, enforced through the fire department, building department, San Francisco Building Code, and San Francisco Fire Code. Additionally, concerning wildfire, as stated in draft SEIR Appendix B, Section E.22, San Francisco County does not contain any State Responsibility Area land or lands classified as very high fire severity zones.

The proposed project would include construction of auxiliary water supply system distribution lines and fire hydrants that would serve the project site for firefighting and other emergency uses (draft SEIR p. 2-36). As described in Impact UT-1, draft SEIR Appendix B, p. B-60, the "SFPUC City Distribution Division would conduct a hydraulic analysis to confirm that the existing system is adequate to meet the project's water demands, including fire suppression system pressure and flow demands. If the existing infrastructure is found to be inadequate to meet the project's demand, the SFPUC would modify the water conveyance system, such as upsizing the water mains and appurtenances." The fire department and San Francisco Department of Building Inspection (building department) would also review building plans to ensure that the proposed project complies with the latest California Building Code requirements for fire and life safety measures as specified in the San Francisco Fire Code. As described under Impact PS-1 on draft SEIR Appendix B, p. B-83, "[t]hese requirements include measures related to emergency access and egress; fire hydrants and sprinkler systems; fire-rated design, construction, and materials; restrictions on occupant loads; emergency lighting; smoke alarms; and mechanical smoke control and emergency notification systems. The

project sponsor would work with the fire department to determine utility and access requirements for fire protection and emergency services at the project site.”

As discussed in Impact UT-1, the project site has not been identified as current or future water storage in San Francisco in the city’s Urban Water Management Plan. The concept of developing the site for water storage was raised during the scoping period for the draft SEIR and described on draft SEIR p. 6-61. As described there, the Balboa Reservoir site does not contribute in any way to water supply or storage, as it is not and was never a functioning reservoir as was originally intended for the site.

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### ***Comment UT-2: Stormwater and Sewer***

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

O-NAF-1  
I-GOODMAN-4

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“San Francisco’s sewer collection system and storm drain system are a combined sewer system (CSS). The vast majority of stormwater should be conveyed through the CSS, which includes the streets and their curbs, catch basins, and underground storm drain, which is then collected and treated. However, the sewers on Ocean Avenue between Frida Kahlo Way (formerly Phelan Avenue) and Miramar are undersized and unable to convey the combined sewage from the sewers uphill from them. Excess combined sewage flow is discharged from the sewers into the streets causing heavy overland flow along Ocean Avenue during moderate storm situations which has resulted in combined sewage, including human waste, flooding downstream of the Balboa Reservoir.

The following CCSF EIR report excerpt from the EIR report (Page 4.6-5 of [https://www.ccsf.edu/MP/Docs/046Services\\_DEIR.pdf](https://www.ccsf.edu/MP/Docs/046Services_DEIR.pdf)) documents that:

"The area west of Phelan Avenue is served by a 30-inch reinforced concrete sewer in Phelan Avenue that carries flow south to Ocean Avenue. Although the sewer’s condition is unknown, it is severely undersized. According to the SFDPW, the sewers surrounding the Main Campus, while adequate for the dry weather flow from the campus, are inadequate for flows that occur in a 5-year storm event. Currently, the City does not have the funds to upgrade the under-sized sewers surrounding the campus. The SFPUC is in the process of revising its 1973 Wastewater Master Plan. Among other things, this Plan would include upgrading the City’s hydraulically and structurally inadequate sewers."

In addition, low lying areas are already negatively impacted by flow from upstream projects like the 2011 Colon/Greenwood/Plymouth/Southwood/Wildwood/Miramar sewer system improvement project which resulted in a transfer of flood risk to Ingleside Terraces:

City and County of San Francisco 2030 Sewer System Master Plan TM505 (<http://sfwater.org/modules/showdocument.aspx?documentid=592>), Section 5.7.3.1, "Conveyance

along Ocean Avenue (Upsizing and Auxiliary, page 107, "This alternative will lower the HGL and alleviate flooding in the upstream portions of the reach, along Ocean Avenue between Phelan and Miramar avenues. However, the extra conveyance capacity provided by the relief and auxiliary sewers serve to move larger peak flows downstream to the Legion Court area west of Ashton Avenue. Predictably, the higher arriving peak flows will cause elevated HGLs and effectively transfer the flooding problems to this area."

Even though the Balboa Reservoir project would not "substantially" alter the existing drainage pattern, any additional waste from additional residents would increase the quantity of human waste discharged during these events and increase the exposure to residents and businesses downstream in low lying areas. The Balboa Reservoir EIR fails to address this issue and fails to fully disclose the project's dry and wet-weather impact on the existing sewer system.

The constant expansion of lines upstream, continued development, and the failure to correct the defects in the existing sewer lines have created and continues to create a nuisance and public health risk by subjecting those residents in low lying areas to the risk of exposure to hazardous waste.

The sewer lines downstream of the Balboa Reservoir project must be enlarged, and all known and foreseeable deficiencies corrected, prior to the start of this development."

*(Neighbors Against Flooding, Email, September 17, 2019 [O-NAF-1])*

"I am for the design and proposal of the housing development as an individual, and feel the need for 100% affordable units and a more robust look at water-use and retention on the site for reclamation and sewage issues and infrastructure must be a part of both sites (Balboa Reservoir and CCSF land developments). My concerns were raised during meetings where I attended SFPUC water games planning charrettes and we indicated the importance of water/sewer systems above sea-level that can begin to alleviate lower down systems elevation wise."

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-4])*

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## **Response UT-2: Stormwater and Sewer**

The comments state that the draft SEIR does not address the increase in wastewater and stormwater caused by the project. The comments also express concern regarding the existing condition and capacity of downstream combined sewer lines and how the proposed project would impact them.

Refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12 for further information regarding consideration of 100 percent affordable housing.

Impacts UT-2 and UT-3 on draft SEIR Appendix B, pp. B-74 to B-76, and Impact HY-2 on draft SEIR Appendix B, pp. B-111 to B-112, analyze impacts associated with wastewater and stormwater generated by the project. The proposed project would be subject to several regulations that require onsite water re-use and decreasing the amount of stormwater runoff from the site. The proposed

project could result in long-term changes in the volume of discharges to the City's combined sewer system in the sub-basin due to new residents, employees, and visitors who could increase the amount of wastewater generation (draft SEIR Appendix B, p. B-112). The draft SEIR Appendix B concludes on p. B-112 that all "wastewater discharges to the combined sewer system would be treated at the Oceanside Treatment Plant in compliance with the Oceanside NPDES permit ... because the stormwater and wastewater discharges from the project would not result in an increase in the frequency of combined sewer discharges, the project's impacts related to changes in combined sewer discharges would be less than significant."

Regarding concerns about the downstream overflow conditions, please refer to Impact UT-3, draft SEIR Appendix B, p. B-75, which acknowledges that the Ocean Avenue sewer main is designated as high risk and slated for replacement through SFPUC's Collections System Asset Management Program (CSAMP). A CSAMP ranking of "high" indicates potential need for replacement. As further stated on p. B-75, the "project team would be required to confirm with SFPUC and the San Francisco Department of Public Works' Engineering Hydraulics Division that adjacent sewer infrastructure has adequate capacity and integrity to serve the potential development program."

Sanitary sewage (wastewater) volumes flowing into the combined sewer system are considerably smaller than stormwater flows into the same system. For example, the City's wastewater treatment system treats approximately 575 million gallons per day (mgd) of combined sanitary sewage and stormwater during storm conditions, but one eighth that volume—70 mgd—during non-storm conditions.<sup>70</sup>

The ratio of stormwater to sanitary sewage from the project site is substantially greater than 8:1 during storm conditions. This is because stormwater runoff flow to the combined sewer system is variable, whereas sanitary sewer flow is less so. That is, storm flow peaks during and shortly after heavy rainfall, and diminishes considerably as time elapses; as a result, stormwater volume, for purposes of sizing stormwater and wastewater conveyance piping such as that along Ocean Avenue, is typically measured in cubic feet per second of peak flow, rather than gallons per day (gpd) of total flow. Conversely, sanitary sewer flows, though considerably smaller in volume, are more consistent and typically have one or two peaks during any given day. For residential areas similar to the proposed project, flows are generally higher before and after the typical work day, although there is sewer flow throughout the day because not all working residents are on the same schedule, some residents may work at home, some residents do not work, some attend school, etc.

Moreover, under current conditions, stormwater flow from the project site (west basin) and the east basin drains to the combined sewer at a constrained rate due to the small capacity of the existing drain inlets and pipes. In particular, the great majority of the west basin drains into two undersized storm drains located along the western perimeter of the former reservoir.<sup>71</sup> That is, the project site, and especially the former reservoir, acts to detain peak stormwater flow into the combined sewer. Additional storm drains in the east basin and along a service road on the west

<sup>70</sup> San Francisco Public Utilities Commission, *Sewer System Improvement Program Fact Sheet*, June 5, 2019, <https://sfwater.org/modules/showdocument.aspx?documentid=13986>, accessed March 15, 2020.

<sup>71</sup> BKF Engineers, *Balboa Reservoir Hydrologic and Hydraulic Modeling*, January 9, 2020.

basin (the location of the proposed Lee Avenue extension) provide for more stormwater conveyance capacity.

The project's master infrastructure plan would include requirements to prevent the project exacerbating that existing condition. Those requirements would include:

- the proposed project will not increase the project site's peak stormwater discharge to the Ocean Avenue sewer system during the 5-year, 3-hour; and 100-year, 3-hour storm conditions. The peak stormwater flows are what the SFPUC and San Francisco Public Works (public works)<sup>72</sup> use to size the stormwater and wastewater conveyance system (the sewer pipe and street surface below top of curb), such as that along Ocean Avenue.
- the proposed project will reduce the existing peak stormwater flows further by an amount to offset the project's additional worst-case condition in which the project's peak sanitary sewage flow would occur simultaneously with peak stormwater flow. This would be achieved through infrastructure design that includes green infrastructure or a combination of green infrastructure and detention facilities.<sup>73</sup>

The master infrastructure plan would be part of the development agreement that must be approved by the Board of Supervisors for the project to proceed, and the design requirements would be a term within the agreement. Thus, while combined sewage overflows would continue to contribute to occasional downstream flooding, implementation of project would not exacerbate that existing condition due the project's peak discharge limitation requirements in its master infrastructure plan.

Additionally, and in compliance with the city's Stormwater Management Ordinance, the project would be required to reduce stormwater rate and volume by 25 percent for the smaller 2-year, 24-hour storm, which would result in a decrease in total flow from the project site to the combined sewer system during this storm condition.

The analysis in the draft SEIR Appendix B, Impact UT-3, as supplemented by the above, determines that the proposed project impacts related to stormwater and wastewater would be less than significant through compliance with the terms of the master infrastructure plan in the development agreement, Non-Potable Water Ordinance, the San Francisco Stormwater Ordinance, and SFPUC and public works infrastructure review.

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### ***Comment UT-3: Other Utilities and Service Systems***

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

I-MUELLER1-2

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<sup>72</sup> San Francisco Public Works has jurisdiction over flows in street surfaces below the top of the curb.

<sup>73</sup> Brian Scott, BKF Engineers, e-mail to ESA, April 24, 2020.

“The recent MUB building at City College and soon-to-be-built Performing Arts Education Center on the college portion of the reservoir use geothermal energy sources. Has there been research on the compatibility of the college’s system with other projects?”

(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-2])

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### **Response UT-3: Other Utilities and Service Systems**

The commenter asks whether research has been done on the compatibility of the college’s proposed geothermal energy system with other projects.

The geothermal energy sources are not proposed as part of the Balboa Reservoir project. As described on draft SEIR p. 2-37, a portion of the Multi-Use Building hydronic wells were installed by City College beneath the location of the proposed Lee Avenue extension and right-of-way along the east side of the project site. The utility pipelines associated with the hydronic wells that extend beneath the project site would be removed during construction and the remainder of the system would be maintained. The hydronic wells under the Lee Avenue easement and project site would be removed or capped, in accordance with a Memorandum of Understanding with City College.

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## **Public Services**

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B, topic E.14, Public Services. These include topics related to:

- Comment PS-1: Emergency Services
- Comment PS-2: Public Services and Secondary Impacts

### ***Comment PS-1: Emergency Services***

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

O-ARHS-3  
I-MARTINPINTO-1  
I-MARTINPINTO-4

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“The other thing is we’re worried that fire trucks aren’t going to be able to get to our school in case of a fire. There’s not been enough detail or clarity about transportation. They’ve delayed that meeting. That was supposed to take place this week. That has not occurred. It’s been delayed until September 30th. I need more clarity on the impact of transportation on our school.”

(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-ARHS-3])

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“This Statement [that the proposed project “would not be expected to increase demand for public services (in order to maintain acceptable service ratios, response times, or other performance objectives for public services) to the extent that it would require new or physically altered governmental facilities, the construction of which could result in significant environmental impacts”] is an erroneous assumption. Response times for emergency vehicles located at Fire Station 15 (address 1000 Ocean Avenue) will be adversely affected, as well as response times from the next nearest three fire stations (Fire Station 33 at 8 Capitol Avenue, Fire Station 39 at 1091 Portola Drive, and Fire Station 19 at 290 Buckingham Way). It is generally assumed that with new residences comes new traffic, which will undoubtedly slow response times. Although response priority 3 emergency calls (also known as code 3 calls) permit the use of emergency lights and sirens to safely bypass traffic signals and other traffic control devices, response priority 2 calls (code 2 calls) do not. Because code 2 calls require that emergency vehicles negotiate traffic at regular speeds, code 2 calls have the potential to become severely extended. Furthermore, upon arrival to the scene of a code 2 call, often times the situation is found to be more severe than previously thought, and calls are often upgraded to code 3.

With the addition of 500 – 1550 new units, an additional 1000 – 3000 or more residents will arrive. This will undoubtedly increase demand on the emergency response system, depending on the demographics of the new residents (statistically, senior citizens and low-income people are more frequent users of 911). Increased demand of the emergency response system combined with increased response times puts a strain on the ability of the SFFD to meet their 4 minute response time criteria (4 minutes from dispatch of call to patient contact).”

*(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-1])*

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“what does the project propose to do to improve emergency vehicle response times?”

*(Stephen Martinpinto, Letter, September 23, 2019 [I-MARTINPINTO-4])*

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### **Response PS-1: Emergency Services**

Commenters request information about emergency vehicle access and express concern regarding emergency access to areas surrounding the project site and project impacts on emergency response times.

Draft SEIR Appendix B, Section E.14, Public Services, discusses the project’s impacts related to the provision of public services associated with the project. As stated in Impact PS-1, the city’s fire protection and medical emergency resources are regularly reassessed based on need in order to maintain acceptable service performance standards. The fire department and building department would review building plans to ensure that proposed buildings comply with the latest California Building Code requirements for fire and life safety measures as specified in the San Francisco Fire Code, including measures related to emergency access and egress. Such review also includes

evaluating the project site's circulation and ensure that emergency access and egress to adjacent sites are not affected. Adherence to San Francisco Fire Code requirements as part of the project design would minimize demand for future fire protection services.

As noted under Impact PS-1, the project-related increase in residents would not be considered substantial or unplanned growth and would not result in a substantial increased demand for police services, fire protection, and emergency medical services. Police, fire protection, and emergency medical services are regularly assessed as part of the City's dynamic demand-based deployment of available resources and the need to maintain acceptable service ratios and response times. While demand might increase as a result of the implementation of the proposed project, the increased demand would not be substantial, nor would it require expansion of existing police or fire stations or construction of new facilities. Therefore, no significant environmental impacts from construction or operation of new or expanded public service facilities would occur as a result of the proposed project. Thus, the incremental increase in the demand for police, fire protection, and emergency medical services would be a less-than-significant impact.

Access to Archbishop Riordan High School north of the site would be maintained. There would be no change to access to the front entrance of Riordan High on Frida Kahlo Way, nor would there be any change in vehicular access into the Riordan campus from Judson Avenue. Egress from Archbishop Riordan High School through the existing exit-only driveway that leads into the project site would also continue with project implementation. As described on draft SEIR p. 2-26, "the functionality of the existing 'exit only' driveway for Archbishop Riordan High School west of the Lee Avenue and north access road intersection would be maintained. The street connecting the 'exit only' driveway to Lee Avenue would be 20 feet wide and one-way eastbound." The emergency access impacts analysis is presented in draft SEIR Section 3.B, Transportation and Circulation, under Impact TR-3 (draft SEIR pp. 3.B-71 to 3.B-73). That analysis found that emergency access to the project site would be similar to existing conditions and that project implementation would not adversely affect fire apparatus responding from nearby San Francisco Fire Department station 15, despite the increase in traffic generated by the project. As stated on draft SEIR p. 3.B-73, the fire department conducted a preliminary review of the development plans and streetscape changes as currently proposed. Prior to finalizing the design and dimensions of the internal street network, the fire department and police department would review and approve the internal roadway configurations and dimensions to ensure emergency access to the site is acceptable.

### ***Comment PS-2: Public Services and Secondary Impacts***

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

I-BARISH1-5	I-FREY1-1	I-MAGNUSON-1
I-BARISH2-7	I-FREY2-1	I-MAGNUSON-2
I-BARISH3-12	I-GOMEZ-2	I-MEDAL
I-BARISH3-13	I-HALFORD1-1	I-MEDAL-1
I-BARISH3-14	I-HALFORD1-2	I-MUELLER1-5
I-BARISH3-16	I-HALFORD2-2	I-NGUYEN-1



I-BARISH3-18	I-HALFORD2-3	I-RHINE-2
I-BARISH3-30	I-E. HANSON-3	I-SAPPHIRE-1
I-BARISH3-31	I-E. HANSON-6	I-SIMON-4
I-BARISH3-32	I-E. HANSON-7	I-SIMON-7
I-BARISH3-39	I-HOUWER-3	I-SIMON-8
I-BELBIN-2	I-JA2-1	I-SIMON-9
I-BERNSTEIN1-3	I-JA2-2	I-SIMON-10
I-BERNSTEIN4-4	I-JA3-1	I-TARQUINO-4
I-BERNSTEIN4-5	I-JA3-2	I-TIMA-1
I-BERNSTEIN5-1	I-JA3-3	I-VESSELENYI-2
I-BERNSTEIN5-3	I-JA4-2	I-VICKY-1
I-BERNSTEIN5-7	I-KAUFMYN2-1	I-WEYER-3
I-BRAD-1	I-KAUFMYN2-2	I-WILENSKY-4
I-COLLINS3-4	I-KAUFMYN2-4	I-WORLEY-6
I-EVBUOMA-1	I-KAUFMYN2-5	I-WORLEY-7
I-EVBUOMA-2	I-KOPP-2	I-ZELTZER-4
I-FISHER-2	I-KOWALSKI-2	
I-FISHER-4	I-LEGION-3	
I-FRAKNOI-1		
I-FRAKNOI-2		

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“Finally, another example, the initial study, Appendix B, concludes the project would not result in cumulative impacts on public services, yet it did not analyze the impacts of the project on City College. Again, the draft SEIR review of this impact is inadequate.”

*(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-5])*

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“3) Finally, the Initial Study concludes the project would not result in cumulative impacts on public services. Yet it did not analyze the impacts of the project on City College. Again, the DSEIR review of this impact is inadequate.”

*(Jean Barish, Letter, September 12, 2019 [I-BARISH2-7])*

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“Public Services Impacts – Failure to Consider Impact on City College of San Francisco (“City College”)

*Impact C-PS-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on public services. (Less than Significant)*

By way of the Initial Study, the DSEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address the impact on student attendance and enrollment and on part-time Instructors who have to travel between multiple community college sites.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-12])*

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"The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the less-than-significant conclusion of the Project's impact on City College. The Initial Study states: The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.

... Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.

This is incorrect. Removing parking would clearly increase demand for public services in the form of, among others, demand for increased public transit, demand for more TNC's, and demand for alternative parking in other areas of the City College campus. For the reasons set forth in the review below of the Kittelson TDM, DSEIR Appendix C, there are no effective mitigations proposed for the loss of parking due to this Project."

*(Jean Barish, Email, September 12, 2019 [I-BARISH3-13])*

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"City College is the central educational, economic, and cultural focus of the neighborhood. Its interests cannot be allowed to be made secondary to the Project.

City College's educational mission makes it a target destination for students, staff, faculty. This simple fact needs to be recognized as being desirable, even if CCSF students need to drive to school and need parking.

The Project must take responsibility for mitigation of its own significant cumulative impacts on City College, traffic and parking. The burden of mitigation should not be shifted onto City College and neighborhoods."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-14])*

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"Removal of student parking will have significant impact on student enrollment and attendance."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-16])*

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"The substantial impact on City College's educational mission must be comprehensively and objectively examined in the DSEIR. The omission of this examination renders the DSEIR and Initial Study inadequate."

*(Jean B. Barish, Letter, September 23, 2019 [I-BARISH3-18])*

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*"The DSEIR is inadequate because it fails to consider the impacts on the public service of City College of San Francisco.*

The Reservoir Project will have an adverse impact on higher public educational services offered by City College. According to a City College Ocean Campus Survey of City College students and workers conducted in May 2016, 45.7% commuted by car. Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules."

Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students' access to higher education services offered by City College.

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered."

*(Jean B. Barish, Esq. MS, Letter, September 23, 2019 [I-BARISH3-30])*

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"The DSEIR says: "... it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..." and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the DSEIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." It avoids assessing the possibility that students might not be able to continue attending City College.

The DSEIR notes that the City College TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of City College. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education."

*(Jean Barish, Email, September 12, 2019 [I- BARISH3-31])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact on City College's ability to provide public higher educational services. It is erroneous to extend 21099's parking exemption onto the elimination of the public benefit of providing access to higher education.

The Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students' access to higher education services offered by City College."

*(Jean Barish, Email, September 12, 2019 [I- BARISH3-32])*

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*"The DSEIR must consider the impact of costs incurred to CCSF*

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 secondary impact must be addressed.

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking."

*(Jean B. Barish, Esq. MS, Letter, September 23, 2019 [I-BARISH3-39])*

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"City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

Subject: Input for planning – CCSF must be considered

Comments:

CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.

Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!"

*(Charles Belbin, Email, September 22, 2019 [I-BELBIN-2])*

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"So, the college really has not -- the impacts on the college, the secondary impacts from parking, not the parking itself because that's an issue that's being considered in other ways, but the impacts on the college, and the access to education, which should have some priority. Thank you."

*(Harry Bernstein, CPC Hearing, September 12, 2019 [I-BERNSTEIN1-3])*

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"I feel that I cannot do better than quote another prior submission regarding the inadequacy of addressing the impact on public services in the vicinity of the Balboa Reservoir site—and public services significantly includes area schools.

"On page 7 of the ESA Scope of Work, under "Task 4. Administrative Draft Initial Study-1", the only mention of impact on schools is: "The public services section will include a discussion of public school capacity, the findings of the water supply assessment, and a discussion of the potential need for access to the SFPUC water/wastewater easement along the south side of the project site. EP will provide ESA with language regarding public schools..." This merging of two environmental effects categories of "Utilities and Service Systems" with "Public Services" is grossly deficient. The evaluation of adverse impacts on schools should not be legitimately bypassed:

The question, as per item 12a under Public Services is:

Would the project result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?

The answer is objectively yes for schools and fire protection from this list."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-4])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-5])*

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"1) there's little acknowledgement of the effect of the development on City College as well as other nearby schools in terms of public services"

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-1])*

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"3) The loss of parking in the Lower Reservoir lot is likely to have a significant impact on access to education, especially for those individuals who are tightly scheduled because they are working, going to school and perhaps having additional family responsibilities besides. That is, the loss of approximately 1000 spaces from the Lower Reservoir site will make it harder for many such people to get to the school in a timely manner. Even now many faculty members mention the difficulty

that their students often have early in the semester getting to class on time because of traffic backing up and fewer spaces available, and those quite often located in the most distant lots.”

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-3])*

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“Another part of the story not yet mentioned is the long promised Performing Arts Education Center (PAEC) at City College, which has been something of a political football. It was a strong component of the last two successful bond measures at the College—in 2001 and 2005—and is essential for the Music and Theatre Arts programs but also for the College as a whole. This project was shovel-ready in October, 2012, but final discussion about it was postponed and in less than a year, during a State takeover initiated in July, 2013, was abruptly canceled by the Special Trustee with Extraordinary Power. Some have doubted the legality of this takeover but the College community is still living with the consequences therefrom. That is why the future of the PAEC is still a current issue. Until about 2014, there was no doubt that the PAEC would eventually be built and that the majority of the parking for it would be in the Lower Reservoir lot. Trustees, when asked about their backup plan (in the event that the Lower Reservoir lot was sold or became otherwise unavailable) and seemed to say that they didn’t know they needed such a plan. The Facilities Master Plan, which has had some interference from City agencies, has been inconsistent in pushing for the timely completion of the PAEC. After returning to power, the Board of Trustees once again advocated strongly for the PAEC’s completion starting in 2016. City/City College meetings about land use, sometimes referred to as the City/City College Consortium have kept track of any progress on plans for the PAEC, and also on the Education Master Plan and Facilities Master Plan. (The former Mayor of San Francisco was in consultation with the State Chancellor of the College system at the time that the College was taken over by the State and did not oppose the maneuvers as he should have been willing to do.)

The PAEC is needed, partly because at present City College is an incomplete campus, lacking an auditorium as it does. This is an accreditation issue, but it has been so for more than 50 years. Plans for the College to complete the PAEC appear to be unclear, but the construction should begin before any housing development is approved. With or without the PAEC, it remains clear that a development of 1100 units or more is a threat to the survival of the College as presently constituted. That is one of the reasons that some have urged either to reduce the number of units of a projected Balboa Reservoir development—instead having 800 units or less, with greater emphasis on gardens and open space.”

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

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“Hi. My name’s Brad. I’ve lived here. I grew up here. I was born here. But you have to really think about this location. It’s City College. It’s the main campus. So, you really have to think about what this use is for and the impact.

I’m all for, you know, affordable housing. I believe in, you know, biking. But you really have to think about all the people that can’t bike here to that location. You know, it’s very valuable to be

able to have a parking lot and so that it opens it to everybody that wants to be able to park there. And it's frustrating and I'm sure you guys are frustrated, too, that it's dragged on so long. But there's a reason why it's dragged on so long because people really, you know, that believe in this. I'm glad that we're really taking time to make sure that this is. And also, so I'm also disabled, and so, you have to think about the mobility of the, you know, people that need to be able to get to campus and to get to class on time.

Obviously, you know, parking's very limited. So, thanks for your time."

*(Brad, CPC Hearing, September 12, 2019 [I-BRAD-1])*

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"7. Low income CCSF students include many parents of two kids, one in day care, another miles away in school, two jobs, an academic course of study or a vocational one at the college. BART doesn't serve all of them, most- even the commuters- aren't on a BART line or within walking distance. BART fares are quite high for adults.

8. Harming these students by impacting/ threatening/ replacing that admittedly ugly and retro parking lot is a huge mistake. I've seen countless grads go from welfare to being happy independent taxpayers and they are tremendously proud and very very grateful to CCSF."

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-4])*

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"If this land is to be developed, plans should at least include parking for CCSF students."

*(Marria Evbuoma, Email, September 19, 2019 [I-EVBUOMA-1])*

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"Also, the land was supposed to have been the site for the Performing Arts Education Center. My son just started Kindergarten at Creative Arts Charter School in the Western Addition."

*(Marria Evbuoma, Email, September 19, 2019 [I-EVBUOMA-2])*

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"A lot of money will be made by for-profit corporation and banks, but I am deeply concerned about the negative effects on CCSF, a gem of a school that serves the community. CCSF students tend to be working class, low income, people of color and stressed between balancing school work, jobs and family life. Many need to drive to school. We must protect their parking."

*(Allan Fisher, Email, September 12, 2019 [I-FISHER-2])*

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"But this massive project will not be beneficial to the students who will not be able to afford these housing units. Instead they will suffer from reduced and more expensive parking and increased road congestion."

*(Allan Fisher, Email, September 12, 2019 [I-FISHER-4])*

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"To propose this project without a guarantee of more efficient mass-transit possibilities, and without compensation to CCSF is unconscionable."

*(Allan Fisher, Email, September 12, 2019 [I-FISHER-5])*

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"As a long-time San Francisco resident and voter, I am appalled that the environmental report on the plan to do away with the parking for students on the Reservoir at CCSF did NOT consider the impact it would have on the college, the students, and the neighborhood."

*(Andrew Fraknoi, Email, September 21, 2019 [I-FRAKNOI-1])*

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"City College, where I have taken classes, is a jewel in the crown of San Francisco, a vital community resource used by people of all economic and racial groups. It is wrong (and sneaky) to ignore its needs when planning to take away one of its key parking resources."

The planning for this project must take those issues into consideration. Not everyone has the luxury of being on a MUNI line to get to the college or the luxury of a schedule that allows waiting for a MUNI line."

*(Andrew Fraknoi, Email, September 21, 2019 [I-FRAKNOI-2])*

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"My name is Laura Frey, Westwood Park. Thanks for your patience with all these people. Three main concerns. My first concern, like a lot of people, is City College. I don't think the impact on City College has been really addressed in this. And I want to remind the Planning Department that the timing of the development, the process began at the same time that the accreditation crisis began. So, City College, like Chris alluded to, was out of the loop and never really caught up."

*(Laura Frey, CPC Hearing, September 12, 2019 [I-FREY1-1])*

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"First is City College. This is public land. I have heard from City College people, as well as long-time SF residents that the reservoir area had been set aside for City College use, if it were to be developed. This draft EIR does not sufficiently examine the long-term impact of this project on City College. Also the timing of the development should be remembered. The process for this proposed development began at the same time as City College's accreditation crisis began--this probably kept City College from having the time and resources to properly consider the impact of this development on its future at the very beginning... and it has probably been "behind" ever since."

*(Laura Frey, Email, September 22, 2019 [I-FREY2-1])*



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"2) Do you believe that the loss of parking, both during the construction of the new development as well as once the new, smaller parking lot is built will have an impact on enrollment and retention of students at city college?"

*(Wilson Oswaldo Gomez, Email, August 28, 2019 [I-GOMEZ-2])*

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

*(Daniel T. Halford, Email, September 9, 2019 [I-HALFORD1-1])*

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"In 2001 and again in 2005 San Francisco voters approved bond measures to build the Performing Arts Education Center (PAEC), which was already shovel ready in fall 2013, when the state-appointed special trustee Robert Agrella put it on hold. The college has already invested \$30 million toward its construction, including the basement (which the PAEC shares with the Multi-Use Building), which is already finished. The latest revision of the PAEC construction plan has extensively downsized the education portion of the PAEC because it would remove too many parking spots! Sufficient parking is so crucial that it is actually endangering the award-winning design of a long-needed building. City College is the only community college in California without a required auditorium. It also does not have the required facilities for students majoring in music. This is a disgrace in a city that is world-famous for performing arts."

*(Daniel T. Halford, Email, September 9, 2019 [I-HALFORD1-2])*

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"In 2001 and again in 2005 San Francisco voters approved bond measures to build the Performing Arts Education Center (PAEC), which was already shovel ready in fall 2013, when the state-appointed special trustee Robert Agrella put it on hold. The college has already invested \$30 million toward its construction, including the basement (which the PAEC shares with the Multi-Use Building), which is already finished. The latest revision of the PAEC construction plan has extensively downsized the education portion of the PAEC because it would remove too many parking spots! Sufficient parking is so crucial that it is actually endangering the award-winning design of a long-needed building. City College is the only community college in California without a required auditorium. It also does not have the required facilities for students majoring in music. This is a disgrace in a city that is world-famous for performing arts."

*(Daniel T. Halford, Email, September 16, 2019 [I-HALFORD2-2])*

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

*(Daniel Halford, Email, September 16, 2019 [I-HALFORD2-3])*

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"2. Accompanying this is a SEIR document that does not address the potential impacts of the development on education or access to education."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-3])*

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"4. Currently the site is the location of a motorcycle safety-training course, which is not mentioned in the SEIR. This is a direct educational use of the site, taking place right now, which would be displaced by the development."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-6])*

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"5. Parking while not a mitigatable factor under CEQUA, is connected to historical use and the viability of the educational institutions that surround the site. If the impact of the development on parking has the potential to disrupt businesses surrounding the site causing them to close or significantly alters their future potential, than that impact needs to be documented in this report. The current report minimizes the impact report on enrollment consequences inherent in the removal of access to education. Nobody wants to argue for parking but in reality due to the unique student population and constraints of the urban environment ease of parking is related to enrollment dynamics and this factor should be taken into account in the projects impact on the surrounding institutions. Comparisons to other equivalent educational institutions should be analyzed."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-7])*

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"Parking is already virtually impossible with the two existing parking lots for the college. If you were to take away the reservoir parking option this would further strain and impact students, the outlying community and other institutions in the area."

*(Michell Houwer, Email, September 12, 2019 [I-HOUWER-3])*

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"The Draft EIR concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary."

It says: "Furthermore, it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..."

Yet to justify the "less than significant" determination, the Draft EIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, Others to rearrange their schedule to travel at other times of day..."

The draft EIR avoids assessing the possibility that students might stop attending CCSF.

And, as predicted, TDM/Sustainability Program is trotted out as justification: "The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict."

The following had been submitted during the Scoping period before the City College Fehr& Peers TDM Plan came out. My October 2018 submission refers to the Nelson/Nygaard Balboa Area TDM, but the comment still pertains.

The DEIR's assumption of the success of TDM to obviate student parking is **purely speculative**.

## **DEFICIENT MITIGATIONS FOR ADVERSE IMPACTS ON PUBLIC SERVICES OF SCHOOLS, TRANSIT**

### **1. SCHOOLS, ESPECIALLY CITY COLLEGE**

There are many schools in the surrounding area: City College, Riordan, Sunnside, Aptos, Lick Wilmerding, Denman, Balboa.

City College is a commuter school. City College students, faculty, and staff commute to school. According to a CCSF Ocean Campus Survey conducted in May 2016, these City College stakeholders—in addition to those using public transit (42%) and walking/biking (9.4%), 45.7% commuted by car.

The mission of any school is to provide education. But if access to an institution is made difficult, the goal of providing education will be curtailed due to impaired physical access.

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

The interests of students, faculty, and staff will inevitably be harmed by the Reservoir Project. Unless willfully blind, the 1100-1550 unit Reservoir Project will obviously create significant adverse impact on the public service provided by the area's schools, especially City College.

*(Alvin Ja, Email, August 8, 2019 [I-JA2-1])*

### Transportation Demand Management As Mitigation

Consequently, the City Team ponied out a Balboa Area Area TDM Framework in response to community concern. The City Team misled the public by giving the impression that it would be an objective study of parking and circulation issues. But in reality the result was a foregone conclusion. The SFCTA contract specified the parameters of this study: "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." In other words, the burden of dealing with the adverse impacts on City College and the neighborhoods of 2,200 to 3,100 new adult Balboa Reservoir residents would be shifted onto the victims.

The Nelson-Nygaard TDM Framework will undoubtedly be brought forth as support for TDM as appropriate mitigation.

The Nelson-Nygaard TDM Framework fails to rise to the standard of providing substantial evidence that TDM would be able to resolve the effects of lost student parking on student enrollment.

The Nelson-Nygaard TDM Framework, lacking substantial evidence of its efficacy, falls back on speculation and wishful thinking. Its dubious evidence in support of the efficacy of a TDM solution for City College are a couple case studies: University of Louisville's Earn-a-Bike Program and Santa Monica College's Corsair Commute Program which provide financial incentives for using sustainable transportation.

(Alvin Ja, Email, August 8, 2019 [I-JA2-3])

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NO EVIDENCE IS PROVIDED THAT A SIMILAR FINANCIAL INCENTIVE PROGRAM WOULD SUCCEED IN MAINTAINING ENROLLMENT AT CITY COLLEGE.

Please refer to the attached critique of the Nelson-Nygaard TDM Framework entitled "Balboa Reservoir's TDM Non Sequitur" (attached) and enter it into the Administrative Record, as well.

### Impact on Public Service of City College and Other Schools

From my 10/11/2018 submission "Comment on Balboa Reservoir NOP re: "Summary of Potential Environmental Issues":

*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 [physical--aj] impact that must be addressed in the Subsequent EIR."*

*(Alvin Ja, Email, August 8, 2019 [I-JA2-2])*

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#### **"Initial Study**

*In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR. Therefore, the topics addressed in the initial study are listed below and are not analyzed in this SEIR chapter.*

Under Public Services, the PEIR did not analyze the impacts of a Reservoir Project on City College."

*(Alvin Ja, Email, August 13, 2019 [I-JA3-1])*

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"By way of the Initial Study, the SEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address impact on student attendance and enrollment and on gig-working part-time Instructors who have to travel between multiple community college sites."

*(Alvin Ja, Email, August 13, 2019 [I-JA3-2])*

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"The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the "less-than-significant" conclusion of impact on City College. The Initial Study states:

*The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.*

- Removal of parking would not conflict with CCSF sustainability plan..... **but it would conflict with access to education.**

*Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.*

- This is an non sequitur. Just because CCSF TDM doesn't conflict with loss of existing parking, does not mean that TDM measures will be able to solve the problem of student access to education. The success of TDM is speculative. Finally, reference to the PEIR is

mystifying because CCSF was not assessed in the BPS Final EIR's Public Services section to begin with.

The SEIR/Initial Study implicitly considers TDM to be the overriding goal of City College instead of recognizing that the main purpose of CCSF is education, with TDM being a secondary consideration.

**The SEIR's speculative possibility of success of TDM to alleviate loss of student parking in the Initial Study is an inadequate justification to come to a conclusion of less-than-significant impact on CCSF.**

**Instead of being relegated to the Initial Study, impact on City College's educational mission and on access to education must be comprehensively and objectively examined. The SEIR and Initial Study are inadequate."**

*(Alvin Ja, Email, August 13, 2019 [I-JA3-3])*

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#### "Parking Conditions

*The proposed project meets all of the criteria, and thus the transportation impact analysis does not consider the adequacy of parking in determining the significance of project impacts under CEQA. Parking is not discussed further in this SEIR.*

My 10/11/2018 scoping comment stated:

*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 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.*

**The draft SEIR is inadequate and defective in failing to treat parking in the main body of the SEIR. Although the Initial Study does discuss the subject, the Initial Study's assessment is similarly inadequate and defective."**

*(Alvin Ja, Email, August 26, 2019 [I-JA4-2])*

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*“The DRAFT SEIR for the Balboa Reservoir Project is inadequate because it fails to consider the impacts of the project on the public service of CCSF*

The Reservoir Project will have an adverse impact on higher public educational services offered by City College of San Francisco, a unique and treasured institution by all of San Francisco.

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. Inside Higher Ed reported on a survey that detailed Community College students’ challenges. The researcher said, ‘The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules.’”

(Wynd Kaufmyn, Email, September 22, 2019 [I-KAUFMYN2-1])

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“Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students’ access to higher education services offered by CCSF.

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered as it will likely affect these workers’ access to employment.”

(Wynd Kaufmyn, Email, September 22, 2019 [I-KAUFMYN2-2])

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*“The DSEIR irresponsibly avoids assessing the possibility that students/contingent faculty will likely not be able to continue attending/working at CCSF.*

*Why is there no recommendation in the DSEIR to enhance public transit infrastructure?*

The DRAFT SEIR notes that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of CCSF. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education.”

(Wynd Kaufmyn, Email, September 22, 2019 [I-KAUFMAN2-4])

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“Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact on CCSF’s ability to provide public higher educational services. It is erroneous to extend 21099’s parking exemption onto the elimination of the public benefit of providing access to higher education.

The Reservoir Project’s elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students’ access to higher education services offered by CCSF.”

*(Wynd Kaufmyn, Email, September 22, 2019 [I-KAUFMAN2-5])*

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“As a San Francisco resident since December 20, 1955, a 15-year member of the Board of Supervisors, and a 12-year State Senator representing the area in which the City College of San Francisco campus is located, a commencement speaker at City College, a lecturer in various City College classes since 1985, and public user of City College facilities, including its wellness center, the proposed EIR minimizes the effect of a horrendous private development of the Balboa Reservoir acreage. I am informed of a proposed construction of 1,100 residential units and a different plan for 1,550 residential units by the City and County of San Francisco, with heights from 25 feet to 88 feet. The affect upon City College will be enormous in terms of parking loss, and the EIR is limited to just the reservoir acreage.”

*(Quentin Kopp, Email, September 23, 2019 [I-KOPP-2])*

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“I do not believe that the EIR takes into account the death that will happen to City College. City College needs different types of things. Some of them may be buildings. Some of them may be parking. Some of them may be an on ramp to the freeway. It needs a lot of different things. To not leads to the college animus.”

*(Ken Kowalski, Member, Westwood Park Homeowners Association, CPC Hearing, September 12, 2019 [I-KOWALSKI-2])*

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“The Draft SEIR fails to address the fact that the Reservoir project will have a negative impact on public services, specifically City College of SF, which needs to re-grow enrollment. The proposed AvalonBay project will do this by reducing student access to education by eliminating over 1000 parking places on the lower reservoir, while hundreds of other parking places on the upper reservoir will be lost to new buildings. The DSEIR provides NO concrete plans for improving public transportation. The 43 and 29 buses and BART all have serious capacity issues already, but no concrete proposals are made to increase capacity. In this context, reducing transportation demand by 15% will only limit student and faculty/staff access and shrink City College.”

*(Vicki Legion, Email, September 22, 2019 [I-LEGION-3])*

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“What I had wanted to say was that I’m deeply disappointed in the Draft EIR. I feel it is tragic that it fails to consider City College of San Francisco and its viability, health and importance to the community as a critical and important element in any plans for development of the Balboa Reservoir.”

*(Sally Magnuson, Email, September 22, 2019 [I-MAGNUSON-1])*

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“CCSF has had use of this public PUC land for many decades and it is necessary for the students of CCSF in order for them to be able to access this life changing education that CCSF offers. Students attending CCSF need easy comfortable access to their classes and if the Balboa Reservoir is sold off for private development it will kill CCSF as we know it.

As a low income working mom I needed to use the Balboa Reservoir all the time to be able to get to my child development classes. I could not take my kids to school on the bus and then bus to CCSF and arrive on time and then get to work. It would have been an impossible. I would have had to drop out of school and not pursue the career in education that I dreamt of.

Please let CCSF do the job it does best which is offering rich and valuable educations to the people of San Francisco. Let's take care of this precious College and not threaten it all the time with greed based land grabs just because it's happening ALL over the city. This is a place for future generations also ... Future generations that if they can have access to the education will be the ones able to envision and help create the changes humanity needs. Our future educators, social workers, artists, musicians, political representatives, gardeners chefs, nurses, doctors, scientists, ambassadors and parents will be able to come from this place, if we keep it safe and accessible.

Please don't let these public lands be stolen from this community college that desperately t needs it. If CCSF were a Public Hospital would we consider selling off access to the hospital ... regarding it as frivolous and inconsequential and then provide no parking and thus no easy way to even BE at the hospital? Would we instead ask patients find their own way there on an erratic and congested public transit system?

CCSF offers a lifeline to at least 70,000 people per semester. It is a critical San Francisco resource and is part of the fabric of the city and it needs to be deeply considered FIRST in any type of “land grab” proposal that comes before you.”

*(Sally Magnuson, Email, September 23, 2019 [I-MAGNUSON-2])*

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“Your SDEIR does not consider what would be the impact of this massive project on the Native American students, the Pacific Islander students, the Latina and Latino students, the Black students, the Asian students, and the disabled students of City College of San Francisco. All of these students desperately need the education that City College offers.

The SDEIR needs to consider what would be the impact of this project on the students of color, the working class students, and the disabled students of City College who need a place to park while they snatch a class among their many work and family obligations. **What will happen to them if they lose access to a parking lot that they need?”**

*(Tomasita Medal, Email, September 23, 2019 [I-MEDAL-1])*

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“Not having parking would make attending classes for working class students who have family and work obligations impossible.”

*(Tomasita Medal, Email, September 23, 2019 [I-MEDAL-3])*

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“Also, since over 1,000 units of affordable student parking (available via PUC leases to CCSF since 1958) will be lost under the proposed development, doesn't it become inappropriate that in order for a commuter school like City College to survive, it must ask San Francisco taxpayers to fund parking structures on the college land. This land is already the site of one of the most densely populated campuses in the State when comparing the number of students per acre (and many of these CCSF acres are vertical)?

The State Chancellor's office for Community Colleges will not fund parking structures. The cost must be borne by local residents. So in order to maintain a Community College that adult learners in San Francisco wish and need, citizens will need to pay hundreds of millions of dollars via bond measures for parking structures!

In effect the PUC is being asked to transfer public land to private profit makers while at the same time charging the public millions of dollars to do so if they wish to maintain their college -----that truly does not make sense (!)”

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-5])*

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“Hi. Sorry, I'm a little nervous. This is my first time at any of these meetings and watching other people speak, it's incredibly inspiring -- sorry. My name is Jess Nguyen and I have been a student since January 2018 and a proud recipient of free City. I'm incredibly grateful for the opportunity to change my life and my career. And now, you help protect the access for future students.

I would like to echo the student disability advocate, Brad, for his statements on the already lack of available parking for disabled students. The parking lot is not just parking it's a representation of students, students carpool. They work two or three jobs just to go to school. Free city is their only option to go and actually get to the next level. They can't afford to even live -- I would -- I've heard the pictures shown in the developer's plan, of the land in question, showing the CCSF parking lot as being under-utilized. The photo was said to be taken on a Sunday. I don't know about you, but we don't offer many Sunday classes at our school or on Ocean campus. The library isn't even open. I don't think it's a fair representation of the current service this public land provides.

Nearby, Riordan uses the parking lot during the school year for band practice. The upper CCSF lot is filled by 10:00 a.m. and the Balboa Reserved Public Land has been essential for students.

Students have been posting videos on Twitter of the Balboa Reservoir being occupied by students, at [ccsfstudentsays/#ccsfbottomlaw](#) and [ccsf](#) said.

Students are going to experience the pain and it's going to affect the success of the community. Neighborhoods are flooded with cars. And if students are rushing to find parking in residential, surrounding areas, then you're going to increase the risk of pedestrian fatalities.

SF is known as a premier city. During the transit week, associate students surveyed students on their MUNI commute to school. One tweeted result showed that a large number of students take over an hour to get to school on MUNI. Students commute over an hour just to come here to learn. And it's not a surprise that veteran students come in droves to San Francisco. The education and higher rate of reimbursement encourages them to come all the way from Hollister, Joshua Tree, Stockton and Sacramento just to go. Where will students go?

Pushing the responsibilities -- pushing the burden on neighbors seems irresponsible.

Is this the absolute best use of the land? The school isn't perfect. It had seven to eight chancellors in the last decade. I question its management of money and how the CCSF Transportation Report represented students.

I've sat on the land. I've organized. I've advocated and I've talked to students for hours at a time. Seventy percent of the CCSF teaching staff are now part-timers. Their salaries won't even cover affordable housing that Avalon claims to build."

*(Jess Nguyen, CPC Hearing, September 12, 2019 [I-NGUYEN-1])*

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"This is a school that has been a part of the life of the City for generations. It's trained people for essential jobs and public services, provided enrichment to countless people through lifelong learning. And to not consider it, consider the impact seems to me a serious flaw that should be reexamined."

*(Marcie Rhine, CPC Hearing, September 12, 2019 [I-RHINE-2])*

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"Hi. My name's Sophie Sapphire. I was born and raised in San Francisco and I've been a City College of San Francisco student since 2012.

I recently moved near campus, so I can walk to school. But for seven years I had to drive, and that was living in the City. I lived in the outer Richmond. And to take a bus from there to City College takes an hour and a half. That's the time it takes for me to walk out of my house until I'm in my classroom. And that was what it was like for me.

So, like Vicky said, over 40 percent of students who go to City College commute.

And for those seven years that I drove to school, I always had to drive straight down to the lower lot, the language -- or, excuse me, the location that is in question, because the upper lot is always full. And as the years have progressed, this has only continued to get more and more severe. There is no access to parking on campus and, frankly, it's a necessity for many of these students who do work part and fulltime jobs, like myself, to be able to attend school."

*(Sophie Sapphire, CPC Hearing, September 12, 2019 [I-SAPPHIRE-1])*

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## “1. Transportation

The DRAFT SEIR says: "... it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..." and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the Draft SEIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." It avoids assessing the possibility that students might stop attending CCSF. The report must consider the true impact on student attendance and enrollment and also on gig-working part-time instructors who have to travel between multiple community college sites."

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-3])*

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"The DRAFT SEIR claims that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. But just because it doesn't conflict with the TDM/Sustainability Plan doesn't mean there is no impact on the public service of CCSF. The current use of the Reservoir serves a public benefit in providing physical access to education."

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-4])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.

**The DRAFT SEIR must consider the impact of reduced parking without first putting viable transportation options in place.** According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school."

Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules." (February 12, 2019)

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-7])*

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"Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

The Balboa Reservoir Project will bring in 2,200 adult residents and will supplant all 1,007 spaces from the Lower Lot decreasing capacity parking for City College students by 50%. This will further erode enrollment at the College. The Balboa Reservoir Project will succeed in permanently shrinking City College, a deeply adverse impact on the College."

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-8])*

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"FYI the proposed public parking by the Balboa Reservoir Project will be too expensive (estimated cost is \$12-\$20/day while students now pay \$3/day or \$40/semester) for City College students. Instead it will serve BART commuters with high paying jobs."

*(Leslie Simon, Email, September 17, 2019 [I-SIMON-9])*

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"The proposed Reservoir development has forced City College to include in its Facilities Master Plan two to three new parking structures to make up for the loss of existing parking in the PUC Reservoir. This secondary impact must be addressed.

To alleviate this impact consider these proposals:

--establish a shuttle to BART from Frida Kahlo Way and offer free public transportation for college students (won for K-12 students in 2013);

--increase service on the lines serving the Reservoir area: K, 29, 43, 54, 15, and 8 Bayshore, and 49.

Only then can students with multiple responsibilities consider public transit as a means of getting to and from jobs and children's schools. Only then can they give up parking in the Balboa Reservoir allowing 100% affordable housing to be built on public land, leaving green space and enough parking for those students for whom even improved public transit will not alleviate their need to drive to school."

"The Balboa Reservoir Project is forcing City College to include new parking garages in its Facilities Master Plan (FMP). But where will the funding for the ambitious FMP come from? One of the proposed sources is a nearly billion-dollar bond measure not even on the ballot yet, let alone approved by the voters. Why force this added burden on one of the most treasured of San Francisco's institutions when it is struggling to regain its health?

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking.

When the Performing Arts and Education Center (approved by voters in bond measures in 2001 and 2005) is built on the Upper Reservoir, aka Upper Lot, at least 200 spaces will be lost, boosting usage to 80% of available space. When the 25% drop in enrollment is restored, then approximately 400 more parking spaces will be needed **pushing the combined lot's usage back to about 100% capacity.**"

(Leslie Simon, Email, September 17, 2019 [I-SIMON-10])

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“\* The DRAFT SEIR must consider the impacts on the public service of City College of San Francisco educational services. The elimination of over 1,000 student parking spaces by the Reservoir development will limit students’ access to CCSF-- a commuter school.”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-4])

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“Thank you for your invitation. My name is Etta Tima. I’m a resident for 48 years and at times old age helps to understand something. I live on Plymouth Avenue. I view the parking lot every morning. It is full. And it is necessary. And it should remain because during Ed Lee’s time, he said he wanted to put another 100,000 people into the County of San Francisco.

Now, I’m asking you, where should they find education? If you reduce the parking space, this at this moment presents 4 percent of the student body. That is not very much.”

(Etta Tima, CPC Hearing, September 12, 2019 [I-TIMA-1])

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“Plenty of students have no choice but to get to school by car and my peers who drive are already having a hard time finding parking on busy days.”

(Hold Sall Vesselenyi, Email, September 23, 2019 [I-VESSELENYI-2])

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“Hi. My name is Vicky. I am a student at City College. And I’m here because -- I’m here to represent a lot of those who couldn’t come with me. If you can imagine the 20,000 students who will be impacted by this, who are currently enrolled at City College. Twenty thousand students, yeah.

We already, as is, are a commuter school. We know that when we did a survey in 2016, it showed that over 45 percent of the students have to commute to the college. Right. And so, we already -- we’re serving a population where more than 80 percent are either employed or looking for paid jobs. So, they’re part-time students. Or, really, they’re actually maybe taking a full course load and just working part-time.

And we know of that, there’s 26 percent who work 26 plus hours. That’s a survey we did in 2019.

So, if we’re thinking about the population that we serve at City College, how they live in the intersections of being marginalized, having disabilities, being of color, being trans, they’re probably the ones who are working these jobs.

So, if you’re taking away access, physical access to education, where they have to transport themselves to the college, we’re probably not going to have the same level of enrollment. These

students won't have access to educations. Is that something we're ready to take away from people? From a population that's already marginalized?"

*(Vicky, CPC Hearing, September 12, 2019 [I-VICKY-1])*

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"Additionally, I am concerned about how the project might impact students at City College. I frequently see cars parked in the reservoir because the main parking lot is full. City College serves a huge number of students who are juggling full or part-time jobs and do not have the ability to depend on MUNI (which is notoriously unreliable) to get to campus. If all of this parking is removed, I fear that we will be limiting the types of students that we are trying to serve in our community. There is nothing more American than people putting in extra effort and working hard to better their situation in life, and I feel that this seemingly "minor" loss of parking could result in a significant negative impact on these individuals."

*(Andy Weyer, Email, September 20, 2019 [I-WEYER-3])*

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"Please remember the current and future needs of City College students and faculty and the needs of the current residents of the neighborhood in regard to this plan for housing. Don't allow crisis thinking regarding the obvious need for affordable housing to push ahead with this ill-conceived plan that will have harmful consequences long into the future."

*(Debra Wilensky, Email, September 23, 2019 [I-WILENSKY-4])*

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***"The DRAFT SEIR is inadequate because it fails to consider the impact of monetary costs incurred to CCSF***

The proposed Reservoir development has already cost the college money due to the major redesign of the original PAEC (Performing Arts Education Center)."

*(Jennifer Worley, President, AFT 2121, Email, September 23, 2019 [I-WORLEY-6])*

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***"The DRAFT SEIR is inadequate because it fails to consider secondary environmental impacts***

The significant secondary environmental impacts of potential new CCSF parking construction replacing spaces eliminated by the project must be addressed."

*(Jennifer Worley, Email, September 23, 2019 [I-WORLEY-7])*

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"The students at San Francisco City College need that parking. There's no plans for parking for them. These are working class students who work at jobs. Where are they going to go? They're going to be driven out of City College because they won't have parking. They have to go to their

jobs. They won't be able to. They'll go to other colleges. That's part of the privatization and the destruction of City College, which is being pushed, really, by the developers and the mayor of San Francisco. And if the supervisors approve that, they're part of this actual development process."

(Steve Zeltzer, CPC Hearing, September 12, 2019 [I-ZELTZER-4])

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## **Response PS-2: Public Services and Secondary Impacts**

The comments assert that secondary impacts of the proposed project on City College and impacts on students, college enrollment, and the neighborhood were not addressed. Comments also disagree with the exemption from parking analysis allowed under CEQA section 21099, and state that the secondary impacts of a potential new City College parking construction replacing the spaces eliminated by the project must be addressed. Other comments disagree that because the project does not conflict with the City College TDM/Sustainability Plan does not mean the project would have no impact on the public service of City College.

Other commenters state that the project would result in shifting car usage to other schools where parking is easier, or causing students to drop out; and motorcycle safety training would be displaced by the project.

Comments regarding traffic congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Concerning the SEIR cover photo, refer to Response CEQA-2, Existing Setting and Baseline, on RTC p. 4.A-22. Regarding a BART shuttle, see Response GC-4, Scope of Project, on RTC p. 4.I-16.

The response to the public services and secondary impacts analysis comments is organized by the following topics:

- Loss of Parking
- CEQA Section 21099
- City College Awareness of the Proposed Project
- City College Not Analyzed in Balboa Park Area Plan EIR
- Scope of Utilities and Service Systems and Public Services Analysis
- Other Issues Raised

### *Loss of Parking*

The commenters do not present evidence supporting their claim that the secondary public services impact analysis is insufficient due to the project removal of parking that is currently used by City College.

Many comments state that the project would result in the loss of access to education due to the removal of parking. Another comment states that the loss of on-site parking "has the potential to disrupt businesses surrounding the site causing them to close or significantly alters their future



potential.” Social and economic impacts, such as potential impacts on City College enrollment and disruption to businesses, need not be evaluated under CEQA. CEQA Guidelines sections 15064(e) and 15131 state economic and social effects are not considered significant impact under CEQA and need not be analyzed unless they could result in adverse physical effects on the environment. The commenters have provided no such evidence that such adverse physical effects could occur. The decision-makers, including the planning commission and the board of supervisors, may choose to consider such additional issues as part of their deliberations on the merits of the proposed project.

CEQA requires public agencies to identify potential direct or indirect effects on the environment that could result from a project. Direct effects are effects that are caused by a project and occur in the same time and place. An indirect or secondary environmental effect is a change in the physical environment that is caused by the project but occurs later in time or further away from the project site and is still reasonably foreseeable. The focus of CEQA is to address whether and how a proposed project’s physical changes to the environment could result in adverse physical impacts on the environment, such as impacts of a project on air quality, water quality, or wildlife habitat. CEQA Guidelines section 15360 defines “environment” for the purposes of CEQA as “the *physical* conditions which exist within the area which will be affected by the proposed project...” (emphasis added).

The draft SEIR adequately addresses the direct and indirect impacts of the project. The CEQA Guidelines Appendix G question for public services, with respect to educational facilities, asks whether the project would “result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for ... schools....”

This question is perhaps best looked at as a two-part question:

1. Would there be any change, as a result of the project, in a public agency’s ability to “maintain acceptable service ratios, response times, or other performance objectives for ... schools...?”
2. If the answer to the above inquiry is or could be yes, the second part of the Appendix G question asks whether “the provision of new or physically altered governmental facilities [or the] need for new or physically altered governmental facilities” would “result in substantial adverse physical impacts” or if “the construction of [such facilities] could cause significant environmental impacts.”

The reason that this Appendix G question must be understood in this manner is that “Effects analyzed under CEQA must be related to a physical change” per CEQA Guidelines section 15358(b). This may include both direct and indirect effects; regardless, however, a CEQA impact must result from a physical change.

Accordingly, the reasoning with respect the potential effect of the removal of the surface parking lot on the project site as a parking use for City College is as follows:

- a) Would the loss of the existing use of the project site for City College parking conflict with one or more performance objectives established by City College?
- b) If a) is yes, would that require the need for new or physically altered City College facilities, such as TDM or replacement parking?
- c) If b) is yes, would the construction or operation of such new or physically altered City facilities, such as TDM or replacement parking, result in any adverse physical effects? Examples include an increase in VMT, increased emissions of criteria pollutants and/or toxic air contaminants, increased noise, or other impacts.

Only if questions a), b), and c) were all answered in the affirmative would a significant impact result under CEQA. As shown in draft SEIR and reiterated and expanded below, the answer to question a) is no. Even if the answer to question a) and b) is yes, the answer to question c) is no as explained below.

Question a): As discussed on draft SEIR Appendix B, p. B-90, the City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. City College does not have performance objectives or other standards related to the provision of parking, except insofar as it seeks to reduce automobile trips, which would serve to decrease parking use.

For informational purposes, neither California Community Colleges nor City College use parking availability as a variable for projecting future enrollment or as an enrollment strategy. The department reviewed several California Community Colleges and City College sources for enrollment projection methodologies, enrollment strategies, and past and future enrollments. Those sources are summarized in **Table RTC-11, Community Colleges Enrollment Projection Variables and Enrollment Strategies**, and **Table RTC-12, City College Student Enrollment**. Some sources show varying enrollment projections. This is to be expected, given the multiple variables that affect enrollment and as prior enrollment projections have not been met. Specific to City College, enrollment has sometimes changed substantially over the decades, including a decline in enrollment between 2008–09 and 2016–17. City College sources did not mention parking availability as a variable for this changing enrollment.

**TABLE RTC-11**  
**COMMUNITY COLLEGES ENROLLMENT PROJECTION VARIABLES AND ENROLLMENT STRATEGIES**

Source		Summary	Enrollment Projection Variables OR Enrollment Strategy
Month/ Year	Name		
June 2011	Research and Planning Group of California Community Colleges, "Weekly Student Contact Hours Forecast Report"	Report prepared for California Community College Chancellor's Office to explore options for forecasting enrollment at the districts that constitute the state community college system.	Enrollment Projection Variables: <ul style="list-style-type: none"> <li>Population by different age group</li> <li>Population by ethnicity</li> <li>Financial and economic (e.g., recession, state budget)</li> <li>Population participation rate (# per thousand residents who attended college district)</li> </ul>
Unknown 2018	City College of San Francisco, "Draft Enrollment Management and Growth Plan 2018–2022"	Draft plan that established a set of benchmarks and goals to guide the City College's efforts to restore enrollment for academic years 2018/19 through 2021/22.	Enrollment strategies: <ul style="list-style-type: none"> <li>Free City</li> <li>Online Learning</li> <li>Student-Centered Scheduling Practices</li> <li>High School Partnerships</li> <li>New Programs in Major Areas</li> <li>Centers and Major Locations</li> <li>Noncredit Strategies</li> <li>Student Development</li> <li>Marketing and Public Relations</li> </ul>
May 2018	Collaborative Brain Trust, "The Path to 32,000 FTES Report"	Report to the Chancellor and Board of Trustees of City College of San Francisco to validate the goal set by City College to attain a full-time equivalent student enrollment (FTES) of 32,000 by the end of the 2021–2022 academic year. They conclude "there is definitely an opportunity to grow its FTES. However, necessary changes will take time and there is no assurance that the goal can be reached in the next four years."	Enrollment strategies: <ul style="list-style-type: none"> <li>Student carrying load</li> <li>Labor Market Analysis</li> <li>Free City</li> <li>Enrollment Management/ Scheduling</li> <li>Distance education</li> </ul>
August 2019	California Community Colleges Chancellor's Office, "2020–21 Five-Year Capital Outlay Plan"	The report identifies the statewide capital needs, priorities, and costs of the California Community Colleges. The report uses an enrollment projection model to identify future growth.	Enrollment Projection Variables: <ul style="list-style-type: none"> <li>Student participation rates</li> <li>In district and out of district enrollment</li> <li>Weekly student contact hours to enrollment ratios</li> <li>Adult population projections</li> </ul>

**TABLE RTC-12**  
**CITY COLLEGE STUDENT ENROLLMENT**

Source		Past and Future Fulltime Equivalent Students Enrollment – Campus Wide (academic years) <sup>a</sup>					
Month/Year	Name	Range between 1992–1993 and 2016–2017 <sup>b</sup>	2017–2018	2018–2019	2019–2020	2020–2021	2024–2025
Unknown 2018	City College of San Francisco, “Draft Enrollment Management and Growth Plan 2018–2022”	19k to 43k (e)	23k (p)	26k (p)	28k (p)	31k (p)	—
March 2019	City College of San Francisco, “Facilities Master Plan Final Draft”		21k (p)	22k (p)	23k (p)	25k (p)	31k (p)
June 2019	City College of San Francisco, “Education Master Plan 2018–2025”		—				
Accessed April 2020	City College, “Instructional Productivity” (webpage)		23k (e)	23k (e)	—	—	—
August 2019	California Community Colleges Chancellor’s Office, “2020–21 Five-Year Capital Outlay Plan” <sup>c</sup>	—				24k (p)	28k (p)

**NOTES:**

Numbers rounded to nearest 1k.

e = actual prior or existing enrollment; p = projected enrollment; — = no reported value

<sup>a</sup> Data was not readily available to isolate only Ocean campus.<sup>b</sup> The sources had variation in actual prior enrollments. The department selected the lowest of the values for this range; if the values differed. City College enrollment reached its peak in 2008–09 and experienced declines to 2016–17.<sup>c</sup> The department calculated the values in this row by using the weekly student enrollment contact hours projections in Appendix E.1, divided by 15. This calculation is consistent with that presented in the City College Facilities Master Plan.

Indirect or secondary effects due to the loss of parking and City College’s performance objective to reduce automobile trips are analyzed on draft SEIR Appendix B, p. B-90. The analysis concludes that under the Developer’s Proposed Option, the up to 750 public parking spaces could accommodate a hypothetical typical four-hour parking shortfall of 37 to 239 parking spaces during the period that City College classes are in session. This shortfall is based on a parking occupancy data survey conducted in 2017 and 2018. This hypothetical shortfall would not be expected to occur during the other 20 hours of the day or during periods that City College classes are not in session.

Under the Additional Housing Option with no public parking garage, the draft SEIR Appendix B, p. B-90 concludes that (1) the additional time needed for drivers to find alternative spots or circling for parking would not result in significant secondary effects, and (2) it would be speculative to conclude the loss of parking would lead to substantial adverse impacts related to the construction of new or physical altered facilities at City College. Thus, the project would not result in significant impacts to the studied performance objective.

The draft SEIR states that the hypothetical shortfall in parking supply “would cause some drivers to shift to another mode of travel,” among other things such as rearranging travel or parking elsewhere. Studies show that the removal of parking would likely cause some drivers to shift to another mode of travel; thus, the information in the draft SEIR regarding this shift is based on

substantial evidence. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90, is included in the project's administrative record: City and County of San Francisco, *Transportation Demand Management Technical Justification*, June 2016, references research that has been used to confirm that the availability of parking increases private car ownership and vehicle travel and that parking supply can undermine incentives to use transit and travel by other modes (see p. 31). Additionally, this document summarizes research conducted in San Francisco that found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar context that provide more off-street vehicular parking. Also refer to Response TR-7, Parking, on RTC p. 4.C-61.

As further described under Impact C-PS-1 on draft SEIR Appendix B, p. B-91, the cumulative analysis considers the proposed project in combination with the City College facilities master plan projects identified in Table 3.A-2 on draft SEIR p. 3-A-13. These projects include a Performance Arts Education Center that would replace a portion of the City College parking on the east basin (or a Diego Rivera Theater), a STEAM building, and an east basin parking structure. The additional parking space shortfall from the facilities master plan would be accommodated should the east basin parking structure be developed. Additionally, according to Fehr & Peers City College of San Francisco Transportation Demand Management (TDM) and Parking Plan, the Performance Arts Education Center "performances would likely occur the evening hours, when parking is much more readily available."<sup>74</sup>

The draft SEIR appropriately evaluates impacts to public services, including secondary impacts related to the loss of City College parking as discussed in Impact PS-1 on draft SEIR Appendix B, pp. B-85 to B-91. Although unrelated to the public services analysis, refer to RTC Chapter 5, Draft SEIR Revisions, on RTC p. 5-10, which updates the status of the potential City College East Basin Parking Garage project.

Although the answer to question a) is no, we turn to questions b) and c) for informational purposes.

Questions b and c): A significant effect on the environment can only result from a physical change relative to existing conditions. Thus, the operational effects of replacing the existing City College parking on the project site with new parking at a nearby location such as the east basin, in and of itself, would result in little or no effect because it would effectively replace existing City College parking with replacement parking at a location close enough so as to not meaningfully change travel patterns.

The draft SEIR considers City College replacement parking on the east basin in its cumulative analysis (see discussion of City College Facilities Master Plan on draft SEIR pp. 3.A-10 to 3.A-14). As described in draft SEIR Section 3.A, Transportation and Circulation, cumulative transit delay and passenger/freight loading effects would be significant and unavoidable (Impacts C-TR-4 and C-TR-6b, respectively). Likewise, cumulative effects related to regional air quality would also be

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<sup>74</sup> Fehr & Peers, *City College of San Francisco Transportation Demand Management (TDM) and Parking Plan*, March 15, 2019; page 33. Available at: [http://ab900balboa.com/EIR\\_References/2019-0315\\_fehr%20peers\\_CCSF%20TDM%20Plan\\_2019-03-15\\_FP.pdf.pdf](http://ab900balboa.com/EIR_References/2019-0315_fehr%20peers_CCSF%20TDM%20Plan_2019-03-15_FP.pdf.pdf). Reviewed February 26, 2020.

significant and unavoidable with mitigation (Impact C-AQ-1 in draft SEIR Section 3.D, Air Quality). With respect to construction impacts, as identified in draft SEIR Sections 3.C, Noise, and 3.D, Air Quality, cumulative construction noise impacts, including development of City College parking on the east basin, would be significant and unavoidable with mitigation with respect to noise (Impact C-NO-1) and air quality (health risk; Impact C-AQ-2).

Further, if City College or the proposed project does not construct additional parking for City College users, this lack of additional parking would not result in direct or indirect physical environmental impacts not already described above or explained earlier as it relates to the Appendix G public services question. Based on the foregoing, the loss of the project site as parking for City College would have no significant effect under CEQA that was not already analyzed in the draft SEIR.

#### *CEQA Section 21099*

CEQA section 21099, Senate Bill (SB) 743 was signed by Governor Jerry Brown in 2013. SB 743 added section 21099 to CEQA regarding analysis of aesthetics and parking impacts for urban infill projects. As described in draft SEIR Section 3.A (p. 3.A-3), CEQA section 21099(d)(1) states that "... parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Thus, it is state legislation, and not a unilateral City decision, that has eliminated the consideration of parking as a CEQA impact for infill projects; the City has implemented CEQA section 21099. The same holds true for removal of automobile delay (aka vehicular level of service) analysis and inclusion of vehicle miles traveled analysis, a change also made pursuant to section 21099(b).

The proposed project meets the three criteria under CEQA section 21099 because the project site is (1) located within 0.5 mile of several Municipal Railway (Muni) transit lines and the Balboa Park Bay Area Rapid Transit (BART) station; (2) located on an infill site that is developed as surface parking, and adjacent to residential and mixed uses; and (3) would include residential, retail, and community center and childcare uses meeting the definition of a mixed-use residential project. This determination and supporting analysis is documented in "San Francisco Planning Department Eligibility Checklist CEQA Section 21099—Modernization of Transportation Analysis for the Balboa Reservoir Project" (November 15, 2018), which is available for review at 1650 Mission Street, Suite 400, San Francisco, California as part of Case No. 2017-007883ENV. Therefore, CEQA section 21099 applies to the proposed project.

#### *City College Awareness of the Proposed Project*

Concerning the allegation that City College staff and/or administrators may not have had "the time and resources to properly consider the impact of this development" due to the college's threatened loss of accreditation, this comment does not raise physical environmental issues. For informational purposes, planning department staff has engaged in communications with City College staff, as explained in the Response CEQA-3, Administrative Record, on RTC p. 4.A-31.

### *City College Not Analyzed in Balboa Park Area Plan EIR*

Concerning the comment that it is not appropriate to compare public services impacts to those effects analyzed in the Balboa Park Area Plan PEIR in that City College was not analyzed in the PEIR, CEQA Guidelines section 15162 states that an impact previously analyzed in an EIR need not be re-evaluated in an EIR unless one of several factors arises. One of these factors is that the project could have one or more significant effects not discussed in the previous EIR. Inasmuch as the PEIR identified no significant effects on public services and the draft SEIR Appendix B concludes that public services impacts would be less than significant, this topic—Public Services—would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR.

### *Scope of Utilities and Service Systems and Public Services Analyses*

One comment states that the merging of the Utilities and Public Service Systems and Public Services initial study checklist categories in the consultant's scope of work is deficient. The analysis contained in the draft SEIR is prepared in accordance with the CEQA Guidelines. The scope of work referred to is required as part of the project initiation phase, in accordance with the planning department's "Environmental Review Guidelines." However, the scope of work is not a replacement for the initial study checklist.

Draft SEIR Appendix B evaluates impacts on utilities and service systems in Section E.13 (starting on p. B-57) and impacts on public services in Section E.14 (starting on p. B-80), including effects on City College (Section E.14) and fire protection (Section E.13), which is also mentioned by the commenter. The scope of the public services analysis is limited by definition to services that are publicly funded pursuant to CEQA Guidelines Appendix G. Archbishop Riordan and Lick Wilmerding are private high schools. Similarly, the motorcycle classes are not considered public services.<sup>75</sup> Effects on these facilities and uses would be considered social and/or economic effects, which, as explained above in this response, are not considered significant effects on the environment.

### *Other Issues Raised*

One commenter states that the 43 and 29 Muni lines and BART all have existing "capacity issues" and that "reducing transportation demand by 15 percent will only limit student and faculty/access and shrink City College."

As explained on draft SEIR p. 3.B-77, the City does not consider transit ridership capacity, by itself, in CEQA analysis, consistent with state guidance to not treat the addition of new users as an adverse impact and to reflect enactment of new funding sources for and policies that encourage additional ridership. Nevertheless, the draft SEIR provides, in Appendix C2, Transit Assessment Memorandum, a discussion of project ridership and capacity. As shown there, while BART ridership does exceed capacity in the peak hours to and from downtown, neither the 29 Sunset nor the 43 Masonic Muni lines approach 85 percent capacity utilization.

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<sup>75</sup> The Motorcycle Safety Foundation is a not-for-profit organization sponsored by U.S. manufacturers and distributors of motorcycles. <https://www.msf-usa.org/AboutMSF.aspx>.

Regarding the comment concerning reducing transportation demand by 15 percent, it is assumed that this refers to the proposed project's Transportation Demand Management (TDM) program. Reducing project-generated vehicle trips would mostly affect only project residents. If the comment is intended to refer to City College's TDM program, implementation of that plan would be the responsibility of City College.

Concerning the "Nelson-Nygaard TDM Framework," this is a document prepared by Nelson\Nygaard Consulting, Inc., in coordination with the San Francisco Planning Department and the San Francisco Municipal Transportation Agency, and with funding from the San Francisco County Transportation Authority (SFCTA) and the Metropolitan Transportation Commission. It was published by SFCTA in December 2017. The TDM Framework "was designed to initiate collaboration between the City, City College of San Francisco (CCSF), and surrounding neighborhoods in the effort to encourage sustainable transportation choices in the area," but is not a plan but rather "a supportive resource" to provide "a common foundation for TDM within the Balboa Reservoir, City College, and the surrounding neighborhoods."<sup>76</sup> As noted, the proposed project would be required under the San Francisco Planning Code to develop and implement a project-specific TDM Plan applicable to the project itself. Refer to Response TR-2, Travel Demand, on RTC p. 4.C-7, for additional information concerning TDM.

Regarding the comment that the draft SEIR should compare City College to comparable educational institutions, there is no requirement in CEQA for such an analysis, particularly with respect to parking, which as explained on draft SEIR p. 3.A-3, is not a CEQA impact in the case of the proposed project.

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## Biological Resources

The comment and corresponding response in this section cover draft SEIR Appendix B topic E.15, Biological Resources:

- Comment BI-1: Biological Resources

### *Comment BI-1: Biological Resources*

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

I-HALL-1

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<sup>76</sup> San Francisco County Transportation Authority, Metropolitan Transportation Commission, San Francisco Municipal Transportation Agency, San Francisco Planning Department, Nelson\Nygaard Associates, Inc., *Balboa Area Transportation Demand Management (TDM) Framework*, Final Draft, December 2017. Available on the internet at: [http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/BalboaPark\\_TDM\\_Final\\_121117.pdf](http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/BalboaPark_TDM_Final_121117.pdf). Accessed February 27, 2020.



“I’m greatly disappointed to learn that the Balboa Reservoir Draft Supplemental Environmental Impact Report fails to take into consideration San Francisco’s vanishing biodiversity.

Although the reservoir was meant to be a hard surface where plants shouldn’t grow, over the years native coyote brush (*Baccharis pilularis*), yellow bush lupine (*Lupinus arboreus*) and various non-native shrubs have colonized the area. The result is a patchy habitat that has attracted a thriving flock of Coastal Nuttall’s white-crowned sparrows. I saw breeding evidence this Spring. About 60 of the birds were counted. A local resident, Greg Gaar, assures me that they’ve been breeding there since, at least, the 1970s. The attraction is the native coyote brush, an amazing plant that offers cover for our local birds and sustenance for over 54 insect species ([https://plants.usda.gov/plantguide/pdf/pg\\_bapi.pdf](https://plants.usda.gov/plantguide/pdf/pg_bapi.pdf)). Also present are house finch, red tail hawk, California scrub jay, Anna’s hummingbird, West Coast lady butterfly, bumblebee, grasshopper and various lichens.

A recent World Wildlife fund study points out that the world has lost 52% of its biodiversity since the 1970s (<https://www.cbsnews.com/news/world-wildlifefund-wwf-half-the-worlds-biodiversity-gone-over-last-40-years/>). This means that, in San Francisco, where habitat for biodiversity is at a premium, we need to be careful where we tread. City and state officials agree, with each entity rolling out biodiversity resolutions that have the goal of protecting flora and fauna.

(<https://sfenvironment.org/policy/resolution-adopting-citywide-biodiversitygoals>)

(<http://opr.ca.gov/docs/20180907-CaliforniaBiodiversityActionPlan.pdf>)

I urge you to hire an ecologist and make plans to mitigate by building new local native habitat in the immediate proximity of your development so biodiversity can adapt to the stark changes you’re proposing. Most of the creatures on this property are non-migratory and have nowhere else to go. Please include biodiversity mitigation in your report.”

*(Bob Hall, Email, August 21, 2019 [I-HALL-1])*

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## **Response BI-1: Biological Resources**

The commenter requests that biodiversity mitigation be included in the draft SEIR.

Draft SEIR Appendix B, Section E.15, Biological Resources, evaluates project impacts on biological resources, including the potential for adverse effects on special-status species, sensitive natural communities, protected wetlands, and wildlife movement and nursery sites. The impact of the loss of vegetation on the site was not identified as an impact on candidate, sensitive, or special-status species because on-site habitat is not suitable for those species and none were identified on the project site based on a review of the California Natural Diversity or California Native Plant Society databases (see draft SEIR Appendix B, p. B-94). Therefore, mitigation is not required.

Impact BI-4 (draft SEIR Appendix B, p. B-95) discusses potential impacts on the movement of resident or migratory wildlife species and acknowledges that trees and vegetation within the project site may provide suitable habitat for migratory and resident birds. The analysis concludes that should removal of the trees and vegetation and construction-related activities occur during

the nesting season, compliance with the requirements of the Migratory Bird Treaty Act and the California Fish and Game Code would ensure that impacts associated with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors would be less than significant; for this reason, no mitigation is proposed.

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## Geology and Soils

The comment and corresponding response in this section cover draft SEIR Appendix B topic E.16, Geology and Soils:

- Comment GE-1: Geology and Soils

### *Comment GE-1: Geology and Soils*

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

I-TIMA-3

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“If you are building 1,200 units on an earthquake fault, and I’m sure you know because I have expressed this before, the earthquake fault runs right through City College, and Riordan High School, and Wildwood.”

*(Etta Tima, CPC Hearing, September 12, 2019 [I-TIMA-3])*

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### **Response GE-1**

The comment states that an earthquake fault runs through City College, Riordan High School, and Wildwood Way in the Westwood Park neighborhood.

The comment does not specify which fault is in the project area. As stated under Impact GE-1 on initial study p. B-100 of the initial study (SEIR Appendix B), “[i]n a seismically active area, such as the San Francisco Bay Area, the remote possibility exists for future faulting in areas where no faults previously existed; however, the geotechnical investigation concluded that the risk of surface faulting and consequent secondary failure from previously unknown faults is very low.” In addition, no known active earthquake faults or fault zones cross the project area, and the area is not within an Alquist-Priolo Fault Zone or a Seismic Hazards Zone. There is a well-established regulatory framework and permitting process in place, enforced through the building department’s site permit process and the San Francisco Building Code. The project sponsor would work with qualified geotechnical engineers on a design-level geotechnical report as part of the building permit process. The report would reflect the latest iteration of the proposed project, and geotechnical recommendations where necessary to comply with the building code. The building department staff would review the construction plans for conformance with the recommendations in the geotechnical report as part of the building permit review process. The project sponsor and

the design team would be required to follow the geotechnical report recommendations as part of the building permit process.

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## 4.1 General Comments

The comments and corresponding responses in this section cover General Comments (GC) on topics throughout the draft SEIR. These include topics related to:

- Comment GC-1: General Environmental Comments
- Comment GC-2: Noticing
- Comment GC-3: Opinions Related to the Project
- Comment GC-4: Scope of Project
- Comment GC-5: Market-Rate Units

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### *Comment GC-1: General Environmental Comments*

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

A-CALTRANS-3	I-BARISH3-28	I-HEGGIE1-1
A-CALTRANS-4	I-BARISH3-42	I-HONG-5
O-ARHS-1	I-BERNSTEIN1-1	I-KAUFMYN-1
I-BARISH1-2	I-BIERINGER1-2	I-KOPP-3
I-BARISH1-6	I-BIERINGER4-2	I-KOWALSKI-3
I-BARISH2-2	I-BURGGRAF-1	I-MARTINEZ-1
I-BARISH2-8	I-BURGGRAF-2	I-MUELLER2-1
I-BARISH3-1	I-E.HANSON-1	I-MUHLHEIM-1
		I-PEDERSON2-2

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#### **“Coordination**

As the project progress, please keep Caltrans informed of any updates with the project, including but not limited to alternative selection and scope changes.”

*(Wahida Rashid, Acting District Branch Chief, Caltrans, Letter, September 10, 2019 [A-CALTRANS-3])*

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#### **“Lead Agency**

As the Lead Agency, the City of San Francisco is responsible for all project mitigation, including any needed improvements to the State Transportation Network. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.”

*(Wahida Rashid, Acting District Branch Chief, Caltrans, Letter, September 10, 2019 [A-CALTRANS-4])*

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“Good afternoon. That’s a tough one to follow, but I’ve got a few concerns. My name’s Dr. Andrew Currier. I’m representing Archbishop Riordan High School, as its President.

There’s a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It’s a specialized designed learning area for students with diagnosed learning needs that they can’t -- we can’t move them elsewhere in the building.

So, we’re worried that there’s not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don’t have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can’t go elsewhere to receive this help.”

*(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [O-ARHS-1])*

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“I’m here to state my opposition to the project in general and to highlight some of the many flaws in the draft EIR. I’d like to show you a rendering of what the project will look like if it has 1,550 units. As you can see, this is an oversized project. It would squeeze up to 1,550 units of housing, mostly market rate, onto a parking lot adjoining CCSF, and a quiet neighborhood of single-family homes.

While it may be a developer’s field of dreams, this project is an environmental nightmare to the surrounding neighborhoods and to City College. It will create traffic congestion, transit issues, environmental problems galore, convert public land into private property for profiteering developers, and it will not meet the growing need in San Francisco for affordable housing.”

*(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-2])*<sup>77</sup>

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“In these and in many other areas the draft SEIR offers no objective criteria to serve as a basis for determining that the impacts aren’t less than significant.

Accordingly, it is a flawed document that must be revised before it is submitted for final review. Thank you for your consideration.”

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<sup>77</sup> The figure referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

*(Jean Barish, CPC Hearing, September 12, 2019 [I-BARISH1-6])*

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"I am here ... to highlight some of the flaws in the Draft Subsequent EIR. (Att 1)

This oversized project could squeeze up to 1,550 units of housing, mostly market rate, onto a parking lot adjoining CCSF and a quiet neighborhood of single-family homes. (Att 1)

While it may be a developer's Field of Dreams, the project is a nightmare to the surrounding neighborhoods and to City College.

It will create congestion, transit problems, lack of access to CCSF, and many other environmental problems. It will also convert public land, currently owned by the SF PUC and used by CCSF for decades, into private property for profiteering developers. And it will not meet the growing need in San Francisco for affordable housing."

*(Jean Barish, Letter, September 12, 2019 [I-BARISH2-2])*

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"In these and many other areas, the DSEIR offers no objective criteria to serve as a basis for determining that the impacts are not significant. Accordingly, the it is a flawed document that must be revised before it is submitted for final review."

*(Jean Barish, Letter, September 12, 2019 [I-BARISH2-8])*

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"After reviewing the DSEIR it is clear there will be many significant environmental impacts to that cannot be mitigated if this project is approved. Additionally, the DSEIR is flawed because it fails to consider numerous environmental impacts that should have been considered.

Following are my questions and comments regarding this DSEIR.

### Definitions

"Substantial Evidence," as used in this letter, shall mean: "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (14 Cal Code Regs Sec. 15384(a)) "Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (14 Cal Code Regs Sec. 15384 (b) ) " Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence." (14 Cal Code Regs. Sec 15064(f)(5))

"Feasible Alternatives", as used in this letter, shall mean: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code section 21061.1; 14 CCR section 15364)"

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-1])*

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**“NOVEMBER 12, 2018 SCOPING LETTER**

Included in this letter as Attachment 1 is the November 12, 2018 Scoping Letter submitted for this Project. Many of these issues were not addressed in the DSEIR. These comments should all be addressed during the preparation of the FSEIR.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-28])*<sup>78</sup>

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“The Balboa Reservoir Project will significantly impact City College of San Francisco and the surrounding neighborhoods. Your preparation of the Final Environmental Impact Report should assure that any project on this land will both benefit the community as well as not harm the environment or community.”

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-42])*

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“My name is Harry Bernstein. I’m a faculty member at City College. So, I would like to provide some context to the impacts indicated in the Subsequent EIR for the Balboa Reservoir Project.

Noise, air quality and transportation from the project will cause significant and unavoidable adverse impact. You hear those words? Significant and unavoidable adverse impact. Impacts on the college students, faculty and staff, students at the adjacent Riordan High School, and students in the childcare program at the adjacent multi-use building.

So, these topics, noise, air quality, and transportation came up before the Planning Commission at their meeting in August. And this was the context I want to mention. The mayor has sought to streamline development, housing development in San Francisco. And so, she is trying to get a -- have several factors that are considered in CEQA to reduce the required mitigation. So, these, besides secondary ones like cultural and paleontological, they include noise, air quality, and transportation.

So, out of this 500-page report, the serious issues are the one that the City is trying to -- I don’t know if it’s put under the rug, but not have to consider. They’ve already done that with parking.

Okay, so that’s the way we’re going, just to save some months, save some dollars, but to give the public and the public health less opportunity, less consideration.”

*(Harry Bernstein, CPC Hearing, September 12, 2019 [I-BERNSTEIN1-1])*

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<sup>78</sup> 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.

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"And I went down to the Planning Commission and I picked up this book, or this tome, as I call it. And as I read through it, I started calling this the Balboa Housing Boondoggle Project.

And I cannot separate the actual project from this SEIR. It's like they borrowed some frumies -- some Sharpies from Donald Trump, drew the lines to make their own reality, and ignored the reality that the neighbors of this project and the students of City College are going to be facing."

*(Garry Bieringer, CPC Hearing, September 12, 2019 [I-BIERINGER1-2])*

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"When I finally picked up a copy of the SDEIR and read through it, I was appalled at how this document minimized all the problems this would cause the community and the 2 large educational institutions closest to this proposed housing: CCSF and Riordan High School. The routes laid out for the trucks (several estimated to be 20 trucks/hr), via the north access road (right off Frieda Kecko way (formerly Phelan Ave.) would cause years of disruption to of us that must drive, walk, or use MUNI down this street and will provide massive noise pollution along with air pollution. Using Lee Avenue would totally block traffic on Ocean Ave., and there is a very large children's climbing structure about 50 yards from the proposed Lee Ave. Route. There is no way we can have children climbing on that structure with all the trucks whizzing by so closely."

*(Garry Bieringer, Email, September 23, 2019 [I-BIERINGER4-2])*

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"You have received a written comment via Email from Michael Ahrens and the Board of the Westwood Park Association in parallel. I am a resident of Westwood Park as well (in the 1300 Plymouth block) and I wholeheartedly agree and concur with all the comments made by the WPA board, especially with the comments made by other residents (Exhibit 5 and 6 respectively attached to the WPA comments)."

*(Alex Burggraf, Email, September 23, 2019 [I-BURGGRAF-1])*

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"In general, I think that a lot of the infrastructural impact (parking, traffic, noise during construction) on the neighborhood of the project - especially Westwood Park - is either not adequately addressed or drastically underestimated in the DEIR."

*(Alex Burggraf, Email, September 23, 2019 [I-BURGGRAF-2])*

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"I also want to express the concern that the aesthetic effects of the proposed development, including height of buildings compared to surrounding areas, is gravely underestimated and downplayed, especially considering that Westwood Park has been declared a "Residential Character District" by the Board of Supervisors."



*(Alex Burggraf, Email, September 23, 2019 [I-BURGGRAF-4])*

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"The DSEIR is not only inadequate, it stands as evidence to a planning process that runs contrary to the principles of good planning, fair input and democracy.

From the onset the project has been biased and selective in the way facts have been presented to the public for input. The SEIR clearly downplays and minimizes the potential impacts of the project on City College of San Francisco, and the surrounding educational institutions"

*(Edward Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-1])*

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"My name's Jennifer Heggie. I'm from Sunnyside and representing the Balboa Reservoir Committee for the SNA.

First, I want to thank the Planning Department for this SEIR. It identifies many of our concerns that are issues that cannot be mitigated, including noise, transportation, and air quality."

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [I-HEGGIE1-1])*

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"4. During the construction period, this massive project will need a lot of daily communication from the sponsor to the community. All too often this process fails."

*(Dennis Hong, Email, September 11, 2019 [I-HONG-5])*

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"Hi. I'm Wynd Kaufmyn and I've been a teacher at City College for 36 years. You know, San Francisco has always prided itself on its commitment to social justice and equity. To that end, the City's undertaking an effort to train its decision makers to be more sensitive and aware of social justice.

In fact, I know that on September 26th you, the Planning Commission, are scheduled to participate in a racial and social equity training.

In light of this, and in light of the fact that the draft Environmental Impact Report states the need to develop the reservoir in a manner that will best benefit the neighborhood, the City, and the region as a whole. In light of these things, I ask you to consider the social justice aspects of the proposed Balboa Reservoir Project with respect to housing, education, and labor."

*(Wynd Kaufmyn, CPC Hearing, September 12, 2019 [I-KAUFMYN1-1])*

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"And, thirdly, the environmental impact to the neighborhood will be overwhelming. When they rebuilt Ocean Avenue, they used right behind our house, which abuts to the reservoir, as a

dumping ground for the concrete and asphalt. There were over 70 filed complaints, with payoffs for damages to homes, sewer lines, et cetera, et cetera, et cetera.”

*(Kevin Kowalski, CPC Hearing, September 12, 2019 [I-KOWALSKI-3])*

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“Has the Planning Department truly assessed the environmental impact, more cars and more pollution, on the neighbors around the Balboa Reservoir?”

*(Anita Martinez, Email, September 23, 2019 [I-MARTINEZ-1])*

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“The email below was sent during last year's CEQA process preceding the current Balboa Reservoir DSEIR. In it, I noted areas which should have been reviewed in this environmental impact report. Many were not; only a few were cherry-picked to be addressed. I do not believe that this is fully legal.”

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER2-1])*

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“<!--[if !supportLists]-->1. <!--[endif]--> This is not a complete report. It does not re-study many areas of the original Balboa Station Area Plan that included a much smaller housing project. Much larger project = larger impact.”

*(Fred Muhlheim, Email, September 23, 2019 [I-MUHLHEIM-1])*

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“it fails to adequately evaluate the environmental impacts of the 750-space public parking garage included in the developer’s proposed option”

*(Christopher Pederson, Email, September 23, 2019 [I-PEDERSON2-2])*

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## **Response GC-1: General Environmental Comments**

The comments include general statements about the City’s responsibility for project mitigation and monitoring. A number of comments express general dissatisfaction with respect to the adequacy of the draft SEIR analysis of noise, air quality, and traffic. In some cases, the comment serves as an introductory paragraph for a more specific and detailed list of issues that follows (which are bracketed as separate comments and responded to elsewhere in this document under each specific topic). Specific comments on which these conclusions may be based are responded to elsewhere in this RTC document, under the relevant environmental topics. The general environmental comments here, and where these issues are addressed in the draft SEIR and this RTC document, include the following:

### *Environmental Impact Report Topics*

- Congestion, transit, pedestrian, and other transportation impacts [draft SEIR Section 3.B; RTC Section 4.C]
- Noise impacts [draft SEIR Section 3.C; RTC Section 4.D]
- Air quality impacts [draft SEIR Section 3.D; RTC Section 4.E]

### *Initial Study Topics*

- Effects on City College of San Francisco [SEIR Appendix B Section E.14; RTC Section 4.H]

Also refer to Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. 4.A-3 for further discussion of the concept of tiering from the prior EIR.

One commenter states that project construction would require communication between the project development team and the community. The comment is acknowledged, and it is noted that Mitigation Measure M-NO-1, Construction Noise Control Measures on draft SEIR pp. 3.C-30 to 3.C-31, requires the preparation of a construction noise control plan that is to be reviewed and approved by the planning department. Such a plan, to be prepared by a qualified acoustical consultant, typically requires the posting of contact information at the project site to allow nearby residents and others to lodge complaints regarding noise generated during construction. The project sponsor would be required to file weekly noise monitoring log reports with the planning department that would include listing of noise complaints and how they were resolved.

A commenter makes specific reference to a “children’s climbing structure about 50 yards from the proposed Lee Ave. Route” and alleges that the project would result in a safety hazard to children using the climbing structure. This comment apparently concerns the play structure at the northern end of Unity Plaza. While the play structure is, indeed, about 50 yards east of the proposed Lee Avenue extension, the play structure is considerably closer than 50 yards (i.e., about 20 yards) to the existing Muni City College Loop. The play structure is also immediately adjacent to the paved area off of Lee Avenue that is currently used as an informal truck loading zone for the Whole Foods grocery and other retail stores. Neither of these proximate bus and truck uses has resulted in reported safety issues with respect to the play structure or Unity Plaza. Moreover, under conditions with the proposed project, with the Lee Avenue extension completed, the Unity Plaza play structure would be no closer to an active street than are many other play structures and children’s playgrounds in the City. For example, in the greater project vicinity, Minnie & Lovie Ward Recreation Center has a children’s playground with play structures that is 30 yards or less from Capitol Avenue. The commenter raises no specific reason why the Unity Plaza play structure should be subject to greater traffic-related effects than any other comparable recreational facilities. It is further noted that the primary haul route for construction truck traffic would be via Frida Kahlo Way and North Access Road. During construction, Lee Avenue extension may be used by non-haul trucks for material delivery. The truck routes would be subject to review and approval by San Francisco Public Works and SFMTA, and the project sponsor would be required to meet the City of San Francisco’s Regulations for Working in San Francisco Streets (blue book requirements) related to safety measures, sidewalk, and lane closures.

One commenter states that aesthetic effects of the project should be considered because the adjacent Westwood Park neighborhood is a “residential character district.” This designation, contained in San Francisco Planning Code section 244.1, requires that new construction and alterations within the Westwood Park Residential Character District “be consistent with the design policies and guidelines of the General Plan and with the previously adopted ‘Residential Design Guidelines’ as amended by portions of ‘The Westwood Park Association Residential Design Guidelines.’” These planning code provisions are not applicable to the proposed project.

More generally with respect to potential aesthetics impacts of the proposed project, as stated in the SEIR, the proposed project is located in an urban infill zone and transit priority area (see draft SEIR Appendix B, p. B-16; draft SEIR p. 3.A-3). As described therein, pursuant to CEQA section 21099, aesthetics impacts of a qualifying mixed-use or employment center project on an infill site located within a transit priority area are not, as a matter of law, considered significant impacts on the environment; and consequently potential aesthetics effects on existing character, scenic vistas, or views are not part of the CEQA analysis. However, aesthetics effects of the proposed project or project variant would still be considered by decision-makers as part of the design review approvals.

Some commenters raise a concern with respect to parking. As with aesthetics, parking effects are not, as a matter of law, considered significant impacts on the environment; and consequently are not part of the CEQA analysis.

CEQA Guidelines section 15151 contains the standards used to determine whether an EIR is adequate:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

The draft SEIR complies with the standards set in CEQA Guidelines section 15151. Further, inadequacy of an EIR can be shown only when there has been a prejudicial abuse of discretion by the lead agency, either because the agency has not proceeded in the manner required by law or because the conclusions in the EIR are not supported by substantial evidence (CEQA section 21168.5). None of the comments on the draft SEIR shows failure to follow the law or demonstrate that the draft SEIR’s conclusions are not based upon substantial evidence.

Finally, one commenter states that the draft SEIR does not re-evaluate some topics analyzed in the Balboa Station Area Plan PEIR. This is incorrect. Environmental topics from the Balboa Station Area Plan PEIR are included in the draft SEIR, either in chapter 3, Environmental Setting, Impacts, and Mitigation Measures, or in draft SEIR Appendix B.

### ***Comment GC-2: Noticing***

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

I-BIERINGER1-1

I-BIERINGER4-1

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“Good afternoon. Garry Bieringer. I live within three blocks of this proposed project area and have lived there for 40 years. I first found out about this project and this meeting today when I was taking my dog for a walk right where the project is to be built. And I saw on these lamp posts, this kind of public notice wrapped around. So, I tried to read it and looked a little bit goofy walking around and around, because it really wasn’t readable to the public. Finally, I was able to sense it’s from the Planning Commission. I got a name and an email. And I wrote Ms. Poling. I told her my problem with this and asked, well, can I get more information?

So, she directed me to the website. She was very helpful.”

*(Garry Bieringer, CPC Hearing, September 12, 2019 [I-BIERINGER1-1])*

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“I first found out about this project while walking my dog in the proposed housing area, and saw a planning notice wrapped around a light pole. I tried to read the notice but had to keep walking around and around the pole and kept losing my place. I finally got a name and phone number from the planning dept. and I called to complain about this placement. The notice was clearly intended to make it very challenging, if not impossible, for anyone to read and showed extreme insensitivity towards the community most impacted by this proposed housing development. This was a harbinger of things to come!”

*(Garry Bieringer, Email, September 23, 2019 [I-BIERINGER4-1])*

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### **Response GC-2: Noticing**

The commenter alleges inadequacy in the public notices posted concerning the availability of the draft SEIR. Public notice was given as required under both CEQA and the San Francisco Administrative Code. CEQA Guidelines section 15087(a) requires that public notice of the publication of a draft EIR be given to any person or organization who has requested such notice and shall also be given by at least one of the following: publication in a newspaper of general circulation; posting on and off the project site; or direct mailing to owners and occupants of contiguous properties. A notice must also be posted in the offices of the county clerk and notification must also be given to the Governor’s Office of Planning and Research CEQA clearinghouse. San Francisco Administrative Code section 31.14(a) requires that all of the above forms of notice be provided with respect to both availability of the draft EIR and of the impending public hearing at which comments on the draft EIR may be made before the planning commission.

In addition, notice of availability of the draft EIR and public hearing is posted at the planning department.

All of the above noticing was completed in accordance with the CEQA Guidelines and the San Francisco Administrative Code and following the planning department guidelines for posting of the project site and vicinity. These planning department guidelines require the posting of one or more larger poster-size (approximately 24 inches by 36 inches) notice and at least several smaller (11-by-17-inch) notices. In the case of the proposed project, because of the relatively large size of the project site, three (3) poster-size notices were installed—one near the eastern boundary of the site, within the upper City College parking lot (west of the Multi-Use Building); one at the end of San Ramon Way, adjacent to the western boundary of the project site; and one at the end of Lee Avenue, adjacent to the project site's southeast corner. In addition to the three large posters, 19 11-by-17-inch notices were posted. These small notices were placed—generally on light standards and utility poles—within both the west and east basin parking lots; on Frida Kahlo Way, Ocean Avenue, and Plymouth Avenue; adjacent to the Ingleside Branch Public Library outdoor courtyard; and in Unity Plaza. All of the posted notices were weather-protected. As required by planning department guidelines, the notices were inspected during the draft SEIR public comment period to ensure that they were still in place and remained legible. Replacement notices were installed on at least four locations during follow up inspections.

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### ***Comment GC-3: Opinions Related to the Project***

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

I-ADAMS-1	I-COLLINS3-2	I-HONG-6
I-ADAMS-3	I-COLLINS3-6	I-HONG-8
I-BARISH3-17	I-CUTTEN-1	I-KAUFMYN1-4
I-BURGGRAF-4	I-EVANS1-1	

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“MR. ADAMS: Hello. My name is Michael Adams. I come to you as a student of City College, a former City Planner, a former Administrator of a major university in this City, and a person who lives in a walkable neighborhood.

The access from my walkable neighborhood to City College is accomplished by rapid transit. Rapid transit in San Francisco is getting in a car, driving twice as far in half the time as you can get on MUNI or BART, and getting to your destination and doing your business, and then departing on your next rapid transit journey.

That parking lot is more than a piece of asphalt. It's kind of like folks would call the runways at San Francisco Airport a parking lot. Without any context in terms of the cultural and social and economic value of that property. It's not a parking lot. It's a transit stop for people's shopping and experiencing the educational opportunity that City College provides.”

*(Michael Adams, CPC Hearing, September 12, 2019 [I-ADAMS-1])*

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"This group, who are opposing this project, I'd like you to look at the diversity of the group and then compare that with the diversity of this panel, and then compare that with the diversity of the project sponsors, who can't find a person who looks like me to support the project.

There's something about San Francisco that gets preserved when diverse populations join together to try to make their point and presence known.

Justin Herman, who I studied under as a City Planner, destroyed the Western Addition. And that legacy has continued, unfortunately, in major decisions by this City, through this Planning Department, through this City Board of Supervisors. And it would be helpful, since you're going through a transition of administrators, to look carefully, and not repeating the ghost of Justin Herman.

Carlton Goodlett is a better ghost. And he was a friend and neighbor of ours in Omaha, Nebraska. Think about it."

*(Michael Adams, CPC Hearing, September 12, 2019 [I-ADAMS-3])*

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"The proposed 'solutions' to circulation, parking, and congestion problems be simply based on wishful thinking and 'creative solutions.' Conjecture and hope is not a solution for student access to education."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-17])*

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"2. No one is allowed to do whatever they want with their property. It's a society and we are strictly governed for the benefit of the commonweal. The benefit of neighbors, and visitors as well. We are a tourist city.

3. Tourist cities that depend heavily on revenue from visitors shouldn't be encouraging dense residential clusters or towers that detract enormously from the beauty of the city and create traffic nightmares. This is why Paris France keeps the beauty in the city- they rely on tourism-and keep dense housing developments just outside city limits. Not saying it's all for the best necessarily, but it's the reason why."

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-2])*

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"12. I'm a 3rd generation construction worker who's pro housing. But not all housing at any cost. Our tiny city isn't Los Angeles Dallas or Atlanta and can't spread at will. We can no more allow all comers physically, than the aforementioned city of Paris, and an infinite number of people would live here as they would there. These are fantasy or dream cities to so many. We're more like

Manhattan. EVERYONE in NYC knows why New York has suburbs and five boroughs, which are mostly for residential purposes. How sensible is that!

13. SF has lost working classes, families, elders, poor and people of color due to gentrification and to eminent domain. This last in the 1960's notoriously, in the now Western Addition, then the Fillmore, working class lively neighborhood heavily populated by proud African American property owners who lost their homes, their cities, their community. DON'T DO TO OMI by gentrification, what was done to the Fillmore by the bulldozer.

14. City College management is not REMOTELY the City College community. The Diego Rivera mural on campus is now threatened with being taken elsewhere permanently. Please listen not to well paid, elite college leadership, but to the actual CCSF community: neighbors, graduates, students, faculty, supporters.

15. CCSF is beloved by all San Franciscans. Please don't let rich corporate developers from elsewhere threaten or destroy it just to generate some revenue for now. This is an answer only insofar as a fix of drugs is an answer to a drug addict. Please look at the long game and the wonderful investment that is public education."

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-6])*

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"This proposal has nothing to do with providing benefits to anybody. It's all about the money and basically is a done deal. Most all of the objections are valid. I can't wait for the day when most of what is going on in SF implodes on the residents. Good luck!"

*(Merritt Cutten, Email, September 16, 2019 [I-CUTTEN-1])*

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"Lastly, the social justice aspect with regard to labor. In the January 9th, 2018 San Francisco County Transit Authority meeting, where the TDM was passed, Malia Cohen says this: I believe that Avalon Bay will create a lot of problems for us.

Yeah. Those of us that have relationships in labor, many times they have come here, our labor partners have come here raising concerns that they haven't hired union labor to do the job. Any project built in San Francisco, and especially one on public land, should be mandated to use local union labor. Thank you."

*(Wynd Kaufmyn, CPC Hearing, September 12, 2019 [I-KAUFMYN1-4])*

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### **Response GC-3: Opinions Related to the Project**

These comments generally represent the opinions of the commenters regarding various aspects of the proposed project. None of the comments raise significant environmental points or identify issues related to the adequacy or accuracy of the SEIR. The opinions of the commenters will be



provided to the decision-makers for their consideration prior to taking an approval action on the project.

### ***Comment GC-4: Scope of Project***

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

I-EVANS2-2

I-HEGGIE2-21

I-PEDERSON2-10

I-FREY1-3

I-OSAWA-10

I-T.RANDOLPH-2

I-FREY2-3

I-PEDERSON2-6

I-WEIBEL-1

I-GOODMAN-3

I-PEDERSON2-8

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#### **“SHUTTLE—WHERE IS THE SHUTTLE???”**

Members of the public participating in the public input process for the Balboa Reservoir development have consistently, repeatedly, and loudly requested that a developer-funded shuttle be part of the solution to the traffic and transportation problems created by the project. The shuttle would run between the Balboa Reservoir site and the Balboa Park Station and would also serve students, faculty and staff at City College of San Francisco.

We believe that a free shuttle with frequent service is an absolutely necessity if the residents of the BR project are actually expected to use public transit. Since this expectation of public transit use is an essential component of a successful project, every reasonable measure to promote the use of transit must be used. In a city saturated with shuttle buses, this a logical part of the solution. The shuttle idea has been brought in public meetings, in meetings with the developer, in meetings with city representatives, and at neighborhood association meetings.

Despite this consistent, loud call for a shuttle, there is no mention of any shuttle in the SEIR. It does not appear to have even been discussed as part of the effort to manage transportation demand. This is a huge deficiency that must be corrected before the SEIR is approved.”

*(Rita Evans, Letter, September 23, 2019 [I-EVANS2-2])*

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“I’ve gone to all the BRCAC meetings and the Planning Department kept assuring us that the parameters of the BRCAC would have a strong bearing on the final plan. The density of this project far exceeds the density that would have been built if the parameters had been followed.

In the urban design parameters it stated that the height would be 28 feet on the west and then gradually go to 65 on the east. Now, it starts out, I think, at 30, 35, something like that, and then it jumps real quick, and then it goes real high to 78 or 88 feet.”

*(Laura Frey, CPC Hearing, September 12, 2019 [I-FREY1-3])*

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"I have gone to all of the BRCAC meetings, and the Planning Department often assured us that the parameters developed at the BRCAC meetings would have a strong bearing on the final plan. This plan far exceeds the density that would be built if the BRCAC parameters were followed. In the URBAN DESIGN parameters, it is stated that the height would be 28' to the west and GRADUALLY increasing to 65' to the east. In the current proposed plan the height quickly jumps to 48'-58' on the west and goes up to 78'-88' on the east."

*(Laura Frey, Email, September 22, 2019 [I-FREY2-3])*

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"The prior proposals for the Balboa Park Station included concepts for platforming over the freeway. My interest is in indicating the direct linkage that can occur from a more robust transit/parking and pedestrian "green-way" linkage from Frida Kahlo Way corner of Ocean down towards the BART station, on or along the southern edge of CCSF with a more gradual walkway that crosses the freeway and brings people directly into an intermodal station at Balboa Park that would treat the station as an intermodal hub that links the T-Geneva Harney, M-Line and J and K lines with significant bus and other systems in the district.

The increase in housing over near Alemany, and at the opposite end of Ocean Ave at the El-Ray theater, means that more congestion will be impacting an already heavily trafficked and gridlocked area."

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-3])*

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#### "18. Use of Natural Gas:

Per the EIR, efforts will be made to move away from fossil fuels toward renewable energy sources in accordance with the 2017 Clean Air Plan. As of 2017, electricity supplied to San Franciscans was 82% emissions-free, with 64% of electricity generated from renewable sources that include wind, solar and existing large hydropower. (DOE's Focus 2030: A Pathway to Net Zero Emissions report of July 2019, p. 7.) "Should the city fail to meet its renewable electricity goal by 2030, and continues to use natural gas and other fossil fuels, San Francisco could see up to five times more cumulative emissions by 2050." (Focus 2030 report, page 8.)

It is in the interest of San Francisco that all new buildings are powered by electricity and not natural gas. In the interest of meeting San Francisco's Net Zero Emissions plan, please identify only electrical infrastructure and appliances in all structures built on the Balboa Reservoir."

*(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-21])*

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"And we should also use the site as a -- you know, goes to reduce car travel. If people -- when I went to City College, I biked to school every day. And if the students are having to drive there that means our region is not investing enough in public transit. We need to be building more bus lanes.

But that's not -- we should have an express bus from the outer Richmond to City College. But that's not part of the EIR for this project. All right, thank you."

*(Theodore Randolph, CPC Hearing, September 12, 2019 [I-T.RANDOLPH-2])*

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I saw in the Balboa Reservoir Project Draft Environmental Impact Report that natural gas will be installed in the development for space heating, cooking, and gas fireplaces.

In light of the climate crisis, I would like to request that no natural gas be installed in the development.

Supervisor Yee, I was impressed by Berkeley's ordinance that bans natural gas in new developments, and I hope you will lead a similar resolution here in San Francisco -- not just for city buildings, as Supervisors Brown and Mandelman have proposed, but for all new construction and major renovation. What a show of leadership it would be to have an 1100+ unit development on all renewable resources, and what a step in the right direction it would be."

*(Christine Weibel, Email, September 19, 2019 [I-WEIBEL-1])*

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#### **Response GC-4: Scope of the Project**

The comments request that the scope of the project should include additional features such as a shuttle service, a pedestrian "green-way" linking Frida Kahlo Way with Balboa Park Station, and no natural gas in the project buildings. Comments also state that the proposed buildings are taller than endorsed by the Balboa Reservoir Citizens Advisory Committee.

Neither a shuttle service nor a pedestrian "green-way" is proposed as part of the project, and the transportation analysis in SEIR Section 3.B does not identify either of these features, or comparable features, as necessary mitigation measures. Also refer to Response TR-4, Transit Impacts, on RTC p. 4.C-33 regarding transit effects of the proposed project. These comments do not raise specific environmental issues with respect to the adequacy or accuracy of the SEIR's analysis of the proposed features of the project, and no further response is required.

Regarding building heights, the Proposed Development Principles & Parameters for the Balboa Reservoir<sup>79</sup>, developed by the Balboa Reservoir Community Advisory Committee, endorsed 25- to 65-foot-tall development for the project site. As described in SEIR Chapter 2, Project Description, under the Developer's Proposed Option, building heights would range from 25 feet closest to Westwood Park to a maximum of 78 feet closest to Frida Kahlo Way. Thus, heights in the western portion of the project site, nearest Westwood Park, would be the same as set forth in the Proposed Development Principles & Parameters, while buildings to the east side of the site would be up to one to two stories taller than called for in the Proposed Development Principles & Parameters. SEIR

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<sup>79</sup> Balboa Reservoir Community Advisory Committee, *Balboa Reservoir Development Principles & Parameters*, March 9, 2017, <https://sfwater.org/modules/showdocument.aspx?documentid=10644>, accessed February 20, 2020.

Appendix B, Section E.10, Wind, and Section E.11, Shadow (pp. B-41 to B-51), Therefore, the draft SEIR adequately analyzes wind and shadow impacts associated with the height of proposed buildings in both options. This comment does not raise specific environmental issues with respect to the adequacy or accuracy of the draft SEIR, and no further response is necessary.

Regarding the use of natural gas as part of the project, Section E.9, Greenhouse Gas Emissions (draft SEIR Appendix B), evaluates project impacts related to greenhouse gas emissions and concludes that no mitigation measures are necessary. These comments do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's coverage of physical environmental impacts.

All of the foregoing comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to their deliberations of the proposed project. These considerations would be carried out independent of the environmental review process.

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### ***Comment GC-5: Market-Rate Units***

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

I-BARISH3-34  
 I-LEGION-2  
 I-TARQUINO-10  
 I-WORLEY-3

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#### ***"The DSEIR must consider the impact of market-rate units in working-class neighborhoods***

The Draft SEIR also does not consider or compare the potential for gentrification impacts to the residents of the Ingleside, the neighborhood located across Ocean Avenue from the proposed development. 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."

*(Jean Barish, Letter, September 23, 2019 [I-BARISH3-34])*

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"The Draft SEIR does not consider the established pattern of market-rate housing driving up the cost of housing in nearby areas, and its impact on OMI and nearby Excelsior, two of the last remaining affordable neighborhoods on SF."

*(Vicki Legion, Email, September 22, 2019 [I-LEGION-2])*

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“\* The DRAFT SEIR must consider the impact of market-rate units in working-class neighborhood”

(Eve Tarquino, Email, September 12, 2019 [I-TARQUINO-10])

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*“The DRAFT SEIR is inadequate because it fails to consider the impact of market-rate units in working-class neighborhoods*

The Draft SEIR does not consider the impacts of the project on the nearby working-class neighborhoods of Ingleside and The Excelsior. The development of mostly market rate units puts the residents at risk of displacement due to gentrification. A development solely devoted to affordable housing would better blend with these working class neighborhoods.”

(Jennifer Worley, Email, September 23, 2019 [I-WORLEY-3])

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### **Response GC-5: Market-Rate Units**

The comments state that the SEIR should analyze the potential for the project’s market-rate housing units to result in increasing the cost of housing nearby, gentrification and potential displacement of residents in nearby neighborhoods. The comments do not identify any potential physical effects on the environment and therefore no detailed response is required.

In response to one 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. Social and economic impacts are not the subject of CEQA analysis except insofar as a chain of cause and effect may be established between such effects and physical changes in the environment. The focus of CEQA is whether and how a proposed project could alter the physical environment in an adverse manner. CEQA Guidelines section 15360 defines “environment” as “the *physical* conditions which exist within the area which will be affected by the proposed project...” (emphasis added). As stated in CEQA Guidelines section 15131(a):

*Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

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## 4.J Merits of the Project

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

- Comment ME-1: Support for the Proposed Project
- Comment ME-2: Opposition to the Proposed Project

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### *Comment ME-1: Support for the Proposed Project*

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

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

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

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

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

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

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

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

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

So, please, approve this project."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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"Let's get moving on this."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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### **Response ME-1: Support for the Proposed Project**

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

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR’s coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. Although general support of the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft SEIR under CEQA, such comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

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### ***Comment ME-2: Opposition to the Proposed Project***

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

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

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

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

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

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

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

I’m a former CCSF faculty member and have also practiced law for over 20 years, including working on a number of cases involving CEQA. I’m here to state my opposition to the project in general and to highlight the many flaws in the draft EIR.”

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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"The developer should be required to build a parking facility which replaces most of the lost parking spaces and makes them available for students. I'd rather see a taller building with more parking underneath or fewer buildings and a parking structure."

*(Andrew Fraknoi, Email, September 21, 2019 [I-FRAKNOI-3])*

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

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

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

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

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

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

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

going to consider the fact that we need to be more concerned about our local tax payers than these techies from other areas.”

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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"By no means should the higher density option be considered."

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

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

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

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

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

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

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"I'm against building any 1,200 units."

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

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

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

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"Steve Zeltzer, United Public Workers for Action. I think we see today, already, the results of your disastrous Planning Commission decisions. Warrior Stadium is a good example of that. You approved that without proper transit. A violation of your rules, but you did it because you're basically a kept commission, which represents the developers. That's why all today you've been

going along with whatever the developers want. You're saying to hell with the people of San Francisco, it's okay to have more gridlock.

Now, this project, at Ocean, the Balboa Reservoir, is a project that will destroy City College of San Francisco. That's not in your plans, although that will be the result. To have construction, massive construction and 1,500 condos next to the college prevents the college from developing. It will create chaos. But you don't really give a damn about City College or the people of San Francisco because you represent the developers.

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

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

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

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

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## **Response ME-2: Opposition to the Proposed Project**

Comments express opposition to the project generally or to particular aspects of the proposed project options based on its merits. Comments also include general statements about the adequacy of the draft SEIR.

Comments include general statements that the proposed project would worsen traffic in the area, disrupt City College students, remove parking used by City College students, prevent City College expansion, and cause health impacts. The draft SEIR evaluates transportation and air quality health risk impacts of the proposed project in Sections 3.B, Transportation and Circulation, and 3.D, Air Quality, respectively. Responses to comments related to transportation and air quality are addressed in Sections 4.C, Transportation and Circulation, and 4.E, Air Quality, in this RTC.

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. Although general opposition of the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft EIR under CEQA, such comments, including recommendations for modifications to

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

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# CHAPTER 5

## Draft SEIR Revisions

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This chapter presents text changes for the Balboa Reservoir Project draft SEIR. The revisions reflect changes identified in RTC Chapter 2, Revisions and Clarifications to the Project Description, RTC Chapter 4, Comments and Responses, or staff-initiated text changes, all of which clarify, expand, or update information and/or graphics presented in the draft SEIR. Staff-initiated changes to clarify information presented in the draft SEIR are highlighted with an asterisk (\*) in the margin to distinguish them from text changes in response to comments. For each change, new language is double underlined, while deleted text is shown in ~~striketrough~~. The changes are organized in the order of the draft SEIR and initial study table of contents.

These revisions do not result in any changes in the draft SEIR conclusions prepared pursuant to CEQA, and thus do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15162(a)(3). Therefore, recirculation of the draft SEIR is not required.

### 5.A Revisions to the Table of Contents, Summary, and Introduction Chapter

- \* **To be consistent with the revisions made under the applicable resource topics in response to comments, p. viii of the SEIR Table of Contents is revised as follows:**

Table 3.B-8    ~~Existing Transit Delay~~Existing Transit Travel Times..... 3.B-22

- \* **To reflect the addition of Appendix C4, Transit Delay Analysis and Capital Improvements Memorandum and Appendix I, Updated Health Risk Assessment Memorandum, p. vi of the SEIR Table of Contents has been revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

#### Appendices

- A Notice of Preparation
- B Initial Study
- C Transportation Supporting Information
  - C1 Travel Demand Memorandum
  - C2 Transit Assessment Memorandum
  - C3 Freight Loading Data
  - C4 Transit Delay Analysis and Capital Improvements Memorandum
- D Noise Supporting Information
  - D1 Construction Noise Model Output



- D2 Traffic Noise Model Output
- D3 Calculations of Long-Term Noise Metrics
- D4 Sound Level Meter Reports
- E Air Quality Technical Memorandum
- F Water Supply Assessment
- G Biological Resources Supporting Information
- H Balboa Park Station Area Plan PEIR Mitigation Measures
- I Updated Health Risk Assessment Memorandum

The new Appendix C4 and Appendix I are provided at the end of this RTC chapter.

To be consistent with the revisions made under the applicable resource topics in response to comments, the following revisions are made to Table S-2, Summary of Impacts of the Proposed Project—Disclosed in this Draft SEIR including the Initial Study.

- \* **The third paragraph on draft SEIR p. S-5 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

Construction phasing is shown in Figure 2-18, Proposed Developer's Option Construction Phasing, p. 2-40, and Figure 2-19, Additional Housing Option Construction Phasing, p. 2-41. The project characteristics presented above (including the total number of residential units, square footage of commercial use, acres of open space, bicycle and automobile spaces) are totals based on full buildout and completion of all phases of the proposed project. Construction would generally occur between the hours of 7 a.m. and 8 p.m., up to seven days a week, consistent with San Francisco Police Code section 2908. Certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, and could include one concrete pour per building, which could occur a total of 12 times throughout the project construction period. ~~Such~~ Construction activities that extend beyond normal hours—would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

- \* In Table S-2, Mitigation Measure M-C-TR-4 on draft SEIR p. S-13 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

**(REVISED) TABLE S-2**  
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
SEIR Section 3.B, Transportation and Circulation [EXCERPT]			
<b>Impact C-TR-4:</b> The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably.	S	<p><b>Mitigation Measure M-C-TR-4: <del>Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay.</del></b> The project sponsor, under either project option, shall <del>monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.</del></p> <p><b><u>Transit Travel Time Performance Standard Routes and Study Segments.</u></b> Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4. The <u>following</u> routes and study segments shown in Table M-C-TR-4 represent routes and study segments <u>would</u> most likely to have <u>a</u> <del>experience</del> cumulative <u>transit delay</u> impact to which the project would have a considerable cumulative contribution.</p> <ul style="list-style-type: none"> <li>• <u>K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)</u></li> <li>• <u>K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue</u></li> <li>• <u>29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue</u></li> <li>• <u>29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue</u></li> <li>• <u>43 Masonic (outbound): Genessee Street/Monterey Boulevard to Geneva Avenue/Howth Street</u></li> <li>• <u>43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard</u></li> </ul>	SUM

**(REVISED) TABLE S-2**  
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures						Level of Significance after Mitigation																																																						
		<p align="center"><b>TABLE M-C-TR-4</b> <b>TRANSIT TRAVEL TIME PERFORMANCE STANDARD</b></p> <table><tr><th rowspan="2">Transit Line</th><th rowspan="2">Study Segment</th><th colspan="2">Existing Transit Travel Time<sup>a</sup></th><th colspan="2">Performance Standard<sup>b</sup></th></tr><tr><th>A.M. Peak Period</th><th>P.M. Peak Period</th><th>A.M. Peak Period</th><th>P.M. Peak Period</th></tr><tr><td rowspan="2">K/T</td><td>Jules Ave/Ocean Ave to Balboa Park BART</td><td>3:30</td><td>8:42</td><td>7:30</td><td>12:42</td></tr><tr><td>San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave</td><td>3:28</td><td>10:03</td><td>7:28</td><td>11:28</td></tr><tr><td rowspan="2">29</td><td>Plymouth Ave/Ocean Ave to Mission St/Persia Ave</td><td>8:04</td><td>12:09</td><td>12:04</td><td>16:04</td></tr><tr><td>Mission St/Persia Ave to Plymouth Ave/Ocean Ave</td><td>7:10</td><td>9:55</td><td>11:10</td><td>15:10</td></tr><tr><td rowspan="2">43</td><td>Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd</td><td>4:20</td><td>4:37</td><td>8:20</td><td>8:37</td></tr><tr><td>Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance</td><td>4:16</td><td>4:23</td><td>8:16</td><td>8:23</td></tr><tr><td rowspan="2">49</td><td>Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave</td><td>5:22</td><td>10:04</td><td>9:22</td><td>14:04</td></tr><tr><td>Mission St/Ocean Ave to Frida Kahlo Way/CCSF South Entrance</td><td>7:18</td><td>11:25</td><td>11:18</td><td>15:25</td></tr></table> <p>SOURCE: Kittelson &amp; Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.</p> <p>NOTES:</p> <p><sup>a</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.</p> <p><sup>b</sup> The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.</p>						Transit Line	Study Segment	Existing Transit Travel Time <sup>a</sup>		Performance Standard <sup>b</sup>		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period	K/T	Jules Ave/Ocean Ave to Balboa Park BART	3:30	8:42	7:30	12:42	San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave	3:28	10:03	7:28	11:28	29	Plymouth Ave/Ocean Ave to Mission St/Persia Ave	8:04	12:09	12:04	16:04	Mission St/Persia Ave to Plymouth Ave/Ocean Ave	7:10	9:55	11:10	15:10	43	Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd	4:20	4:37	8:20	8:37	Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance	4:16	4:23	8:16	8:23	49	Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave	5:22	10:04	9:22	14:04	Mission St/Ocean Ave to Frida Kahlo Way/CCSF South Entrance	7:18	11:25	11:18	15:25	
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**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		<p><b>Monitoring and Reporting.</b> The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.</p> <p><b>Timing.</b> The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building<sup>80</sup> at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.</p> <p>The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets its terms for this measure.</p> <p><b>Collection and Reporting Details.</b> For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non-holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.</p> <p>For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).</p> <p><b>Implement Fair Share of Capital Improvement Measures.</b> If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the project sponsor shall implement contribute funds for the following capital</p>	

<sup>80</sup> A new major building is City College of San Francisco Ocean Avenue campus construction post-2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.

**(REVISED) TABLE S-2**  
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		<p><u>improvement measures</u> that reduce transit travel times. These measures are subject to agency approval and could include:</p> <ol style="list-style-type: none"> <li><u>1. Signal Timing Modifications at Ocean Avenue/Brighton Avenue.</u> The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.</li> <li><u>2. Signal Timing Modifications at Ocean Avenue/Plymouth Avenue.</u> The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.</li> <li><u>3. Bus Boarding Island on Southbound Frida Kahlo Way.</u> The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.</li> </ol> <p><u>The cost of these capital improvement measures is \$200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment), and shall be considered the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA<sup>81</sup>, shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay \$110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and \$90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2.</u></p> <p><u>If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA.</u></p> <p><u>The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.</u></p> <ol style="list-style-type: none"> <li><u>1. Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.</u></li> <li><u>2. Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.</u></li> <li><u>3. Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may include off-site capital</u></li> </ol>	

<sup>81</sup> Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

**(REVISED) TABLE S-2**  
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		<p>improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.</p> <p><b>Term Condition A:</b> The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.</p> <p><b>Term Condition B:</b> The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.</p>	

- \* In Table S-2, the sixth bullet point of Mitigation Measure M-NO-1 on draft SEIR p. S-18 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

**(REVISED) TABLE S-2: SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
<b>SEIR Section 3.C, Noise [EXCERPT]</b>			
<b>Impact NO-1:</b> Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project.	S	<p><b>Mitigation Measure M-NO-1: Construction Noise Control Measures.</b></p> <p>...</p> <ul style="list-style-type: none"> <li>Undertake the noisiest activities (<u>e.g., demolition using hoe rams</u>) during times of least disturbance to surrounding residents and occupants <u>the hours of (9 a.m. to 4 p.m.); and select or construct</u> haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue <u>and Lee Avenue, such as the temporary or permanent relocation of North Street.</u></li> </ul> <p>...</p>	SUM



- \* In Table S-2, Mitigation Measures M-AQ-2a (Construction Emissions Minimization) and M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) on SEIR pp. S-21, and S-23 to S-24 are revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

(REVISED) TABLE S-2: SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
SEIR Section 3.D, Air Quality [EXCERPT]			
...			
<b>Impact AQ-2a:</b> During construction, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.	S	<p><b>Mitigation Measure M-AQ-2a: Construction Emissions Minimization.</b> <del>In the case of the Developer's Proposed Option under the compressed three-year construction schedule or in the case of the Additional Housing Option under either the six-year construction schedule or the compressed three-year construction schedule, the project sponsor or the project sponsor's contractor shall comply with the following:</del></p> <p>...</p> <p><b>Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule.</b> Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, the project sponsor, with the oversight of the <u>Environmental Review Officer (ERO)</u>, shall either:</p> <ol style="list-style-type: none"> <li>1. <i>Directly fund or implement a specific offset project within San Francisco if available to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or</i></li> <li>2. <i>Pay mitigation offset fees to the Bay Area Air Quality Management District Bay Area Clean Air Foundation <u>or other governmental entity or third party</u>. The mitigation offset fee, <del>currently estimated at approximately \$30,000 per weighted ton, plus an administrative fee of no more than 5 percent of the total offset,</del> shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the <del>planning department</del> <u>ERO</u>, the project sponsor, and the <del>air district governmental entity or third party responsible for administering the funds</del>, and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions</i></li> </ol>	SUM

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		<p>below significance levels after implementation of other identified mitigation measures as currently calculated.</p> <p>The agreement that specifies fees and timing of payment shall be signed by the project sponsor, <del>the air district governmental entity or third party responsible for administering the funds</del>, and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c.</p> <p>The total emission offset amount <del>is presented above</del> <u>was</u> calculated by summing the maximum daily construction of ROG and NOx (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated operational and construction-related ROG and NOx emissions offsets required. No reductions are needed for operations or overlapping construction and operations.</p>	



- \* **The text on SEIR p. 1-14 is revised as follows to include Appendix C3 and to reflect the addition of Appendix C4, Transit Delay Analysis and Capital Improvements Memorandum and Appendix I, Updated Health Risk Assessment Memorandum (deleted text is shown in ~~strike through~~ and new text is shown in double underline):**

- Appendix C: Transportation Supporting Information
  - Appendix C1: Travel Demand Memorandum
  - Appendix C2: Transit Assessment Memorandum
  - Appendix C3: Freight Loading Data
  - Appendix C4: Transit Delay Analysis and Capital Improvements Memorandum
- Appendix D: Noise Supporting Information
  - Appendix D1: Construction Noise Model Output
  - Appendix D2: Traffic Noise Model Output
  - Appendix D3: Calculations of Long-Term Noise Metrics
  - Appendix D4: Sound Level Meter Reports
- Appendix E: Air Quality Technical Memorandum
- Appendix F: Water Supply Assessment
- Appendix G: Biological Resources Supporting Information
- Appendix H: Balboa Park Station Area Plan PEIR Mitigation Measures
- Appendix I: Updated Health Risk Assessment Memorandum

## 5.B Revisions to Chapter 2, Project Description

The following figure has been revised to show the revised street ownership; the revised figure is provided at the end of this chapter.

- Figure 2-12 on draft SEIR p. 2-27

The last paragraph on SEIR p. 2-7 is revised as follows:

The site does not contain any permanent structures and currently contains 1,007 surface vehicular parking spaces. The lot provides overflow vehicular parking for City College students, faculty, and staff.<sup>26</sup> The San Francisco Municipal Transportation Agency (SFMTA) is also temporarily using a portion of the project site for SFMTA employee parking, under an agreement with SFPUC. The SFMTA started temporarily using on October 1, 2019, an approximate 29,100-square-foot area of the project site. This temporary use will expire September 2020.

**The paragraph under Section 2.E.1, Developer's Proposed Option on SEIR p. 2-13 is revised as follows:**

The Developer's Proposed Option would include up to 1.64 million gsf in new construction on 10 Blocks (**Figure 2-4, Developer's Proposed Option Site Plan and Height Ranges**). Construction under this option would provide 1,100 residential units totaling about 1.3 million gsf. Housing would be provided on each block. A total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income, depending on market surveys, funding source restrictions and other stakeholder input on the affordable housing plan. Affordable housing would be distributed throughout the site. For purposes of this SEIR, the unit mix is assumed to be 40 percent studio/one bedroom units and 60 percent two-or-more-bedroom units. The project proposes to provide approximately 150 moderate-income dwelling units (as a component of the project's 50 percent affordable housing element) that would be deed-restricted to occupancy by educator households with an average income of 100 percent of the area median income. Households with at least one full-time employee of the City College of San Francisco or San Francisco Unified School District would have preferential priority for all educator dwelling units, with City College households having first priority and San Francisco Unified School District households having second priority.

**Figure 2-5, Ground Floor Use Plan for Developer's Proposed Option**, presents the proposed ground floor use plan at the project site. With the exception of the townhome blocks (Blocks TH1 and TH2), the ground floor areas on all blocks could include common spaces, building lobbies, residential units, as well as utility and parking access. As shown in Figure 2-5, the ground floor of Block B would contain approximately 10,000 gsf of childcare and community space. Approximately 7,500 gsf of retail space, including a café, could be provided on the ground level of Block A, C, D, E, or F.

**The first bullet under Section 2.E.6, Vehicle Parking and Loading, on SEIR p. 2-23 is revised as follows:**

- **Developer's Proposed Option:** The Developer's Proposed Option would provide a total of up to 1,300 off-street vehicle parking spaces. **Figure 2-10, Developer's Proposed Option Parking Facilities and Street Parking Plan**, illustrates the proposed off-street parking locations. Up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks A, B, C, D, F, and G and in the townhomes. In addition to resident parking, the Developer's Proposed Option would include a below-grade multilevel public garage of up to 750 spaces located under Blocks A and B and accessed from South Street. Alternatively, the public parking could be located in several of the residential garages. The Developer's Proposed Option would include a minimum of seven car-share parking spaces located on streets and in buildings. In addition, the Developer's Proposed Option would include approximately six on-street freight loading areas and approximately eight passenger loading areas along the internal streets.

**The text on SEIR p. 2-39 is revised as follows to clarify the compressed schedule:**

As stated in the footnote to Table 2-2, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 under a compressed schedule or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity. Phase 0 would occur in 2021, followed by Phases 1 and 2 occurring simultaneously for approximately 24 months from 2022 to 2023, and completed by early 2024. The construction analysis in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, is generally based on conservative assumptions where appropriate and described in the “Approach to Analysis” section of the resource topic area.

**Section 2.I.1, State and Regional Agencies on SEIR p. 2-50 is revised as follows:**

**California Department of Transportation**

- Transportation permit for oversized or excessive load vehicles

- \* **Section 2.I.2, Local Agencies on SEIR pp. 2-50 to 2-51 is revised as follows to update or correct local agency approval actions:**

## **2.I.2 Local Agencies**

**San Francisco Board of Supervisors**

- Adoption of CEQA findings
- Approval of general plan amendments
- Approval of planning code amendments (SUD) and associated zoning map and height map amendments
- Approval of a development agreement
- Approval of final subdivision map(s)
- Approval of dedications and easements for public improvements, and acceptance of public improvements, as necessary
- Approval of an amended easement and access agreement with City College of the San Francisco Community College District for roadway access and any joint development of streets, if applicable
- Approval of a resolution(s) authorizing the sale of property under SFPUC jurisdiction and various license agreements for use, construction, and open space on SFPUC property
- Approval of a resolution acknowledging City’s intention to fund affordable housing in the project

### **San Francisco Planning Commission**

- Certification of the final SEIR
- Adoption of CEQA findings
- Approval of special use district design standards and guidelines
- Initiation and recommendation to the San Francisco Board of Supervisors to approve amendments to the general plan
- Initiation and recommendation to the San Francisco Board of Supervisors to approve planning code amendments adopting an SUD and associated zoning map amendments
- Approval of Design Standards and Guidelines
- Recommendation to the San Francisco Board of Supervisors to approve a development agreement

### **San Francisco Public Utilities Commission or General Manager**

- Adoption of CEQA findings
- Actions and approvals related to a development agreement and ~~purchase and sale an~~ agreement for the sale of property under SFPUC jurisdiction, and various license agreements for use, construction, and open space on SFPUC property and other actions and approvals related to its jurisdictional authority
- Approval of an amended easement and access agreement with the San Francisco Community College District for roadway access and any joint development of streets, if applicable

### **San Francisco Department of Public Works**

- Actions and approvals related to its jurisdictional authority

### **San Francisco Municipal Transportation Agency**

- Actions and approvals related to a development agreement and approval of transit improvements, public improvements and infrastructure, including certain roadway improvements, stop controls, bicycle infrastructure and loading zones, to the extent included in the project

### **San Francisco Fire Department**

- Actions and approvals related to its jurisdictional authority

### **San Francisco Department of Building Inspection**

- Approval and issuance of demolition, grading, and site construction permits
- Nighttime construction permit, if required

### **San Francisco Department of Public Health**

- Actions and approvals related to its jurisdictional authority

**City College of San Francisco Community College District**

- Act as responsible agency under CEQA
- Approval of an amended easement and access agreement

## 5.C Revisions to Section 3.A.6, Approach to Cumulative Impact Analysis

- \* To update the status of the potential City College east basin parking garage project and passage of San Francisco Proposition A bond measure on March 3, 2020, the SEIR text is revised on pp. 3.A-13 to 3.A-14 as follows:

At subsequent 2019 Board of Trustees meetings, City College staff presented a facilities planning update on a potential bond measure that would be anticipated to fund construction of the facilities master plan projects, shown under the “Bond Measure” column in Table 3.A-2. In that update, a number of the facilities master plan projects were included in the list of potential bond-funded improvements. However, the East Basin Parking Garage was no longer included, the Performing Arts and Education Center was replaced by a new Diego Rivera Theater and a smaller STEAM building (both on the east basin), and a Student Development Building was proposed at the location of the existing Creative Arts Extension Building. The bond measure passed on March 3, 2020. The bond measure identified the types of projects the measure would fund, but generally didn’t identify specific projects like those shown in the table. The various types of projects that could be funded through the bond are subject to approval by the City College Board of Trustees.

To support the college’s projected increase in enrollment, the Balboa Reservoir project sponsor may fund a portion of a study addressing a potential City College garage on the east basin, if the college decides to consider pursuing such a project. A parking garage on the east basin would have independent utility from the Balboa Reservoir project—in other words, the east basin parking garage could move forward regardless of whether the Balboa Reservoir project on the west basin occurs. Consequently, this SEIR analysis need not address an east basin parking lot as part of the Balboa Reservoir project other than accounting for it as part of the cumulative analysis.

## 5.D Revisions to Section 3.B, Transportation and Circulation

- \* Table 3.B-2 on draft SEIR p. 3.B-10 is revised as follows (deleted text is shown in ~~strike through~~ and new text is shown in double underline):

**TABLE 3.B-2**  
**VEHICULAR COUNTS AT STUDY INTERSECTIONS**

Number	Intersection	Number of Vehicles <sup>a,b</sup>	
		A.M. Peak Hour	P.M. Peak Hour
1	Ocean Avenue/Miramar Avenue	1,833	1,876
2	Ocean Avenue/Lee Avenue	1,898	2,021
3	Ocean Avenue/Frida Kahlo Way/Geneva Avenue	2,090	2,293
4	Ocean Avenue/San Jose Avenue	1,376	1,413
5	Ocean Avenue/Plymouth Avenue	1,841	1,866
6	San Ramon Way/Southwood Drive/Plymouth Avenue	<del>422</del> <u>268</u>	<del>409</del> <u>226</u>
7	Greenwood Avenue/Plymouth Avenue	430	397
8	Geneva Avenue/San Jose Avenue	2,590	2,485
9	Judson Avenue/Frida Kahlo Way	1,030	1,040
10	Judson Avenue/Hazelwood Avenue	437	341
11	Judson Avenue/Genessee Street	851	780
12	Monterey Boulevard/Genessee Street	1,684	1,636
13	Cloud Circle (N)/Frida Kahlo Way	750	923
14	Cloud Circle (S)/Frida Kahlo Way	1,074	1,210
15	City College Upper Reservoir Lot (N)/Frida Kahlo Way	750	923
16	City College Upper Reservoir Lot (S)/Frida Kahlo Way	1,074	1,210
17	I-280 SB Off Ramp/Ocean Avenue	1,505	1,509
18	I-280 SB Ramps/Geneva Avenue	2,463	2,590
19	I-280 NB Ramps/Geneva Avenue	2,653	2,642
20	I-280 NB Ramps/Ocean Avenue	1,101	1,207
21	Ocean Avenue/Brighton Avenue	1,708	1,846
22	Ocean Avenue/Harold Avenue	1,905	1,981
23	Holloway Avenue/Lee Avenue	440	378

SOURCE: Quality Counts, 2018.

**NOTES:**

<sup>a</sup> Vehicle volume (number of vehicles) reflects the sum of all turning movements at the intersection.

<sup>b</sup> The weekday a.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 7 a.m. and 9 a.m. The weekday p.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 4 p.m. and 6 p.m.

- \* **The text on draft SEIR pp. 3.B-22 to 3.B-23 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

Muni transit operations in the study area were evaluated using transit delay analysis. The transit delay analysis presents the delay associated with traffic congestion, transit reentry, and passenger boarding along the following ~~corridors and Muni lines~~ for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
- K/T Third/Ingleside:
  - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (inbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (outbound)

The results of the transit delay analysis are summarized in ~~Table 3.B-8, Existing Transit Delay~~ Existing Transit Travel Times, and provided in Attachment C, Corridor Delay Analysis Synchro Worksheets, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations, of SEIR Appendix C2, Transit Assessment Memorandum. Transit ridership and capacity analysis are provided in Attachment F (transit ridership and capacity analysis) of SEIR Appendix C2 for informational purposes. Table 3.B-8 presents the estimated ~~seconds of delay a transit vehicle encounters~~ travel times during the a.m. and p.m. peak hours ~~along each of the study corridors.~~

**TABLE 3.B-8**  
**EXISTING TRANSIT DELAY**

Corridor	Weekday a.m. Peak Hour (seconds of delay)		Weekday p.m. Peak Hour (seconds of delay)	
	Northbound/ Eastbound	Southbound/ Westbound	Northbound/ Eastbound	Southbound/ Westbound
Frida Kahlo Way	3	42	3	25
Ocean Avenue	440	432	443	433
Geneva Avenue	70	48	66	44

SOURCE: Kittelson & Associates Inc., 2018.

NOTES:

Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.

**TABLE 3.B-8**  
**EXISTING TRANSIT TRAVEL TIMES**

Transit Line	Study Segment	Existing Transit Travel Time <sup>a</sup>	
		A.M. Peak Period	P.M. Peak Period
K/T	Jules Ave/Ocean Ave to Balboa Park BART (outbound)	3:30	8:42
	San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave (inbound)	3:28	10:03
29	Plymouth Ave/Ocean Ave to Mission St/Persia Ave (outbound)	8:01	12:09
	Mission St/Persia Ave to Plymouth Ave/Ocean Ave (inbound)	7:10	9:55
43	Geneva Avenue/Howth Street to Foerster St/Monterey Blvd (inbound)	4:20	4:37
	Genessee St/Monterey Blvd to Geneva Avenue/Howth Street (outbound)	4:16	4:23
49	Frida Kahlo Way/City College South Entrance to Mission St/Persia Ave (outbound)	5:39	10:04
	Mission St/Ocean Ave to Frida Kahlo Way/City College South Entrance (inbound)	7:18	11:25

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

<sup>a</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

As shown in Table 3.B-8, the ~~highest transit delays~~ most variability in transit travel times are experienced along Ocean Avenue ~~between Plymouth Avenue and Judson Avenue in the westbound direction where there is a difference in travel times of over 6.5 minutes between the weekday a.m. and p.m. peak hours.~~ This is primarily caused by the vehicular traffic at the Ocean Avenue/San Jose Avenue intersection during the weekday p.m. peak hour, which operates with an average intersection delay above 100 seconds. Additionally, as a result of the high volume of vehicle traffic ~~volumes~~ in the curbside travel lane on



westbound Ocean Avenue (between 900 and 930 vehicles per hour) transit vehicles ~~in this corridor~~ typically experience transit reentry delays of around 11 seconds.

- \* **Footnote 96 on draft SEIR p. 3.B-52 is revised as follows (deleted text is shown in ~~strike~~through and new text is shown in double underline):**

<sup>96</sup> The threshold uses the adopted the Transit First Policy, City Charter section 8A.103(c)1, 85, percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.

- \* **The text on draft SEIR pp. 3.B-73 to 3.B-74 is revised as follows (deleted text is shown in ~~strike~~through and new text is shown in double underline):**

The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) was evaluated along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
- K/T Third/Ingleside:
- Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (outbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (inbound)

The results of the transit delay analysis are summarized in **Table 3.B-18, Transit Delay Analysis**, ~~and~~ Synchro travel time calculation worksheets presenting transit delay along the corridors are provided in Attachment C, Corridor Delay Analysis Synchro Worksheets, ~~and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations,~~ of SEIR Appendix C2, Transit Assessment Memorandum and supplementary transit

analysis is provided in the SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.

**TABLE 3.B-18**  
**TRANSIT DELAY ANALYSIS**

Corridor	Weekday a.m. Peak Hour (seconds of delay)		Weekday p.m. Peak Hour (seconds of delay)	
	Northbound/ Eastbound	Southbound/ Westbound	Northbound/ Eastbound	Southbound/ Westbound
<b>Transit Delay</b>				
<b>Existing Conditions</b>				
Frida Kahlo Way	5	45	5	28
Ocean Avenue	424	443	424	444
Geneva Avenue	79	53	75	46
<b>Existing plus Developer's Proposed Option</b>				
Frida Kahlo Way	18	74	29	101
Ocean Avenue	487	482	482	244
Geneva Avenue	99	427	417	127
<b>Existing plus Additional Housing Option</b>				
Frida Kahlo Way	21	87	46	111
Ocean Avenue	483	207	208	272
Geneva Avenue	109	437	433	437
<b>Project Related Increase in Delay</b>				
<b>Developer's Proposed Option</b>				
Frida Kahlo Way	13	59	24	73
Ocean Avenue	66	39	58	100
Geneva Avenue	20	74	42	81
<b>Additional Housing Option</b>				
Frida Kahlo Way	16	72	41	83
Ocean Avenue	62	64	84	128
Geneva Avenue	30	84	58	94
SOURCE: Kittelson & Associates, Inc. 2018.				
NOTES:				
Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.				

**TABLE 3.B-18**  
**TRANSIT DELAY ANALYSIS**

Transit Line	Study Segment	Transit Travel Time		Project-Related Change		Exceeds Four-Minute Threshold? <sup>a</sup>	
		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period
Existing Conditions <sup>b</sup>							
K/T	Jules/Ocean to Balboa Park BART (outbound)	3:30	8:42	==	==	==	==
	San Jose/Geneva to Dorado/Ocean (inbound)	3:28	10:03	==	==	==	==
29	Plymouth/Ocean to Mission/Persia (outbound)	8:01	12:09	==	==	==	==
	Mission/Persia to Plymouth/Ocean (inbound)	7:10	9:55	==	==	==	==
43	Geneva/Howth to Monterey/Foerster <sup>c</sup> (inbound)	4:50 <sup>c</sup>	5:07 <sup>c</sup>	==	==	==	==
	Gennessee/Monterey to Geneva/Howth <sup>c</sup> (outbound)	4:27 <sup>c</sup>	4:46 <sup>c</sup>	==	==	==	==
49	Frida Kahlo/City College South to Mission/Persia (outbound)	5:39	10:04	==	==	==	==
	Mission/Ocean to Frida Kahlo/City College South (inbound)	7:18	11:25	==	==	==	==
Existing Conditions + Developer's Proposed Option							
K/T	Jules/Ocean to Balboa Park BART (outbound)	4:36	9:40	1:06	0:58	No	No
	San Jose/Geneva to Dorado/Ocean (inbound)	4:07	11:43	0:39	1:40	No	No
29	Plymouth/Ocean to Mission/Persia (outbound)	9:07	13:07	1:06	0:58	No	No
	Mission/Persia to Plymouth/Ocean (inbound)	7:49	11:35	0:39	1:40	No	No
43	Geneva/Howth to Monterey/Foerster <sup>c</sup> (inbound)	5:04 <sup>c</sup>	5:33 <sup>c</sup>	0:14	0:26	No	No
	Gennessee/Monterey to Geneva/Howth <sup>c</sup> (outbound)	5:37 <sup>c</sup>	5:50 <sup>c</sup>	1:10	1:04	No	No
49	Frida Kahlo/City College South to Mission/Persia (outbound)	6:45	11:02	1:06	0:58	No	No
	Mission/Ocean to Frida Kahlo/City College South (inbound)	7:57	13:05	0:39	1:40	No	No
Existing Conditions + Additional Housing Option							
K/T	Jules/Ocean to Balboa Park BART (outbound)	4:32	10:06	1:02	1:24	No	No
	San Jose/Geneva to Dorado/Ocean (inbound)	4:32	12:11	1:04	2:08	No	No
29	Plymouth/Ocean to Mission/Persia (outbound)	9:03	13:33	1:02	1:24	No	No
	Mission/Persia to Plymouth/Ocean (inbound)	8:14	12:03	1:04	2:08	No	No

<u>Transit Line</u>	<u>Study Segment</u>	<u>Transit Travel Time</u>		<u>Project-Related Change</u>		<u>Exceeds Four-Minute Threshold?<sup>a</sup></u>	
		<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>	<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>	<u>A.M. Peak Period</u>	<u>P.M. Peak Period</u>
<u>43</u>	<u>Geneva/Howth to Monterey/Foerster<sup>c</sup> (inbound)</u>	<u>5:07<sup>c</sup></u>	<u>6:07<sup>c</sup></u>	<u>0:17</u>	<u>1:00</u>	<u>No</u>	<u>No</u>
	<u>Genessee/Monterey to Geneva/Howth<sup>c</sup> (outbound)</u>	<u>5:39<sup>c</sup></u>	<u>6:07<sup>c</sup></u>	<u>1:12</u>	<u>1:21</u>	<u>No</u>	<u>No</u>
<u>49</u>	<u>Frida Kahlo/City College South to Mission/Persia (outbound)</u>	<u>6:41</u>	<u>11:28</u>	<u>1:02</u>	<u>1:24</u>	<u>No</u>	<u>No</u>
	<u>Mission/Ocean to Frida Kahlo/City College South (inbound)</u>	<u>8:22</u>	<u>13:33</u>	<u>1:04</u>	<u>2:08</u>	<u>No</u>	<u>No</u>

SOURCE: Kittelson & Associates, Inc. 2019. SFMTA Automatic Vehicle Location Data, 2019.

**NOTES:**

<sup>a</sup> The threshold is calculated as the existing transit travel time plus four minutes.

<sup>b</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

<sup>c</sup> The Transit Travel Time column for existing conditions represents the 43 line between Geneva Avenue/Howth Street and Foerster Street/Monterey Boulevard (inbound) or Genessee Avenue/Monterey Boulevard (outbound), with collected transit travel time data along the route segment between Frida Kahlo Way/Geneva Avenue/Ocean Avenue and Foerster Street/Monterey Boulevard (inbound) or Genessee Avenue/Monterey Boulevard (outbound), plus the Synchro estimated delay at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The Project-Related Change columns in Table 3.B-18 represent Synchro-estimated increase for the 43 line between Foerster Street/Monterey Boulevard and Geneva Avenue/Howth Street.

### *Developer's Proposed Option*

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). 1 minute and 40 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 6 seconds along Ocean Avenue i to the 29, 49, and K/T n the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, tThe majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, tThe Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, based on the established thresholds of significance, the Developer's Proposed Option would result in a *less-than-significant* impact related to transit delay.

### *Additional Housing Option*

As shown in Table 3.B-18, vehicle and transit generated by the Additional Housing Option would increase transit delay by a maximum of ~~83 seconds along Frida Kahlo Way, (southbound direction, weekday p.m. peak hour), a maximum of 128 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 91 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 2 minutes and 8 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 2 seconds along Ocean Avenue to the 29, 49, and K/T in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, ~~t~~The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Additional Housing Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, ~~t~~The Additional Housing Option would not result in transit delay greater than or equal to four minutes.<sup>423</sup> Therefore, based on the established thresholds of significance, the Additional Housing Option would result in a *less-than-significant* impact related to transit delay.

<sup>423</sup> ~~Ibid~~

- \* The last sentence on draft SEIR p. 3.B-79 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

The Developer's Proposed Option would construct an up to 750~~650~~-space public parking garage to partially replace the existing 1,007-space surface parking lot on the project site.

- \* The following edits update draft SEIR pp. 3.B-95 to 3.B-98, including Mitigation Measure M-C-TR-4, Implement Measures to Reduce Transit Delay, to reflect the impact conclusion updates regarding the 49 Van Ness/Mission and transit capital improvements (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

~~Mitigation Measure M-C-TR-4: Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay.~~ The project sponsor, under either project option, shall ~~monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.~~

Transit Travel Time Performance Standard Routes and Study Segments. Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4. The following routes and

study segments shown in Table M-C-TR-4 represent routes and study segments would most likely to have a experience cumulative transit delay impact to which the project would have a considerable cumulative contribution.

- K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)
- K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue
- 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue
- 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue
- 43 Masonic (outbound): Genessee Street/Monterey Boulevard to Geneva Avenue/Howth Street
- 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard

**TABLE M-C-TR-4**  
**TRANSIT TRAVEL TIME PERFORMANCE STANDARD**

Transit Line	Study Segment	Existing Transit Travel Time <sup>a</sup>		Performance Standard <sup>b</sup>	
		A.M. Peak Period	P.M. Peak Period	A.M. Peak Period	P.M. Peak Period
K/T	Jules Ave/Ocean Ave to Balboa Park BART	3:30	8:42	7:30	12:42
	San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave	3:28	10:03	7:28	11:28
29	Plymouth Ave/Ocean Ave to Mission St/Persia Ave	8:01	12:09	12:01	16:01
	Mission St/Persia Ave to Plymouth Ave/Ocean Ave	7:10	9:55	11:10	15:10
43	Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd	4:20	4:37	8:20	8:37
	Genessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance	4:16	4:23	8:16	8:23
49	Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave	5:22	10:04	9:22	14:04
	Mission St/Ocean Ave to Frida Kahlo Way/CCSF South Entrance	7:18	11:25	11:18	15:25

SOURCE: Kittelson & Associates, Inc., 2019; SFMTA Automatic Vehicle Location Data, 2019.

**NOTES:**

<sup>a</sup> Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.

<sup>b</sup> The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

**Monitoring and Reporting.** ~~The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.~~

*Timing.* ~~The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building<sup>82</sup> at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.~~

~~The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets its terms for this measure.~~

*Collection and Reporting Details.* ~~For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non-holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.~~

~~For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).~~

**Implement Fair Share of Capital Improvement Measures.** ~~If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the The project sponsor shall implement~~

<sup>82</sup>—A new major building is City College of San Francisco Ocean Avenue campus construction post-2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.

contribute funds for the following capital improvement measures that reduce transit travel times. These measures are subject to agency approval and could include:

1. **Signal Timing Modifications at Ocean Avenue/Brighton Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
2. **Signal Timing Modifications at Ocean Avenue/Plymouth Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
3. **Bus Boarding Island on Southbound Frida Kahlo Way.** The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.

The cost of these capital improvement measures is \$200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment) and shall be considered the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA<sup>83</sup>, shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay \$110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and \$90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2.

If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA.

The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.

1. ~~Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.~~
2. ~~Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.~~
3. ~~Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may~~

<sup>83</sup> Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.



~~include off-site capital improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.~~

~~**Term Condition A:** The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.~~

~~**Term Condition B:** The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.~~

~~In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and Implementation of these capital improvement measures would reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. Payment of the fair share contribution levels would mitigate the project's contribution to the cumulative impacts of the estimated transit delay added by full development of the proposed project options, City College facilities master plan, and other cumulative projects. However, given the uncertainty of SFMTA approval of other measures under their jurisdiction, of these capital improvement measures, the impact of the proposed project options would remain significant and unavoidable with mitigation, even with implementation of Mitigation Measure M-C-TR-4.~~

Significance after Mitigation: Significant and Unavoidable.

## 5.E Revisions to Section 3.C, Noise

The text on draft SEIR p. 3.C-23 is revised as follows to clarify nighttime noise-generating activity (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

Construction activities would generally occur between the hours of 7 a.m. and 8 p.m., up to seven days a week. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity and would not occur during nighttime hours. Consequently, construction activities would be consistent with San Francisco Police Code section 2908.

## Construction-Related Noise Sources

Project implementation would result in operation of heavy equipment on the project site for the demolition of the west side berm, and north and east embankments, construction of new structures and associated infrastructure, and open space improvements. Construction activities would occur intermittently on the project site over the six-year construction duration and could expose nearby existing and future sensitive receptors to temporary increases in noise levels substantially in excess of ambient levels. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity. Construction activity is only proposed to occur during daytime hours and nighttime construction noise impacts would not occur and are not assessed herein. While certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, and could include one concrete pour per building, which could occur a total of 12 times throughout the project construction period. Such construction activities that extend beyond normal hours have not been specifically identified by the applicant and would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

**The text on draft SEIR p. 3.C-25 is revised as follows to correct the location of this receptor (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

Archbishop Riordan High School would be the receptor nearest to the ~~eastern-northern~~ property line. Archbishop Riordan High School would be located approximately 80 feet from Phase 0 demolition activities which would last approximately two months.

**The text on draft SEIR p. 3.C-29 is revised as follows to clarify the noise analysis under the compressed construction schedule (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

As stated in the footnote to Table 2-2, p. 2-38, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity.

Compression of the construction schedule from six to three years would increase the intensity of construction and may result in more individual pieces of equipment operating simultaneously than under the proposed six-year construction period of the project. Under the compressed scenario, Phase 0 would occur over a 12-month period, as under the six-year construction scenario; therefore, the construction noise impacts for Phase 0 would be the same.

Under the compressed scenario, Phases 1 and 2 would be constructed simultaneously after Phase 0 and would involve more equipment operation but not at the same location, as Phase 1 and Phase 2 are in separate geographic areas of the project site. Consequently, construction noise impacts at Archbishop Riordan High School as assessed in Table 3.C-8 would increase by 3 dBA and only if development of Blocks G and TH2 would occur simultaneously (see Figure 2-18). All other Phase 1 development would be over 300 feet away, such that construction noise would be attenuated by distance so as not to contribute considerably to construction noise from concurrent development of Phase 2 area under the compressed schedule. Additionally, because construction noise analysis involves consideration of the simultaneous operation of the two noisiest pieces of equipment, the compressed construction scenario would not appreciably result in a change in the character of the significant and unavoidable construction noise impact identified. Therefore, due to the distances involved, the compressed construction scenario would only have a potential for a modest increase in noise levels over those predicted for the proposed schedule.

The peak volume of truck trips under the compressed schedule would also occur over four months in 2022 and would be 1.2 times greater than the six-year schedule due to the simultaneous construction of Phase 1 and 2. As indicated in Table 3.C-8 on SEIR p. 3.C-27, the noise contribution of truck trips would be much less than that of off-road construction equipment. There would not be a substantial increase in the severity of construction noise impacts under the compressed schedule compared to that of the proposed project. The same pieces of equipment would be operating under a compressed construction schedule. Therefore, the maximum noise level would not change based on the methodology above combining the operation of the noisiest pieces of equipment with each phase. Under the compressed construction schedule, the construction noise impact from off-road equipment would be significant.

**The sixth bullet point of Mitigation Measure M-NO-1 on draft SEIR p. 3.C-30 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

- Undertake the noisiest activities (e.g., demolition using hoe rams) during ~~times of least disturbance to surrounding residents and occupants the hours of (9 a.m. to 4 p.m.); and~~ select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street.

**The second full paragraph on draft SEIR p. 3.C-31 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

**Significance after Mitigation:** Significant and Unavoidable. Implementation of construction-related noise control measures in Mitigation Measure M-NO-1 would reduce the project's temporary or periodic increases in ambient noise levels. However, given that there would still be periods of peak construction activity exceeding the "Ambient + 10 dBA" standard at the nearest sensitive receptor locations for occasional periods when

activity would be conducted at the property lines nearest to receptors, these occurrences would occur in all three phases of construction over an extended period of up to six years.

Plywood barriers or moveable sound barrier curtains can provide, at best, 10 to 15 dBA of sound attenuation but would not be effective for elevated receptors in the 1100–1150 Ocean Avenue residences. The feasibility of implementing either a temporary or permanent North Street extension is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College.

If construction were to be conducted under the compressed schedule and be complete as early as 2024, a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity. Therefore, in either case the construction noise impacts would be significant and unavoidable with mitigation.

**The second paragraph of draft SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

This analysis evaluates the significance of construction-related vibration on structures and people (receptors), specifically cosmetic damage effects on structures and sleep disturbance and associated health effects on people. For building damage, the threshold limit depends on the architectural characteristics of the potentially affected structure (see Table 3.C-6, p. 3.C-14), ~~but, for~~ For modern residential, industrial and commercial buildings, a standard of 0.5 in/sec PPV is applied, while for older residential structures, a standard of 0.3 in/sec PPV is applied. ~~Potential nighttime concrete pours would not involve the use of vibration-generating equipment.~~ The potential for sleep disturbance vibration effects are evaluated only when construction activities are proposed during the nighttime hours, which would not occur under the proposed project, therefore, there would be no sleep disturbance vibration impacts.

**The fourth paragraph of SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

As shown in Table 3.C-6, p. 3.C-14, depending on the type of vibration (transient versus continuous), groundborne vibration generated by project-related demolition and construction activities above ~~0.5~~ 0.3 in/sec PPV could cause cosmetic damage to new or older nearby structures. As shown Table 3.C-9, estimated vibration levels of PPV's would be ~~well~~ below the ~~0.5~~ 0.3 in/sec threshold and this impact would be *less than significant*.

## 5.F Revisions to Section 3.D, Air Quality

The background existing cancer risk and PM<sub>2.5</sub> concentrations presented in the draft SEIR were based on the most recent San Francisco Citywide Health Risk Assessment database available at the time the notice of preparation (NOP) and draft SEIR were released. This assessment was conducted

in 2012 and indicates that the project site is not located within an air pollutant exposure zone (APEZ). In February 2020, the city, in collaboration with the regional air district, completed a draft update to the Citywide Health Risk Assessment database in order to update the APEZ map, as required by Health Code article 38. The draft 2020 Citywide Health Risk Assessment database includes the following updates compared to the prior Citywide Health Risk Assessment database:

- Vehicle activity is based on an updated San Francisco Chained Activity Modeling Process (SF-CHAMP) model run for year 2020
- Vehicle emissions are updated for year 2020
- Vehicle emissions include re-suspended road dust, which was not included in the prior citywide health risk assessment
- Maritime emissions now also account for ferry emissions (emissions that were not included in the prior Citywide Health Risk Assessment database due to lack of available information at that time)
- Caltrain emissions have been updated
- Stationary source emissions permitted by the air district have been updated
- Updated citywide air dispersion modeling was conducted
- Cancer risk estimates have been updated based on updated methodologies from the Office of Environmental Health Hazard Assessment

Based on this draft updated database, the San Francisco Department of Public Health issued a draft updated APEZ map, issued a draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, and initiated a 30-day public review period.<sup>84</sup> The updated final APEZ map shows that the project site is not located within an APEZ, consistent with the draft SEIR.

Based on the updated final APEZ map<sup>85</sup> and the draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, the proposed project would result in a significant health risk impact to on- and off-site sensitive receptors during the project's construction activities without mitigation, consistent with what was presented in the draft SEIR. However, with implementation of Mitigation Measure M-AQ-2a (Construction Emissions Minimization) and M-AQ-4a (Install MERV 13 Filters at the Daycare Facility), this impact would be reduced to a less-than-significant level, also consistent with what was presented in the draft SEIR. Also consistent with the draft SEIR, the health risks to existing offsite sensitive receptors may exceed the cancer risk thresholds under the worst-case three-year construction phasing scenario, and therefore this impact would be significant and unavoidable with mitigation. Specifically:

- For excess cancer risk from construction and operation emissions for both offsite and onsite receptors not in APEZ under existing conditions, the project's contribution is either less than the threshold of 10.0 cancers per 1 million and/or the project's contribution would not place any offsite or onsite receptor into a new APEZ.

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<sup>84</sup> San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020

<sup>85</sup> San Francisco Planning Department, San Francisco Property Information Map, <https://sfplanninggis.org/PIM/>.

- For excess cancer risk from construction and operation emissions for both offsite and onsite receptors in the APEZ under existing conditions, the project's contribution is less than the threshold of 7.0 cancers per 1 million.
- For excess cancer risk from construction and operation emissions under the compressed construction scenario for offsite receptors in the APEZ under existing conditions, this impact would be conservatively considered significant and unavoidable with mitigation.
- For PM<sub>2.5</sub> concentrations from construction and operation emissions for both offsite and onsite receptors not in APEZ under existing conditions, the project's contribution is either less than the threshold of 0.3  $\mu\text{m}^3$  and/or the project's contribution would not place any offsite or onsite receptor into a new APEZ.
- For PM<sub>2.5</sub> concentrations from construction and operation emissions for both offsite and onsite receptors in the APEZ under existing conditions, the project's contribution is less than the threshold of 0.2  $\mu\text{m}^3$ .
- For PM<sub>2.5</sub> concentrations from construction and operation emissions under the compressed construction scenario for offsite receptors in the APEZ under existing conditions, this impact would be conservatively considered significant and unavoidable with mitigation.

Therefore, the following text in the draft SEIR has been revised to update references to, and data from, the updated citywide health risk modeling database. The revised text does not provide new information that would result in any new significant impact not already identified in the draft SEIR or a substantial increase in the severity of an impact identified in the draft SEIR that cannot be mitigated to less than significant level with implementation of mitigation measure(s) agreed to by the project sponsor. Therefore, recirculation pursuant to CEQA guidelines section 15088.5 is not required.

- \* **To reflect the updated health risk analysis, the last sentence in the first paragraph on draft SEIR p. 3.D-1 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

Supplemental air quality information supporting the analysis in this section is provided in SEIR Appendix E, Air Quality Technical Memorandum, and Appendix I, Updated Health Risk Assessment Memorandum.

- \* **To reflect the updated APEZ map and the draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, draft SEIR pp. 3.D-16 to 3.D-17, and footnote 239, is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

In an effort to identify areas of San Francisco most adversely affected by sources of TACs and elevated concentrations of particulate matter, the City and County of San Francisco partnered with BAAQMD to inventory and assess air pollution exposure from vehicles, stationary sources, and area sources within San Francisco. Citywide dispersion modeling was conducted using AERMOD<sup>238</sup> to assess the emissions from the following primary sources: vehicles on local roadways, permitted stationary sources, port and maritime sources, and diesel emissions from Caltrain. Emissions of PM<sub>10</sub> (DPM is assumed equivalent to PM<sub>10</sub>), PM<sub>2.5</sub>, and total organic gases (TOGs) were modeled on a 20 by 20–

meter receptor grid covering the entire city. The citywide modeling results represent a comprehensive assessment of existing cumulative exposures to air pollution throughout the city. The methodology and technical documentation for modeling citywide air pollution are available in the document entitled, *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*.<sup>239</sup>

Model results were used to identify areas in the city with poor air quality, which are designated as the *Air Pollutant Exposure Zone* (APEZ), based on the following health-protective criteria: (1) cumulative PM<sub>2.5</sub> concentrations greater than 10 µg/m<sup>3</sup> and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million persons exposed. See below for evidence supporting these standards.

An additional health vulnerability layer was incorporated in the APEZ for those San Francisco ZIP codes in the worst quintile of Bay Area Health Vulnerability scores (ZIP Codes 94102, 94103, ~~94105~~94110, 94124, and ~~94130~~94134). In these areas, the standard for identifying areas as being within the zone were lowered to: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 90 per one million persons exposed and/or (2) cumulative PM<sub>2.5</sub> concentrations greater than 9 µg/m<sup>3</sup>.

Lastly, all parcels within 500 feet of a major freeway were also included in the APEZ, consistent with findings in CARB's Air Quality and Land Use Handbook: A Community Health Perspective, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.<sup>240</sup>

Citywide modeling results identified that the project site is not located within the APEZ, including it is not located within a health vulnerable zip code. The closest parcels to the project site within the APEZ are those within 500 feet of I-280 bounded by Howth Street, Ocean Avenue, and Geneva Avenue, located approximately 1,300 feet to the southeast of the project site.

<sup>239</sup> ~~BAAQMD, San Francisco Department of Public Health, and San Francisco Planning Department, and Ramboll, The San Francisco Community Risk Reduction Plan: Technical Support Documentation, Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation, December 2012~~February 2020.

- \* **To reflect the updated health risk analysis background values, draft SEIR p. 3.D-20 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

The project site is not located within an area with risk factors that meet the updated APEZ criteria. Background cancer risk values on the project site range from 8 to 22 in one million, with background values ranging from ~~43~~ to ~~139~~549 in one million within 3,280 feet (1,000 meters) of the site. Background PM<sub>2.5</sub> concentrations range from 8.3 to 8.6 µg/m<sup>3</sup> on the project site, with background values varying between ~~8.17~~8 and ~~11.3~~18.2 µg/m<sup>3</sup> within

3,280 feet (1,000 meters) of the site. The nearest offsite receptors within an APEZ are located approximately 1,100 feet to the southeast and are so designated due to the proximity of I-280. Receptors within 3,280 feet (1,000 meters) of the project boundary are located both within and outside of the APEZ and impacts are assessed accordingly as discussed below in the “Approach to Analysis” section.

- \* **The last paragraph on draft SEIR p. 3.D-36 and first two lines on p. 3.D-37 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

As part of this project, a health risk assessment was conducted for the proposed project to estimate health risks from exposures to TACs. The assessment examined sensitive receptors within 3,280 feet (1,000 meters) of the project boundary, used the ~~citywide Community Risk Reduction Plan (CRRP) model~~ draft 2020 San Francisco Citywide Health Risk Assessment database to identify existing background risk, included updated locations and emission rates of existing stationary sources provided by the BAAQMD, and updated cancer risk values based on the latest (2015) guidance by OEHHA.

- \* **The third full paragraph and footnote 282 on draft SEIR p. 3.D-37 is revised as follows to update the new draft Citywide Health Risk Assessment references (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

The threshold of significance used to evaluate health risks from new sources of TACs associated with the project is based on the potential for the proposed project to substantially affect the extent and severity of the APEZ at sensitive receptor locations. The health protective standards used for determining the APEZ and evidence supporting these standards are discussed in the Setting section above and were developed in consultation with BAAQMD staff as part of the preparation of a ~~Community Risk Reduction Plan~~ draft 2020 San Francisco Citywide Health Risk Assessment.<sup>282</sup> The project site is not within an identified health vulnerable ZIP code; therefore, the APEZ criterion for this location is based on: (1) cumulative PM<sub>2.5</sub> concentrations greater than 10 µg/m<sup>3</sup>, and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population.

<sup>282</sup> San Francisco has prepared a ~~Community Risk Reduction Plan~~ Citywide Health Risk Assessment. Extensive modeling has been conducted and is documented in ~~The San Francisco Community Risk Reduction Plan: Technical Support Documentation~~ the draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation. This modeling provides the technical basis for development of the ~~Community Risk Reduction Plan~~ Citywide Health Risk Assessment.



- \* The text on draft SEIR p. 3.D-39 and footnote 289 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

#### TAC Concentrations

Consistent with the ~~Community Risk Reduction Plan Health Risk Assessment (CRRP HRA)~~ draft 2020 San Francisco Citywide Health Risk Assessment, the air toxics analysis evaluated health risks and PM<sub>2.5</sub> concentrations resulting from the proposed project upon the surrounding community. For the proposed project, this would include construction emissions over the course of buildout, operational traffic (which was assessed using the ~~CRRP HRA~~ draft 2020 San Francisco Citywide Health Risk Assessment modeling), operational heavy-duty delivery truck travel and idling, and stationary sources (the emergency generators). The methods used to evaluate emissions for the proposed project and cumulative health risk assessment are based on the most recent air district CEQA Guidelines and the most recent Air Toxics Hot Spots Program Risk Assessment Guidelines.<sup>287</sup>

The cancer risk analysis in the health risk assessment for the project is based on DPM concentrations from on- and off-road construction equipment, as well as the operational DPM concentrations from the emergency generators and delivery trucks. Concentrations of TACs from the proposed project construction emissions were estimated using the U.S. EPA's preferred atmospheric dispersion modeling system (AERMOD), as were project-related operational mobile sources (vehicle traffic and delivery vehicles) and stationary sources (emergency generators and delivery trucks). The most-recent version of the American Meteorological Society/U.S. EPA regulatory air dispersion model (AERMOD version 9.6.5) was used to evaluate ambient air concentrations of DPM and PM<sub>2.5</sub> at on- and offsite receptors.<sup>288</sup>

AERMOD requires a number of inputs including meteorological data. For this project's health risk assessment, BAAQMD's Mission Bay meteorological data for 2008 were used, which aligns with the San Francisco ~~CRRP HRA Methodology~~ draft 2020 San Francisco Citywide Health Risk Assessment.<sup>289</sup> For detail with regard to terrain and land use considerations, emission rates, source parameters, and risk characterization methods applied in the assessment, please refer to Appendix E, Air Quality Technical Memorandum.

#### Sensitive Receptors

In order to evaluate health impacts to onsite and offsite receptors, receptors were placed at locations co-located with the receptors used in the ~~CRRP HRA~~ draft 2020 San Francisco Citywide Health Risk Assessment and within 3,280 feet (1,000 meters) of the project site. Sensitive receptors were modeled at a height of 6 feet (1.8 meters), above terrain height, a default breathing height for ground-floor receptors, consistent with the ~~CRRP HRA analysis~~ draft 2020 San Francisco Citywide Health Risk Assessment.

<sup>289</sup> ~~BAAQMD, San Francisco Department of Public Health, and San Francisco Planning Department, and Ramboll, The San Francisco Community Risk Reduction Plan: Technical Support Documentation, Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation, December 2012~~ February 2020.

- \* The beginning of Mitigation Measure M-AQ-2a (Construction Emissions Minimization) on draft SEIR p. 3.D-49 is revised as follows because it applies under all scenarios for Impact AQ-2b and Impact AQ-4 (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

Mitigation Measure M-AQ-2a: Construction Emissions Minimization. ~~In the case of the Developer's Proposed Option under the compressed three year construction schedule or in the case of the Additional Housing Option under either the six year construction schedule or the compressed three year construction schedule, t~~The project sponsor or the project sponsor's contractor shall comply with the following:

- \* The scenario descriptions are revised as follows to clarify the scenarios with overlapping construction and operation on draft SEIR p. 3.D-40 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

Scenario 3. Construction Plus Operation: offsite receptors (residents, daycare, and school) evaluated starting when construction commences and exposed to all construction emissions and 27 years of operational emissions.

Scenario 4. Construction Plus Operation: onsite receptors (residents and daycare) present at the project site once Phase 1 is complete evaluated starting when construction for Phase 1 concludes and exposed to all Phase 2 construction emissions and 30 years of operational emissions.

- \* The last paragraph on draft SEIR p. 3.D-45 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

With regard to construction schedule and phasing, the analysis assumed that Phase 0 (site preparation and grading) would require a full year, followed by Phase 1 construction for 30 months, followed by Phase 2 construction for 30 months, for a full construction duration of six years. ~~This is the longest feasible timeline as anticipated by the project sponsor.~~

In response to the air district's request, acknowledging that the air district's emissions reduction grant program is evolving, and because individual emission reduction projects needed to support the ozone precursor offsets required by Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) have not yet been identified, Mitigation Measure M-AQ-2d is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):

Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule. Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building

associated with Phase 1, the project sponsor, with the oversight of the Environmental Review Officer (ERO), shall either:

1. *Directly fund or implement a specific offset project within San Francisco if available to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or*
2. *Pay mitigation offset fees to the Bay Area Air Quality Management District Bay Area Clean Air Foundation or other governmental entity or third party. The mitigation offset fee, ~~currently estimated at approximately \$30,000 per weighted ton, plus an administrative fee of no more than 5 percent of the total offset,~~ shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the ~~planning department~~ ERO, the project sponsor, and the ~~air district governmental entity or third party responsible for administering the funds,~~ and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions below significance levels after implementation of other identified mitigation measures as currently calculated.*

The agreement that specifies fees and timing of payment shall be signed by the project sponsor, the ~~air district governmental entity or third party responsible for administering the funds,~~ and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c.

The total emission offset amount ~~is presented above~~ was calculated by summing the maximum daily construction emissions of ROG and NO<sub>x</sub> (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated construction-related ROG and NO<sub>x</sub> emissions offsets required. No reductions are needed for operations or overlapping construction and operations.

**The second paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:**

Mitigation Measure M-AQ-2d would offset emissions of ROG and NO<sub>x</sub> that would exceed the respective thresholds of significance for these pollutants. Thus, these offsets, if implemented, would reduce impacts to less-than-significant levels. The measure allows the project sponsor to directly fund or implement an offset project; however, no such project has yet been identified. Additionally, implementation of the emissions reduction

project could be conducted by the ~~air district governmental entity or third party responsible for administering the funds~~ and is outside the jurisdiction and control of the City and not fully within the control of the project sponsor. Therefore, the residual impact of project emissions during construction is conservatively considered *significant and unavoidable with mitigation*, due to some limited uncertainty in its implementation. This finding does assume that the project sponsor would implement Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c, in addition to Mitigation Measure M-AQ-2d. Although the specific offset projects are not known, it is anticipated that implementation of this mitigation measure would not result in any adverse environmental effects.

**The last paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:**

The Developer's Proposed Option would be *less than significant* under the assumed six-year construction schedule. The Additional Housing Option under the assumed six-year schedule would be reduced to *less than significant with mitigation* through the implementation of Mitigation Measure M-AQ-2a and M-AQ-2b. Given the potential that the project could be developed under an accelerated construction schedule of three years' duration, the potential exists that construction emissions of NO<sub>x</sub> would exceed the daily and annual significance thresholds even with mitigation, which would be a *significant impact* (see Table 3.D-8b). Therefore, in the case of the Developer's Proposed Option or the Additional Housing Option under the compressed three-year construction schedule, the project sponsor would also be required to implement Mitigation Measure M-AQ-2c, which requires that all heavy-duty trucks greater than 19,500 pounds must have model year 2014 or newer engines, and Mitigation Measure M-AQ-2d, which requires the project sponsor to implement emission offsets. However, because implementation of the emissions offset project would be conducted by the ~~air district governmental entity or third party responsible for administering the funds~~ and would be outside the jurisdiction and control of the City and not fully within the control of the project sponsor, because no specific emission reduction project has been identified, and because the project may be constructed over a much shorter timeframe resulting in higher NO<sub>x</sub> emissions than presented above, the impact with respect to criteria air pollutants is conservatively considered *significant and unavoidable with mitigation*. These conclusions are summarized in Table 3.D-9, Summary of Construction Criteria Pollutant Impacts (Impact AQ-2).

- \* **To reflect the updated health risk analysis, the text on draft SEIR pp. 3.D-66 to 3.D-68 is revised as follows (deleted text is shown in ~~striketrough~~ and new text is shown in double underline):**

The maximum estimated excess lifetime cancer risk for each exposure scenario (see "Health Risk Assessment Methods," p. 3.D-38) for all sensitive receptor locations<sup>306</sup> for receptors not in the APEZ under existing conditions is presented in Table 3.D-13a, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Developer's Proposed Option, and Table 3.D-13b, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Additional Housing Option.

**TABLE 3.D-13A**  
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ**  
**WITH THE PROPOSED PROJECT – DEVELOPER’S PROPOSED OPTION**

Scenario / Receptor Type	Lifetime Excess Cancer Risk (in One Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	10.0 <sup>d</sup>	100.0	10.0 <sup>d</sup>	100.0
<b>Construction</b>					
Resident (offsite) <sup>e</sup> f	<u>78.145.7</u>	<u>36.167.4</u>	<u>114.282.8</u>	<u>4.77.7</u>	<u>82.823.4</u>
Resident (onsite) <sup>f</sup>	<u>64.823.7</u>	<b>108.69</b>	<b>173.3432.6</b>	9.5	<u>74.233.2</u>
Daycare (offsite) <sup>f</sup>	<u>62.021.9</u>	<b>87.5</b>	<b>149.6409.4</b>	11.6	<u>73.633.5</u>
Daycare (onsite) <sup>f</sup>	<u>59.321.8</u>	<b>238.4</b>	<b>297.6260.2</b>	20.9	<u>80.142.7</u>
School (offsite) <sup>e</sup>	<u>28.047.5</u>	12.9	<u>40.830.3</u>	1.5	<u>29.549.0</u>
<b>Construction + Operations</b>					
Resident (offsite) <sup>ef</sup>	<u>52.945.7</u>	<u>61.867.5</u>	<u>114.883.3</u>	<u>7.98.4</u>	<u>60.823.9</u>
Resident (onsite) <sup>f</sup>	<u>64.823.7</u>	<b>110.3440.9</b>	<b>175.0434.6</b>	11.4	<u>75.935.4</u>
Daycare (offsite) <sup>f</sup>	<u>62.021.9</u>	<b>87.7</b>	<b>149.7409.6</b>	11.8	<u>73.833.6</u>
Daycare (onsite) <sup>f</sup>	<u>59.321.8</u>	<b>239.5</b>	<b>298.8261.3</b>	22.0	<u>81.343.8</u>
School (offsite) <sup>e</sup>	<u>28.047.5</u>	13.1	<u>41.130.6</u>	1.7	<u>29.749.2</u>
<b>Operations<sup>e</sup></b>					
Resident (offsite) <sup>fe</sup>	<u>28.961.7</u>	<u>2.65.5</u>	<u>31.567.2</u>	<u>2.25.4</u>	<u>31.267.2</u>
Resident (onsite) <sup>fe</sup>	<u>45.348.2</u>	14.8	<u>60.133.0</u>	14.7	<u>60.032.9</u>
Daycare (offsite) <sup>fe</sup>	<u>62.041.3</u>	<u>0.74.2</u>	<u>62.742.5</u>	<u>0.70.7</u>	<u>62.722.6</u>
Daycare (onsite) <sup>fe</sup>	<u>50.849.4</u>	7.0	<u>57.826.4</u>	6.9	<u>57.726.3</u>
School (offsite) <sup>fe</sup>	<u>28.935.4</u>	0.6	<u>29.535.7</u>	0.5	<u>29.535.6</u>

SOURCE: ESA, 2019, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment, 2020*. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

<sup>a</sup> **Bold values** = threshold exceedance

<sup>b</sup> All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

<sup>c</sup> Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

<sup>d</sup> The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

<sup>e</sup> Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the onsite-MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

<sup>f</sup> Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the onsite-MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

**TABLE 3.D-13B**  
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ**  
**WITH THE PROPOSED PROJECT – ADDITIONAL HOUSING OPTION**

Scenario / Receptor Type	Lifetime Excess Cancer Risk (in One Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	10.0 <sup>d</sup>	100.0	10.0 <sup>d</sup>	100.0 <sup>d</sup>
<b>Construction</b>					
Resident (offsite) <sup>fe</sup>	49.845.7	<b>76.380.5</b>	<b>126.096.3</b>	8.28.5	57.924.3
Resident (onsite) <sup>f</sup>	64.823.7	<b>122.2122.6</b>	<b>186.9146.3</b>	10.7	75.434.4
Daycare (offsite) <sup>f</sup>	62.024.9	<b>101.7</b>	<b>163.7423.6</b>	12.6	74.634.5
Daycare (onsite) <sup>f</sup>	59.324.8	<b>267.7</b>	<b>326.9289.5</b>	23.4	82.745.3
School (offsite) <sup>e</sup>	28.017.5	14.4	42.437.9	1.6	29.619.1
<b>Construction + Operations</b>					
Resident (offsite) <sup>fe</sup>	49.845.7	<b>77.584.2</b>	<b>127.397.0</b>	9.49.2	59.125.0
Resident (onsite) <sup>f</sup>	63.923.7	<b>125.6</b>	<b>189.5149.3</b>	13.4	77.337.4
Daycare (offsite) <sup>f</sup>	62.021.9	<b>102.0</b>	<b>164.0423.8</b>	12.8	74.834.7
Daycare (onsite) <sup>f</sup>	59.324.8	<b>269.6</b>	<b>328.8291.4</b>	25.3	84.547.4
School (offsite) <sup>e</sup>	28.017.5	14.8	42.832.3	1.9	29.919.4
<b>Operations<sup>e</sup></b>					
Resident (offsite) <sup>f</sup>	28.961.7	4.27.8	33.269.5	3.267.6	32.269.4
Resident (onsite) <sup>ef</sup>	45.348.2	25.1	70.443.2	24.9	70.243.4
Daycare (offsite) <sup>ef</sup>	62.041.3	1.24.8	63.243.0	1.1	63.123.0
Daycare (onsite) <sup>ef</sup>	50.849.4	11.8	62.631.2	11.7	62.531.4
School (offsite) <sup>ef</sup>	29.035.4	1.0	29.936.4	0.7	29.725.4

SOURCE: ESA, 2019, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment, 2020*. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

<sup>a</sup> Bold values = threshold exceedance

<sup>b</sup> All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

<sup>c</sup> Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

<sup>d</sup> The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

<sup>e</sup> Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the onsite-MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

<sup>f</sup> Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the onsite-MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

- \* **To reflect the updated health risk analysis, the third paragraph on draft SEIR p. 3.D-69 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

For the offsite MEISR (daycare receptor), the mitigated lifetime excess cancer risk under proposed project conditions for the Developer's Proposed Option of 11.8 combined with the background cancer risk of ~~21.962.0~~ would equal ~~33.573.8~~, which is less than 100; the mitigated lifetime excess cancer risk under proposed project conditions for the Additional Housing Option of 12.8 combined with the background cancer risk of ~~21.962.0~~ would equal ~~34.774.8~~, which is also less than 100; therefore, under mitigated conditions, the offsite MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of 10.0 per 1 million would not apply. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and the excess cancer risk impact on offsite receptors not located in the APEZ would be less than significant with mitigation.

- \* **To reflect the updated health risk analysis, the third paragraph on draft SEIR p. 3.D-70 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

Table 3.D-13a, p. 3.D-67, and Table 3.D-12b, p. 3.D-68, also show the cancer risk under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. For the onsite MEISR (daycare receptor), the mitigated lifetime excess cancer risk under proposed project conditions for the Developer's Proposed Option of 22.0 combined with the background cancer risk of ~~21.859.3~~ would equal ~~43.881.3~~, which is less than 100; the mitigated lifetime excess cancer risk under proposed project conditions for the Additional Housing Option of 25.3 combined with the background cancer risk of ~~21.859.3~~ would equal ~~47.484.5~~, which is also less than 100; therefore, under mitigated conditions, the onsite daycare MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of 10.0 per 1 million would not apply. As shown in Table 3.D-13a and Table 3.D-12b, implementation of these mitigation measures would be sufficient to reduce this impact to a less-than-significant level, and the excess cancer risk impact on onsite receptors not located in the APEZ would be less than significant with mitigation.



- \* To reflect the updated health risk analysis, draft SEIR pp. 3.D-73 to 3.D-78 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

TABLE 3.D-14A  
LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – DEVELOPER’S PROPOSED OPTION

Scenario / Receptor Type <sup>d</sup>	Lifetime Excess Cancer Risk (in one Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	7.0	—	7.0	—
<b>Construction</b>					
Resident (offsite)	<u>80.974.0</u>	<u>43.44.2</u>	<u>124.378.2</u>	<u>6.00.5</u>	<u>86.974.5</u>
<u>Daycare (offsite)</u>	<u>104.8</u>	<u>37.3</u>	<u>142.0</u>	<u>5.1</u>	<u>109.8</u>
School (offsite)	<u>145.536.6</u>	1.1	<u>146.737.7</u>	0.1	<u>145.736.7</u>
<b>Construction + Operations</b>					
Resident (offsite)	<u>80.974.0</u>	<u>44.14.4</u>	<u>125.078.4</u>	<u>6.74.4</u>	<u>87.658.0</u>
<u>Daycare (offsite)</u>	<u>104.8</u>	<u>37.4</u>	<u>142.1</u>	<u>5.2</u>	<u>109.9</u>
School (offsite)	<u>145.536.6</u>	1.3	<u>146.837.8</u>	0.3	<u>145.836.8</u>
<b>Operations</b>					
Resident (offsite)	<u>187.056.6</u>	<u>5.02.4</u>	<u>192.059.0</u>	<u>4.92.4</u>	<u>191.959.0</u>
<u>Daycare (offsite)</u>	<u>124.2</u>	<u>1.2</u>	<u>125.4</u>	<u>1.2</u>	<u>125.4</u>
School (offsite)	<u>145.536.6</u>	0.2	<u>145.836.8</u>	0.2	<u>145.736.8</u>

SOURCE: ESA, 2019, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment, 2020*. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; Bkgd. = background value; n/a = Not applicable; i.e., for this receptor type, there are no receptors that are currently located in the APEZ.

<sup>a</sup> Bold values = threshold exceedance

<sup>b</sup> All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB’s *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

<sup>c</sup> Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

<sup>d</sup> Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents, ~~offsite daycare, and or~~ onsite daycare receptors in the modeling domain that are already located in the APEZ.

Offsite receptors considered in the health risk assessment include existing offsite receptors currently located in the APEZ due to their proximity to I-280 (within 500 feet) and Ocean Avenue. These tables do not show receptor types that are not already in the APEZ, including onsite residents, offsite daycare, and onsite daycare; risks to these receptors are discussed above. The majority of project-generated excess cancer risk at the MEISR would be attributable to construction emissions. For these receptor locations, the project would contribute cancer risks of up to 4.437.4 per million and 5.443.1 per million at offsite ~~resident daycare~~ locations for the Developer’s Proposed Option and the Additional Housing Option, respectively. The project’s excess cancer risk contribution would ~~not~~



exceed the significance threshold of 7.0 in a million. Therefore, without mitigation, the impact with regard to increased cancer risk would be ~~less than~~ significant for offsite receptors located in the APEZ.

**TABLE 3.D-14B**  
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – ADDITIONAL HOUSING OPTION**

Scenario / Receptor Type <sup>d</sup>	Lifetime Excess Cancer Risk (in one Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	7.0	—	7.0	<u>7</u>
<b>Construction</b>					
Resident (offsite)	<u>80.974.0</u>	<b>48.54.9</b>	<u>129.478.9</u>	<u>6.30.6</u>	<u>87.374.6</u>
Daycare (offsite)	<u>104.8</u>	<b>43.0</b>	<u>147.7</u>	<u>5.5</u>	<u>110.2</u>
School (offsite)	<u>145.536.6</u>	1.3	<u>146.837.8</u>	0.1	<u>145.736.7</u>
<b>Construction + Operations</b>					
Resident (offsite) <sup>e</sup>	<u>80.9/83.974.0</u>	<b>49.65.4</b>	<u>130.579.4</u>	<u>6.4.8<sup>f</sup></u>	<u>91.258.5</u>
Daycare (offsite)	<u>104.8</u>	<b>43.1</b>	<u>147.8</u>	<u>5.6</u>	<u>110.4</u>
School (offsite)	<u>145.536.6</u>	1.5	<u>147.038.0</u>	0.3	<u>145.936.9</u>
<b>Operations</b>					
Resident (offsite)	<u>187.056.6</u>	<u>7.03.4</u>	<u>194.060.0</u>	<u>6.93.4</u>	<u>193.960.0</u>
Daycare (offsite)	<u>124.2</u>	<u>1.8</u>	<u>126.0</u>	<u>1.7</u>	<u>125.9</u>
School (offsite)	<u>145.536.6</u>	0.3	<u>145.936.9</u>	0.3	<u>145.836.9</u>

SOURCE: ESA, 2019, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment, 2020*. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; Bkgd. = background value; n/a = Not applicable; i.e., for this receptor type, there are no receptors that are currently located in the APEZ.

<sup>a</sup> **Bold values** = threshold exceedance

<sup>b</sup> All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

<sup>c</sup> Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

<sup>d</sup> Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents, ~~offsite daycare, and/or~~ onsite daycare receptors in the modeling domain that are already located in the APEZ.

<sup>e</sup> Under mitigated conditions, the offsite residential MEISR is a different receptor location than under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated offsite residential MEISR occurs during the project operations phase.

<sup>f</sup> Although the cancer risk for the Additional Housing Option of 7.4 per million exceeds the significance threshold for the project's contribution of 7.0 per million, the project's contribution does not increase the severity of the cancer risk for this receptor, nor does the project expand the geography of the APEZ. The total background plus project value does not exceed the APEZ criterion of 100 per million. Therefore, this receptor does not technically meet the criteria for the APEZ.

~~Although Because~~ mitigation measures are ~~not~~ required to reduce the impact to offsite sensitive receptors located in the APEZ, Table 3.D-14a and Table 3.D-14b also show the cancer risk under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71, which are required to

reduce impacts to receptors not in the APEZ under existing conditions and to reduce construction-generated emissions of criteria pollutants.

Construction emissions contribute over 90 percent of the unmitigated project's health risk at the MEISR (see Appendix E, Air Quality Technical Memorandum, for additional detail). Implementation of Mitigation Measure M-AQ-2a would reduce cancer risk at the offsite receptor locations currently located in the APEZ further below the significance thresholds. As shown in Table 3.D-14a and Table 3.D-14b, under mitigated conditions, the project would contribute cancer risks at the unmitigated MEISR of up to ~~1.45.2~~ per million and ~~1.95.6~~ per million at offsite ~~resident day care~~ locations for the Developer's Proposed Option and the Additional Housing Option, respectively. It is worth noting that under mitigated conditions, the offsite MEISR is a different receptor location than under unmitigated conditions; in other words, the greatest cancer risk for mitigated emissions occurs at a different location than greatest cancer risk under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated MEISR occurs during the project operations phase. The project would contribute cancer risks at the mitigated MEISR of up to ~~2.46.7~~ per million and ~~3.47.4~~ per million at offsite resident locations for the Developer's Proposed Option and the Additional Housing Option, respectively.

Under the Additional Housing Option, the unmitigated cancer risk at the offsite resident MEISR is about 50 per million. When combined with the background cancer risk of 83.9, the total cancer risk is approximately 130 per million, which exceeds the APEZ criteria of 100 cancers per million. Without mitigation, the project's cancer risk contribution would be significant because it would exceed a cancer risk of 7 per million. However, with mitigation, the Additional Housing Option would contribute a cancer risk of 7.4 per million, resulting in a total cancer risk of 91.2. This total cancer risk is below the APEZ cancer risk criteria of 100 per million. Therefore, with mitigation, this receptor does not technically meet the criteria for the APEZ and the project would not substantially increase the severity of the cancer risk for this receptor, nor does the project expand the geography of the APEZ.

The reason this receptor is located in the APEZ is because the APEZ is defined at the parcel level, and there are one or more receptor points within 20 meters of the parcel where this receptor is located that exceed the APEZ criterion of 100 per million. In other words, if one receptor point within a given parcel meets the APEZ criteria, all receptor points within this parcel are also categorized as within the APEZ. However, because neither the background cancer risk value of 83.9 nor the combined total cancer risk value of 91.2 (background of 83.9 plus the project's contribution of 7.4) at the offsite resident MEISR exceeds the APEZ criterion of 100 per million, the project would not increase the severity of the cancer risk for this receptor or expand the geography of the APEZ. In addition, the cancer risk values presented above are the result of many conservative assumptions and do not consider the effect of the building shell on outdoor TAC concentrations to the resulting indoor concentrations and the associated sensitive receptor exposure. Therefore, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level.

All of the other cancer risk values for both the Developer's Proposed Option and the Additional Housing Option are less than the significance threshold for the project's contribution of 7.0 per million. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and the excess cancer risk impact on offsite receptors located in the APEZ would be less than significant with mitigation.

As discussed above, the project may be constructed over a total of three years instead of six years. If this were to occur, the excess lifetime cancer risk at offsite sensitive receptor locations would increase. While the total exposure to TACs remains the same in this compressed construction scenario, more exposure would occur when sensitive receptors are younger and, thus, more susceptible to TAC exposure. It is estimated that cancer risks could increase at least 30 percent for the offsite MEISR currently located in the APEZ under the three-year construction schedule, leading to mitigated cancer risks of ~~79~~ to ~~810~~ per million for the Developer's Proposed Option and ~~4011~~ to ~~4412~~ per million for the Additional Housing Option. Although the mitigated cancer risk for both the Developer's Proposed Option and the Additional Housing Option under the anticipated construction schedule would be less than ~~the threshold of 7.0 in a million significant with mitigation as discussed above~~, because the construction schedule is subject to change, this impact would be conservatively considered significant. Therefore, the excess cancer risk impact on offsite receptors would be significant and unavoidable with mitigation.

#### Onsite Receptors

There are currently no onsite receptors located in the APEZ under existing conditions. Therefore, no analysis was conducted.

#### PM<sub>2.5</sub> Concentrations from Construction and Operation Emissions for Receptors Not in APEZ under Existing Conditions

#### Offsite Receptors

The maximum estimated annual average PM<sub>2.5</sub> concentrations from all project sources at offsite receptor locations not in the APEZ under existing conditions are presented in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Assessment Memorandum, Tables ~~345~~ and ~~336~~. The project's emissions would combine with existing background concentrations and would exceed the APEZ criteria of either an annual average PM<sub>2.5</sub> concentration of 10.0 µg/m<sup>3</sup>, or a total lifetime excess cancer risk of 100.0 per million,<sup>86</sup> with the project contributing PM<sub>2.5</sub> concentrations of up to 0.38 µg/m<sup>3</sup> and 0.43 µg/m<sup>3</sup> at offsite daycare locations for the Developer's Proposed Option and the Additional Housing Option, respectively. The project's annual average PM<sub>2.5</sub> concentrations would exceed the significance threshold of 0.3 µg/m<sup>3</sup>. Therefore, without

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<sup>86</sup> The APEZ is defined for receptor locations that meet the criteria for *either* lifetime excess cancer risk *or* annual average PM<sub>2.5</sub> concentrations. For example, if the lifetime excess cancer risk is 105 per million and the annual average PM<sub>2.5</sub> concentration is 9.5 µg/m<sup>3</sup>, and the receptor would be in the APEZ even though the annual average PM<sub>2.5</sub> concentration does not exceed the APEZ criteria of 10.0 µg/m<sup>3</sup>.

mitigation, the impact with regard to PM<sub>2.5</sub> concentrations would be significant for offsite receptors not located in the APEZ.

Tables ~~345~~ and ~~336~~ in ~~Appendix E, Air Quality Technical Memorandum~~ new SEIR Appendix I, Updated Health Risk Assessment Memorandum, also show the annual average PM<sub>2.5</sub> concentrations under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. Mitigation Measure M-AQ-2a would reduce off-road PM<sub>2.5</sub> exhaust emissions by 80 to 85 percent, and Mitigation Measure M-AQ-4a would reduce generator PM<sub>2.5</sub> exhaust emissions by 93 percent. Construction emissions contribute over 90 percent of the unmitigated project's PM<sub>2.5</sub> concentrations (see SEIR Appendix E for additional detail).

For the offsite MEISR (daycare), the maximum mitigated annual average PM<sub>2.5</sub> concentrations under the Developer's Proposed Option of 0.04 µg/m<sup>3</sup> combined with background annual average PM<sub>2.5</sub> concentrations of ~~8.498.92~~ would equal ~~8.538.95~~, which is less than 10.0; and the maximum mitigated annual average PM<sub>2.5</sub> concentrations under proposed project conditions for the Additional Housing Option of 0.04 µg/m<sup>3</sup> combined with background annual average PM<sub>2.5</sub> concentrations of ~~8.498.92~~ would equal ~~8.538.95~~, which is less than 10.0. Therefore, under mitigated conditions, the offsite MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of an annual average PM<sub>2.5</sub> concentration of 0.3 µg/m<sup>3</sup> would not apply. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and the annual average PM<sub>2.5</sub> concentration impact on offsite receptors not located in the APEZ would be less than significant with mitigation.

As noted above, the project may be constructed over a total of three years instead of six years. If this were to occur, the annual average PM<sub>2.5</sub> concentrations at offsite sensitive receptor locations would increase. While the total PM<sub>2.5</sub> emissions remain the same in this compressed construction scenario, annual average PM<sub>2.5</sub> concentrations would increase because the construction duration would be shorter. It is estimated that annual average PM<sub>2.5</sub> concentrations could increase at least 50 percent for the offsite MEISR currently located in the APEZ under the three-year construction schedule, leading to mitigated annual average PM<sub>2.5</sub> concentrations of approximately 0.05 µg/m<sup>3</sup> for the Developer's Proposed Option and approximately 0.06 µg/m<sup>3</sup> for the Additional Housing Option. Therefore, the annual average PM<sub>2.5</sub> concentration impact on offsite receptors not located in the APEZ would be less than significant with mitigation.

### Onsite Receptors

The maximum estimated annual average PM<sub>2.5</sub> concentrations from all project sources at onsite receptor locations are also presented in Tables ~~345~~ and ~~336~~ in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Assessment Memorandum. The project's emissions would combine with existing background concentrations and would exceed the APEZ criteria of an annual average PM<sub>2.5</sub> concentration of 10 µg/m<sup>3</sup>, or a total lifetime excess cancer risk of 100 per million,<sup>12</sup> with the project

contributing PM<sub>2.5</sub> concentrations up to ~~1.33~~1.32 µg/m<sup>3</sup> for onsite residential receptors and 1.33 µg/m<sup>3</sup> for onsite daycare receptors for the Developer's Proposed Option and 1.49 µg/m<sup>3</sup> for onsite residential receptors and 1.50 µg/m<sup>3</sup> for onsite daycare receptors for the Additional Housing Option. The project's annual average PM<sub>2.5</sub> concentrations would exceed the significance threshold of 0.3 µg/m<sup>3</sup>. Therefore, without mitigation, the impact with regard to PM<sub>2.5</sub> concentrations would be significant for onsite receptors not located in the APEZ.

As noted above, this analysis conservatively assumes that the daycare would be fully operational and occupied as part of Phase 1 and exposed to all Phase 2 construction TAC emissions. However, the daycare would be part of Block B in Phase 2 and will likely not be operational and occupied until the proposed projects is fully built-out in 2027 with the completion of Phase 2. This was assumed to provide a worst-case analysis of health risks to the onsite daycare receptor in the event that the daycare would be occupied in Phase 1 and exposed to all of Phase 2 construction TAC emissions. Likely, the daycare receptors would not be exposed to any construction emissions at the project site.

Tables ~~315~~ and ~~336~~ in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Memorandum, also shows the annual average PM<sub>2.5</sub> concentrations under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. For the onsite resident MEISRs, the maximum modeled mitigated annual average PM<sub>2.5</sub> concentrations under proposed project conditions for the Developer's Proposed Option of 0.12 µg/m<sup>3</sup> combined with background annual average PM<sub>2.5</sub> concentrations of ~~8.488,90~~ would equal ~~8.609,02~~, which is less than 10.0; and the maximum mitigated annual average PM<sub>2.5</sub> concentrations under proposed project conditions for the Additional Housing Option of ~~0.140,13~~ µg/m<sup>3</sup> combined with background annual average PM<sub>2.5</sub> concentrations of ~~8.488,90~~ would equal ~~8.629,04~~, which is less than 10.0. Therefore, under mitigated conditions, the onsite MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of an annual average PM<sub>2.5</sub> concentration of 0.3 µg/m<sup>3</sup> would not apply. Consequently, implementation of these mitigation measures would be sufficient to reduce this impact to a less-than-significant level, and the annual average PM<sub>2.5</sub> concentration impact on onsite receptors not located in the APEZ would be less than significant with mitigation.

It should be noted that if construction durations and phases are spread out over a longer period of time, this could result in increased PM<sub>2.5</sub> concentrations to onsite receptors compared to what has been modeled. Under an extended construction schedule, onsite receptors could be exposed to construction for longer periods of time, which could result in a significant and unavoidable impact. However, it should also be noted that ~~by the time the project buildings are constructed, it is likely that~~ MERV 13 filtration ~~would be~~ is required by the Building Code for all new residential development.<sup>343</sup> This would presumably result in less than significant health risk impacts to new onsite sensitive receptors.

## PM<sub>2.5</sub> Concentrations from Construction and Operation Emissions for Receptors in APEZ under Existing Conditions

### Offsite Receptors

The maximum estimated annual average PM<sub>2.5</sub> concentrations from all project sources at offsite receptor locations in the APEZ under existing conditions are presented in Tables ~~357~~ and ~~378~~ in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Assessment Memorandum. For these receptor locations, the project would contribute PM<sub>2.5</sub> concentrations of ~~0.020,64~~ 0.020,64 µg/m<sup>3</sup> and ~~0.030,72~~ 0.030,72 µg/m<sup>3</sup> at offsite resident locations for the Developer's Proposed Option and the Additional Housing Option, respectively. These values would ~~not~~ exceed the significance threshold of 0.2 µg/m<sup>3</sup>. Therefore, without mitigation, the impact with regard to PM<sub>2.5</sub> concentrations would be ~~less than~~ significant for offsite receptors located in the APEZ.

~~However,~~ Tables ~~357~~ and ~~378~~ in ~~SEIR~~ Appendix E also show the annual average PM<sub>2.5</sub> concentrations under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. ~~These mitigation measures are required to reduce the excess cancer risk impact.~~ The annual average PM<sub>2.5</sub> concentrations from the proposed project would be reduced as a result of these mitigation measures, as shown in Table 3.D-14a, p. 3.D-73, and Table 3.D-14b, p. 3.D-74. For these receptor locations, the project would contribute PM<sub>2.5</sub> concentrations of 0.06 µg/m<sup>3</sup> and 0.07 µg/m<sup>3</sup> at offsite resident locations for the Developer's Proposed Option and the Additional Housing Option, respectively. These values would not exceed the significance threshold of 0.2 µg/m<sup>3</sup>. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and therefore, the PM<sub>2.5</sub> concentration impact on offsite receptors located in the APEZ would be less than significant.

As noted above, the project may be constructed over a total of three years instead of six years. If this were to occur, the annual average PM<sub>2.5</sub> concentrations at offsite sensitive receptor locations would increase, contributing further to the impact. While the total PM<sub>2.5</sub> emissions remain the same in this compressed construction scenario, annual average PM<sub>2.5</sub> concentrations would increase because the construction duration would be shorter. It is estimated that annual average PM<sub>2.5</sub> concentrations could increase at least 50 percent for the offsite MEISR currently located in the APEZ under the three-year construction schedule, leading to mitigated annual average PM<sub>2.5</sub> concentrations of approximately ~~0.050,09~~ 0.050,09 µg/m<sup>3</sup> for the Developer's Proposed Option and approximately ~~0.060,10~~ 0.060,10 µg/m<sup>3</sup> for the Additional Housing Option. Therefore, the annual average PM<sub>2.5</sub> concentration impact on offsite receptors located in the APEZ would be less than significant with mitigation.

<sup>343</sup> ~~Currently being confirmed.~~

## 5.G Revisions to Chapter 5, Variants

- \* The text in the second paragraph on SEIR p. 5-6 is revised as follows to update the mitigation measure title:

Thus, the operational-related mitigation measure identified for the Developer's Proposed Option would be applicable to Variant 1 (Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay [under Impact C-TR-4], p. 3.B-96).

**The first paragraph on SEIR p. 5-9 for Variant 2: South Street Alignment and Aboveground Public Parking at North End of Site is revised as follows:**

Variant 2 would have the same mix of land uses, square footages, and construction and operational characteristics as the Developer's Proposed Option, except the 750-space multilevel public parking garage would be constructed aboveground on Block G towards the north end of the site and would be wrapped by housing, or in dedicated public parking areas within several of the residential garages. South Street would be shifted south and occupy SFPUC's 80-foot-wide strip of land located along the southern edge of the site and south of Blocks A and B. As a result of this change in configuration, Blocks A, C, and D would have slightly different footprints. The maximum height (seven stories) would not change between the Developer's Proposed Option and Variant 2.

## 5.H Revisions to Chapter 6, Alternatives

- \* The text in the last bullet on SEIR p. 6-3 is revised as follows to reflect changes to the mitigation measure:

Mitigation would require the project sponsor to ~~monitor transit travel times and~~ implement measures to meet the transit travel time performance standard; however, given the uncertainty regarding the effectiveness of TDM measures and if SFMTA would approve other measures under their jurisdiction, even with implementation of Mitigation Measure M-C-TR-4, this impact is conservatively considered to remain significant and unavoidable with mitigation. (Impact C-TR-4)

- \* The text in the second paragraph under "Alternative Strategy to Address Transit Delay" on SEIR p. 6-6 is revised as follows to update the mitigation measure title:

As discussed under Impact C-TR-4, p. 3.B-94, given the uncertainty regarding the effectiveness of TDM measures and if SFMTA would approve other measures under their jurisdiction, even with implementation of Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay, p. 3.B-96, the proposed project options and variants would result in a significant and unavoidable with mitigation cumulative impact with respect to transit delay.

- \* **The text in the first paragraph on SEIR p. 6-13 is revised as follows to update the mitigation measure title:**

Therefore, the mitigation measure identified for the proposed project options and variants (Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay~~, p. 3.B-96) would not be applicable.

- \* **The text at the top of SEIR p. 6-21 is revised as follows to update the mitigation measure title:**

~~Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay~~, p. 3.B-96, as with the proposed project options and variants, Alternative B would result in a *significant and unavoidable with mitigation* cumulative impact with respect to transit delay.

- \* **The text at the top of SEIR p. 6-39 is revised as follows to update the mitigation measure title:**

approve other measures under their jurisdiction, even with implementation of Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay~~, p. 3.B-96, as with the proposed project options and variants, Alternative C would result in a *significant and unavoidable with mitigation* cumulative impact with respect to transit delay.

- \* **The text under “Transportation and Circulation” on SEIR p. 6-45 is revised as follows to update the mitigation measure title:**

Project- and cumulative-level construction and operational transportation and circulation impacts would be the same as under the proposed project options. Cumulative operational-related mitigation measures identified for the proposed project options and variants would be applicable to Alternative D (i.e., Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay~~, p. 3.B-96). Alternative D impacts for cumulative transit delay would be *significant and unavoidable with mitigation* (Impact C-TR-4, p. 3.B-94).



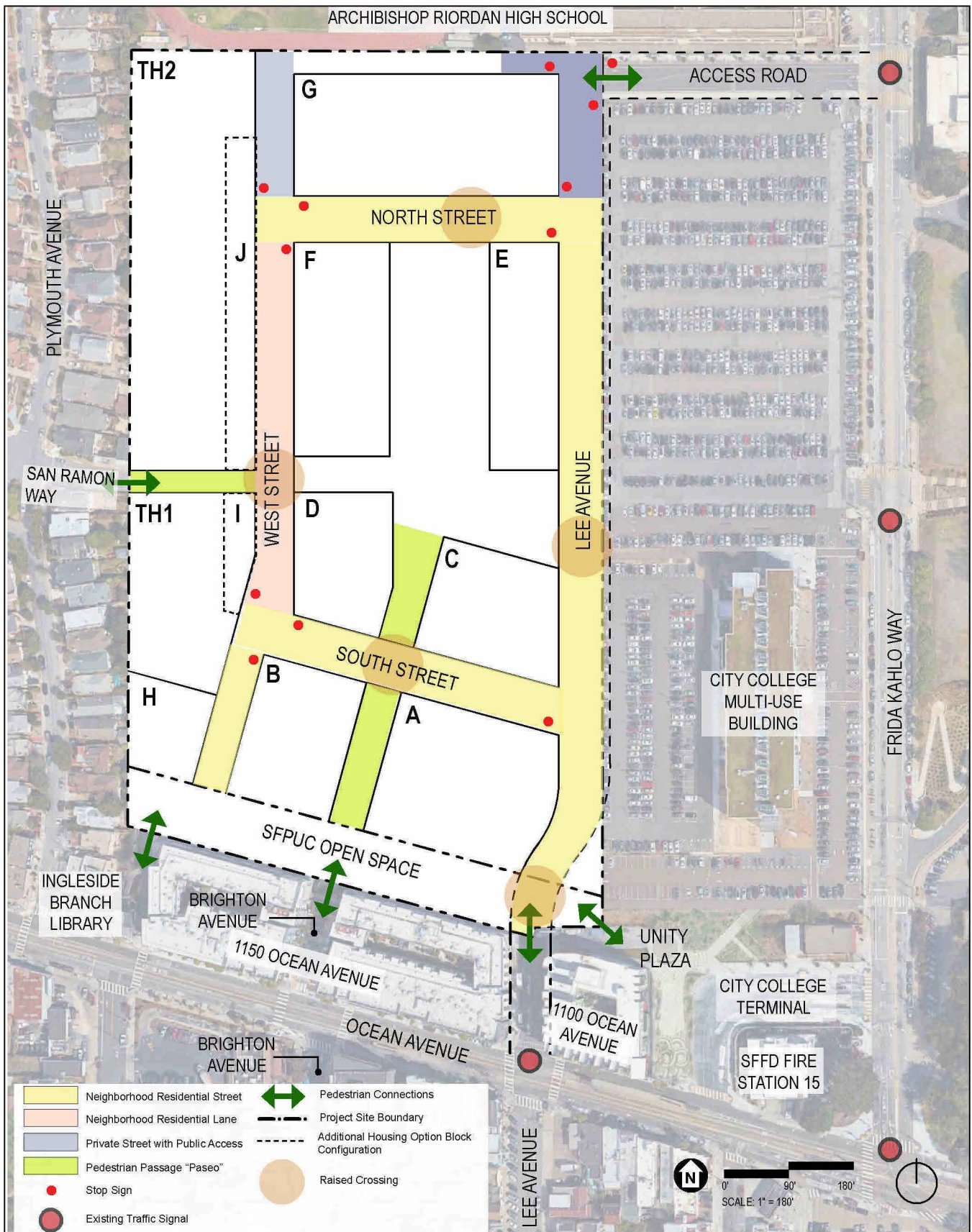
## 5.I Revisions to Appendix D2, Noise Supporting Information

Pages 1 and 2 of draft SEIR Appendix D2 are revised as follows:

Existing																				
ROAD SEGMENT		TOTAL # VEHICLES	VEHICLE TYPE %			VEHICLE SPEED				NOISE LEVEL (dBA)			CALCULATED NOISE LEVEL 15 meters from roadway center	Receptor Dist. from Roadway	Adjusted Noise Level	Distance from Roadway to 65 dBA	Distance from Roadway to 65 dBA			
			Auto	MT	HT	Auto k/h	MT k/h	HT k/h	Auto	MT	HT									
Calvento Peak	from: to:		%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	Ocean Cloud	1179	97	1143.6	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	914	97	885.56	2	18.28	1	9.14	25	40	25	40	59.6	54.4	59.0	63.0	40	56.7	9.4	30.6
Lee	Ocean Site	167	97	161.99	2	3.34	1	1.67	25	40	25	40	52.2	47.0	51.6	55.6	40	51.3	1.7	5.6
Lee	Ocean Holloway	165	97	161.02	2	3.32	1	1.66	25	40	25	40	52.2	47.0	51.6	55.6	40	51.3	1.7	5.6
Plymouth	Ocean S.Wood	177	97	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.5	1.8	6.0
City Coll N	F. Kahlo Site	323	97	313.31	2	6.46	1	3.23	25	40	25	40	55.1	49.9	54.5	58.4	40	54.2	3.3	10.9
Judson	F. Kahlo Genesee	670	97	649.9	2	13.4	1	6.7	25	40	25	40	58.2	53.0	57.7	61.5	40	57.4	8.9	22.6
Genesee	Plymouth-Minnesa	465	97	455.6	2	9.6	1	4.8	25	40	25	40	53.2	48.0	52.8	56.5	40	52.3	2.1	7.0
Genesee	F. Kahlo Site	465	97	455.6	2	9.6	1	4.8	25	40	25	40	53.2	48.0	52.8	56.5	40	52.3	2.1	7.0
Assumptions: PM peak hour traffic data from Kitleson																				
Existing + Developer's Project																				
ROAD SEGMENT		TOTAL # VEHICLES	VEHICLE TYPE %			VEHICLE SPEED				NOISE LEVEL (dBA)			CALCULATED NOISE LEVEL 15 meters from roadway center	Receptor Dist. from Roadway	Adjusted Noise Level	Distance from Roadway to 65 dBA	Distance from Roadway to 65 dBA			
			Auto	MT	HT	Auto k/h	MT k/h	HT k/h	Auto	MT	HT									
Calvento Peak	from: to:		%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	Ocean Cloud	1179	97	1143.6	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	997	97	967.09	2	19.94	1	9.97	25	40	25	40	60.0	54.6	59.4	63.4	40	59.1	10.2	33.5
Lee	Ocean Site	387	97	375.39	2	7.74	1	3.87	25	40	25	40	55.8	50.6	55.3	59.2	40	55.0	4.0	13.0
Lee	Ocean Holloway	209	97	202.73	2	4.18	1	2.09	25	40	25	40	53.2	48.0	52.8	56.4	40	52.3	2.1	7.0
Plymouth	Ocean S.Wood	177	97	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.5	1.8	6.0
City Coll N	F. Kahlo Site	358	97	355.96	2	7.36	1	3.68	25	40	25	40	55.6	50.4	55.1	59.0	40	54.7	3.6	12.4
Judson	F. Kahlo Genesee	700	97	679	2	14	1	7	25	40	25	40	58.4	53.2	57.9	61.8	40	57.5	9.2	23.5
Assumptions: PM peak hour traffic data from Kitleson																				
Existing + Additional Housing Scenario																				
ROAD SEGMENT		TOTAL # VEHICLES	VEHICLE TYPE %			VEHICLE SPEED				NOISE LEVEL (dBA)			CALCULATED NOISE LEVEL 15 meters from roadway center	Receptor Dist. from Roadway	Adjusted Noise Level	Distance from Roadway to 65 dBA	Distance from Roadway to 65 dBA			
			Auto	MT	HT	Auto k/h	MT k/h	HT k/h	Auto	MT	HT									
Calvento Peak	from: to:		%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	Ocean Cloud	1179	97	1143.6	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	1063	97	1031.1	2	21.28	1	10.63	25	40	25	40	60.2	55.0	59.7	63.5	40	59.4	10.9	35.8
Lee	Ocean Site	434	97	420.96	2	8.68	1	4.34	25	40	25	40	56.3	51.1	55.8	59.7	40	55.5	4.5	14.8
Lee	Ocean Holloway	225	97	219.22	2	4.52	1	2.26	25	40	25	40	53.5	48.3	52.9	56.9	40	52.5	2.3	7.6
Plymouth	Ocean S.Wood	177	97	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.5	1.8	6.0
City Coll N	F. Kahlo Site	479	97	464.63	2	9.58	1	4.79	25	40	25	40	56.8	51.6	56.2	60.2	40	55.9	4.9	16.1
Judson	F. Kahlo Genesee	733	97	711.01	2	14.65	1	7.33	25	40	25	40	58.5	53.4	58.1	62.0	40	57.7	7.5	24.7
Assumptions: PM peak hour traffic data from Kitleson																				
Cumulative + Developer's Project																				
ROAD SEGMENT		TOTAL # VEHICLES	VEHICLE TYPE %			VEHICLE SPEED				NOISE LEVEL (dBA)			CALCULATED NOISE LEVEL 15 meters from roadway center	Receptor Dist. from Roadway	Adjusted Noise Level	Distance from Roadway to 65 dBA	Distance from Roadway to 65 dBA			
			Auto	MT	HT	Auto k/h	MT k/h	HT k/h	Auto	MT	HT									
Calvento Peak	from: to:		%	Auto	%	MT	%	HT	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	Ocean Cloud	1179	97	1143.6	2	23.58	1	11.79	25	40	25	40	60.7	55.5	60.1	64.1	40	59.8	12.1	39.7
F. Kahlo	C. Coll N. Judson	1063	97	1031.1	2	21.28	1	10.63	25	40	25	40	60.2	55.0	59.7	63.5	40	59.4	10.9	35.8
Lee	Ocean Site	434	97	420.96	2	8.68	1	4.34	25	40	25	40	56.3	51.1	55.8	59.7	40	55.5	4.5	14.8
Lee	Ocean Holloway	225	97	219.22	2	4.52	1	2.26	25	40	25	40	53.5	48.3	52.9	56.9	40	52.5	2.3	7.6
Plymouth	Ocean S.Wood	177	97	171.89	2	3.54	1	1.77	25	40	25	40	52.4	47.2	51.9	55.8	40	51.5	1.8	6.0
City Coll N	F. Kahlo Site	479	97	464.63	2	9.58	1	4.79	25	40	25	40	56.8	51.6	56.2	60.2	40	55.9	4.9	16.1
Judson	F. Kahlo Genesee	733	97	711.01	2	14.65	1	7.33	25	40	25	40	58.5	53.4	58.1	62.0	40	57.7	7.5	24.7
Genesee	Plymouth-Minnesa	465	97	455.6	2	9.6	1	4.8	25	40	25	40	53.2	48.0	52.8	56.5	40	52.3	2.1	7.0
Genesee	F. Kahlo Site	465	97	455.6	2	9.6	1	4.8	25	40	25	40	53.2	48.0	52.8	56.5	40	52.3	2.1	7.0
Assumptions: PM peak hour traffic data from Kitleson																				

Existing + Additional Housing Alternative C																					
ROAD SEGMENT	TOTAL # VEHICLES	VEHICLE TYPE %						VEHICLE SPEED						NOISE LEVEL (dBA)			CALCULATED NOISE LEVEL 15 meters from	Receptor Dist. from Roadway	Adjusted Noise Level	Distance from Roadway to 55 dBA	Distance from Roadway to 65 dBA
		Auto	MT	HT	Avg k/h	MT k/h	HT k/h	Auto	MT	HT	Auto	MT	HT	15 meters from							
Calaveras Peak:																					
Plymouth																					
from: San Ramon Wild wd		% Auto	% MT	% HT																	
to: 235	97	226.92	2	4.72	1	2.95	25	40	25	40	25	40	53.7	48.5	53.1	57.1	40	52.6	2.4	7.9	
Assumptions: PM peak hour traffic data from Kittelson																					





SOURCE: : Van Meter Williams Pollack LLP, 2020

Case No. 2018-007883ENV: Balboa Reservoir Project

**(Revised) Figure 2-12**  
Proposed Street Type Plan

# Appendix C

## **Transportation Supporting Information**

- C1 Travel Demand Memorandum
- C2 Transit Assessment Memorandum
- C3 Freight Loading Data
- C4 Transit Delay Analysis and Capital Improvements  
Memorandum

**C4 Transit Delay Analysis  
and Capital  
Improvements  
Memorandum**

## TECHNICAL MEMORANDUM

### Balboa Reservoir Subsequent EIR

Responses to Comments Supplementary Memorandum

Transit Delay Analysis and Capital Improvements

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Date: April 17, 2020  
To: Wade Wietgreffe, Liz White  
From: Mike Alston, RSP & Amanda Leahy, AICP  
cc: Jeanie Poling

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## PURPOSE OF MEMORANDUM

This technical memorandum (memo) identifies and analyzes existing sources of transit delay to the 29 Sunset, K/T Third/Ingleside, and 43 Masonic Muni lines in the Balboa Reservoir project study area, and then recommends offsite capital improvements to reduce transit travel times. The results of this analysis further refine and inform Balboa Reservoir Draft Subsequent Environmental Impact Report (draft SEIR)'s **Mitigation Measure M-C-TR-4. Monitor Cumulative Transit Travel Times and Implement Measures To Reduce Transit Delay.**

This memo is organized as follows:

- Background
- Analysis Approach
- Findings
- Recommended Improvements
- Secondary Effects of Implementing Improvements

## BACKGROUND

The draft SEIR presented an analysis of transit delay under existing plus project conditions and under 2040 cumulative conditions. The impacts were determined to be less than significant under existing plus project conditions and significant and unavoidable under 2040 cumulative conditions, with the proposed project contributing considerably. The project would make a considerable contribution, defined as two



or more minutes, to cumulative transit delay to the K/T Third/Ingleside; 29 Sunset; and the 43 Masonic Muni lines.<sup>1,2</sup>

## ANALYSIS APPROACH

This analysis consists of both quantitative and qualitative approaches to identify and analyze sources of transit delay and quantify how implementation of capital improvements would reduce transit travel times. **Figure 1** presents the study area as it relates to these approaches.

### Analysis Approach for K/T Third/Ingleside and 29 Sunset

The analysis approach compares transit travel times during the peak period and nighttime off-peak period. Transit travel times are typically slowest during the p.m. peak period as travel times are greatly influenced by vehicle congestion. Off-peak nighttime travel times represent conditions in which transit vehicles do not experience the typical delays related to vehicle congestion in the p.m. peak period. As a result, the off-peak nighttime travel times are compared to the p.m. peak period travel times to calculate the differences between individual segments of delay within the study area, and to identify the delay sources for those segments.

Identifying the specific locations, causes, and amount of delay along a transit route provides the ability to estimate delay reductions from capital improvements. In contrast, the data collected for the draft SEIR analysis includes existing K/T travel times for the full segment along Ocean Avenue between Jules Avenue and Balboa Park BART, but not for points and subdivided segments along the corridor.

The analysis was conducted for the routes along the following segments:

- K/T Third/Ingleside: Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART);
- K/T Third/Ingleside: San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue;
- 29 Sunset: Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue; and
- 29 Sunset: Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue.

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<sup>1</sup> The 8 Bayshore and 8BX Bayshore B Express series buses also travel through the study area; however, as identified in the draft SEIR, the proposed project would not considerably contribute to cumulative transit delay on these routes. The 91 Third Street/19th Avenue Owl and K Owl also travels through the corridor but is an overnight only route and is not included in the analysis.

<sup>2</sup> The Responses to Comments (RTC) document revised the draft SEIR analysis and Mitigation Measure M-C-TR-4, which incorrectly identified that the proposed project would have a considerable contribution to cumulative transit delay on the 49 Van Ness/Mission line.



**Figure 1**  
**Transit Delay Analysis and Capital Improvements Study Area**  
**Existing Transit Service and Weekday P.M. Peak Headways**



Field data collection was collected to identify the following:

- Sources of transit delay along the corridor (location and descriptive cause);
- Delay values associated with given locations and bus actions (corridor delay, transit reentry delay, or passenger boarding delay); and
- Qualitative observations of conditions at potential improvement locations.

Based on these data and observations, capital improvements are then recommended to improve transit operations at a fixed point along a service segment (i.e., an intersection and approach direction), with benefits accruing to the segment's travel time.

### Analysis Approach for 43 Masonic

The analysis for the 43 Masonic supplements the Synchro corridor analysis from the draft SEIR and utilizes the traffic counts and future traffic volumes from the draft SEIR to calculate delay to the line at the Ocean Avenue/Frida Kahlo Way/Geneva Avenue intersection.<sup>3</sup> The delay associated with the inbound 43 Masonic (i.e., going towards Balboa Park BART station) primarily comes from the signal at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The delay experienced at this intersection is primarily associated with vehicle congestion. This is different than the delay on Ocean Avenue, which can be attributed to other factors, such as left or right turning vehicles.

As a result, no additional data collection was needed to calculate transit delay because the supplemental Synchro analysis allows the disaggregation of corridor travel time to identify the amount of delay attributable to the specific transit movement at the intersection versus along the segment as a whole.

## DATA COLLECTION

The field data collection occurred in two phases to achieve a disaggregate analysis of travel times and delays. The p.m. peak period data collection and observations yielded travel times along and through fixed segments of the transit routes, along with descriptions of operational events at each location. The p.m. peak period data collection was conducted from 5-7 p.m. on Tuesday, December 17, 2019; Wednesday, December 18, 2019; and Thursday, January 16, 2020. The off-peak travel time runs provided a baseline travel time along the lines as well as times along and through the same fixed segments

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<sup>3</sup> As part of the draft SEIR analysis, transit corridor delay was quantified using Trafficware's Synchro modeling software arterial/corridor delay reports to calculate traffic congestion delays along corridors served by transit. Intersection operations analysis was performed using Synchro software and conducted using the SF Planning Department's *Guidelines for Synchro Intersection LOS Analysis*. Intersection operations were analyzed for Existing Conditions, Existing plus Developer's Proposed Option (which includes reassigned parking trips), and Existing plus Additional Housing Option (does not include reassigned parking trips) for the weekday a.m. and p.m. peak hours.

observed in the p.m. peak period collection. The off-peak travel time runs occurred between 8 p.m. and 11:59 p.m. on Thursday, January 9, 2020, and Thursday, January 23, 2020.<sup>4,5</sup>

### P.M. Peak Period Delay Collection and Observation

Travel time data were collected and qualitative observations recorded at the following locations from a fixed vantage point<sup>6</sup>:

- Ocean Avenue and Brighton Avenue (eastbound and westbound)<sup>7</sup>;
- Ocean Avenue and Plymouth Avenue (eastbound and westbound)<sup>8</sup>; and
- Ocean Avenue and Frida Kahlo Avenue (eastbound and westbound)<sup>9</sup>.

At each intersection, both segment travel time and intersection travel time were calculated, both of which are defined below. The number of observations used to establish the averages is provided in each table with the discussion of findings.

Segment travel time is defined as the time required for the transit vehicle to travel from the previous intersection to the subject intersection. The recorded time began when the front of the vehicle cleared the previous intersection and ended when:

- The vehicle stopped at a red light or entered the back of a queue at the light; or
- The front of the vehicle entered the intersection during a green light; or
- The vehicle was within a car length of the back of a queue at the intersection.

Intersection travel time is defined as the time required for the transit vehicle to pass through an intersection. The recorded time began when:

- The vehicle stopped at a red light or entered the back of a queue at the light; or
- The front of the vehicle entered the intersection during a green light; or

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<sup>4</sup> City College was in regular session during all p.m. peak period data collection (December 17, 2019, December 18, 2019, and January 16, 2020). City College was in regular session during January 23, 2020, off-peak (8-11 p.m.) data collection but not during January 9, 2020 off-peak data collection. As explained, off-peak travel time runs were compared to historical data to check that they were representative.

<sup>5</sup> Field data were collected during typical conditions (i.e., no events, disruptions, or inclement weather).

<sup>6</sup> These data collection locations were identified in coordination with the SFMTA.

<sup>7</sup> This intersection was observed from public space in front of the McDonald's on the south side of Ocean Avenue between Plymouth and Brighton avenues.

<sup>8</sup> Ibid.

<sup>9</sup> This intersection was observed from an elevated vantage point on the Ocean Avenue pedestrian bridge.

- The recorded time ended when the front of the transit vehicle cleared the intersection.

### Off-Peak Travel Nighttime Time Runs

Kittelsohn conducted onboard travel time runs (as compared to the fixed vantage point data collection during the p.m. period) on the studied segments to establish baseline times in calculating p.m. peak period delay.<sup>10</sup> These segments included:

- K/T Third/Ingleside
  - Eastbound, Ocean Avenue/Miramar Avenue to Balboa Park BART
  - Westbound, Balboa Park BART to Ocean Avenue/Miramar Avenue
- 29 Sunset
  - Eastbound, Plymouth Avenue/Ocean Avenue to Ocean Avenue/Howth Street
  - Westbound, Ocean Avenue/I-280 onramp to Plymouth Avenue/ Ocean Avenue

## FINDINGS

### Ocean Avenue/Brighton Avenue

#### *Eastbound*

**Table 1** provides average observed travel times at Ocean and Brighton avenues in the eastbound direction for the K/T Third/Ingleside and the 29 Sunset.

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<sup>10</sup> To ensure these travel times were representative of typical off-peak nighttime conditions, Kittelson compared the stop-to-stop travel times to historical SFMTA travel time data as a cross-check. The SFMTA maintains an internal database of historical travel times; those data points are aggregated as historical travel time between stops. SFMTA provided historical weeknight travel times as a point of reference. The SFMTA data provided includes median and 90<sup>th</sup> percentile historical travel times between stops. The historical travel time data is included in Appendix D.



**Table 1: Transit Travel Time Delays Eastbound at Ocean Avenue/Brighton Avenue**

Route/Location	Off-Peak Average Travel Time, Seconds (number of observations)	Nighttime Average Travel Time, Seconds (number of observations)	Peak Average Travel Time, Seconds (number of observations)	Difference in seconds
K/T Third/Ingleside				
Segment travel time: Plymouth to Brighton	14		14	0
Intersection travel time: through Brighton	4		29	26
29 Sunset				
Segment travel time: Plymouth to Brighton	13		17	4
Intersection travel time: through Brighton	12		28	16

Note: Averages based on four K/T off-peak period observations, three 29 Sunset off-peak period observations, 16 peak period K/T observations, and 10 peak period 29 Sunset observations.

Source: Kittelson, 2020.

Most differences in delay at this location were associated with the intersection: an average of 26 and 16 seconds for the K/T Third/Ingleside and 29 Sunset, respectively. The following observations provide context for peak period travel times at this location in the eastbound direction:

- The segment travel times were relatively similar between peak and off-peak periods, indicating that delay is mostly related to signal timing and intersection queueing rather than conditions along the corridor that would slow transit along the segment.
- The K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles. The train was frequently observed to be stuck behind left-turning vehicles, at times resulting in missing a green light and incurring additional delay from the red signal.
- The K/T routinely stopped at red lights in the p.m. peak period. In the off-peak period, the line was not observed to experience any travel time delay due to red lights.
- The 29 has the flexibility to operate in either lane and was generally observed in the right travel lane and does not wait directly behind left-turning vehicles (it must be in the right lane traveling through the intersection to be aligned to serve the next passenger stop). However, one observation noted that queuing from a left-turning vehicle affected both lanes and contributed to delay for the 29.
- The 29 was frequently stopped at red lights during the peak period.
- With the center-running track lane serving left-turning vehicles, the right lane serves the 29, a majority of through vehicles, and right-turning vehicles. Drivers turning right must yield to pedestrian movements at the parallel crosswalk, delaying through vehicles behind right-turning vehicles.

In the eastbound direction, much of the delay to the K/T Line and a portion of the delay to the 29 can be attributed to left-turning vehicle delay. This includes frequently waiting behind left-turning vehicles searching for a gap in oncoming traffic.

### Westbound

**Table 2** provides average observed travel times on Ocean Avenue approaching and through Brighton Avenue in the westbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 2: Transit Travel Time Delays Westbound at Ocean Avenue/Brighton Avenue**

Route/Location	Off-Peak Average Travel Time (seconds)	Nighttime Travel Time (seconds)	Peak Average Travel Time (seconds)	Difference in seconds
K/T Third/Ingleside				
Segment travel time: Lee to Brighton	8		15	7
Intersection travel time: through Brighton	3		23	20
29 Sunset				
Segment travel time: Lee to Brighton	8		19	11
Intersection travel time: through Brighton	2		32	30

Note: Averages based on two K/T off-peak period observations, two 29 Sunset off-peak period observations, five peak period K/T observations, and seven peak period 29 Sunset observations.

Source: Kittelson, 2020.

Most differences in delay were associated with the intersection: an average of 20 and 30 seconds for the K/T Third/Ingleside and 29 Sunset, respectively. The following observations provide context for the peak period travel times at this location in the westbound direction:

- The segment travel times almost doubled for the K/T and more than doubled for the 29 but represent a small portion of each line's travel time compared to the time through the intersection. The differences indicate that p.m. peak period congestion levels affect operating speed through the corridor in the westbound direction.
- The K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles. The train was not observed to be stuck behind left-turning vehicles such that the train would miss a green light and incur additional delay from the red signal, as was observed in the eastbound direction. However, left turns do contribute to approach delay in this direction, and the K/T was frequently observed to experience delay at red lights in this direction. The p.m. peak hour turning movement counts collected for the project show 122 left-turning vehicles in the p.m. peak hour (see Appendix A); observations indicate that most left-turning drivers must wait until the end of the permissive green phase to turn left.

- The 29 operates in the right travel lane and does not wait directly behind left-turning vehicles. The left-turning delay has less direct influence on 29 operations.
- The 29 was frequently stopped at red lights during the peak period.
- With the center-running track lane serving left-turning vehicles, the right lane serves the 29, and right-turning vehicles, as well as observed to serve the majority of through vehicles. Drivers turning right must yield to pedestrian movements at the parallel crosswalk, potentially delaying through vehicles behind right-turning vehicles.

## Ocean Avenue/Plymouth Avenue

### Eastbound

**Table 3** provides average observed travel times at Ocean and Plymouth avenues in the eastbound direction for the K/T Third/Ingleside.

**Table 3: Transit Travel Time Delays Eastbound at Ocean Avenue/Plymouth Avenue**

Location	Off-Peak Average Travel Time (seconds)	Nighttime Travel Time (seconds)	Peak Average Travel Time (seconds)	Difference in seconds
K/T Third/Ingleside				
Segment travel time: Miramar to Plymouth	16		Not recorded <sup>1</sup>	-
Intersection travel time: through Plymouth	13		27	14

<sup>1</sup> Because of limitations from a fixed vantage point, observed p.m. peak period segment travel time was noted between Granada and Plymouth avenues, whereas off-peak period observations noted time between Miramar and Plymouth avenues. Comparison of the two entries would not be commensurate.

Note: Averages based on four K/T off-peak period observations and seven peak period K/T observations.

Source: Kittelson, 2020.

The average p.m. peak hour travel time delay through the intersection was 14 seconds compared to off-peak nighttime conditions. The following observations provide context for peak period travel times:

- The K/T was observed to sit at a red light in almost all p.m. peak hour observations, including as a result of waiting behind a left-turning vehicle and subsequently missing a green phase. Similar to the Brighton location, the K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles.
- The 29 turns right from Plymouth Avenue onto Ocean Avenue at this intersection and does not travel eastbound through the intersection.



## Westbound

**Table 4** provides average observed travel times at Ocean and Plymouth avenues in the westbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 4: Transit Travel Time Delays Westbound at Ocean Avenue/Plymouth Avenue**

Location	Off-Peak Nighttime Average Travel Time (seconds)	Peak Average Travel Time (seconds)	Difference in seconds
K/T Third/Ingleside			
Segment travel time: Brighton to Plymouth	7	11	4
Intersection travel time: through Plymouth	4	29	25
29 Sunset			
Segment travel time: Brighton to Plymouth	5	9	4
Intersection travel time: through Plymouth	3	33	30

Note: Averages based on two K/T off-peak period observations, three off-peak period 29 Sunset observations, six peak period K/T observations, and 12 peak period 29 Sunset observations.

Source: Kittelson, 2020.

The average p.m. peak hour travel time delay through the intersection was 14 seconds compared to off-peak nighttime conditions. The following observations provide context for peak period travel times:

- The travel time difference in segment travel times for each line indicates that the sources of delay are at the intersection rather than due to overall travel speeds on the segment.
- The K/T was observed to sit at a red light in most all p.m. peak hour observations, including as a result of waiting behind a left-turning vehicle and subsequently missing a green phase on multiple occasions. The average delay experienced is largely a result of delay behind left-turning vehicles and subsequent red-light delay. Although the p.m. peak hour average among observations is 30 seconds, the maximum observed intersection travel time was 57 seconds, indicating wide variability. Like at the Brighton location, the K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles.
- The 29 turns left onto Plymouth Avenue at this intersection, so it is subject to the same operational delay and issues as the K/T. During the p.m. peak hour, the 29 was observed to miss its green phase multiple times, with a maximum intersection travel time of 99 seconds attributed to left-turning drivers (sitting through two red phases).

## Ocean Avenue and Geneva Avenue/Frida Kahlo Way

### Eastbound

**Table 5** provides average observed travel times in the eastbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 5: Transit Travel Time Delays Eastbound at Ocean Avenue/Frida Kahlo Way/Geneva Avenue**

Location	Off-Peak Average Travel Time (seconds)	Nighttime Travel Time (seconds)	Peak Average Travel Time (seconds)	Difference in seconds
K/T Third/Ingleside				
Segment travel time: Lee to Frida Kahlo	19		18	-
Intersection travel time: through Frida Kahlo <sup>1</sup>	39		53	14
29 Sunset				
Segment travel time: Lee to Frida Kahlo	10		15	5
Intersection travel time: through Frida Kahlo	57		54	-

<sup>1</sup> Includes dwell time

Note: Averages based on four K/T off-peak period observations, three off-peak period 29 Sunset observations, four peak period K/T observations, and eight peak period 29 Sunset observations.

Source: Kittelson, 2020.

As **Table 5** indicates, the p.m. peak period travel time delays were relatively small based on the observations and data collection. The following observations provide context for travel times:

- During peak and off-peak periods, the K/T showed consistent travel times between Lee Avenue and the intersection (or back of queue).
- The 29 includes a near side bus stop between Harold and Geneva avenues. Following this stop, the bus driver must reenter the traffic stream to continue along Ocean Avenue. A combination of red lights, associated re-entry delay (with a green or red indication), and slow operating speeds through the intersection resulted in similar peak hour and off-peak average travel times for the 29.
- Observed p.m. peak hour intersection travel times were widely variable, ranging from 21 seconds to 82 seconds.
- The K/T line shares a travel lane with left-turning vehicles in a left-turn lane with a protected left-turn phase. Although drivers do not share a conflicting phase with crossing pedestrians and do not need to yield to oncoming traffic, the K/T (which continues straight) must wait behind left-turning



vehicles at a red light. In contrast, adjacent through traffic has a green indication, delaying the line relative to if it was in an exclusive lane or a through lane.

### Westbound

**Table 6** provides average observed travel times in the westbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 6: Transit Travel Time Delays Westbound at Ocean Avenue/Frida Kahlo Way/Geneva Avenue**

Location	Off-Peak Average Travel Time (seconds)	Nighttime Travel Time (seconds)	Peak Average Travel Time (seconds)	Difference in seconds
K/T Third/Ingleside				
Segment travel time: Howth to Frida Kahlo	12		17	5
Intersection travel time: through Frida Kahlo	11		49	38
29 Sunset				
Segment travel time: Howth to Frida Kahlo	15		20	5
Intersection travel time: through Frida Kahlo	8		66	58

Note: Averages based on two K/T off-peak period observations, two off-peak period 29 Sunset observations, six peak period K/T observations, and 10 peak period 29 Sunset observations.

Source: Kittelson, 2020.

The following observations provide context for travel times:

- In the p.m. peak hour, the K/T experienced an average of 38 seconds of travel time delay compared to off-peak conditions. This delay was mostly a result of red-light delay and of queuing once the K/T left the separated track lane to the east of the intersection. No left turns are allowed from the center-running track lane, so the K/T was not observed to be waiting behind turning vehicles. Rather, the limited green time and the queuing present contributed to higher p.m. peak hour travel times.
- The 29 experienced 58 seconds of relative delay to travel through the intersection in p.m. peak hour conditions compared to in off-peak conditions. Observations noted that the 29 frequently queued in advance of the intersection, in some cases back to Howth Street. As a result of queuing, buses missed green signal phases and waited for an extra signal cycle; the maximum intersection travel time observed in the p.m. peak observations was 213 seconds.
- The 29 was observed to use the center-running track lane to bypass queuing on at least one occasion.

- This intersection is uniquely constrained compared to the other study intersections:
  - It serves multiple approaches with higher volumes than the Brighton and Plymouth intersections. This includes cross-street volumes and through and turning movement volumes along Ocean Avenue. Much of the delay recorded was observed to be a result of queuing, likely as a result of the allocation of green time to competing intersection approaches.
  - The intersection includes longer pedestrian crossings across Ocean Avenue (in excess of 80 feet) than the other intersections, requiring longer side-street pedestrian crossings phases and a longer signal cycle than the other locations.

These constraints reduce the ability to provide capital improvement solutions compared to the other locations in the study area.

### **Southbound**

The 43 Masonic outbound travels south from one of two shared left-through lanes on Frida Kahlo Way, across Ocean Avenue, and on to Geneva Avenue; this movement is signal protected and does not include conflicting pedestrian or vehicle movements. Project-related increase in vehicle traffic and passenger boarding/alighting activity would be associated with 82 seconds of travel time delay during the p.m. peak hour.<sup>11</sup> Travel time delay is attributable to passenger boarding activity, transit reentry time, and the level of vehicular traffic at the intersection and surrounding the Muni stop approximately 250 feet north of the intersection. The 2000 *Highway Capacity Manual* shows average bus re-entry delay into adjacent traffic streams to increase as a function of the adjacent lane hourly volumes, from an average of zero seconds with 100 vehicles to an average between four and six seconds at volumes between 400 and 600 vehicles per hour.<sup>12</sup> Data collected for this project show a southbound p.m. peak hour volume of 508 vehicles, which corresponds with an estimate of between four and six seconds of reentry delay in addition to delay at the intersection. As explained in the preceding section, this intersection is constrained by vehicle demand and pedestrian crossing lengths that limit possible signal timing solutions.

### **Combined Delay**

**Table 7** provides the recorded travel time delays presented above by line, direction, and location.

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<sup>11</sup>

<sup>12</sup> 2000 *Highway Capacity Manual*, Chapter 27, Exhibit 27-10. Reproduced in the “Public Transit” appendix of the 2019 *San Francisco Transportation Impact Analysis Guidelines* and available at <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>

**Table 7: P.M. Peak Hour Transit Travel Time Delays by Line**

Location	Eastbound	Westbound
<b>K/T Third/Ingleside</b>		
Intersection travel time: through Plymouth Avenue	14	25
Intersection travel time: through Brighton Avenue	26	20
Intersection travel time: through Frida Kahlo Way	14	38
<b>Total Combined Delay</b>	<b>54</b>	<b>83</b>
<b>29 Sunset</b>		
Segment Travel Time: Lee to Brighton	n/a	11
Intersection travel time: through Brighton Avenue	16	30
Intersection travel time: through Plymouth	-	30
Intersection travel time: through Frida Kahlo Way	-	58
<b>Total Combined Delay</b>	<b>16</b>	<b>129</b>

Source: Kittelson, 2020.

## RECOMMENDED IMPROVEMENTS

The following improvements are recommended to reduce transit travel times in the study area and are displayed in Figure 2. These proposed improvements require approval by the SFMTA and are subject to review by relevant rail oversight authorities.

- Providing a protected green arrow signal phase for westbound left turns at Ocean Avenue/Brighton Avenue;
- Prohibit eastbound left turns at Ocean Avenue/Brighton Avenue;
- Providing a protected green arrow signal phase for westbound left turns at Ocean Avenue/Plymouth Avenue;
- Prohibit eastbound left turns at Ocean Avenue/Plymouth Avenue; and
- Construct a bus boarding island on southbound Frida Kahlo Way.



**Figure 2: Recommended Improvements to Reduce Transit Travel Times**



Source: Google Earth.

## Ocean Avenue/Brighton Avenue

### ***Eastbound: Prohibit Left Turns***

At Ocean and Brighton avenues, prohibiting eastbound left turns would provide dual benefit to transit operations. It would eliminate transit delay for the K/T associated with waiting behind left-turning vehicles, which was observed to result in missing green phases. A left turn prohibition would also provide more through volume capacity and would give through drivers the ability to choose a lane rather than to proceed in the right lane. This would benefit the 29 as well, whose drivers would either travel in a right lane with fewer vehicles or could also use the left lane to travel through the intersection if right-turning vehicles are yielding to crossing pedestrians.

Implementing this improvement would improve reliability for the K/T and 29 and could reduce p.m. peak hour travel time delay compared to off-peak travel times by up to 26 and 16 seconds, respectively. There is no guarantee that the improvement would reduce delay by the full amounts observed, given there are other sources of transit delay, although it is a reasonable approximation of travel time savings.

### ***Westbound: Provide Protected/Permissive Left Turn Phasing***

At Ocean and Brighton avenues, providing a protected green arrow left turn phase would allow left-turning vehicles a dedicated portion of the signal phase and would reduce delay for the K/T associated with waiting behind those left-turning vehicles. This improvement would improve reliability for the K/T and could reduce delay by up to 20 seconds. There is no guarantee that the improvement would reduce delay by the full amounts observed, as the K/T line would need to wait for a turning vehicle to clear even though the movement would be more reliable with a protected/permissive phase, although it is a reasonable approximation of travel time savings.

## **Ocean Avenue/Plymouth Avenue**

### ***Eastbound: Prohibit Left Turns***

At Ocean and Plymouth avenues, prohibiting eastbound left turns would provide dual benefit to transit operations. It would eliminate transit delay for the K/T associated with waiting behind left-turning vehicles, which was observed to result in missing green phases. A left turn prohibition would also provide more through volume capacity and would give through drivers the ability to choose a lane rather than to proceed in the right lane. This improvement would improve reliability for both lines and could reduce delay for the K/T by up to 14 seconds. There is no guarantee that the improvement would reduce delay by the full amounts observed, given there are other sources of transit delay, although it is a reasonable approximation of travel time savings.

### ***Westbound: Provide Protected/Permissive Left Turn Phasing***

At Ocean and Brighton avenues, providing a protected/permissive left turn phase would allow left-turning vehicles a dedicated portion of the signal phase and would reduce delay for the K/T associated with waiting behind those left-turning vehicles. This improvement would improve reliability for the K/T. This benefit would also accrue to the 29, which turns left at the intersection and is subject to the same travel delays. This improvement would improve reliability for both lines and could reduce delay for the K/T by up to 25 seconds and for the 29 by up to 30 seconds. There is no guarantee that the improvement would reduce delay by the full amounts observed, as the K/T and 29 lines would need to wait for a turning vehicle to clear even though the movement would be more reliable with a protected/permissive phase, although it is a reasonable approximation of travel time savings.

## **Frida Kahlo Way/ Ocean Avenue/Geneva Avenue**

### ***Southbound: Transit Boarding Island***

The improvement identified to improve transit operations at this intersection is the addition of a along the southbound approach of Frida Kahlo Way. A transit boarding island would reduce passenger boarding and re-entry delay associated with accessing the bus stop. The SFMTA Transportation Engineering *Transit*



*Preferential Toolkit* identifies that transit boarding islands typically reduce passenger boarding/alighting delay by an average of five seconds and reduce re-entry delay by an average of five seconds. This location may be associated with more passenger boarding/alighting delay than five seconds. The would reduce transit reentry delay, which is estimated to be up to be about ten seconds under existing conditions, which would in turn allow Muni buses better access to the signal, potentially reducing delay at the intersection by proceeding through on more green signals or getting better position in a queue.

## Conclusion

The recommended improvements further refine the capital measures identified as part of SEIR's **Project Mitigation Measure M-C-TR-4: Implement Measures to Reduce Transit Delay**<sup>13</sup>.

## SECONDARY EFFECTS OF IMPLEMENTING IMPROVEMENTS

The following describes the secondary construction and operational effects of implementing the improvements identified above.

### Construction

Construction of the identified capital improvements would include the installation of signage for the prohibited left turns at both Brighton and Plymouth avenues and the installation of additional signal heads, possibly including a new mast arm, to provide protected/permissive phasing in the eastbound direction at Plymouth and Brighton avenues.

These construction activities would cause temporary disruption to existing conditions and may include temporary sidewalk and lane closures. Construction activities would be similar to those evaluated as part of the DEIR and require compliance with the public works code, public works department orders, and the blue book, as applicable, so that potentially hazardous conditions or substantial public transit delay would not occur.

### General Effect to Vehicle Traffic

The reliability and delay reduction benefits described for transit vehicles along Ocean Avenue as a result of the proposed changes would also accrue to general traffic along Ocean Avenue. Anticipated effects are discussed below:

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<sup>13</sup> Originally entitled Project Mitigation Measure M-C-TR-4: **Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay** in the DEIR, the title of the mitigation measure was amended as part of the Responses to Comments document.

- For westbound left-turning drivers at Plymouth and Brighton avenues, a protected/permissive phase provides dedicated time to make the left turn separated from oncoming traffic or pedestrians. This would also reduce the number of conflicts between people driving and walking through the provision of the protected movement.
- The westbound protected left-turn phase would occupy a share of green time and would result in a decrease in green time of a few seconds to other phases.
- For eastbound through drivers along Ocean Avenue, the prohibition of left turns at Plymouth and Brighton avenues would improve travel times and reliability, eliminating instances of delay from waiting behind a left-turning vehicle.

Effects on left-turning drivers at Plymouth or Brighton avenues are discussed in the General Effect on Circulation section below.

### General Effect to Pedestrians

The Ocean Avenue/Plymouth Avenue intersection serves many pedestrians in the p.m. peak hour. These pedestrians share a signal phase with the parallel Ocean Avenue movements, including right-turn and left-turn movements. The shared vehicle turning movements and pedestrian crossings create a conflict between road users and contribute travel time delay for turning drivers yielding to pedestrians. The two intersections with recommended improvements serve the following number of pedestrians:

- **Ocean Avenue/Brighton Avenue:** 442 pedestrians across north leg, 278 pedestrians across south leg in the weekday p.m. peak hour (5-7 p.m.; see Appendix A)
- **Ocean Avenue/Plymouth Avenue:** 349 pedestrians across north leg, 152 pedestrians across south leg in the weekday p.m. peak hour (5-7 p.m.; see Appendix A)

For pedestrians crossing the north legs of these intersections, conflicting left-turning vehicles would be eliminated. For pedestrians crossing the south legs of these intersections, conflicts with left-turning drivers would be reduced.

### General Effect on Circulation

The prohibition of eastbound left turns at Ocean and Plymouth avenues would redistribute the 11 left-turning drivers currently making this movement in the p.m. peak hour. These drivers would have the following options (see Figure 2):

- Turn left at Faxon, Miramar, or Granada avenues in advance of the Plymouth Avenue intersection; or
- Turn right at Granada Avenue, left to Holloway Avenue, and then left at Plymouth Avenue, left at Ocean Avenue, and right at Plymouth Avenue, adding approximately 1,700 feet of diversion to their trip.

The prohibition of eastbound left turns at Ocean and Brighton avenues would redistribute the 39 left turning drivers currently making this movement in the p.m. peak hour. These drivers would have the

following options (see Figure 2):

- Turn right at Plymouth, Granada, or Miramar avenues, left at Brighton Avenue, and through at Ocean Avenue, adding approximately 1,700 feet of diversion to their trip. Transit travel time and reliability benefits accrue to general traffic.

Note that Brighton Avenue provides vehicular access to the Whole Foods parking deck and to Avalon Ocean Avenue residential parking.

Both prohibitions would redistribute approximately the number of left-turning trips presented above and would increase the traffic on the relevant local streets by an amount commensurate to the existing eastbound left-turn volumes.

The redistribution of vehicles trips would be anticipated to occur on Plymouth, Granada, Miramar, Brighton, and Holloway avenues, which are low-speed local roads. The capital improvements and potential diversions discussed above would not be expected to introduce new conflicts or delays to existing transit operations and would not create potentially hazardous conditions for people walking, biking, driving, or public transit operations.

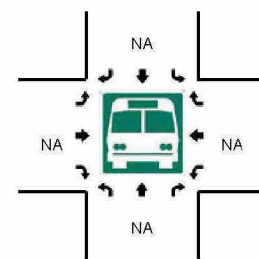
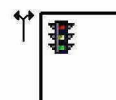
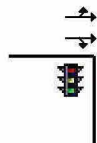
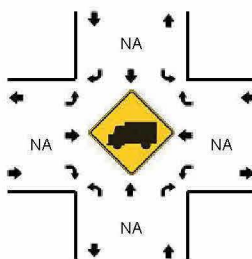
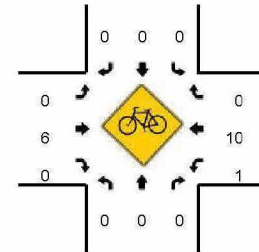
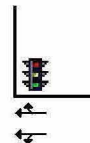
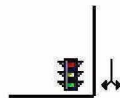
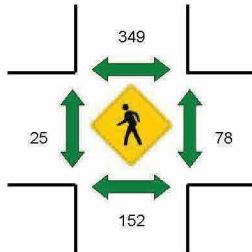
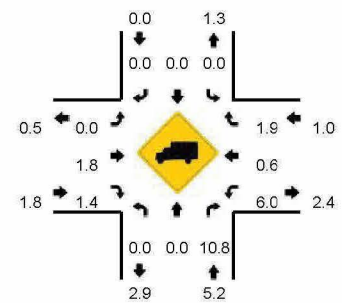
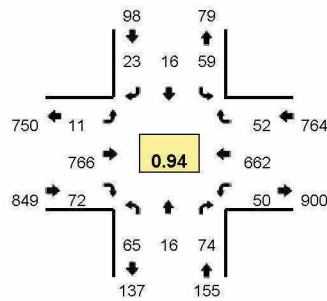


## APPENDIX A: MULTIMODAL TURNING MOVEMENT COUNTS

**LOCATION:** Plymouth Ave -- Ocean Ave  
**CITY/STATE:** San Francisco, CA

**QC JOB #:** 14612226  
**DATE:** Wed, Jan 31 2018

**Peak-Hour: 5:00 PM -- 6:00 PM**  
**Peak 15-Min: 5:00 PM -- 5:15 PM**



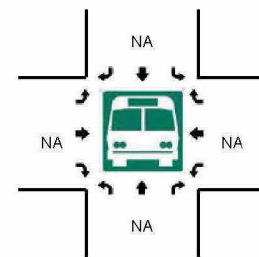
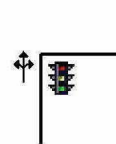
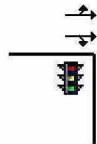
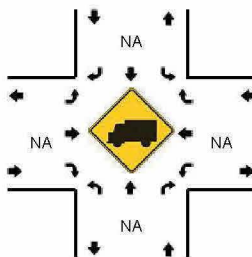
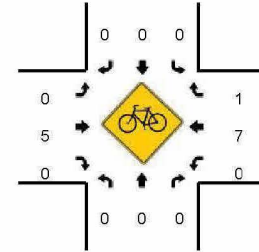
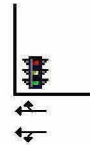
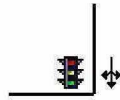
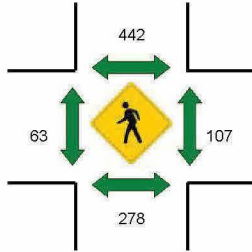
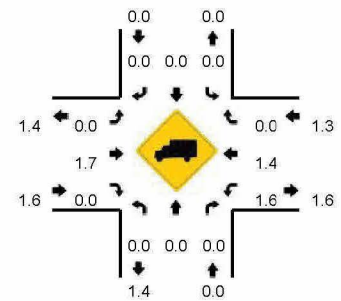
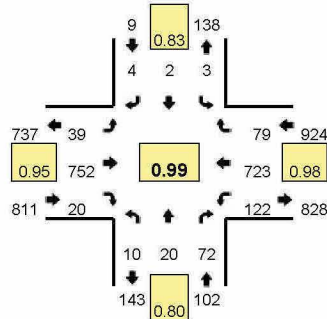
5-Min Count Period Beginning At	Plymouth Ave (Northbound)				Plymouth Ave (Southbound)				Ocean Ave (Eastbound)				Ocean Ave (Westbound)				Total	Hourly Totals
	Left	Thru	Right	U	Left	Thru	Right	U	Left	Thru	Right	U	Left	Thru	Right	U		
4:00 PM	5	0	7	0	1	1	2	0	0	63	6	0	3	48	4	0	140	
4:05 PM	3	0	2	0	3	3	1	0	1	74	1	0	5	61	2	0	156	
4:10 PM	4	5	5	0	1	1	0	0	2	51	4	0	5	49	4	0	131	
4:15 PM	2	0	1	0	5	2	2	0	0	58	5	0	3	53	4	0	135	
4:20 PM	3	1	6	0	0	1	1	0	1	60	11	0	4	56	3	0	147	
4:25 PM	2	2	8	0	0	2	1	0	0	58	10	0	7	52	6	0	148	
4:30 PM	4	1	4	0	3	4	1	0	0	49	9	0	7	37	1	0	120	
4:35 PM	3	3	4	0	6	1	0	0	1	59	4	0	4	52	4	0	141	
4:40 PM	4	2	4	0	2	0	2	0	2	69	6	0	6	65	4	0	166	
4:45 PM	3	5	6	0	2	2	0	0	2	59	7	0	1	68	2	0	157	
4:50 PM	4	4	2	0	8	3	2	0	1	52	5	0	3	53	6	0	143	
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5:10 PM	6	1	6	0	8	1	2	0	1	64	10	0	2	63	4	0	168	1774
5:15 PM	6	2	6	0	5	3	3	0	2	57	8	0	4	48	3	0	147	1786
5:20 PM	5	0	3	0	4	1	1	0	0	58	4	0	2	54	4	0	136	1775
5:25 PM	10	0	7	0	5	3	4	0	0	73	7	0	5	64	4	0	182	1809
5:30 PM	6	1	8	0	2	3	0	0	0	63	2	0	3	48	4	0	140	1829
5:35 PM	4	2	10	0	7	0	2	0	1	56	6	0	10	58	4	0	160	1848
5:40 PM	7	3	7	0	2	1	3	0	1	63	5	0	6	63	4	0	165	1847
5:45 PM	6	0	4	0	5	0	2	0	2	69	2	0	1	48	6	0	145	1835
5:50 PM	6	4	7	0	4	0	1	0	3	66	7	0	3	51	4	0	156	1848
5:55 PM	1	2	6	0	3	1	1	0	0	61	7	0	3	46	7	1	139	1866
<b>Peak 15-Min Flowrates</b>	<b>Northbound</b>				<b>Southbound</b>				<b>Eastbound</b>				<b>Westbound</b>				<b>Total</b>	
	Left	Thru	Right	U	Left	Thru	Right	U	Left	Thru	Right	U	Left	Thru	Right	U		
All Vehicles	56	8	64	0	88	16	24	0	8	800	96	0	48	728	48	0	1984	
Heavy Trucks	0	0	8		0	0	0		0	8	0		4	8	0		28	
Pedestrians		104				464				56				40			664	
Bicycles	0	0	0		0	0	0		0	0	0		0	1	0		1	
Railroad																		
Stopped Buses																		

**Comments:**

**LOCATION:** Brighton Ave -- Ocean Ave  
**CITY/STATE:** San Francisco, CA

**QC JOB #:** 14777402  
**DATE:** Tue, Aug 28 2018

**Peak-Hour: 5:00 PM -- 6:00 PM**  
**Peak 15-Min: 5:15 PM -- 5:30 PM**



15-Min Count Period Beginning At	Brighton Ave (Northbound)				Brighton Ave (Southbound)				Ocean Ave (Eastbound)				Ocean Ave (Westbound)				Total	Hourly Totals
	Left	Thru	Right	U	Left	Thru	Right	U	Left	Thru	Right	U	Left	Thru	Right	U		
4:00 PM	5	4	12	0	3	0	0	0	10	186	10	0	22	173	20	0	445	1770
4:15 PM	5	6	10	0	2	0	1	0	8	174	10	0	20	192	25	0	453	
4:30 PM	6	5	23	0	0	1	1	0	9	152	4	0	23	187	20	0	431	
4:45 PM	3	5	15	0	1	0	1	0	11	177	6	1	28	178	15	0	441	
5:00 PM	3	7	16	0	0	0	1	0	9	186	7	0	30	188	17	0	464	1789
5:15 PM	0	7	19	0	2	1	0	0	13	187	7	0	27	182	22	1	468	1804
5:30 PM	4	4	19	0	0	0	2	0	11	176	2	0	39	173	24	0	454	1827
5:45 PM	3	2	18	0	1	1	1	0	6	203	4	0	25	180	16	0	460	1846

## APPENDIX B: PEAK HOUR DATA COLLECTION

Location Ocean Avenue/Brighton Avenue  
 Direction Westbound  
 EBH - 12/18/2019

Route K / T Third

Observation		Time	Ocean/Lee doors open	Ocean/Lee initial boarding end	Ocean/Lee arrival stop	Ocean/Lee departure	Ocean/Brighton arrival stop	Ocean/Brighton departure	Total Red Time	Notes
2	Time	5:21pm	Start	30	N/A	35	57	80	11	
2	Delay Note						RL (57)	GL (68)		
3	Time	5:34pm	Start	25	N/A	70	83	83	32	
3	Delay Note				RL (32)	GL (64)				
4	Time	6:00pm	Start	27	N/A	75	N/A	92	23	Slowed, but did not stop, by Ocean/Brighton due to car trying to parallel park
4	Delay Note				RL (32)	GL (58)				
5	Time	6:10pm	Start	13	N/A	18	30	57	20	
5	Delay Note						RL (30)	GL (50)		
6	Time	6:22pm	Start	16	N/A	59	73	113	64	
6	Delay Note				RL (25)	GL (56)	RL (75)	GL (108)		

average  
count

Route 29

Observation		Time	Ocean/Lee doors open	Ocean/Lee initial boarding end	Ocean/Lee arrival stop	Ocean/Lee departure	Ocean/Brighton arrival stop	Ocean/Brighton departure	Total Red Time	Notes
1	Time	5:10pm	Start	11	N/A	12	27	60	22	
1	Delay Note						RL (27)	GL (45)		
2	Time	5:19pm	Start	12	N/A	55	71	N/A	34	
2	Delay Note				RL (20)	GL (54)				
3	Time	5:35pm	Start	20	N/A	20	41	80	32	
3	Delay Note						RL (41)	GL (73)		
4	Time	5:48pm	Start	21	N/A	55	80	124	68	
4	Delay Note				RL (23)	GL (54)	RL (83)	GL (120)		
5	Time	5:55pm	Start	19	N/A	45	N/A	75	25	
5	Delay Note				RL (20)	GL (45)				
6	Time	6:15pm	Start	15	N/A	40	59	97	57	
6	Delay Note				RL (16)	GL (39)	RL (59)	GL (99)		
7	Time	6:18pm	Start	12	N/A	13	30	48	9	
7	Delay Note						RL (30)	GL (39)		
8	Time	6:31pm	Start	20	N/A	23	40	57		
8	Delay Note						There is no RL or queue.			
9	Time	6:50pm	Start	28	N/A	59	N/A	75	31	
9	Delay Note				RL (27)	GL (58)				

**Location** Ocean Avenue/Plymouth Avenue  
**Direction** Westbound  
**DAY** 1 12/18 - ASG  
**Route** K / T Third

Observation	Info	Time	Ocean/Lee departure	Ocean/Brighton arrival stop	Ocean/Brighton departure	Ocean/Plymouth S arrival stop	Ocean/Plymouth S departure	Ocean/Plymouth N arrival stop	Ocean/Plymouth N departure	Total Red Time	Notes
1	Time	6:01 PM	Start		9	76	88	118	122	43	
1	Delay Note				RL (13) + LT		RL (28)				
2	Time	6:06 PM	Start		5	69	79	118	122	69	LT resulted in RL delay
2	Delay Note				RL (32) + LT (x2)		RL (37)				
3	Time	6:29 PM	Start		7	55	64	75	77	31	LT resulted in RL delay
3	Delay Note				RL (31) + LT		LT (slowed never stop)				
4	Time	6:42 PM	Start		5	6	21	47	49	51	Clear run with no LTs at Brighton or Plymouth
4	Delay Note				RL (24)						
5	Time	6:48 PM	Start		4	40	49	59	68	96	Almost entirely RL related
5	Delay Note				RL only (24)		LT (slowed never stop)	RL (18)			
6	Time	6:49 PM	Start		5	55	65	66	67	68	RL delay due to LT blocking vehicle
6	Delay Note				LT + RL (29)						

**Route** 29

Observation	Info	Time	Ocean/Lee departure	Ocean/Brighton arrival stop	Ocean/Brighton departure	Ocean/Plymouth S arrival stop	Ocean/Plymouth S departure (completes left turn)	Total Red Time	Notes
1	Time	5:55 PM	Start		3	60	78	98	32
1	Delay Note				RL + LT		Gap Finding		
2	Time	6:18 PM	Start		1	195	205	218	99
2	Delay Note				RL (x3) + LT (x2)		Gap Finding		Worst case scenario - Missed multiple cycles at Brighton
3	Time	6:40 PM	Start		9	10	25	90	18
3	Delay Note						RL (18) + GF		Red Light <b>not</b> result of GF
4	Time	6:46 PM	Start		10	30	37	62	
4	Delay Note				RL (23)		GF		Complete turn during yellow phase
5	Time		Start						
5	Delay Note								
6	Time		Start						
6	Delay Note								

29

Info	Time	Ocean/Lee departure	Ocean/Brighton arrival stop	Ocean/Brighton departure	McDonalds	Ocean/Plymouth S arrival stop	Ocean/Plymouth S departure (completes left turn)	Total Red Time	Notes
Time	5:20 AM				Start	8	82	24	Red light then finding gap
Delay Note							RL (24) + Gap (45)		
Time	5:36 AM				Start	7	19		Quick to find gap
Delay Note							Gap (7)		
Time	5:51 AM				Start	6	16		quick to find gap
Delay Note							Gap (5)		
Time	5:56 AM				Start	5	72	28	red light then finding gap
Delay Note							RL (28) + Gap (34)		
Time	6:17 PM				Start	6	30		
Delay Note							Gap (21)		
Time	6:20 PM				Start	7	21		slowed down because signal had just turned green ahead
Delay Note									
Time	6:33 PM				Start	14	20		cars moving slowly because of signal change
Delay Note							Gap (1)		
Time	6:52 AM				Start	7	70	24	red light then car ahead turning left
Delay Note							RL (24) + LT (32)		

**Location** Ocean Avenue/Frida Kahlo/Geneva  
**Direction** Eastbound  
 EBH 12/17/19

**Route** 29

Observation	Info	Time	Ocean/Lee departure	Ocean/Harold/Frida arrival	Ocean/Harold/Frida doors open	Ocean/Harold/Frida initial boarding end	Ocean/Frida departure (this should account for intersection footprint)	Total Red Time
1	Time	6:06pm	Start	18	30	49	62	
1	Delay Note			RL				
2	Time	6:12pm	Start	13	24	55	69	
2	Delay Note			RL			No queuing involved; just slow	
3	Time	6:20pm	Start	15	35	50	56	
3	Delay Note			RL	GL (21)			
4	Time	6:27pm	Start	N/A	13	25	79	
4	Delay Note					RL	GL (63)	
5	Time	6:32pm	Start	N/A	15	40	66	23
5	Delay Note				RL (40)	GL (63)		
6	Time	6:43pm	Start	N/A	19	25	63	
6	Delay Note				RL	GL (61)		
7	Time	6:48pm	Start	N/A	12	19	30	
7	Delay Note							
8	Time	6:54pm	Start	N/A	14	95	129	
8	Delay Note				RL (14)	GL		

**Route** 49

Observation	Info	Time	Ocean/Frida arrival stop	Ocean/Harold departure	Ocean/Frida departure (this should account for intersection footprint)	Total Red Time
1	Time	6:32pm	Start	15	67	25
1	Delay Note			RL (40)	GL (65)	
2	Time	6:40pm	Start	13	19	
2	Delay Note			RL	GL (14)	
3	Time	6:49pm	Start	14	20	0
3	Delay Note					
4	Time		Start			
4	Delay Note					
5	Time		Start			
5	Delay Note					
6	Time		Start			
6	Delay Note					

**Route** K/ T Third

Observation	Info	Time	Ocean/Lee departure	Ocean/Frida Kahlo arrival stop	Ocean/Frida Kahlo departure (this should account for intersection footprint)	Ocean/ped bridge doors open	Ocean/ped bridge initial boarding end	Total Red Time
1	Time	6:22pm	Start	13	18	N/A	46	
1	Delay Note			RL	GL (18)			
2	Time	6:31pm	Start	N/A	N/A	51	63	
2	Delay Note			Kept going				
3	Time	6:42pm	Start	N/A	43	100	128	
3	Delay Note			Slow to move (no	RL	GL (79)		
4	Time	6:46pm	Start	40	60	N/A	114	
4	Delay Note		RL	GL (18) *Bus remained stopped. The	RL (60)	GL (91)		
5	Time	6:54pm	Start	11	18	39	90	
5	Delay Note			RL				
6	Time	6:58pm	Start	9	69	N/A	90	
6	Delay Note			RL				

Location Ocean Avenue/Frida Kahlo/Geneva  
 Direction Westbound  
 QGW, EBH 12/17/2019

Route 29

Observation	Info	Time	Howth Street departure	Howth Street door open	Howth Street initial boarding end	Ocean/Harold/Frida arrival stop	Ocean/Frida departure (this should account for intersection footprint)	Total Red Time	Notes
1	Time	5:00	Start	8	18	32	135	50	(Alex's observations)
1	Delay Note				merging delay to get to center				
2	Time	5:20	Start	13	23	24	50		
2	Delay Note						RL; merging to get to center lane		
3	Time	5:35	Start	8	19	36	76		
3	Delay Note				queue				
4	Time	5:45	Start	9	33	94	110		
4	Delay Note				RL (58)	queue			
5	Time	5:53	Start	n/a	n/a	32	53		
5	Delay Note				queue				
6	Time	6:10	Start	4	12	15	228		major queueing in both lights while bus trying to change lanes
6	Delay Note				queue	queue, red light			
7	Time	6:15	Start	n/a	n/a	25	61		traveled on tracks with 49 bus from Howth
7	Delay Note			skip stop		red light			
8	Time	6:38	Start	10	24	45	55		no delay
8	Delay Note								
9	Time	6:42	Start	n/a	n/a	13	140		bus sat for 1 extra cycle
9	Delay Note			skip stop		queue, red light			
10	Time	6:56	Start	n/a	n/a	31	98		all delay was at second light
10	Delay Note			skip stop		red light			

Route K/ T Third

Observation	Info	Time	Howth Street departure	Ocean/Frida Kahlo door open	Ocean/Frida Kahlo initial boarding end	Ocean/Frida Kahlo departure (this should account for intersection footprint)	Total Red Time	Notes
1	Time	5:15	Start	26	35	112	43	
1	Delay Note					RL (43)		
2	Time	5:25	Start	15	45	118	48	hit both red lights
2	Delay Note					RL #1 (37) + RL #2 (11)		
3	Time	5:42	Start	16	28	99	42	slowed at second intersection due to recent light change
3	Delay Note					RL #1 (42) slowed at intersection 2		
4	Time	6:00	Start	15	22	50		no delay
4	Delay Note							
5	Time	6:10	Start	n/a	n/a	95		
5	Delay Note			skip stop		queueing		
6	Time	6:39	Start	16	38	64		no delay
6	Delay Note							
7	Time	6:45	Start	n/a	n/a	123		
7	Delay Note			skip stop		2 red lights, 1 queue		
8	Time	6:48	Start	16	26	47		
8	Delay Note					red light		



Location Ocean Avenue/Plymouth Avenue  
Direction Eastbound

Route K / T Third

Observation	Info	Time	Ocean/Granda departure	Ocean/Plymouth N arrival stop	Ocean/Plymouth N departure	Ocean/Plymouth S arrival stop	Ocean/Plymouth S departure	Total Red Time	Notes
1	Time	5:03	Start	3	23	n/a	27	12	
1	Delay Note				RL (12)				
2	Time	5:40	Start	6	26	n/a	33	14	
2	Delay Note				RL (14)				
3	Time	5:42	Start	6	29	n/a	33	19	
3	Delay Note				RL (19)				
4	Time	5:47	Start	6	26	n/a	32	14	
4	Delay Note				RL (14)				
5	Time	6:03	Start	5	24	n/a	31	13	
5	Delay Note				RL (13)				
6	Time	6:35	Start	6	23	n/a	30	8	
6	Delay Note				RL (8)				
7	Time	6:37	Start	3	31	n/a	38	2	
7	Delay Note				RL (2) + LT (20)				
8	Time	6:39	Start	n/a	9	n/a	14		some slight slowing at the first intersection
8	Delay Note								

Route	K / T Third
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[illegible][illegible]008322

## APPENDIX C: OFF-PEAK (NIGHTTIME) DATA COLLECTION

## Travel Time Summaries

K/T							
Westbound				Eastbound			
Segment	Off-Peak	Peak	Delta	Segment	Off-Peak	Peak	Delta
link travel time: Howth to Frida Kahlo	12	17	5	Link travel time: Miramar to Plymouth	16	-	-
node travel time: through Frida Kahlo (including dwell)	20	64	44	Node travel time: through Plymouth	13	27	14
node travel time: through Frida Kahlo (excluding dwell)	11	49	38	link travel time: plymouth to Brighton	14	14	0
link travel time: Lee to Brighton	8	15	7	node travel time: through Brighton	4	29	26
node travel time: through Brighton	3	23	20	link travel time: Lee to Frida Kahlo	19	18	-
link travel time: Brighton to plymouth	7	11	4	node travel time: through Frida Kahlo	39	53	14
node travel time: through plymouth	4	29	25				

29							
Westbound				Eastbound			
Segment	Off-Peak	Peak	Delta	Segment	Off-Peak	Peak	Delta
link travel time: Howth to Frida Kahlo	15	20	5	link travel time: plymouth to Brighton	13	17	4
node travel time: through Frida Kahlo	8	66	58	node travel time: through Brighton	12	28	16
link travel time: Lee to Brighton	8	19	11	link travel time: Lee to Frida Kahlo	10	15	5
node travel time: through Brighton	2	32	30	node travel time: through Frida Kahlo (including dwell)	57	54	-
link travel time: Brighton to plymouth	5	9	4				
node travel time: through plymouth	3	33	30				

K/T Eastbound Travel Time Runs

	TRAVEL TIME RUN 1			TRAVEL TIME RUN 2			TRAVEL TIME RUN 3			TRAVEL TIME RUN 4			Average Times	
	Seconds	Delta	comments	Seconds	Delta	comments	Seconds	Delta	comments	Seconds	Delta	comments		
Ocean/Miramar STOP + SIGNAL	Pre-bus stop Arrival time (if queue)			0										
	Bus stop door open time			18			58			11				
	End of active initial boarding			18			70			11				
	Intx departure time (front of bus clears intx)			18			105			16				
	Total red time			0			30			0				
Plymouth/Ocean signal	N LEG: Pre-bus stop Arrival time (if queue)			20			115			41				
	N LEG Intx departure time (front of bus clears intx)			35			135			45			16 Link travel time: Miramar to Plymouth	
	Total red time			15			20			0			13.25 Node travel time: through Plymouth	
Ocean/Brighton SIGNAL	Arrival stop time (signal control or queue)			45			159			50				
	Intersection departure (front of bus clears intx)			48			162			53			13.5 link travel time: plymouth to brighton	
	Pre-bus stop Arrival time (if queue)									61			3.5 node travel time: through brighton	
Ocean/Lee STOP + SIGNAL	Bus stop door open time			58			173			61				
	End of active initial boarding			58			181			68			19 link travel time: lee to Frida Kahlo	
	Intx departure time (front of bus clears intx)			105			213			105			39 node travel time: through Frida Kahlo	
	Total red time			40			17			29				
	Ocean/ Lee arrival time			120			233			123				
Ocean/Frida Kahlo/Geneva	Ocean/Frida departure (front of bus clears intx)			165			157			271				
	Total red time			0			21			27				
	Door open time			175			175			182				
Ocean/CCSF/Ped Bridge Stop	End of active initial boarding / doors close			180			175			182				
	Reentry time (bus moving)			200			175							

			Historical data		TRAVEL TIME RUN 1				TRAVEL TIME RUN 2				TRAVEL TIME RUN 3				TRAVEL TIME RUN 4				Average Travel Times			
			incl. dwell	excl. dwell																				
			(doors open to doors open)	(doors close to doors open)	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical		
Calcs:																								
From:		to:																						
Ocean Avenue & Miramar Avenue																								
SW-NS/SI	Ocean Avenue & Lee St SW-NS		99	70	57	-42%	57	-19%	53	-46%	53	-24%	115	16%	68	-3%	50	-49%	45	-36%	69	-31%	56	-20%
Ocean Avenue & Miramar Avenue																								
SW-NS/SI	City College Pedestrian Bridge SW		117	80	117	0%	117	46%	104	-11%	89	11%	117	0%	109	36%	121	3%	114	43%	115	-2%	107	34%

Note: Refer to Appendix D for Historical Travel Times.

## 29 Eastbound Travel Time Runs

		TRAVEL TIME RUN 1			TRAVEL TIME RUN 2			TRAVEL TIME RUN 3			Average Times	
		Seconds	Delta	comments	Seconds	Delta	comments	Seconds	Delta	comments		
Plymouth Ave & Holloway Avenue NS Stop Control + near side bus stop	Pre-bus stop Arrival time (if queue)				0							
	Bus stop door open time											
	End of active initial boarding											
	Intx departure time (front of bus clears intx)				8			0				
Plymouth & Ocean signal control + near side bus stop	Pre-bus stop Arrival time (if queue)	0										
	Bus stop door open time	21			41			9				
	End of active initial boarding	29			56			25				
	Intx departure time (front of bus clears intx)	70	41		68	12		104	79			
	Total red time	40	40		0	0 negligible r		0	0 negligible red time -- c	13.33333 link travel time: plymouth to brighton		
Ocean & Brighton signal	Arrival stop time (signal control or queue)	83	13		82	14		117	13		12.33333 node travel time: through brighton	
	Intersection departure (front of bus clears intx)	105	22		88	6		126	9			
	Total red time	22			6			138			10 link travel time: lee to Frida Kahlo	
Ocean & Lee signal control + near side bus stop	Pre-bus stop Arrival time (if queue)							138			56.66667 node travel time: through Frida Kahlo (including dwell)	
	Bus stop door open time	118	13		101	13		141	15		50.33333 node travel time: through Frida Kahlo (excluding dwell)	
	End of active initial boarding	125			109			141			22.66667 red time at Frida Kahlo	
	Intx departure time (front of bus clears intx)	132	7		145	36		141	0			
	Total red time	0	0		36	36		0	0			
Ocean & Frida Kahlo/Geneva	Ocean/Harold/Frida arrival time	143	11		155	10		150	9			
	Ocean/Harold/Friday doors open	156			170			161				
	End of active initial boarding	165	9		175	5		166	5			
	Ocean/Frida departure (front of bus clears intx)	225	82		206	51		187	37		73	
	Total red time	48	48		15	15		5	5		46	
Ocean & Howth signal control + far side bus stop	Arrival time (queue or signal)	247	22		220	14		205	18		32	
	Departure time (front of bus clears intx)				223							
	Door open time	247			223			210				
	End of active initial boarding / doors close	247						217				
	Reentry time (bus moving)	247						220				
	Total Red time	0										

		Historical data		TRAVEL TIME RUN 1				TRAVEL TIME RUN 2				TRAVEL TIME RUN 3				AVERAGE			
		incl. dwell (doors open to doors open)	excl. dwell (doors close to doors open)	incl. dwell (doors open to doors open)	% Diff close to historical	excl. dwell (doors close to doors open)	% Diff from historical	incl. dwell (doors open to doors open)	% Diff close to historical	excl. dwell (doors close to doors open)	% Diff from historical	incl. dwell (doors open to doors open)	% Diff close to historical	excl. dwell (doors close to doors open)	% Diff from historical	incl. dwell (doors open to doors open)	% Diff close to historical	excl. dwell (doors close to doors open)	% Diff from historical
Calcs:																			
from:	to:																		
Plymouth Avenue & Ocean Avenue SE-NS/PS	Ocean Avenue & Lee Street SW-NS	69	56	97	41%	89	59%	60	-13%	45	-20%	132	91%	116	107%	96	40%	83	49%
Ocean Avenue & Lee Street SW-NS	Ocean Avenue & Geneva Avenue SW-NS/SI	54	38	38	-30%	31	-18%	69	28%	61	61%	20	-63%	20	-47%	42	-22%	37	-2%
Ocean Avenue & Geneva Avenue SW-NS/SI	Ocean Avenue & Howth Street SE-FS/BZ	58	46	91	57%	82	78%	53	-9%	48	4%	49	-16%	44	-4%	64	11%	58	26%

Note: Refer to Appendix D for Historical Travel Times.

**49 Westbound Travel Time Runs**

		TRAVEL TIME RUN 1			TRAVEL TIME RUN 2			Average Times	
		Seconds	Delta	comments	Seconds	Delta	comments		
Ocean & I-280 onramp signal control + near side bus stop	Pre-bus stop Arrival time (if queue)								
	Bus stop door open time				-3				
	End of active initial boarding				4				
	Intx departure time (front of bus clears intx)				16				
	Total red time				0				
Ocean & Howth signal	Arrival time (queue or signal)	0			45				
	Departure time (front of bus clears intx)	2			68				
	Door open time	2			78			13.5 link travel time: Howth to Frida Kahlo	
	End of active initial boarding / doors close	2			85			16.5 node travel time: through Frida Kahlo	
	Reentry time (bus moving)	2			100				
	Total Red time	0			20				
Ocean/ Frida Kahlo/Geneva signalized intersection	Arrival time (queue or signal)	16	14		113	13			
	Intx departure time (front of bus clears intx)	24	8		138	25			
	Total red time	0	0		0	0 no red, but 10 seconds of queueing			
City College Terminal	Arrival/doors open time	58			171				
	End of active initial boarding	65							

		Historical data		TRAVEL TIME RUN 1				TRAVEL TIME RUN 2				AVERAGE			
		incl. dwell	excl. dwell	incl. dwell	% Diff	excl. dwell	% Diff	incl. dwell	% Diff	excl. dwell	% Diff	incl. dwell	% Diff	excl. dwell	% Diff
		(doors open to doors open)	(doors close to doors open)	(doors open to doors open)	from historical	(doors close to doors open)	from historical	(doors open to doors open)	from historical	(doors close to doors open)	from historical	(doors open to doors open)	from historical	(doors close to doors open)	from historical
Calcs:															
from:	to:														
Ocean Avenue & Howth Street NW-FS/PS	City College terminal NW-FS/SI	90	81	56	-38%	56	-31%	93	3%	86	6%	74.5	-17%	71	-12%

Note: Refer to Appendix D for Historical Travel Times.

## 29 Westbound Travel Time Runs

	TRAVEL TIME RUN 1			TRAVEL TIME RUN 2			Average Times
	Seconds	Delta	comments	Seconds	Delta	comments	
Ocean & I-280 onramp signal control + near side bus stop	Pre-bus stop Arrival time (if queue)						
	Bus stop door open time			3			
	End of active initial boarding			12			
	Intx departure time (front of bus clears intx)			20			
	Total red time			0			
Ocean & Howth signal	Arrival time (queue or signal)			56			
	Departure time (front of bus clears intx)			60			
	Door open time			60			
	End of active initial boarding / doors close			60			
	Reentry time (bus moving)			60			15 link travel time: Howth to Frida Kahlo
	Total Red time			0			7.5 node travel time: through Frida Kahlo
Ocean/ Frida Kahlo/Geneva signalized intersection	Arrival time (queue or signal)			78			
	Intx departure time (front of bus clears intx)			85			
	Total red time			0			
Ocean & Lee signal control + near side transit stop	Pre-bus stop Arrival time (if queue)						8 link travel time: lee to brighton
	Bus stop door open time			109			2 node travel time: through brighton
	End of active initial boarding			115			
	Intx departure time (front of bus clears intx)			148			
	Total red time			30			5 link travel time: brighton to plymouth
Ocean & Brighton signal	S LEG Arrival time (queue or red signal)			155			3 node travel time: through plymouth
	S LEG Departure time (front of bus clears intx)			157			
	Total red time			0			
Ocean & Plymouth signal + far side bus stop	S LEG Arrival time (queue or red signal)			165			
	S LEG Departure time (front of bus clears intx)			165			
	Total red time			0			
Ocean & Miramar signal control + near side transit stop	Pre-bus stop Arrival time (if queue)						
	Intx departure time (front of bus clears intx)						
	Total red time						
	Bus stop door open time						
	End of active initial boarding						

		Historical data		TRAVEL TIME RUN 1				TRAVEL TIME RUN 2				AVERAGE			
		incl. dwell	excl. dwell	incl. dwell	% Diff	excl. dwell	% Diff	incl. dwell	% Diff	excl. dwell	% Diff	incl. dwell	% Diff	excl. dwell	% Diff
		(doors open to doors open)	(doors close to doors open)	(doors open to doors open)	historical	(doors close to doors open)	historical	(doors open to doors open)	historical	(doors close to doors open)	historical	(doors open to doors open)	historical	(doors close to doors open)	historical
Calcs:															
from:	to:														
Ocean Avenue & Howth Street NW-FS/PS	Ocean Avenue & Lee Street NE-NS/SI	74	66	42	-43%	42	-36%	49	-34%		-100%	46	-39%	42	-36%
Ocean Avenue & Lee Street NE-NS/SI	Plymouth Avenue & Ocean Avenue SW-FS/BZ	87	68	74	-15%	54	-21%	56	-36%		-100%	65	-25%	54	-21%

Note: Refer to Appendix D for Historical Travel Times.



**K/T Westbound Travel Time Runs**

		TRAVEL TIME RUN 1			TRAVEL TIME RUN 2			Average Times	
		Seconds	Delta	comments	Seconds	Delta	comments		
Ocean & San Jose signal	Intersection departure time	5			10				
	Arrival stop time (signal control or queue)	76	71		154	144			
Ocean & Howth signal	Intersection departure (front of bus clears intx)	85	9		156	2			
	Total red time	5	5		0	0			
Ocean/CCSF Ped Bridge stop / Frida Kahlo/Geneva intersection	Pre-bus stop Arrival time (if queue)	97	12		168	12			
	Bus stop door open time	102			168				
	End of active initial boarding	120	18		168	0			
	Intx departure time (front of bus clears intx)	145	25		182	14			
	Total red time	10	10		0	0			
Ocean & Lee signal control + near side transit stop	Pre-bus stop Arrival time (if queue)	165			201			12 link travel time: Howth to Frida Kahlo	
	Bus stop door open time	165	20		201	19		19.5 node travel time: through Frida Kahlo (including dwell)	
	End of active initial boarding	188	23		215	14		10.5 node travel time: through Frida Kahlo (excluding dwell)	
	Intx departure time (front of bus clears intx)	223	35		245	30			
	Total red time	32	32		0	0			
Ocean & Brighton signal	S LEG Arrival time (queue or red signal)	233	10		251	6		8 link travel time: lee to brighton	
	S LEG Departure time (front of bus clears intx)	236	3		253	2		2.5 node travel time: through brighton	
	Total red time	0	0		0	0			
Ocean & Plymouth signal	S LEG Arrival time (queue or red signal)	243	7		259	6			
	S LEG Departure time (front of bus clears intx)	248	5		261	2		6.5 link travel time: brighton to plymouth	
	Total red time	0	0		0	0		3.5 node travel time: through plymouth	
Ocean & Miramar signal control + near side transit stop	Pre-bus stop Arrival time (if queue)	268	20		281	20			
	Bus stop door open time	280	12		281	0			
	End of active initial boarding				281				
	Intx departure time (front of bus clears intx)				285				
	Total red time				0				

		Historical data		TRAVEL TIME RUN 1				TRAVEL TIME RUN 2				AVERAGE			
		incl. dwell	excl. dwell	incl. dwell		excl. dwell		incl. dwell		excl. dwell		incl. dwell		excl. dwell	
		(doors open to doors open)	(doors close to doors open)	(doors open to doors open)	% Diff from historical	(doors close to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors close to doors open)	% Diff from historical	(doors open to doors open)	% Diff from historical	(doors close to doors open)	% Diff from historical
Calcs:															
from:	to:														
City College Pedestrian Bridge N-MI Ocean Avenue & Lee Street NE-NS/SI		71	45	63	-11%	45	0%	33	-54%	33	-27%	48	-32%	39	-13%
Ocean Avenue & Lee Street NE-NS/Ocean Avenue & Miramar Avenue NE-NS/SI		139	69	115	-17%	92	33%	66	-53%	66	-4%	91	-35%	79	14%

Note: Refer to Appendix D for Historical Travel Times.

## APPENDIX D: HISTORICAL SFMTA MUNI TRAVEL TIMES

## 29 westbound/inbound, including dwell

Stop to Stop Travel Time - Before/After						Based on APC data Contact: Tal Green
From	To	Median Travel Time (sec)	Variability (90% - 50%)	Number of Records	Difference in Travel Time (sec)	
Persia Ave&Paris St E-NS/SB	Persia Ave&Mission St E-NL	39	13.0	305		
Persia Ave&Mission St E-NS/BZ	Ocean Ave&Cayuga Ave N...	92	36.5	368		
Ocean Ave&Cayuga Ave NE-NS/BZ	Ocean Ave&Otsego Ave N...	30	10.0	257		
Ocean Ave&Otsego Ave NE-NS/BZ	Ocean Ave&San Jose Ave ...	55	26.0	277		
Ocean Ave&San Jose Ave NW-FS/BZ	Ocean Ave & I-280 on-ramp	37	14.5	458		
Ocean Ave & I-280 on-ramp NE-NS/SB	Ocean Ave&Howth St NW...	75	49.7	404		
Ocean Ave&Howth St NW-FS/PS	Ocean Ave&Lee St NE-NS/S...	74	57.0	408		
Ocean Ave&Lee St NE-NS/SI	Plymouth Ave&Ocean Ave ...	87	26.0	639		
Plymouth Ave&Ocean Ave SW-FS/BZ	Plymouth Ave&Holloway A...	42	13.0	399		
Plymouth Ave&Holloway Ave NW-NS/PS	Plymouth Ave&Grafton Ave...	36	9.0	365		
Plymouth Ave&Grafton Ave NW-NS/PS	Grafton Ave&Granada Ave...	33	11.0	329		
Grafton Ave&Granada Ave NE-NS/SB	Grafton Ave&Capitol Ave...	30	12.0	314		
Grafton Ave&Capitol Ave NE-NS/PS	Grafton Ave&Jules Ave NE...	36	8.0	416		
Grafton Ave&Jules Ave NE-NS/SB	Garfield St&Bright St NE-N...	39	10.0	441		
Garfield St&Bright St NE-NS/SB	Garfield St&Victoria St NE...	36	6.0	408		
Garfield St&Victoria St NE-NS/SB	Garfield St&Vernon St NE...	42	10.0	408		
Garfield St&Vernon St NE-NS/SB	Garfield St&Bybee St NE...	35	7.0	385		
Garfield St&Bybee St NE-NS/SB	Garfield St&Beverly St NE...	39	10.0	287		
Garfield St&Beverly St NE-NS/PS	Holloway Ave&Junipero Se...	88	42.4	257		
Holloway Ave&Junipero Serra NW-FS	19th Ave&Holloway Ave N...	41	41.5	308		
19th Ave&Holloway Ave NE-FS/BZ	Winston Dr&20th Ave NE...	117	80.1	690		
Winston Dr&20th Ave NE-NS/BZ	Winston Dr&Buckingham...	74	13.0	459		
Winston Dr&Buckingham Way E-NS/BZ	Winston Dr&Lake Merced ...	63	11.5	366		
Winston Dr&Lake Merced Blvd NE-NS	Lake Merced&Middlefield ...	50	21.0	318		
Lake Merced&Middlefield Dr NE-NS	Sunset Blvd&Lake Merced ...	67	24.0	246		
Sunset Blvd&Lake Merced Blvd NE-FS	Sunset Blvd&Ocean Ave S...	16	15.0	250		
Sunset Blvd&Ocean Ave SE-NS/SB	Sunset Blvd&Yorba St SE-N...	45	24.0	375		
Sunset Blvd&Yorba St SE-NS/PS	Sunset Blvd&Wawona St S...	33	15.0	347		
Sunset Blvd&Wawona St SE-NS/SB	Sunset Blvd&Vicente St SE...	34	13.5	330		
Sunset Blvd&Vicente St SE-NS/SB	Sunset Blvd&Ulloa St SE-N...	38	18.0	357		
Sunset Blvd&Ulloa St SE-NS/SB	Sunset Blvd&Taraval St SE...	38	30.0	417		

### Route Information

Route: 29

Direction: ☒ INBOUND ☐ OUTBOUND

### Date and Time

BEFORE - Start Date: 3/1/2019

BEFORE - End Date: 12/13/2019

AFTER - Start Date: 3/1/2019

AFTER - End Date: 6/30/2019

Days of Week: [Multiple values]

Hours: [Multiple values]

### Additional Options

Include Dwell Times: ☒ Include (Door Open to Door Open) ☐ Exclude (Door Close to Door Open)

Pattern: Full

Segments to Include (Starting Stop): [All]

## 29 westbound/inbound, excluding dwell

Stop to Stop Travel Time - Before/After						Based on APC data Contact: Tal Green
From	To	Median Travel Time (sec)	Variability (90% - 50%)	Number of Records	Difference in Travel Time (sec)	
Persia Ave&Paris St E-NS/SB	Persia Ave&Mission St E-NL	56	9	304		
Persia Ave&Mission St E-NS/BZ	Ocean Ave&Cayuga Ave N...	73	52	370		
Ocean Ave&Cayuga Ave NE-NS/BZ	Ocean Ave&Otsego Ave N...	50	2	257		
Ocean Ave&Otsego Ave NE-NS/BZ	Ocean Ave&San Jose Ave ...	51	26	277		
Ocean Ave&San Jose Ave NW-FS/BZ	Ocean Ave & I-280 on-ramp	39	9	458		
Ocean Ave & I-280 on-ramp NE-NS/SB	Ocean Ave&Howth St NW...	60	39	404		
Ocean Ave&Howth St NW-FS/PS	Ocean Ave&Lee St NE-NS/S...	66	35	408		
Ocean Ave&Lee St NE-NS/SI	Plymouth Ave&Ocean Ave ...	68	21	641		
Plymouth Ave&Ocean Ave SW-FS/BZ	Plymouth Ave&Holloway A...	30	6	398		
Plymouth Ave&Holloway Ave NW-NS/PS	Plymouth Ave&Grafton Ave...	30	7	364		
Plymouth Ave&Grafton Ave NW-NS/PS	Grafton Ave&Granada Ave...	24	7	329		
Grafton Ave&Granada Ave NE-NS/SB	Grafton Ave&Capitol Ave...	28	6	314		
Grafton Ave&Capitol Ave NE-NS/PS	Grafton Ave&Jules Ave NE...	29	5	414		
Grafton Ave&Jules Ave NE-NS/SB	Garfield St&Bright St NE-N...	31	7	441		
Garfield St&Bright St NE-NS/SB	Garfield St&Victoria St NE...	29	3	412		
Garfield St&Victoria St NE-NS/SB	Garfield St&Vernon St NE...	34	8	409		
Garfield St&Vernon St NE-NS/SB	Garfield St&Bybee St NE...	27	6	385		
Garfield St&Bybee St NE-NS/SB	Garfield St&Beverly St NE...	25	5	288		
Garfield St&Beverly St NE-NS/PS	Holloway Ave&Junipero Se...	96	40	257		
Holloway Ave&Junipero Serra NW-FS	19th Ave&Holloway Ave N...	38	40	307		
19th Ave&Holloway Ave NE-FS/BZ	Winston Dr&20th Ave NE...	101	70	690		
Winston Dr&20th Ave NE-NS/BZ	Winston Dr&Buckingham...	48	13	461		
Winston Dr&Buckingham Way E-NS/BZ	Winston Dr&Lake Merced ...	55	8	366		
Winston Dr&Lake Merced Blvd NE-NS	Lake Merced&Middlefield ...	43	18	318		
Lake Merced&Middlefield Dr NE-NS	Sunset Blvd&Lake Merced ...	64	17	244		
Sunset Blvd&Lake Merced Blvd NE-FS	Sunset Blvd&Ocean Ave S...	16	9	250		
Sunset Blvd&Ocean Ave SE-NS/SB	Sunset Blvd&Yorba St SE-N...	37	21	375		
Sunset Blvd&Yorba St SE-NS/PS	Sunset Blvd&Wawona St S...	26	11	346		
Sunset Blvd&Wawona St SE-NS/SB	Sunset Blvd&Vicente St SE...	28	12	331		
Sunset Blvd&Vicente St SE-NS/SB	Sunset Blvd&Ulloa St SE-N...	50	16	353		
Sunset Blvd&Ulloa St SE-NS/SB	Sunset Blvd&Taraval St SE...	31	29	418		

### Route Information

Route: 29

Direction: ☒ INBOUND ☐ OUTBOUND

### Date and Time

BEFORE - Start Date: 3/1/2019

BEFORE - End Date: 12/13/2019

AFTER - Start Date: 3/1/2019

AFTER - End Date: 6/30/2019

Days of Week: [Multiple values]

Hours: [Multiple values]

### Additional Options

Include Dwell Times: ☐ Include (Door Open to Door Open) ☒ Exclude (Door Close to Door Open)

Pattern: Full

Segments to Include (Starting Stop): [All]

## 29 eastbound/outbound, including dwell

Stop to Stop Travel Time - Before/After						Based on APC data Contact: Tal Green
From	To	Median Travel Time (sec)	Variability (90% - 50%)	Number of Records	Difference in Travel Time (sec)	Route Information
Winston Dr&20th Ave SE-FS/BZ	19th Ave&Holloway Ave N...	90	27	804		Route: 29
19th Ave&Holloway Ave NW-NS/SB	Crespi Dr&Varela Ave NE-...	76	24	478		Direction: <input type="radio"/> INBOUND <input checked="" type="radio"/> OUTBOUND
Crespi Dr&Varela Ave NE-NS/SB	19th Ave&Holloway Ave S...	58	13	343		Date and Time
19th Ave&Holloway Ave SE-NS/SB	Holloway Ave&Junipero Se...	43	32	270		BEFORE - Start Date: 3/1/2019
Holloway Ave&Junipero Serra SW-NS	Holloway Ave&Beverly St S...	29	20	259		BEFORE - End Date: 12/13/2019
Holloway Ave&Beverly St SW-NS/SB	Beverly St&Garfield St NW...	32	16	276		AFTER - Start Date: 3/1/2019
Beverly St&Garfield St NW-NS/SB	Garfield St&Bybee St SW-...	38	10	348		AFTER - End Date: 6/30/2019
Garfield St&Bybee St SW-NS/SB	Garfield St&Vernon St SW...	34	8	438		Days of Week: (Multiple values)
Garfield St&Vernon St SW-NS/SB	Garfield St&Victoria St SW...	42	7	429		Hours: (Multiple values)
Garfield St&Victoria St SW-NS/PS	Garfield St&Bright St SW-N...	34	6	419		Additional Options
Garfield St&Bright St SW-NS/SB	Grafton Ave&Julius Ave S...	38	9	434		Include Dwell Times: <input checked="" type="radio"/> Include (Door Open to Door Open) <input type="radio"/> Exclude (Door Close to Door Open)
Grafton Ave&Julius Ave SW-NS/PS	Grafton Ave&Capitol Ave...	37	8	457		Pattern: Full
Grafton Ave&Capitol Ave SW-NS/PS	Grafton Ave&Granada Ave...	35	8	363		Segments to include (Starting Stop): (All)
Grafton Ave&Granada Ave SW-NS/SB	Grafton Ave&Plymouth Av...	25	7	385		
Grafton Ave&Plymouth Ave SW-NS/PS	Plymouth Ave&Holloway A...	39	12	394		
Plymouth Ave&Holloway Ave SE-NS/PS	Plymouth Ave&Ocean Ave...	38	10	437		
Plymouth Ave&Ocean Ave SE-NS/PS	Ocean Ave&Lee St SW-NS	69	38	615		
Ocean Ave&Lee St SW-NS	Ocean Ave&Geneva Ave S...	54	20	562		
Ocean Ave&Geneva Ave SW-NS/SI	Ocean Ave&Henth St SE-F...	58	29	430		
Ocean Ave&Henth St SE-FS/BZ	Ocean Ave&Balboa Park B...	32	18	821		
Ocean Ave&Balboa Park BART S-MB/BZ	Ocean Ave&San Jose St SE...	77	65	694		
Ocean Ave&San Jose St SE-FS/BZ	Ocean Ave&Clayton Ave S...	44	11	462		
Ocean Ave&Clayton Ave SW-NS/BZ	Ocean Ave&Cayuga Ave S...	43	10	428		
Ocean Ave&Cayuga Ave SE-FS/BZ	Persia Ave&Mission St S-F...	78	31	605		
Persia Ave&Mission St S-FS/BZ	Persia Ave&Paris St W-NS/...	53	18	661		
Persia Ave&Paris St W-NS/SB	Persia Ave&Madrid St W-N...	41	8	549		
Persia Ave&Madrid St W-NS/SB	Persia Ave&Naples St W-N...	35	7	653		
Persia Ave&Naples St W-NS/PS	Persia Ave&Athens St E-NS	38	9	712		
Persia Ave&Athens St E-NS	Persia Ave&Moscow St W-...	27	6	588		
Persia Ave&Moscow St W-NS	Persia Ave&Prague St W-N...	35	8	613		
Persia Ave&Prague St W-NS/PS	Persia Ave&Brazil Ave S-NS...	65	18	299		

## 29 eastbound/outbound, excluding dwell

Stop to Stop Travel Time - Before/After						Based on APC data Contact: Tal Green
From	To	Median Travel Time (sec)	Variability (90% - 50%)	Number of Records	Difference in Travel Time (sec)	Route Information
Winston Dr&20th Ave SE-FS/BZ	19th Ave&Holloway Ave N...	70	21	804		Route: 29
19th Ave&Holloway Ave NW-NS/SB	Crespi Dr&Varela Ave NE-...	56	33	477		Direction: <input type="radio"/> INBOUND <input checked="" type="radio"/> OUTBOUND
Crespi Dr&Varela Ave NE-NS/SB	19th Ave&Holloway Ave S...	48	15	345		Date and Time
19th Ave&Holloway Ave SE-NS/SB	Holloway Ave&Junipero Se...	37	37	269		BEFORE - Start Date: 3/1/2019
Holloway Ave&Junipero Serra SW-NS	Holloway Ave&Beverly St S...	29	32	260		BEFORE - End Date: 12/13/2019
Holloway Ave&Beverly St SW-NS/SB	Beverly St&Garfield St NW...	30	10	276		AFTER - Start Date: 3/1/2019
Beverly St&Garfield St NW-NS/SB	Garfield St&Bybee St SW-...	28	6	344		AFTER - End Date: 6/30/2019
Garfield St&Bybee St SW-NS/SB	Garfield St&Vernon St SW...	26	4	438		Days of Week: (Multiple values)
Garfield St&Vernon St SW-NS/SB	Garfield St&Victoria St SW...	33	6	460		Hours: (Multiple values)
Garfield St&Victoria St SW-NS/PS	Garfield St&Bright St SW-N...	27	3	430		Additional Options
Garfield St&Bright St SW-NS/SB	Grafton Ave&Julius Ave S...	30	7	432		Include Dwell Times: <input type="radio"/> Include (Door Open to Door Open) <input checked="" type="radio"/> Exclude (Door Close to Door Open)
Grafton Ave&Julius Ave SW-NS/PS	Grafton Ave&Capitol Ave...	29	5	450		Pattern: Full
Grafton Ave&Capitol Ave SW-NS/PS	Grafton Ave&Granada Ave...	29	4	363		Segments to include (Starting Stop): (All)
Grafton Ave&Granada Ave SW-NS/SB	Grafton Ave&Plymouth Av...	19	7	384		
Grafton Ave&Plymouth Ave SW-NS/PS	Plymouth Ave&Holloway A...	30	8	393		
Plymouth Ave&Holloway Ave SE-NS/PS	Plymouth Ave&Ocean Ave...	31	8	438		
Plymouth Ave&Ocean Ave SE-NS/PS	Ocean Ave&Lee St SW-NS	58	32	614		
Ocean Ave&Lee St SW-NS	Ocean Ave&Geneva Ave S...	38	23	557		
Ocean Ave&Geneva Ave SW-NS/SI	Ocean Ave&Henth St SE-F...	46	24	453		
Ocean Ave&Henth St SE-FS/BZ	Ocean Ave&Balboa Park B...	24	12	521		
Ocean Ave&Balboa Park BART S-MB/BZ	Ocean Ave&San Jose St SE...	60	50	698		
Ocean Ave&San Jose St SE-FS/BZ	Ocean Ave&Clayton Ave S...	35	8	462		
Ocean Ave&Clayton Ave SW-NS/BZ	Ocean Ave&Cayuga Ave S...	38	10	428		
Ocean Ave&Cayuga Ave SE-FS/BZ	Persia Ave&Mission St S-F...	71	29	609		
Persia Ave&Mission St S-FS/BZ	Persia Ave&Paris St W-NS/...	31	11	662		
Persia Ave&Paris St W-NS/SB	Persia Ave&Madrid St W-N...	33	5	549		
Persia Ave&Madrid St W-NS/SB	Persia Ave&Naples St W-N...	27	5	621		
Persia Ave&Naples St W-NS/PS	Persia Ave&Athens St E-NS	28	4	710		
Persia Ave&Athens St E-NS	Persia Ave&Moscow St W-...	18	3	585		
Persia Ave&Moscow St W-NS	Persia Ave&Prague St W-N...	27	6	613		
Persia Ave&Prague St W-NS/PS	Persia Ave&Brazil Ave S-NS...	60	9	298		

Appendix I  
Updated Health Risk  
Assessment Memorandum



# memorandum

date April 17, 2020

to Jeanie Poling, San Francisco Environmental Planning

cc Susan Yogi, Environmental Science Associates  
Jessica Range, San Francisco Environmental Planning

from Brian Schuster, Environmental Science Associates

subject Updated Health Risk Assessment Memorandum for the Balboa Reservoir Project

## Introduction

Environmental Science Associates (ESA) evaluated the health risks associated with construction and operation of the Balboa Reservoir Project on the 17.6-acre site in the West of Twin Peaks area of south central San Francisco known as the Balboa Reservoir (the “project”) for the draft Subsequent Environmental Impact Report (draft SEIR). This analysis was described in draft SEIR Appendix E, *Balboa Reservoir Project Air Quality Technical Memorandum*.

In February 2020, after the release of the draft SEIR, the City and County of San Francisco, in collaboration with the Bay Area Air Quality Management District (air district), updated the Community Risk Reduction Plan (CRRP) database of health impacts throughout the City. This database is now referred to as the draft 2020 Citywide Health Risk Assessment, or Citywide HRA. This action was initiated to update the APEZ map, as required by San Francisco Health Code article 38.<sup>1</sup>

Using the new Citywide HRA database for the background health impacts in the City, the project remains outside of the Air Pollution Exposure Zone (APEZ); see **Figure 1, Balboa Reservoir Project Site and New 2020 Air Pollutant Exposure Zone**. However, sensitive receptors in the immediately surrounding areas to the south and west would meet the APEZ criteria. This includes four daycares that previously were outside of the APEZ, residential receptors to the south of the project site along Ocean Avenue, and the City College campus and Multi-Use Building to the east of the project site. In addition, the background health risk values, including excess lifetime cancer risk due to exposure to emissions of diesel particulate matter (DPM), and annual average concentrations of particulate matter less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>), have been updated in the new Citywide HRA database. The majority of these background health risk values have increased compared to the 2012 CRRP database included in the draft SEIR and draft SEIR Appendix E. This is the primary reason for

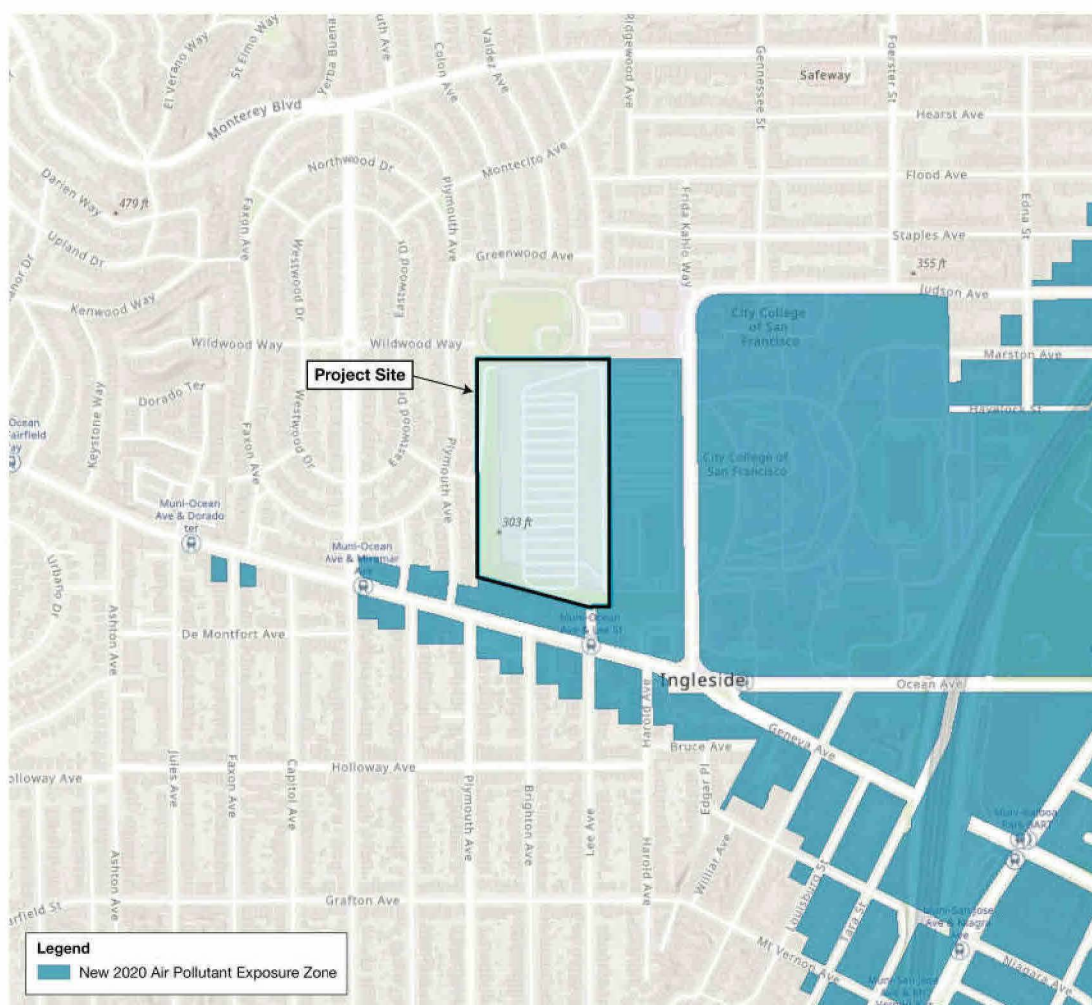
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<sup>1</sup> For more information, see: <https://www.sfdph.org/dph/EH/Air/Article38.asp>

why the APEZ has expanded. For more information on the Citywide HRA, please refer to the City's technical documentation for the analysis.<sup>2</sup>

ESA prepared an updated HRA for the project to account for the cumulative background health risk values from the updated Citywide HRA database. The health risk values from the updated Citywide HRA were provided by the City and County of San Francisco Planning Department. The analysis of the project is unchanged from the draft SEIR. The unmitigated and mitigated emissions associated with the project were used to estimate excess lifetime cancer risk and annual average PM<sub>2.5</sub> concentrations using the same methodologies described under Impact AQ-4 (draft SEIR p. 3.D-67) and in draft SEIR Appendix E, *Air Quality Technical Memorandum*.

**FIGURE 1**  
**BALBOA RESERVOIR PROJECT SITE AND NEW 2020 AIR POLLUTANT EXPOSURE ZONE**



<sup>2</sup> San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020, [https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air\\_Pollutant\\_Exposure\\_Zone\\_Technical\\_Documentation\\_2020.pdf](https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf), accessed March 2020.

## HRA Methods

As discussed above, ESA updated the HRA to incorporate the new Citywide HRA database and APEZ map. The Citywide HRA database presents the existing health risk impacts on the project site and in the project vicinity. Because construction and operational activities for the project have not changed, ESA did not update construction or operational emissions. In addition, ESA did not update the project's health risk impact calculations for onsite and offsite sensitive receptors. Only the background cumulative health risk values and the Maximum Exposed Individual Sensitive Receptor (MEISR) locations were updated to reflect the new Citywide HRA database.

This updated HRA was prepared using technical information and HRA protocol from the air district, California Air Pollution Control Officer's Association, California Air Resources Board, Office of Environmental Health Hazard Assessment, and the U.S. Environmental Protection Agency. The HRA evaluates the estimated incremental increase in lifetime cancer risks from exposure to emissions of toxic air contaminants (TACs), which include DPM and total organic gases from gasoline vehicle exhaust, and annual average PM<sub>2.5</sub> concentrations associated with combustion (i.e., exhaust) that would be emitted by project-related construction sources and project-related operational sources. Concentrations were estimated using the U.S. Environmental Protection Agency's American Meteorological Society/Environmental Protection Agency regulatory air dispersion model (AERMOD version 9.6.5).

ESA calculated health risks for the following exposure scenarios. TAC exposure and resulting health risks were quantified for both the Developer's Proposed Option (1,100 dwelling units) and the Additional Housing Option (1,550 dwelling units).

**Scenario 1.** *Construction:* offsite receptors (residents, daycare, and school) evaluated starting when construction commences for Phase 0 and exposed to all construction emissions for Phase 1 and Phase 2.

**Scenario 2.** *Construction:* onsite receptors (residents and daycare<sup>3</sup>) present at the project site once Phase 1 is complete evaluated starting when construction for Phase 1 concludes and exposed to all Phase 2 construction emissions.

**Scenario 3.** *Construction plus Operation:* offsite receptors (residents, daycare, and school) evaluated starting when construction commences and exposed to all construction emissions and 27 years of operational emissions.

**Scenario 4.** *Construction plus Operation:* onsite receptors (residents and daycare) present at the project site once Phase 1 is complete evaluated starting when construction for Phase 1 concludes and exposed to all Phase 2 construction emissions and 30 years of operational emissions.

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<sup>3</sup> It was assumed that daycare receptors would be present at the site when Phase 1 construction is complete and exposed to all Phase 2 construction emissions. Although the project phasing plan indicates that the daycare is part of Phase 2 and would not be occupied until Phase 2 construction is complete (and therefore daycare receptors would not be exposed to any construction emissions), the health risk assessment assumes that daycare receptors would be present when Phase 1 is complete. This results in a highly conservative assessment of daycare risk.



**Scenario 5. Operation:** offsite (residents, daycare, and school) and onsite receptors (residents and daycare) evaluated starting when full buildout operation commences and exposed to 30 years of operational emissions.

For each exposure scenario, health risks were evaluated for the following receptor locations based on the APEZ:

1. the maximum lifetime excess cancer risks and annual average  $PM_{2.5}$  exhaust concentrations contribution from the proposed project for those off-site receptors not located in the APEZ during existing conditions, but which would be placed in the APEZ during existing plus proposed project conditions; and
2. the maximum lifetime excess cancer risks and annual average  $PM_{2.5}$  exhaust concentrations contribution from the proposed project for those off-site receptors located in the APEZ during existing conditions, and which would continue to be located in the APEZ during existing plus proposed project conditions.

For more information on exposure scenarios, emission calculation methods, health risk analysis methods, and sensitive receptor types, please see “Health Risk Assessment Methods,” draft SEIR p. 3.D-38, and draft SEIR Appendix E, *Air Quality Technical Memorandum*, pp. 12-24.

## Results of the Updated HRA

### Excess Cancer Risk from Construction and Operation Emissions for Receptors Not in APEZ under Existing Conditions

The cancer risk analysis in the health risk assessment for the project is based on DPM concentrations from construction on- and off-road equipment, as well as the operational DPM concentrations from the emergency generators and project-generated vehicle emissions. The assessment evaluated excess cancer risk and  $PM_{2.5}$  concentrations as a result of exposure to both construction and operational emissions.

The maximum estimated excess lifetime cancer risk for each exposure scenario (see “Health Risk Assessment Methods,” draft SIER p. 3.D-38) for all sensitive receptor locations for receptors not in the APEZ under existing conditions is presented in **Table 1, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Developer’s Proposed Option**, and **Table 2, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Additional Housing Option**. These tables can be compared to the results in draft SEIR Table 3.D-13a (p. 3.D-67) and 3.D-13b (p. 3.D-68) in Impact AQ-4 of the draft SEIR, respectively.

**TABLE 1**  
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH**  
**THE PROPOSED PROJECT – DEVELOPER’S PROPOSED OPTION**

Scenario / Receptor Type	Lifetime Excess Cancer Risk (in One Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	10.0 <sup>d</sup>	100.0	10.0 <sup>d</sup>	100.0
<b>Construction</b>					
Resident (offsite) <sup>f</sup>	78.1	<b>36.1</b>	<b>114.2</b>	4.7	82.8
Resident (onsite) <sup>f</sup>	64.8	<b>108.6</b>	<b>173.3</b>	9.5	74.2
Daycare (offsite) <sup>f</sup>	62.0	<b>87.5</b>	<b>149.6</b>	11.6	73.6
Daycare (onsite) <sup>f</sup>	59.3	<b>238.4</b>	<b>297.6</b>	20.9	80.1
School (offsite) <sup>e</sup>	28.0	12.9	40.8	1.5	29.5
<b>Construction + Operations</b>					
Resident (offsite) <sup>f</sup>	52.9	<b>61.8</b>	<b>114.8</b>	7.9	60.8
Resident (onsite) <sup>f</sup>	64.8	<b>110.3</b>	<b>175.0</b>	11.4	75.9
Daycare (offsite) <sup>f</sup>	62.0	<b>87.7</b>	<b>149.7</b>	11.8	73.8
Daycare (onsite) <sup>f</sup>	59.3	<b>239.5</b>	<b>298.8</b>	22.0	81.3
School (offsite) <sup>e</sup>	28.0	13.1	41.1	1.7	29.7
<b>Operations<sup>e</sup></b>					
Resident (offsite) <sup>f</sup>	28.9	2.6	31.5	2.2	31.2
Resident (onsite) <sup>e</sup>	45.3	14.8	60.1	14.7	60.0
Daycare (offsite) <sup>e</sup>	62.0	0.7	62.7	0.7	62.7
Daycare (onsite) <sup>e</sup>	50.8	7.0	57.8	6.9	57.7
School (offsite) <sup>e</sup>	29.0	0.6	29.6	0.5	29.5

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB’s *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

**TABLE 1**  
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – ADDITIONAL HOUSING OPTION**

Scenario / Receptor Type	Lifetime Excess Cancer Risk (in One Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	–	10.0 <sup>d</sup>	100.0	10.0 <sup>d</sup>	100.0
<b>Construction</b>					
Resident (offsite) <sup>f</sup>	49.8	<b>76.3</b>	126.0	8.2	57.9
Resident (onsite) <sup>f</sup>	64.8	<b>122.2</b>	<b>186.9</b>	10.7	75.4
Daycare (offsite) <sup>f</sup>	62.0	<b>101.7</b>	<b>163.7</b>	12.6	74.6
Daycare (onsite) <sup>f</sup>	59.3	<b>267.7</b>	<b>326.9</b>	23.4	82.7
School (offsite) <sup>e</sup>	28.0	<b>14.4</b>	42.4	1.6	29.6
<b>Construction + Operations</b>					
Resident (offsite) <sup>f</sup>	49.8	<b>77.5</b>	<b>127.3</b>	9.4	59.1
Resident (onsite) <sup>f</sup>	63.9	<b>125.6</b>	<b>189.5</b>	13.4	77.3
Daycare (offsite) <sup>f</sup>	62.0	<b>102.0</b>	<b>164.0</b>	12.8	74.8
Daycare (onsite) <sup>f</sup>	59.3	<b>269.6</b>	<b>328.8</b>	25.3	84.5
School (offsite) <sup>e</sup>	28.0	14.8	42.8	1.9	29.9
<b>Operations</b>					
Resident (offsite) <sup>f</sup>	28.9	4.2	33.2	3.26	32.2
Resident (onsite) <sup>e</sup>	45.3	25.1	70.4	24.9	70.2
Daycare (offsite) <sup>e</sup>	62.0	1.2	63.2	1.1	63.1
Daycare (onsite) <sup>e</sup>	50.8	11.8	62.6	11.7	62.5
School (offsite) <sup>e</sup>	29.0	1.0	29.9	0.7	29.7

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

## Excess Cancer Risk from Construction and Operation Emissions for Receptors in APEZ under Existing Conditions

The maximum estimated excess lifetime cancer risk for each exposure scenario (see “Health Risk Assessment Methods,” draft SEIR p. 3.D-38) for all sensitive receptors in the APEZ under existing conditions is presented in **Table 3, Lifetime Cancer Risk for Receptors Located in the APEZ – Developer’s Proposed Option**, and **Table 4, Lifetime Cancer Risk for Receptors Located in the APEZ – Additional Housing Option**. These tables can be compared to the results in draft SEIR Table 3.D-14a (p. 3.D-73) and 3.D-14b (p. 3.D-74) in Impact AQ-4 of the draft SEIR, respectively.

**TABLE 3**  
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – DEVELOPER’S PROPOSED OPTION**

Scenario / Receptor Type <sup>d</sup>	Lifetime Excess Cancer Risk (in one Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	7.0	—	7.0	—
<b>Construction</b>					
Resident (offsite)	80.9	<b>43.4</b>	124.3	6.0	86.9
Daycare (offsite)	104.8	<b>37.3</b>	142.0	5.1	109.8
School (offsite)	145.5	1.1	146.7	0.1	145.7
<b>Construction + Operations</b>					
Resident (offsite)	80.9	<b>44.1</b>	125.0	6.7	87.6
Daycare (offsite)	104.8	<b>37.4</b>	142.1	5.2	109.9
School (offsite)	145.5	1.3	146.8	0.3	145.8
<b>Operations</b>					
Resident (offsite)	187.0	5.0	192.0	4.9	191.9
Daycare (offsite)	124.2	1.2	125.4	1.2	125.4
School (offsite)	145.5	0.2	145.8	0.2	145.7

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

**NOTES:**

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB’s *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.



**TABLE 4**  
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – ADDITIONAL HOUSING OPTION**

Scenario / Receptor Type <sup>d</sup>	Lifetime Excess Cancer Risk (in one Million) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	7.0	—	7.0	—
<b>Construction</b>					
Resident (offsite)	80.9	<b>48.5</b>	129.4	6.3	87.3
Daycare (offsite)	104.8	<b>43.0</b>	147.7	5.5	110.2
School (offsite)	145.5	1.3	146.8	0.1	145.7
<b>Construction + Operations</b>					
Resident (offsite) <sup>e</sup>	80.9/83.9	<b>49.6</b>	130.5	7.4 <sup>f</sup>	91.2
Daycare (offsite)	104.8	<b>43.1</b>	147.8	5.6	110.4
School (offsite)	145.5	1.5	147.0	0.3	145.9
<b>Operations</b>					
Resident (offsite)	187.0	7.0	194.0	6.9	193.9
Daycare (offsite)	124.2	1.8	126.0	1.7	125.9
School (offsite)	145.5	0.3	145.9	0.3	145.8

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.

e Under mitigated conditions, the offsite residential MEISR is a different receptor location than under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated offsite residential MEISR occurs during the project operations phase.

f Although the cancer risk for the Additional Housing Option of 7.4 per million exceeds the significance threshold for the project's contribution of 7.0 per million, the project's contribution does not increase the severity of the cancer risk for this receptor, nor does the project expand the geography of the APEZ. The total background plus project value does not exceed the APEZ criterion of 100 per million. Therefore, this receptor does not technically meet the criteria for the APEZ.

## PM<sub>2.5</sub> Concentrations from Construction and Operation Emissions for Receptors Not in APEZ under Existing Conditions

The maximum estimated annual average PM<sub>2.5</sub> concentrations from all project sources at offsite receptor locations not in the APEZ under existing conditions are presented in **Table 5, Annual Average PM<sub>2.5</sub> Concentrations for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Developer's Proposed Option**, and **Table 6, Annual Average PM<sub>2.5</sub> Concentrations for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Additional Housing**

**Option.** These tables can be compared to the results in draft SEIR Appendix E, Table 32 (p. 57) and 34 (p. 61), respectively.

**TABLE 5**  
**ANNUAL AVERAGE PM<sub>2.5</sub> CONCENTRATIONS FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – DEVELOPER’S PROPOSED OPTION**

Scenario / Receptor Type	Annual Average PM <sub>2.5</sub> Concentrations (µg/m <sup>3</sup> ) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	0.3 <sup>d</sup>	10.0	0.3 <sup>d</sup>	10.0
<b>Construction</b>					
Resident (offsite) <sup>e</sup>	9.60	<0.01	9.61	<0.01	9.60
Resident (onsite) <sup>f</sup>	8.90	<b>1.32</b>	<b>10.22</b>	0.12	9.02
Daycare (offsite) <sup>e</sup>	8.92	0.38	9.29	0.03	8.95
Daycare (onsite) <sup>f</sup>	8.82	<b>1.33</b>	<b>10.14</b>	0.12	8.93
School (offsite) <sup>e</sup>	8.29	0.25	8.54	0.02	8.31
<b>Construction + Operations</b>					
Resident (offsite) <sup>e</sup>	9.60	<0.01	9.61	<0.01	9.60
Resident (onsite) <sup>f</sup>	8.90	<b>1.32</b>	<b>10.23</b>	0.12	9.02
Daycare (offsite) <sup>e</sup>	8.92	0.38	9.30	0.04	8.95
Daycare (onsite) <sup>f</sup>	8.82	<b>1.33</b>	<b>10.15</b>	0.12	8.94
School (offsite) <sup>e</sup>	8.29	0.25	8.55	0.02	8.32
<b>Operations</b>					
Resident (offsite) <sup>e</sup>	9.87	0.01	9.88	0.01	9.88
Resident (onsite) <sup>e</sup>	8.59	0.04	8.62	0.04	8.62
Daycare (offsite) <sup>e</sup>	8.92	<0.01	8.92	<0.01	8.92
Daycare (onsite) <sup>e</sup>	8.68	0.03	8.71	0.03	8.71
School (offsite) <sup>e</sup>	8.30	<0.01	8.31	<0.01	8.31

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their PM<sub>2.5</sub> concentrations risk value, which may be below the APEZ criteria of 10 µg/m<sup>3</sup>. This is consistent with CARB’s *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 10 µg/m<sup>3</sup>; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 µg/m<sup>3</sup>; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 µg/m<sup>3</sup> would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 µg/m<sup>3</sup>; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 µg/m<sup>3</sup> would not apply.

**TABLE 6**  
**ANNUAL AVERAGE PM<sub>2.5</sub> CONCENTRATIONS FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – ADDITIONAL HOUSING OPTION**

Scenario / Receptor Type	Annual Average PM <sub>2.5</sub> Concentrations (µg/m <sup>3</sup> ) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	0.3 <sup>d</sup>	10.0	0.3 <sup>d</sup>	10.0
<b>Construction</b>					
Resident (offsite) <sup>e</sup>	9.19	<b>0.46</b>	9.65	0.04	9.23
Resident (onsite) <sup>f</sup>	8.90	<b>1.48</b>	<b>10.38</b>	0.13	9.03
Daycare (offsite) <sup>e</sup>	8.92	0.42	9.34	0.04	8.95
Daycare (onsite) <sup>f</sup>	8.82	<b>1.49</b>	<b>10.30</b>	0.13	8.95
School (offsite) <sup>e</sup>	8.29	0.28	8.57	0.02	8.32
<b>Construction + Operations</b>					
Resident (offsite) <sup>e</sup>	9.19	<b>0.46</b>	9.65	0.04	9.23
Resident (onsite) <sup>f</sup>	8.90	<b>1.49</b>	<b>10.39</b>	0.13	9.04
Daycare (offsite) <sup>e</sup>	8.92	0.43	9.34	0.04	8.96
Daycare (onsite) <sup>f</sup>	8.82	<b>1.50</b>	<b>10.31</b>	0.14	8.95
School (offsite) <sup>e</sup>	8.29	0.28	8.58	0.03	8.32
<b>Operations</b>					
Resident (offsite) <sup>e</sup>	9.87	0.01	9.88	0.01	9.88
Resident (onsite) <sup>e</sup>	8.59	0.05	8.64	0.05	8.64
Daycare (offsite) <sup>e</sup>	8.92	<0.01	8.92	<0.01	8.92
Daycare (onsite) <sup>e</sup>	8.68	0.05	8.73	0.05	8.73
School (offsite) <sup>e</sup>	8.30	0.01	8.31	0.01	8.31

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their PM<sub>2.5</sub> concentrations risk value, which may be below the APEZ criteria of 10 µg/m<sup>3</sup>. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 10 µg/m<sup>3</sup>; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 µg/m<sup>3</sup>; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 µg/m<sup>3</sup> would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 µg/m<sup>3</sup>; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 µg/m<sup>3</sup> would not apply.



## PM<sub>2.5</sub> Concentrations from Construction and Operation Emissions for Receptors in APEZ under Existing Conditions

The maximum estimated annual average PM<sub>2.5</sub> concentrations from all project sources at offsite receptor locations not in the APEZ under existing conditions are presented in **Table 7, Annual Average PM<sub>2.5</sub> Concentrations for Receptors Located in the APEZ – Developer’s Proposed Option**, and **Table 8, Annual Average PM<sub>2.5</sub> Concentrations for Receptors Located in the APEZ – Additional Housing Option**. These tables can be compared to the results in draft SEIR Appendix E, Table 36 (p. 66) and 38 (p. 70), respectively.

**TABLE 7**  
**ANNUAL AVERAGE PM<sub>2.5</sub> CONCENTRATIONS FOR RECEPTORS LOCATED IN THE APEZ – DEVELOPER’S PROPOSED OPTION**

Scenario / Receptor Type <sup>d</sup>	Annual Average PM <sub>2.5</sub> Concentrations (µg/m <sup>3</sup> ) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	0.2	—	0.2	—
<b>Construction</b>					
Resident (offsite)	9.18	<b>0.64</b>	9.82	0.06	9.23
Daycare (offsite)	9.68	0.17	9.85	0.02	9.69
School (offsite)	10.26	0.02	10.28	<0.01	10.26
<b>Construction + Operations</b>					
Resident (offsite)	9.18	<b>0.64</b>	9.82	0.06	9.24
Daycare (offsite)	9.68	0.18	9.85	0.02	9.70
School (offsite)	10.26	0.02	10.28	<0.01	10.27
<b>Operations</b>					
Resident (offsite)	11.12	<0.01	11.13	<0.01	11.1
Daycare (offsite)	9.72	<0.01	9.72	<0.01	9.7
School (offsite)	10.26	<0.01	10.26	<0.01	10.3

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

**NOTES:**

APEZ = Air Pollutant Exposure Zone; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 10 µg/m<sup>3</sup>. This is consistent with CARB’s *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.



**TABLE 8**  
**ANNUAL AVERAGE PM<sub>2.5</sub> CONCENTRATIONS FOR RECEPTORS LOCATED IN THE APEZ – ADDITIONAL HOUSING OPTION**

Scenario / Receptor Type <sup>d</sup>	Annual Average PM <sub>2.5</sub> Concentrations (µg/m <sup>3</sup> ) <sup>a,b</sup>				
	Bkgd.	Unmitigated		Mitigated <sup>c</sup>	
		Project	Total	Project	Total
Significance Threshold	—	0.2	—	0.2	—
<b>Construction</b>					
Resident (offsite)	9.18	<b>0.72</b>	9.89	0.06	9.24
Daycare (offsite)	9.68	0.19	9.87	0.02	9.70
School (offsite)	10.26	0.02	10.28	<0.01	10.26
<b>Construction + Operations</b>					
Resident (offsite)	9.18	<b>0.72</b>	9.90	0.07	9.25
Daycare (offsite) <sup>e</sup>	9.68/9.72	0.20	9.88	0.02	9.74
School (offsite)	10.26	0.02	10.29	<0.01	10.27
<b>Operations</b>					
Resident (offsite)	11.12	0.01	11.14	0.01	11.1
Daycare (offsite)	9.72	<0.01	9.73	<0.01	9.7
School (offsite)	10.26	<0.01	10.27	<0.01	10.3

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns in diameter; µg/m<sup>3</sup> = micrograms per cubic meter; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 10 µg/m<sup>3</sup>. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.

e Under mitigated conditions, the offsite residential MEISR is a different receptor location than under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated offsite residential MEISR occurs during the project operations phase.