

July 21, 2020

Dear Supervisors:

The Balboa Reservoir development will create more problems than it solves. After participating in five years of community meetings, the key issues have still not been addressed, and I urge you not to support this development as it is currently planned. The damage will be serious, not just to the immediate neighborhoods, schools and daycare centers, but also to the City at large as equitable access to education is curtailed. As livelihoods are lost due to this pandemic, many will need to retrain to support themselves and their families. This is not the time to shut down access to retraining facilities. But that will be the unintended consequence of beginning construction of the Balboa Reservoir development at the time planned.

There are many legitimate and important reasons this plan falls short, and I am including only a few of them here. Some of these shortcomings are due to a lack of resources from the City and County of San Francisco. If you choose to move the project forward despite the pain it will cause, please make any approval conditional on a feasible SFMTA improvement plan for the area with finances to implement the recommendations or require the developers to provide additional public parking, and postpone the Balboa Reservoir development construction until after the critical City College construction has been completed adjacent to it. Those measures will mitigate a few of the issues.

Four key concerns are described in more detail below. They are: 1) Inadequate replacement parking for City College students will result in less access to the opportunities that education provides; 2) Needed improvements for the safe access of pedestrian and non-car vehicles to City College and the Balboa Reservoir development are mostly unplanned and unfunded; 3) Significant adverse impacts to transportation, noise and air quality from the Balboa Reservoir development are identified in the EIR causing particular harm to nearby sensitive receptors; and 4) Delays due to simultaneous construction will result in significant added costs to City College.

1. Inadequate replacement parking for City College students will result in less access to the opportunities that education provides:

- a. Despite public comments at PUC hearings and the SF Public Utilities CAC, the implications of long-planned improvements to City College were ignored by the SFPUC when deciding to sell their land. City College of San Francisco has been planning for at least 15 years to construct new buildings on its main campus western parking lot while using the Balboa Reservoir for replacement student parking during and after construction. The plan for re-placing campus buildings was long delayed due to the uncertainty of the future of the college, lawsuits over past shoddy construction, a revolving door of senior administrators, and funding redirected to emergency patches that would allow ADA access and keep existing buildings in use long past their expected lifetime.

- b. The Balboa Reservoir developers have agreed to build “up to 450 public parking spaces” to replace the typical amount of parking use on the Balboa Reservoir when classes are in session. This is not “replacement” parking because it does not take into account:
 - i. That the loss of parking spaces on the City College owned “upper lot” (adjacent to the Balboa Reservoir) displaced by replacement campus buildings is not considered in the 450 count. Per the Fehr-Peers TDM study of 2018, construction of the Performing Arts Education Center (PAEC) would result in the removal of 760 existing parking spaces. The City College plan has changed since the 2018 TDM and the 2019 Subsequent EIR, and the number of parking spaces displaced will be represented by the combined footprints of the Diego Rivera Theater and STEAM (Science, Technology, Engineering, arts and Math) building. What has remained consistent, at least up until the time of the pandemic, is that the City College-owned “upper lot” is consistently full during midday on week days, and the Balboa Reservoir is used for the overflow, an overflow that will increase as new City College buildings are constructed.
 - ii. The lack of an identified and assured source of funding for discounted student parking rates in the public-use parking lot where market rate parking is planned. This has implications for the equity of access to public education.
 - iii. The “replacement” parking number does not take into account the periods of highest student parking use in the Balboa Reservoir, midday during the first two weeks of the semester when students are deciding which classes to take, when many more than 450 parking spaces on the reservoir are filled.
 - iv. The core TDM plan assumes a pre-pandemic public transportation infrastructure that would result a shortfall in parking during peak periods in 2026. (See Fehr-Peers CCSF TDM Study of 2018.) It’s unclear whether implementing even the core TDM plan is still feasible.
 - v. The lack of funding for implementing more aggressive and expensive Additional TDM Measures that would reduce the need for driver parking. There is no funding for these measures from the Balboa Reservoir developers, SFMTA or City College.

2. Needed improvements for the safe access of pedestrian and non-car vehicles to City College and the Balboa Reservoir development are unplanned and unfunded.

- a. An SFMTA plan for wider pedestrian walkways, bike lanes, and other safety improvements along Ocean Avenue from the Balboa BART station to Frida Kahlo Way, is

not expected to be available until the end of the year, and it is unclear if it will include the heavily congested area along Frida Kahlo Way to Judson. In the current climate it doesn't appear likely that any of the needed improvements on which the dense Balboa Reservoir development was justified will be funded. From the start, it has been clear that safe alternatives to driving to mitigate the significant increase in population into an already heavily congested area requires some sort of mitigation.

- b. A TDM study developed to gauge what would cause students to switch to non-car alternatives identified key concerns of students. When asked how City College should allocate available resources to transportation, the largest response (29%) was to improve connections to BART and Muni. And in response to the question about the key barrier to switching from driving to other forms of transportation, the majority (39%) responded, "time-based access." (Fehr-Peers CCSF TDM study of 2018) But nothing is being done to improve the connection to BART and Muni from the Ocean campus or reduce commute times. In fact the opposite is the case due to pandemic fallout.

3. Significant adverse impacts to transportation, noise and air quality from the Balboa Reservoir construction and operation are identified in the EIR, causing particular harm to nearby sensitive receptors.

Three areas identified in the City Planning EIR cannot be adequately mitigated per the current Balboa Reservoir developer plan. Transportation and Noise, and Air Quality, if the construction time period is compressed, meet or exceed the threshold of "significant adverse impacts." The developer is planning offsets for air pollution, but that won't help the detrimental impacts to learning, brain development and health in the surrounding area. The development will sit smack in the middle of multiple daycare centers, a high school which houses boarding students, City College, a 100% affordable multi-unit building that includes a daycare center, residences, and a grocery store with loading dock on a single lane road for driving in and out of the Reservoir. The only other point of ingress/egress for drivers is already heavily used by employees and students of City College and Riordan High School. Ongoing noise pollution during key periods of construction (9am to 4pm on weekdays) will adversely impact student learning, and the health impacts of high pollution areas are well known. All of the adjoining institutions and residents will be adversely impacted as well as a larger swath of San Francisco, as pollution from the development construction mixes with that of the 280 freeway APEZ zones.

The plan identifies the use of backup generators at the many large residential buildings in the development. Post construction, once the Balboa Reservoir development is operational, each building will be starting up their diesel generators on a regular basis for testing. As we express concerns about natural gas in our new construction, so should we also require electric battery generator backup, rather than heavily polluting diesel generators.

4. **Delays due to simultaneous construction will result in significant added costs to City College.**

Famous artist Diego Rivera gifted the Pan American Unity mural to City College. The replacement City College theater has been designed to display that mural to the public. The mural is to be loaned for an exhibition at SFMOMA while the City College Diego Rivera theater is being constructed on City College's parking lot. That coincides with the period of adjacent Balboa Reservoir construction. SFMOMA has a timeline by which the mural must be gone after the exhibit. That date is a month after the projected completion date of City College's Diego Rivera theater, a very tight schedule. If the theater construction is delayed, the mural will need to be placed in very expensive storage. This is not an additional cost that City College is in a position to handle.

Allowing simultaneous construction of the City College and Balboa Reservoir buildings creates a real risk of theater construction delay due to vehicle congestion as well as cumulative environmental factors. We already know from the EIR that there will be months at a time when trucks will be going in and out of the Balboa Reservoir every 2 to 3 minutes from 9am to 4pm, during the most active hours for City College student access. Further delays may need to be imposed to reduce periods of excessive noise or cumulative air pollution during simultaneous construction. If construction of the Balboa Reservoir development can be postponed, some of the worst cumulative impacts during construction can be averted, and City College won't be forced into another expensive loss imposed by outside forces.

Thank you for your consideration of the preceding points. I hope you will consider the alternatives to approving this development and, at a minimum, delay the start of the Balboa Reservoir construction until after City College concerns have been addressed. As we emerge from this pandemic, City College's ability to provide the transitional training that San Francisco residents will need, makes it clear that this is a time to prioritize access to City College and the educational services that it provides.

Sincerely,

Jennifer Heggie