

Kirk Palmer & Miriam Vu
1405 Plymouth Avenue
San Francisco, CA 94112
November 11, 2018

Ms. Jeanie Poling
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Via electronic mail to jeanie.poling@sfgov.org

cc: Supervisor Norman Yee, Director of SF Planning John Rahaim, Board of Supervisors, Westwood Park Association

Re: Case Number 2018-007883ENV (Balboa Reservoir Project) – Scope and Content of Environmental Impact Analysis

Dear Planning Department,

Thank you for taking the time and effort to conduct a comprehensive EIR of this important proposed development and for soliciting – and incorporating – input from the local community in determining what physical-environmental impacts of the project need to be considered / addressed before any final proposal may be approved. We are long-time San Franciscans and long-time (and happy) residents of the local neighborhood, having lived in Westwood Park for the last 19 years. We welcome thoughtful, productive, and appropriate development into our wonderful little corner of the city – but, understandably, are keen to ensure that new projects do not come with large negative, unintended consequences.

While the specific suggestions in this letter are strictly our own, we have talked with many of our neighbors and attended meetings that have brought out hundreds of community members to discuss the proposed development of the site. We believe that there is broad agreement among residents of Westwood Park, Westwood Highlands, Sunnyside, and Ingleside on a number of points:

- San Francisco is in need of additional housing, and some of it should be on this site;
- Especially, the city needs below-market-rate housing, and a substantial fraction of the units in any Balboa-Reservoir development should be dedicated to this purpose;
- New housing should be “transit-friendly;” *i.e.*, housing should be preferentially located near to public transit **and** public-transit infrastructure and service should be improved in order to lessen needs for car use, especially in the case of larger-scale projects.

In short, we are strongly in favor of developing the Balboa-Reservoir site to provide additional housing, with a high percentage of that being dedicated to below-market units. And, we are confident that a majority of our neighbors share this view.

That said, there are a number of specifics about the current proposal that are deeply troubling. This project could become a disaster for the area – and the city – if it is not carefully rethought and managed. While we detail below each of our precise concerns, many of them can be traced back to the high and jarringly anomalous (for this part of SF) *density* of units currently proposed for this site. By way of comparison, Westwood Park consists of approximately 650 units on ~100 acres of land, and Sunnyside has similar density. The Balboa-Reservoir property is 17 acres in total—if 1100 units were to be built on the site, this would represent a density that is ballpark **ten times greater than current housing**.

Of course, density in and of itself is not necessarily a problem, nor – specific to an EIR – is it directly a negative impact on the physical environment. However, when one considers the roads, parking, transit, architectural environment, natural lighting, and lines-of-sight/views in the existing surrounding community, it is manifest that the current proposal carries serious and insurmountable flaws. It is critical that the EIR of this proposal examine each of the following vital, and potentially disastrous, consequences in detail. Without modification/redress, no proposal should be approved.

Traffic – Ocean Avenue is a critical route of access for cars entering or leaving a broad swath of south-central San Francisco (West Portal, St. Francis Woods, Balboa Park, Ingleside, Westwood Park, Westwood Highlands, Sunnyside, and more). Interstate 280 has busy (already congested) entrances nearby on Ocean Avenue and at Geneva Avenue. Residents, together with students and employees of SF City College, driving to/from 280 – or simply traveling within the city via vital local corridors such as Mission Street, Geneva, Alemany Boulevard, and San Jose Avenue – face back-ups along Ocean Avenue each weekday morning and evening (and, increasingly, at other times as well). If 1100 units were added to the area, hundreds or thousands of additional vehicles would be unleashed onto already over-crowded roads. Environmental consequences would be negative and severe as pollution and greenhouse-gas emissions would spike. Of course, there would be a concomitant rise in wasted time, frustration, accidents, and violence (I have witnessed fights already on my own too narrow and overly utilized Plymouth Avenue during rush hour). Public-transportation improvements could mitigate (some) of these consequences but if, **and only if**, improved routes, vehicles, and services are actually put into place *prior* to occupancy of new construction. It is not enough to point to potential/theoretical improvement to BART and Muni and suggest they will minimize the problems. Unless, specific improvements are proposed, approved, funded, and completed, public transit will remain a woefully inadequate option in the region.

Parking – City College currently utilizes much of the Balboa Reservoir property for parking and, even with that, there is a substantial shortfall in CC parking capacity. Dozens, if not hundreds, of cars associated with campus visits are regularly to be found on the streets of both Sunnyside and Westwood Park (and probably further afield as well). While the proposed development would bring hundreds of additional cars to the area it would also *diminish* City-College parking stock by over 1000 spaces. The math just doesn't work. The currently proposed project would push an inordinately large number of vehicles onto narrow, congested residential streets further ensnarling traffic, polluting the area, and making life more difficult and less appealing for local residents. **The current proposal even has the audacity to incorporate fewer spaces on site than would be used by the vehicles kept by the site's residential occupants.** Even if the City-College parking problem could be magically solved, the proposed development would itself cause/exacerbate local parking difficulties...and associated environmental impacts.

Character of the Neighborhood – Residents of this area have a right to have new development regulated so as to be consistent/harmonious with existing structures. Neighborhoods adjacent to the

Reservoir have historic, charming, and distinctive style. Indeed, in 1995 Westwood Park became the city's first Residential Character District, providing legal protection to local architectural integrity. The 650+ arts-and-crafts-style bungalows of the neighborhood are a treasure; any building nearby must respect and cohere with this vital SF resource. Failure to ensure harmonious development would lessen the beauty, character, value, and quality of life for residents of the beloved neighborhood.

Skylines and Views – An ancillary benefit of the current, coherent development across this part of the city, are near-universal, spectacular views of the city and of the open sky. Almost without exception, residential and commercial structures in this section of the city are limited in height to at most a few floors. Indeed, the vast majority of homes are single-story. Residents, together with local businesses' employees and patrons, enjoy excellent natural light as well as pleasing views of the sky and horizon almost everywhere they look. To the best of our knowledge, there currently are no buildings taller than 50' within a mile or so of the Reservoir. A single three-floor apartment building at 1344 Ocean Avenue is the only long-standing structure anywhere nearby that is even more than two stories tall. Unfortunately, recent and decidedly *uncharacteristic* development in the 1200 block of Ocean has exceeded that height. Negative consequences in terms of a dark corridor of reduced light and visibility are manifest there, and while many are grateful for the market and restaurants that have opened, the quality and character of these buildings are widely disliked (or loathed).

Quality of Construction – The vast majority of buildings (residential and otherwise) in this part of the city are more than 50 years old. They were built to last and built (and designed) to last well. They are attractive and, with modest maintenance, have not become dilapidated—nor have they gone out of style. Sadly, similar things could not be said about much of the new construction that has been allowed in San Francisco in the last decade or two. Much of the recent construction in the city has come to look cheap, tawdry, and downright run-down after only a few years (if it did not already appear that way as new construction). Specifically, Avalon-Bay developed properties on Ocean Avenue, in China Basin, in Potrero Hill and elsewhere in SF have exhibited such rapid deterioration (in stylishness and upkeep). Buildings that *look* rundown and those that *are* rundown, and therefore require maintenance/upkeep construction work, degrade the local physical environment both by their unattractiveness and by the burden on the neighborhood of having to accommodate the impacts of maintenance construction in the area (adding to pollution, traffic, and parking problems each time some work is needed).

Physical Attractiveness – Avalon Bay has been selected as the developer for this project, along with BRIDGE Housing Corporation, the former for the market-rate development on site and the latter for the below-market-rate component. Frankly, this in and of itself is extremely disconcerting. Avalon Bay has been responsible for a significant fraction of the major development projects carried out in the city in the last decade or two. In daily life – and in researching the potential consequences of the Reservoir development – we have examined many of the buildings for which Avalon Bay has been responsible. They are, in general, boxy, simplistic, seemingly slap-dash in design and construction, inharmonious with their surroundings, and prone to overly rapid deterioration in appearance/upkeep. While one might be tempted to dismiss such perspective as being wholly subjective, it is interesting to note that Avalon Bay themselves agree with this appraisal. At a **public** meeting between selected developers and the residents of Westwood Park and Sunnyside (held at Archbishop Riordan High School on May 23, 2018), a resident asked whether the below-market housing planned for the Balboa Reservoir site would be attractive. The project supervisor who was there from Avalon Bay answered the question by saying: **“Honestly, BRIDGE Housing builds better looking buildings than we do at Avalon.”** In light of this chilling declaration, it is of utmost importance that the EIR for this proposal consider the physical attractiveness (and negative consequence of potentially unattractive development) among its analyses.

Once again, we wish to thank the Department for its considered and careful attention to the proposed development at Balboa Reservoir. We would love to see appropriate, attractive, high-quality residential construction on the property. Your analysis and the department/city's management of any eventual final design and construction, however, will be of vital importance to ensure that the end result is a positive benefit to the community and the city rather than a burden, eyesore, and detriment. There is political will to build needed housing in this city. That is fantastic; but, there needs to be equally strong will to regulate and manage development so that it is of the quality and attractiveness that will serve the city well for many years to come.

San Francisco is a special place; it is beautiful and a wonderful place to live. Our own corner of the city certainly meets (or exceeds) that general description. We are also a diverse neighborhood that includes people of various ethnicities, income levels, and ages. We are pleased to have a higher percentage of residents who are middle-aged to elderly than do most neighborhoods in SF. The wisdom, memory, and experience of this population are a value to us all. That said, this is a group that is less able, on average, to rely on bicycle, foot, or public transit than are the much younger people who are super-majority residents elsewhere. Please, give special consideration to the impacts of traffic, pollution, and other negative consequences of ill-conceived development on these valued community members, lest we further challenge them in their desire to continuing living in, and contributing to, San Francisco.

Thank you and best regards,

Kirk Palmer & Miriam Vu