

November 12, 2018

Dear Ms. Polling:

I welcome this opportunity to submit comments, questions and concerns to be included as part of the Public Scoping EIR Process for Balboa Reservoir Project Case # 2018-007833ENV.

Negative impact on public educational service:

City College for nine decades has provided San Francisco with needed well trained workers in many fields essential for the success of the city's economy. City College's Mission and Vision Statement states, "City College of San Francisco belongs to the community and continually strives to provide and accessible, affordable and high quality education to all its students."

Removal of the parking on the lower reservoir will result in lowered enrollment at the college, impede the implementation of the "Free City Program" and result in a concomitant loss in the value that CCSF gives to San Francisco. Parking is not optional at a commuter school. Many students and staff (particularly staff that teach at multiple sites) are unable to use public transportation to arrive at the college in a timely manner. Parking studies on the use of the reservoir parking must include parking at high use-times (e.g.: mid weekday mornings during mid fall and mid spring semester periods).

In line with CEQA requirements for mitigation of adverse impacts on public/educational services, the reservoir project should be required to pay for replacement of all the parking it takes away. In addition, if parking is to be removed from the reservoir, affordable replacement parking must be provided for attendees, students and workers as part of the completion of the Performing Arts Education Center on the upper reservoir.

Growth-Inducing Impact/Population Density:

Population density for the proposed project, even with the 1100 unit option, is many times denser than people per square mile figures for the surrounding neighborhoods.

The project description in the October 10, 2018 Notice of Preparation of an Environmental Impact Report describes amending "the general plan, including the Balboa Park Station Area Plan(the area plan) and the planning code, adding a new Balboa Reservoir Special Use District. The special use district would establish land use zoning controls and incorporate design standards and guidelines for the site." It also describes changes to the current zoning including modifications to existing height limits and proposed gross square feet (gsf) construction.

The project description does not include comparisons of population density per square mile for each of the housing options of the proposed project with population density per square mile in the surrounding communities, other neighborhoods in San Francisco, overall San Francisco population density and in other high density US areas.

The website <https://statisticalatlas.com/place/California/San-Francisco/Population> provides data to make these comparisons.

The lower density developer proposed option of 1100 units yields population density of 82,560* people per square mile.

*Calculating 1100 units with 2 people per unit = development population of 2200.

Dividing 2200 by 17(the # of acres in the project site) = 129 people per acre

Multiplying 129 x 640 acres in a square mile = 82,560 people per square mile

For comparison statiscalatlas.com shows the population densities of New York and San Francisco
Overall Population (excluding waters)
New York (the densest city in the US) 28,007
San Francisco 18,130

San Francisco Neighborhoods – (taken from list of the 50 densest neighborhoods per statiscalatlas.com)
#1 Tenderloin 128,980 (San Francisco's most dense neighborhood)
#2 Chinatown 62,500 (San Francisco's 2nd most dense neighborhood)
#36 Ingleside 28,210
#48 Sunnyside 13,990
Westwood Park is less dense and does not make the "50" list

Public presentations of the proposed developments have included architectural renderings, but not 3D models. 3D models are necessary for most people to be able to gauge the density and height of the proposed project to that of its neighbors.

High density deteriorates the housing experience. It is unfair to attempt to solve the city's housing crisis by unduly burdening select areas. A much better alternative is to create new housing by building smaller building projects throughout the city, particularly in less densely populated neighborhoods. Fortunately as the statiscalatlas.com San Francisco 50 Densest Neighborhoods List shows, we have many of those.

Transportation/Traffic

The proposed project will have a negative impact on traffic in these ways:

- Increased congestion on Ocean Ave between Frida Kahlo and Junipero Serra. This stretch is already slow for the K line and vehicular traffic during most of the day.
- Increased congestion at Lee and Ocean Avenues
 - The K line stop at Lee and Ocean already provides a very heavily trafficked intersection.
 - Traffic turning left when exiting the project on the proposed extension of Lee Ave will need to cross light rail tracks.
 - Impact of the ingress and egress of vehicles to the Whole Foods Parking Lot from Lee Avenue will affect traffic flow in and out of the proposed development
- Impact of population influx on these existing traffic bottlenecks:
 - Frida Kahlo Way from Judson to Ocean. This already very slow and backs up at commute times, even when CCSF students are not arriving or exiting the current Lower Reservoir Lot.
 - The stretch from the 280 Ocean Westbound off-ramp to Ocean to the Frida Kahlo
- Allocation of 0.5 pkg. space per unit increases use of ride share services which increase traffic congestion.
- An increase in traffic density impedes emergency vehicles (particularly from the fire station at Frida Kahlo and Ocean).
- If CCSF parking is removed on the reservoir, the impact on surrounding neighborhoods, many of which have narrow streets and short distances between driveway curbs will be significant.
- It will be impossible to improve frequency and reliability of the Muni 43 Masonic, which connects CCSF and Forest Hill Station.

Land Use Planning and Public Safety:

Despite the fact that the Balboa Reservoir until now has never been used to store water, keeping this potential for emergency storage should be evaluated:

- Increased population and projected increased population
- Increased storage capacity for use in drought years or fire outbreak.
- Emergency water storage in the event of water supply disruption due to earthquake.

In addition to the EIR evaluating a No Project Alternative, it should also consider a reduced density alternative of 500 units as was proposed in the 2008 Balboa Park Station Area Plan. Potentially this alternative could retain a sizable amount of water storage capacity, create parking with solar roofed power generation above the water storage, and build 100% affordable units using trust funds, bonds and other available funding sources.

Thank you for considering the foregoing issues. Please continue to keep me informed of all documents and notices regarding this project.

Sincerely,
Frederic Muhlheim