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**From:** Yonathan <yonathan@gmail.com>  
**Sent:** Monday, November 12, 2018 5:03 PM  
**To:** Poling, Jeanie (CPC)  
**Subject:** Re: Balboa Reservoir EIR Scoping

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I meant “housing intensity” not “resource intensity”

On Mon, Nov 12, 2018 at 4:59 PM Yonathan <[yonathan@gmail.com](mailto:yonathan@gmail.com)> wrote:  
Dear Jeanie Poling,

This is in response to the [Notice of Preparation of the Balboa Reservoir EIR](#).

### 1. Please study a high-rise alternative with thousands of units

I believe that there is a disconnect between the city’s objectives in the project and the scoping parameters of the EIR. In particular, the EIR should study alternatives to the project that maximize the resource intensity.

According to CEQA Guidelines: Project Description ([CCR §15124\(b\)](#)), the EIR must contain “A statement of the objectives sought by the proposed project. A clearly written statement of **objectives** will help the lead agency develop a **reasonable range of alternatives** to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.” (emphasis added)

So what are the objectives of the project? Here is a brief history of the Balboa Park Reservoir project over the past 10 years:

- The [2009 Balboa Park Station Area Plan](#) Objective 4.1 reads, “**Maximize** opportunities for residential infill throughout the plan area,” (emphasis added) and specifically regarding the Reservoir, Objective 4.4 reads, “consider housing as a primary component to any development on the reservoir.”
- The [2014 Housing Element](#) identified the Balboa Reservoir as an Opportunity Site on Public Land
- 2014 the Mayor identified the Balboa Reservoir as a site for the [Public Land for Housing Program](#) (formerly Public Sites Portfolio), whose purpose is to “**maximize** their use and opportunities for public benefit”.
- The Balboa Reservoir Community Action Committee’s Housing Principle 1(b) (in the [Principles and Parameters](#)) requests to “**Maximize** the amount of affordable housing” on the reservoir
- At the Land Use Committee on 3/12/2018, Supervisor Malia Cohen requested that the EIR include an alternative up to “5,000 [units] to understand the full range” ([SF Examiner](#))

And what are the constraints on the scale of the project?

- The 2009 Balboa Park Station Area Plan [EIR](#) only studied the effect of 500 units on the Balboa Reservoir

- The Community Action Committee’s Urban Design Guidelines Principle 2(c) (in the [Principles and Parameters](#)) requests heights of up to 65ft, and Housing principles 1(b) requests a minimum number of market rate compared to deed-restricted units.

It is clear that the citywide objective of the Balboa Reservoir project is to **maximize** the amount of housing that it can provide. On the other hand, the CAC (which is the community’s “clearinghouse for community input” ([Ordinance 45-15](#)) and is advisory only) has concerns about aesthetic, parking, and traffic impacts. The EIR should study the entire range of alternatives; limiting its scope of the EIR because of concerns about local impacts is putting the cart before the horse.

According to the [Notice of Preparation of the EIR](#), “The second is the Additional Housing Option (1,550 dwelling units), developed by the City to fulfill the objectives of the San Francisco General Plan (the general plan) to maximize affordable housing and housing in transit-rich neighborhoods”. A “maximize”d alternative should include several thousands of housing units and includes high-rises (e.g. 15 or 20 stories), not just 8 stories. If we claim to care about the housing crisis, we should study the effects of all options that are technologically and financially feasible.

## **2. Please separate the effect of housing from the effect of parking**

The “Additional Housing Option” differs from the “Developer’s Proposed Option” in both number of housing units and number of parking spaces. In the comparison of impacts, please include how each impact differs when only one of these variables changes (e.g. the partial derivative of Vehicle Miles Traveled with respect to number of housing units only).

## **3. Please include environmental benefits of more housing alternative**

The Balboa Reservoir is probably the largest transit-oriented development that is near a BART station in San Francisco for the foreseeable future. Please include in the analysis the opportunity cost of not maximizing the number of housing units in the No Project Alternative and Developer Proposed alternatives, as studied by the MTC and ABAG in Plan Bay Area.

Thank you  
Yonathan