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Via Electronic Mail

November 12, 2018

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

Re: Balboa Reservoir Project
EIR Case No. 2018-007883ENV
Scoping Requests

Dear Ms. Poling:

Thank you for the opportunity to submit comments regarding the environmental review for the referenced project. Following are requests for your consideration during the Environmental Impact Report process.

Introduction

The proposed Balboa Reservoir Project (the "Project") would be a large housing development built on approximately 17 acres of land adjoining City College of San Francisco, Riordan High School, the Westwood Park neighborhood, and Ocean Avenue. According to the Planning Department's October 10, 2010 Notice of Preparation, this project could have up to 1,550 dwelling units. It will also include community space, retail space, and no more than 750 public parking spaces, almost half as many parking spaces now available. Buildings could be up to 88 feet tall.

Following are the Project impacts that should be studied in the Environmental Impact Report:

Transportation/Traffic Impacts

The Project will significantly impact transportation and traffic in the neighborhood. The EIR should 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 EIR should consider these impacts on lower income students who likely reside further away and must use automobiles. This study should also include the impact of increased traffic on congestion and parking in the neighborhoods impacted by the Project.

Transportation Demand Management - 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 EIR must include a completed TDM, and a Draft EIR should not be circulated until this completed TDM has been incorporated into the EIR.

MTA and BART Impacts - The Project will significantly alter the demand for public transit in the area. This is especially true since up to 1,500 student parking spaces may be lost. The EIR should study the following impacts on public transit:

- The impact of road changes on the reliability and frequency in the neighborhood of all bus and streetcar lines servicing the neighborhood
- The impact of increased demand on BART
- The impact of changes proposed in the City College Facilities Master Plan on transit reliability and frequency

Additional Impacts - The EIR should also study the following transportation and traffic impacts:

- The impact of the City College of San Francisco Facilities Master Plan on traffic and transportation in areas adjoining the Project
- The impact of the Project on increased traffic from ride sharing companies such as Uber and Lyft
- The impact of the Project on access of emergency vehicles, such as fire trucks and ambulances, in the neighborhood
- The impact of the Project on pedestrian, bicycle, and other alternative modes of transportation
- The impact of the Project on traffic congestion in the neighborhood

Community Resources

Impact of Reduced Parking on CCSF - The Project will significantly reduce parking for City College of San Francisco students, faculty, and staff. Additionally, it is expected that parking

fees in a replacement parking structure will be more expensive. The EIR should study the impacts of this reduced parking and increased cost on:

- student enrollment at City College of San Francisco, especially the impact on lower income students
- faculty employment at City College of San Francisco
- staff employment at City College of San Francisco

Project Impact on the Performing Arts Education Center - City College of San Francisco is planning to construct a Performing Arts Education Center (PAEC) on property adjoining the Project. The EIR should study the impact of the Project on:

- The commencement of the construction of the PAEC
- The completion of the construction of the PAEC
- The location of the PAEC
- The availability of parking for the PAEC

Additional impacts – The EIR should study the following additional impacts on community resources

- The impact of the Project on the City College of San Francisco Facilities Master Plan
- The impact of increased retail on the Project site on retail businesses in the surrounding neighborhoods
- The impact of Project construction activities on the surrounding neighborhoods
- The impact of significantly increasing market-rate housing on the cost of housing in the adjoining neighborhoods, especially housing for minorities, low-income, elderly, disabled, transit-dependent and other interest groups
- The impact of a large, market-rate housing project on the character and stability of the surrounding neighborhoods

Hydrology and Water Quality – The EIR should study the following impacts on hydrology and water quality:

- The impact on the availability of potable water, especially during emergencies and natural disasters
- The impact on the availability of emergency water for fighting fires during natural disasters such as earthquakes
- The impact of increased demand for water on the groundwater supply
- The impact of increased demand of stormwater runoff

Cultural Resources

In 1995, Westwood Park became San Francisco's only Residential Character District, providing the neighborhood with protection for its architectural integrity. The Project does not conform to the density or height of the neighborhood. The EIR should study how the Project will impact the character of the neighborhood, especially the Residential Character of Westwood Park and any other neighborhoods or homes that have an historical designation.

Public Services - The EIR should study the following impacts on public services:

- The impact of the Project on the supply of water during an emergency such as an earthquake or fire
- The impact of the Project on enrollment at City College of San Francisco
- The impact of the Project on the availability of adequate access to K-12 education in the neighborhood
- The impact of the Project on the availability of adequate access to police, fire protection, public libraries, post offices, and other public services in the neighborhood

Air Quality – The EIR should study the following impacts on air quality:

- The impact of increased automobile traffic on air quality in the neighborhood
- The impact of construction on air quality in the neighborhood

Alternative Projects

Additional Housing Option - The Notice of Preparation identifies two options for the site's residential density. One would have 1,100 units and the other would have 1,550 units. The 1,550 unit project, defined as the Additional Housing Option, was never considered by the Balboa Reservoir Project CAC, which met for approximately two years. Nor was it ever presented to the general public. It is unclear why a larger project was never publicly considered. In view of this lack of transparency and due process, the EIR should defer the review of this project until it has been fully reviewed by the CAC and other members of the public.

The EIR should also study several alternative projects.

No Build Alternative - The EIR should study a No Build Alternative. The EIR should review keeping the land under public or non-profit control rather than allowing a private development company to purchase it from the SF Public Utilities Commission for their personal gain. A No Build Alternative would allow the land to continue to be used for any number of public uses, including the expansion of City College of San Francisco, which has used the land for decades and which voters have consistently determined should be zoned Public.

Additionally, the impact of the No Build Alternative should be considered in light of the commitment of CCSF and the citizens of San Francisco to building a Performing Arts Education Center on land adjoining the Project site.

Smaller Project – In view of the significant environmental impacts the Project will have, the EIR should also study reducing the number of units in the Project to no more than 400 and no more than 3 floors. A smaller project will be compatible with the surrounding neighborhoods, and will mitigate many environmental impacts, including but not limited to traffic congestion, infrastructure problems, and loss of enrollment at City College of San Francisco due to loss of parking and inadequate public transit.

Attached is an architect's rendering of a proposed smaller project that the EIR should consider.

100% Affordable Housing – The need for affordable housing in San Francisco is undeniable. While there has been an increase in the construction of units in San Francisco, most of them are market rate units which are too expensive for the majority of the people living and working in San Francisco.

The public land on which the Project will be built should be used to build a development that is 100% affordable. The October 10, 2018 Notice of Preparation addresses the importance of affordable housing, stating that the Balboa Park Station Area Plan should "prioritize affordable housing." (NOP, p. 4)

The EIR should study building 100% affordable housing on the Project land.

Conclusion

The Balboa Reservoir Project will significantly impact City College of San Francisco and the surrounding neighborhoods. Your preparation of the 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.

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

Sincerely,

Jean B Barish, Esq., MS

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