# RESPONSES TO COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
## Volume 1

# Balboa Reservoir Project

SAN FRANCISCO PLANNING DEPARTMENT
CASE NO. 2018-007883ENV
STATE CLEARINGHOUSE NO. 2018102028

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| Draft EIR Publication Date: | AUGUST 7, 2019 |
| Draft EIR Public Hearing Date: | SEPTEMBER 12, 2019 |
| Draft EIR Public Comment Period: | AUGUST 8, 2019 – SEPTEMBER 23, 2019 |
| Responses to Comments Publication Date: | APRIL 29, 2020 |
| Final EIR Certification Hearing Date: | MAY 28, 2020 |

*NOTE: Because of the COVID-19 shelter-in-place order, the planning commission may have to hold the certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at www.sfplanning.org and on the planning commission agenda.*

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DATE: April 29, 2020

TO: Members of the Planning Commission and Interested Parties

FROM: Lisa Gibson, Environmental Review Officer

**Re: Attached Responses to Comments on Draft Subsequent Environmental Impact Report Case No. 2018-007883ENV [Balboa Reservoir Project]**

Attached for your review please find the responses to comments document for the draft subsequent environmental impact report (SEIR) for the above-referenced project. **This document, along with the draft SEIR, will be before the planning commission for final EIR certification on May 28, 2020.** The planning commission will receive public testimony on the final SEIR certification at the May 28 hearing. Please note that the public review period for the draft SEIR ended on September 23, 2019; any comments received after that date, including any comments provided orally or in writing at the final SEIR certification hearing, will not be responded to in writing.

The planning commission does not conduct a hearing to receive comments on the responses to comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may write to commission members or to the president of the commission at commissions.secretary@sfgov.org (preferred) or 1650 Mission Street and express an opinion on the responses to comments document, or the commission's decision to certify the completion of the final SEIR for this project.

Please note that the responses to comments document in addition to the draft SEIR is the final SEIR. If you have any questions concerning the responses to comments document or the environmental review process, please contact Jeanie Poling at Jeanie.Poling@sfgov.org or by leaving a voicemail at 415.575.9072.

Thank you for your interest in this project and your consideration of this matter.

*NOTE: Because of the COVID-19 shelter-in-place order, planning department offices are closed and staff are working from home, and the planning commission may have to hold the certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at www.sfplanning.org. To reduce risks to outside service providers, the department is aiming to limit the distribution of hard copy documents. Please contact Jeanie Poling if you still require a hard copy of the responses to comments document.*

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# CHAPTER 1
# Introduction

## 1.A Purpose of This Responses to Comments Document

The purpose of this responses to comments (RTC) document is to present comments on the draft subsequent environmental impact report (draft SEIR) for the Balboa Reservoir Project (proposed project), to respond in writing to comments on environmental issues, and to revise the draft SEIR as necessary to provide additional clarity. Comments were made in written form during the public comment period from August 8, 2019, to September 23, 2019, and as oral testimony received before the San Francisco Planning Commission at the public hearing on the draft SEIR held on September 12, 2019. A complete transcript of proceedings from the public hearing on the draft SEIR and all written comments are included herein in their entirety. A complete list of commenters is provided in Chapter 3, Public Agencies, Organizations, and Individual Persons Commenting on the Draft SEIR. Note that some commenters re-submitted their comments on the Notice of Preparation (NOP); these comments are included in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

Pursuant to the California Environmental Quality Act[1] (CEQA) Public Resource Code section 21091(d)(2)(A) and (B) and the CEQA Guidelines,[2] the San Francisco Planning Department (planning department) has considered the comments received on the draft SEIR, evaluated the issues raised, and provides written responses that fully address each substantive physical environmental issue that has been raised. CEQA Guidelines section 15088 requires the evaluation of all public comments received on the draft SEIR and the identification of comments that raise significant environmental issues requiring a good faith, reasoned analysis in the written response. As further stated in CEQA Guidelines section 15088(c), the level of detail in response may correspond to the level of detail provided in the comment. Where appropriate, this RTC document also includes SEIR text changes made in response to comments.

In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. "Significant effects on the environment" means substantial, or potentially substantial, adverse changes in any of the physical conditions within the area affected by the project. Economic or social changes alone are not considered a significant effect on the environment.[3] Therefore, this document focuses

1 Public Resources Code sections 21000–21189 (the California Environmental Quality Act, or CEQA).
2 *California Code of Regulations*, title 14, division 6, chapter 3, sections 15000–15387, Guidelines for Implementation of the California Environmental Quality Act (the CEQA Guidelines).
3 CEQA Guidelines section 15064 (e).

primarily on responding to comments that relate to physical environmental issues, in compliance with CEQA.[4] However, for informational purposes, this RTC document also provides limited responses to general comments on the draft SEIR received during the public review period that were not related to physical environmental issues.

The comments do not identify any new significant environmental impacts, or substantial increases in the severity of previously identified environmental impacts, from those analyzed in the SEIR. Nor do the comments identify feasible project alternatives or mitigation measures that are considerably different from those analyzed in the SEIR that would clearly lessen the significant environmental impacts of the proposed project or project variant, but which the project sponsor has not agreed to study or implement.

The planning department is the Lead Agency under CEQA responsible for administering the environmental review of projects within the City and County of San Francisco. The draft SEIR and this RTC document together constitute the final SEIR for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The final SEIR has been prepared in compliance with CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. This final SEIR is an informational document for use by (1) governmental agencies (such as the planning department) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts; and (2) the San Francisco Planning Commission, other commissions/departments, and the Board of Supervisors prior to their decision to approve, disapprove, or modify the project. If the San Francisco Planning Commission, Board of Supervisors, or other City entities approve the proposed project, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP or mitigation program) to ensure that mitigation measures identified in the final SEIR are implemented.

# 1.B Environmental Review Processes

## Notice of Preparation of an EIR and Public Scoping

On October 10, 2018, the planning department published a Notice of Preparation (NOP) of an Environmental Impact Report and Notice of Public Scoping Meeting (draft SEIR Appendix A), announcing its intent to solicit public comments on the scope of the environmental analysis and to prepare and distribute an SEIR on the Balboa Reservoir Project. The planning department mailed the Notice of Availability of an NOP and Notice of Public Scoping Meeting to the State Clearinghouse and relevant state and regional agencies; occupants of adjacent properties; property owners within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations and individuals who have requested such notice. A legal notice in the newspaper was also published on Wednesday October 10, 2018.

Publication of the NOP initiated a 30-day public review and comment period that ended on November 12, 2018. Pursuant to CEQA section 21083.9 and CEQA Guidelines section 15206, the

[4] CEQA Guidelines sections 15382, 15064(c), and 15064 (d).

planning department held a public scoping meeting on October 30, 2018, to receive input on the scope of the environmental review for this project.[5] During the NOP review and comment period, a total of 84 comment letters and emails were submitted to the planning department and 16 speakers provided oral comments at the public scoping meeting. The comment letters received in response to the NOP and a copy of the transcript from the public scoping meeting are available for review at the planning department offices as part of Case File No. 2015-014028ENV.[6] The planning department considered the comments made by the public in preparation of the draft SEIR for the proposed project.

## Draft SEIR Public Review

The planning department prepared the Balboa Reservoir Project Draft SEIR in accordance with CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. The draft SEIR was published on August 7, 2019. The draft SEIR identified a 45-day public comment period from Thursday August 8, 2019, through Monday September 23, 2019, to solicit public comment on the adequacy and accuracy of the information presented in the draft SEIR. Paper copies of the draft SEIR were made available for public review at the following locations: (1) San Francisco Planning Department, 1650 Mission Street, and Planning Information Counter, 1660 Mission Street, and (2) the San Francisco Main Library, 100 Larkin Street.[7] The planning department also distributed notices of availability (NOAs) of the draft SEIR; published the NOA in a newspaper of general circulation in San Francisco (*San Francisco Examiner*); posted the NOA at the San Francisco County Clerk's office; and posted NOAs at multiple locations within and adjacent to the project site.

Comments on the draft SEIR were made in written form during the public comment period and as oral testimony received at the public hearing on the draft SEIR before the San Francisco Planning Commission on September 12, 2019. A court reporter was present at the public hearing to transcribe the oral comments verbatim and provide a written transcript.

## Responses to Comments Document and Final SEIR

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the draft SEIR. Under CEQA Guidelines section 15201,[8] members of the public may comment on any aspect of the project. Further, CEQA Guidelines section 15204(a) states that the focus of public review should be "on the sufficiency of the [Draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." CEQA Guidelines section 15088 specifies that the lead agency is required to respond to the comments raising significant environmental issues received during the public review

[5] The public scoping meeting was held at the Lick Wilmerding High School Cafeteria at 755 Ocean Avenue, San Francisco on Tuesday October 30, 2018, between 6 p.m. and 8 p.m. A transcript of the proceedings is available as part of Case No. 2018-007883.

[6] The administrative record is also online at *http://www.ab900balboa.com*.

[7] Electronic copies of the draft SEIR can be accessed online at *https://sfplanning.org/environmental-review-documents*.

[8] CEQA section 21082.1(b).

period. Therefore, this RTC document is focused on the sufficiency and adequacy of the draft SEIR in disclosing the significance of the environmental impacts of the proposed project or project variant that were evaluated in the draft SEIR.

The planning department distributed this RTC document for review to the San Francisco Planning Commission as well as to the other public agencies and commissions, non-governmental organizations including neighborhood associations, and individuals who commented on the draft SEIR. The San Francisco Planning Commission will consider the adequacy of the final SEIR – consisting of the draft SEIR and the RTC document – in complying with the requirements of CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. If the San Francisco Planning Commission finds that the final SEIR is adequate, accurate, and complete and complies with CEQA requirements, it will certify the final SEIR and will then consider the associated MMRP, and the requested approvals for the proposed project.

Consistent with CEQA Guidelines section 15097,[9] the MMRP is designed to ensure implementation of the mitigation measures identified in the final EIR and adopted by decision-makers to mitigate or avoid the proposed project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA sections 21002, 21002.1, and 21081 and CEQA Guidelines sections 15091 and 15092). The draft SEIR identifies six significant impacts that can be mitigated to less-than-significant levels with mitigation measures; these six impacts are related to:

- Noise (project-level and cumulative operational noise from fixed mechanical equipment)
- Air quality (consistency with the Clean Air Plan)
- Cultural resources (archeological resources)
- Tribal cultural resources
- Geology and soils (paleontological resources)

This SEIR also identifies nine significant impacts that cannot be mitigated to less-than-significant levels even with mitigation measures; these impacts are related to:

- Cumulative public transit delay
- Project-level and cumulative loading effects along Lee Avenue
- Project-level and cumulative construction noise
- Project-level and cumulative criteria pollutant emissions and health risks under the compressed three-year construction schedule

Thus, the San Francisco Planning Commission must adopt findings that include a statement of overriding considerations for relevant significant unavoidable impacts (CEQA sections 21081(a)(3) and (b) and CEQA Guidelines section 15093(b)) if the proposed project would be approved. The project sponsor would be required to implement the MMRP as a condition of project approval.

[9] CEQA Guidelines section 15097 cites CEQA section 21081.6 as the authority for the CEQA Guidelines section.

The project sponsor, Reservoir Community Partners, LLC, applied to the Governor of California for certification of the Balboa Reservoir Project as an Environmental Leadership Development Project (ELDP), pursuant to Assembly Bill (AB) 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code section 21178 et seq., with public review commencing on June 25, 2019. The AB 900 process included a public comment period from June 25, 2019, to July 28, 2019. The ELDP application is available at *http://opr.ca.gov/ceqa/california-jobs.html* (see "201802028 – Balboa Reservoir Project"). The AB 900 Record of Proceedings is available at *http://www.ab900balboa.com*.

The ELDP application was certified. On December 30, 2019, the California Air Resources Board (CARB) issued Executive Order G-19-195 determining that the proposed project would not result in any net additional greenhouse gases with payment of offsets for purposes of certification under AB 900. On December 30, 2019, Governor Gavin Newsom, with assistance from the Governor's Office of Planning and Research, certified the proposed project as an eligible project under AB 900, and the Governor's Office of Planning and Research forwarded the Governor's determination to the Joint Legislative Budget Committee. The State Legislative Analyst's Office indicated that the project aligns with the intent of AB 900, and recommended to the Joint Legislative Budget Committee that they concur with the Governor's determination. On January 27, 2020, the Joint Legislative Budget Committee concurred with the Governor's determination that the project is an eligible project under AB 900.

# 1.C Document Organization

This RTC document is organized into the following chapters:

- **Chapter 1, Introduction** – This chapter discusses the purpose of the RTC document, the environmental review processes, and the organization of the RTC document.
- **Chapter 2, Revisions and Clarifications to the Proposed Project** – This chapter summarizes changes to the description of the proposed project, as described in draft SEIR Chapter 2, that the project sponsor has initiated since publication of the draft SEIR. The revisions and clarifications consist of minor updates to the project description and the associated environmental analysis previously presented in the draft SEIR. RTC Chapter 2 analyzes and concludes that these revisions and clarifications to the proposed project would not result in any new environmental impacts not already discussed in the draft SEIR or a substantial increase in the severity of previously identified significant environmental impacts.
- **Chapter 3, Public Agencies, Organizations, and Individual Persons Commenting on the Draft SEIR** – This chapter provides tables that list the public agencies, organizations, and individual persons who submitted written comments during the public review period or spoke at the public hearing for the draft SEIR. The tables identify whether the persons submitted comments in writing (i.e., via letter) during the public comment period or verbally at the draft SEIR public hearing. Commenters within each category are listed in alphabetical order. These lists also show the comment code (described below) and the format (i.e., public hearing transcript, letter, or email) and date of each set of comments.
- **Chapter 4, Comments and Responses** – This chapter presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. The complete

transcript, letters, and emails containing the comments are provided in Attachments 1 and 2 of this RTC document. The comments and responses in this chapter are organized by topic and, where appropriate, by subtopic, including the same environmental topics addressed in draft SEIR Chapter 4 and draft SEIR Appendix B. The comments appear as single-spaced text and are coded in the following way:

- Comments from public agencies and commissions are designated by "A-" and an acronym of the agency's name
- Comments from non-governmental organizations including neighborhood associations are designated by "O-" and an acronym of the organization's or association's name
- Comments from individuals are designated by "I-" and the individual's last name

In cases where a commenter spoke at the public hearing and also submitted written comments, or submitted more than one letter or email, the individual's last name or the acronym of the organization's name is followed by a sequential number by date of submission. A final number at the end of the code keys each comment to the order of the bracketed comments within each written communication or set of transcript comments. Thus, each discrete comment has a unique comment code. The coded comment excerpts in Chapter 4 tie in with the bracketed comments presented in Attachments 1 and 2 of this RTC document.

Preceding each group of comments is a summary introduction of issues raised about the specific topic. Following each comment or group of comments on a topic are the planning department's responses. The responses generally provide clarification of the draft SEIR text. In some instances, the responses may result in revisions or additions to the draft SEIR. Text changes to the draft SEIR are shown as indented text, with new text double underlined and deleted material shown as ~~strikethrough~~ text.

- **Chapter 5, Draft SEIR Revisions** – This chapter presents the text changes to the draft SEIR made as a result of a response to comments, and/or staff-initiated text changes identified by planning department staff to update, correct, or clarify the draft SEIR text. This chapter also includes revisions to the text of the draft SEIR described in RTC Chapter 2 relating to changes to the proposed project initiated by the project sponsor, shown as indented text, with new text double underlined and deletions shown with ~~strikethrough~~. In addition, as described in RTC Chapter 2, the proposed project has been revised, and text and graphic changes are limited to the minor modifications.

  Staff-initiated text changes are identified by an asterisk (*) in the margin. These changes and minor errata do not result in significant new information with respect to the proposed project or project variant, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft SEIR pursuant to CEQA Guidelines section 15088.5 is not required.

  The revisions also include the addition of two appendices to the SEIR, which are provided at the end of RTC Chapter 5:

  - Appendix C4: Transit Delay Analysis and Capital Improvements Memorandum
  - Appendix I: Updated Health Risk Assessment Memorandum

- **Attachments** – The following attachments (called "attachments" to distinguish them from the draft SEIR appendices) are included as part of this document:
  - Attachment 1: Planning Commission Hearing Transcript
  - Attachment 2: Comment Letters and Emails on the Draft SEIR
  - Attachment 3: Non-CEQA Transportation Analysis
  - Attachment 4: Travel Demand Workbook
  - Attachment 5: SFMTA Transit Delay Analysis Memorandum

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# CHAPTER 2
# Revisions and Clarifications to the Project Description

## 2.A Introduction

Since publication of the draft SEIR, the project sponsor has initiated minor revisions to the proposed project as described in draft SEIR Chapter 2, Project Description. This chapter summarizes these minor revisions, describes updates to the text in the draft SEIR (deletions are shown in ~~strikethrough~~; new text is double-underlined), and describes the environmental impacts of the revisions. Draft SEIR text revisions are presented in this chapter only where they have been made specifically in SEIR Chapter 2, Project Description. Text revisions in other portions of the SEIR that are updated as a result of these changes are presented in RTC Chapter 5, Draft SEIR Revisions.

The revisions update the information in the draft SEIR. The revisions do not provide new information that would result in any new significant impacts that were not already identified in the draft SEIR, nor would these changes increase the severity of any of the project's impacts identified in the draft SEIR. Mitigation measures identified in the draft SEIR would continue to be required in order to reduce or avoid significant environmental impacts. No new measures would be required to mitigate the significant impacts identified for the proposed project in the draft SEIR.

CEQA Guidelines section 15088.5 requires recirculation of an EIR when "significant new information" is added to the EIR after publication of the draft EIR but before certification. The CEQA Guidelines states that information is "significant" if "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement." Section 15088.5 further defines "significant new information" that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, of a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact to a less-than-significant level), or of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines section 15088.5(b) states that recirculation is not required if "new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

As described below, the revisions and clarifications to the proposed project options would not introduce new characteristics or substantially modify previously proposed characteristics that would result in any new significant impacts not already identified for the proposed project studied in the draft SEIR, nor would these changes increase the severity of any identified significant impacts.

# 2.B Project Description Revisions

The minor revisions to the proposed project are described below. Certain aspects of the proposed project are superseded and replaced by the minor revisions presented in this chapter; all other aspects of the project description remain unchanged, as presented in draft SEIR Chapter 2, Project Description. The environmental effects of the proposed project with the project refinements incorporated are fully covered by the analyses in this chapter together with the analyses in draft SEIR Chapter 4, Environmental Setting and Impacts.

## Proposed Street Type Plan

As illustrated on Figure 2-12, Proposed Street Type Plan, on draft SEIR p. 2-27, the portion of West Street that is south of South Street is proposed as a private street and the portion of Lee Avenue that is north of North Street is proposed as a neighborhood residential street. The type of street has been modified by the project sponsor such that West Street south of South Street is proposed as a neighborhood residential street, and Lee Avenue north of North Street is proposed as a private street. These revisions would only change the street ownership and would not result in changes to roadway configurations or vehicle, pedestrian, or bicycle access to and from the project site. The revised street ownership is shown in Revised Figure 2-12 in RTC Chapter 5, Draft SEIR Revisions.

## Educator Housing

Under the Developer's Proposed Option, a total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income. The project sponsor has provided information regarding the affordable housing component, which would include approximately 150 moderate-income dwelling units dedicated to educator households as part of the 50 percent affordable housing. Under the Additional Housing Option, approximately 150 moderate-income dwelling units would also be dedicated to educator housing as part of the 50 percent affordable housing. This would not change the number and mix of residential units, building footprints, or overall development program of the proposed project.

## Parking

Under the Developer's Proposed Option, public parking spaces could be provided in the up to 750-space garage located under Blocks A and B, or in dedicated public parking areas within several of the residential garages, all of which would be separate from the residential parking. This would not change the overall number of parking spaces provided at the site.

## Temporary Use of the Project Site

Since publication of the draft SEIR, the San Francisco Municipal Transportation Agency (SFMTA) has been temporarily using a portion of the project site since October 1, 2019, for SFMTA employee parking, under an agreement with the SFPUC. The agreement for this temporary use will expire September 2020, prior to the potential start of project construction activity, and therefore would neither be affected by, nor affect, the proposed project.

# 2.C Draft SEIR Revisions

The following figure has been revised to show the revised street ownership; the revised figure is provided in RTC Chapter 5, Draft SEIR Revisions.

- Figure 2-12 on draft SEIR p. 2-27

The last paragraph on SEIR p. 2-7 is revised as follows:

> The site does not contain any permanent structures and currently contains 1,007 surface vehicular parking spaces. The lot provides overflow vehicular parking for City College students, faculty, and staff.[26] The San Francisco Municipal Transportation Agency (SFMTA) is also temporarily using a portion of the project site for SFMTA employee parking, under an agreement with SFPUC. The SFMTA started temporarily using on October 1, 2019, an approximate 29,100-square-foot area of the project site. This temporary use will expire September 2020.

The paragraph under Section 2.E.1, Developer's Proposed Option, on SEIR p. 2-13 is revised as follows:

> The Developer's Proposed Option would include up to 1.64 million gsf in new construction on 10 Blocks (**Figure 2-4, Developer's Proposed Option Site Plan and Height Ranges**). Construction under this option would provide 1,100 residential units totaling about 1.3 million gsf. Housing would be provided on each block. A total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income, depending on market surveys, funding source restrictions and other stakeholder input on the affordable housing plan. Affordable housing would be distributed throughout the site. For purposes of this SEIR, the unit mix is assumed to be 40 percent studio/one bedroom units and 60 percent two-or-more-bedroom units. The project proposes to provide approximately 150 moderate-income dwelling units (as a component of the project's 50 percent affordable housing element) that would be deed-restricted to occupancy by educator households with an average income of 100 percent of the area median income. Households with at least one full-time employee of the City College of San Francisco or San Francisco Unified School District would have preferential priority for all educator dwelling units, with City College households having first priority and San Francisco Unified School District households having second priority.
>
> **Figure 2-5, Ground Floor Use Plan for Developer's Proposed Option**, presents the proposed ground floor use plan at the project site. With the exception of the townhome blocks (Blocks TH1 and TH2), the ground floor areas on all blocks could include common spaces, building lobbies, residential units, as well as utility and parking access. As shown in Figure 2-5, the ground floor of Block B would contain approximately 10,000 gsf of childcare and community space. Approximately 7,500 gsf of retail space, including a café, could be provided on the ground level of Block A, C, D, E, or F.

The first bullet under Section 2.E.6, Vehicle Parking and Loading, on SEIR p. 2-23 is revised as follows to clarify that: (1) residential parking may also be included under Blocks A and B as shown

in draft SEIR Figure 2-10, and (2) that public parking could be provided in the up to 750-space garage under Blocks A and B or within several of the residential garages:

- **Developer's Proposed Option:** The Developer's Proposed Option would provide a total of up to 1,300 off-street vehicle parking spaces. **Figure 2-10, Developer's Proposed Option Parking Facilities and Street Parking Plan**, illustrates the proposed off-street parking locations. Up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks A, B, C, D, F, and G and in the townhomes. In addition to resident parking, the Developer's Proposed Option would include a below-grade multilevel public garage of up to 750 spaces located under Blocks A and B and accessed from South Street. Alternatively, the public parking could be located in several of the residential garages. The Developer's Proposed Option would include a minimum of seven car-share parking spaces located on streets and in buildings. In addition, the Developer's Proposed Option would include approximately six on-street freight loading areas and approximately eight passenger loading areas along the internal streets.

Section 2.I.2, Local Agencies, on SEIR pp. 2-50 to 2-51 is revised as follows to update or correct local agency approval actions:

## 2.I.2 Local Agencies

**San Francisco Board of Supervisors**

- Adoption of CEQA findings
- Approval of general plan amendments
- Approval of planning code amendments (SUD) and associated zoning map and height map amendments
- Approval of a development agreement
- Approval of final subdivision map(s)
- Approval of dedications and easements for public improvements, and acceptance of public improvements, as necessary
- Approval of an amended easement and access agreement with ~~City College of~~the San Francisco Community College District for roadway access and any joint development of streets, if applicable
- Approval of a resolution(s) authorizing the sale of property under SFPUC jurisdiction and various license agreements for use, construction, and open space on SFPUC property
- Approval of a resolution acknowledging City's intention to fund affordable housing in the project

**San Francisco Planning Commission**

- Certification of the final SEIR
- Adoption of CEQA findings

- Approval of special use district design standards and guidelines
- Initiation and recommendation to the San Francisco Board of Supervisors to approve amendments to the general plan
- Initiation and recommendation to the San Francisco Board of Supervisors to approve planning code amendments adopting an SUD and associated zoning map amendments
- Approval of Design Standards and Guidelines
- Recommendation to the San Francisco Board of Supervisors to approve a development agreement

**San Francisco Public Utilities Commission or General Manager**

- Adoption of CEQA findings
- Actions and approvals related to a development agreement and ~~purchase and sale~~ an agreement for the sale of property under SFPUC jurisdiction, and various license agreements for use, construction, and open space on SFPUC property and other actions and approvals related to its jurisdictional authority
- Approval of an amended easement and access agreement with the San Francisco Community College District for roadway access and any joint development of streets, if applicable

**San Francisco Department of Public Works**

- Actions and approvals related to its jurisdictional authority

**San Francisco Municipal Transportation Agency**

- Actions and approvals related to a development agreement and approval of transit improvements, public improvements and infrastructure, including certain roadway improvements, stop controls, bicycle infrastructure and loading zones, to the extent included in the project

**San Francisco Fire Department**

- Actions and approvals related to its jurisdictional authority

**San Francisco Department of Building Inspection**

- Approval and issuance of demolition, grading, and site construction permits
- Nighttime construction permit, if required

**San Francisco Department of Public Health**

- Actions and approvals related to its jurisdictional authority

**~~City College of~~ San Francisco Community College District**

- Act as responsible agency under CEQA

- Approval of an amended easement and access agreement

# 2.D Environmental Impacts

The minor modifications described in RTC Section 2.C above would not result in any changes to the site layout, street configuration, proposed number of housing units, or construction assumptions. These modifications would result in no changes to the assumptions, analysis, or conclusions described in the draft SEIR assessment of environmental impacts of the proposed project as presented in draft SEIR Chapter 3, Environmental Setting and Impacts, and draft SEIR Appendix B with respect to any resource topics. The significant and unavoidable transportation, noise, and air quality would remain and are discussed below.

The transportation impacts would remain significant and unavoidable for several reasons as described on draft SEIR pp. 6-59 to 6-60:

- Providing approximately 150 moderate-income dwelling units dedicated to educator households may lead to slightly less vehicular travel than not providing such dedicated housing. However, the cumulative impact related to public transit delay (Impact C-TR-4, discussed on draft SEIR pp. 3.B-94 to 3.B-99) is based on the addition of vehicle and transit trips generated by the proposed project in combination with the City College facilities master plan projects and other cumulative development. Due to the uncertainty surrounding the development at City College's Ocean Campus and the uncertainty of SFMTA approval of other measures under its jurisdiction, cumulative transit delay impacts would be significant and unavoidable. The impacts to transit delay would occur irrespective of potential changes in travel demand or patterns from educator housing.
- The cumulative impact to passenger and freight loading (Impact C-TR-6b, discussed on draft SEIR pp. 3.B-101 to 3.B-102) is determined based on the impact to existing loading zones along Lee Avenue between Ocean Avenue and the project site. Under such a scenario, the Lee Avenue extension would still occur, and impacts to loading on Lee Avenue would occur irrespective of potential changes travel demand or patterns from educator or student housing. Thus, the impact conclusion would be significant and unavoidable.

An additional reason that the transportation impacts would remain significant and unavoidable is:

- The 150 educator-dedicated housing at the site would not obviate the need for travel to and from other City College centers and instructional sites and San Francisco Unified School District schools throughout San Francisco. Employees traveling to and from the Ocean Campus accounts for only a portion of total daily travel to and from the project; other travel would still occur from these employees throughout the day. Thus, educator housing at the project site would not prevent project-related vehicle travel from using Ocean Avenue in the project vicinity.

The minor modifications described in RTC Section 2.C would not change the confirguration of the site or size of the buildings. Therefore, construction assumptions and durations would remain the same. The construction-related noise and air quality impacts would remain significant and unavoidable as described in draft SEIR Sections 3.C, Noise, and 3.D, Air Quality.

The revisions to the proposed project would not result in any new significant impacts that were not already identified in the draft SEIR, nor would these changes substantially increase the severity of any impacts identified in the draft SEIR. The mitigation measures identified in the draft SEIR for the proposed project would continue to be required to reduce or avoid the significant environmental impacts of the revised proposed project. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project in the draft SEIR. Therefore, references to the proposed project in this RTC document, including Chapter 5, Draft SEIR Revisions, shall be interpreted to include and incorporate any changes proposed by the revised proposed project, unless otherwise noted.

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# CHAPTER 3
# Public Agencies, Organizations, and Individual Persons Commenting on the Draft SEIR

## 3.A Introduction

This chapter presents the agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearings on the draft SEIR. This RTC document codes the comments in the following way:

- Comments from agencies are designated by "A-" and the acronym for the agency's name.
- Comments from organizations are designated by "O-" and the acronym for the organization's name.
- Comments from individuals are designated by "I-" and the individual's last name.

Within each category, commenters are listed in alphabetical order. In cases where commenters provided oral testimony at the public hearing and submitted written comments, or submitted more than one letter or email, comment codes end with a sequential number (e.g., O-WPA1, O-WPA2).

The planning commission hearing transcript is included as Attachment 1. Comment letters and emails received are included as Attachment 2.

## 3.B State, Regional, and Local Agencies, Boards, and Commissions

**TABLE RTC-1**
**FEDERAL, STATE, REGIONAL, AND LOCAL AGENCIES, BOARDS, AND COMMISSIONS COMMENTING ON THE DRAFT SEIR**

| Commenter Code | Name and Title of Commenter | Agency/Organization | Format | Date |
|---|---|---|---|---|
| A-CALTRANS | Wahida Rashid, Acting District Branch Chief | California Department of Transportation (Caltrans) | Letter | September 10, 2019 |
| A-BAAQMD | Areana Flores, Environmental Planner | Bay Area Air Quality Management District (BAAQMD) | Email | September 23, 2019 |
| A-SCH | Scott Morgan, Director | State Clearinghouse | Letter | September 23, 2019 |

# 3.C Organizations

**TABLE RTC-2**
**ORGANIZATIONS COMMENTING ON THE DRAFT SEIR**

| Commenter Code | Name and Title of Commenter | Agency/Organization | Format | Date |
|---|---|---|---|---|
| O-BRCAC | Jon Winston, Chair | Balboa Reservoir Community Advisory Committee | Hearing Transcript | September 12, 2019 |
| O-ARHS | Dr. Andrew Currier, President | Archbishop Riordan High School | Hearing Transcript | September 12, 2019 |
| O-MHDC | Sam Moss, Executive Director | Mission Housing Development Corporation | Hearing Transcript | September 12, 2019 |
| O-NAF | Neighbors Against Flooding | Ingleside Terraces Residents | Email | September 17, 2019 |
| O-SFHAC | Nicholas Nagle | San Francisco Housing Action Coalition | Hearing Transcript | September 12, 2019 |
| O-SNA1 | Amy O'Hair | Sunnyside Neighborhood Association | Hearing Transcript | September 12, 2019 |
| O-SNA2 | Amy O'Hair | Sunnyside Neighborhood Association | Letter | September 12, 2019 |
| O-WPA1 | Michael Ahrens, President | Westwood Park Homeowners Association | Hearing Transcript | September 12, 2019 |
| O-WPA2 | Anita Theoharis, Board Member | Westwood Park Association | Hearing Transcript | September 12, 2019 |
| O-WPA3 | Michael Ahrens, President | Westwood Park Association | Email | September 22, 2019 |
| O-YIMBY | Laura Foote | YIMBY Action | Hearing Transcript | September 12, 2019 |

# 3.D Individuals

**TABLE RTC-3**
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

| Commenter Code | Name and Title of Commenter | Format | Date |
|---|---|---|---|
| I-ADAMS | Michael Adams | Hearing Transcript | September 12, 2019 |
| I-AISSA | Sharon Aissa and David Bean | Scan | September 13, 2019 |
| I-ALI | Amna Ali | Email | September 18, 2019 |
| I-ANDERSON1 | Lisa Anderson | Hearing Transcript | September 12, 2019 |
| I-ANDERSON2 | Lisa Anderson | Email | September 12, 2019 |
| I-BARISH1 | Jean Barish | Hearing Transcript | September 12, 2019 |
| I-BARISH2 | Jean Barish | Scan | September 12, 2019 |
| I-BARISH3 | Jean Barish | Email | September 23, 2019 |
| I-BARNARD | Julie Barnard | Email | September 11, 2019 |
| I-BARZ | Sara Barz | Email | September 11, 2019 |
| I-BELBIN | Charles Belbin | Email | September 22, 2019 |
| I-BERNSTEIN1[a] | Harry Bernstein | Hearing Transcript | September 12, 2019 |
| I-BERNSTEIN2 | Harry Bernstein | Email | August 11, 2019 |
| I-BERNSTEIN3 | Harry Bernstein | Email | September 23, 2019 |
| I-BERNSTEIN4 | Harry Bernstein | Email | September 23, 2019 |
| I-BERNSTEIN5 | Harry Bernstein | Email | September 23, 2019 |
| I-BIERINGER1 | Garry Bieringer | Hearing Transcript | September 12, 2019 |
| I-BIERINGER2 | Garry Bieringer | Email | August 16, 2019 |
| I-BIERINGER3 | Garry Bieringer | Email | September 23, 2019 |
| I-BIERINGER4 | Garry Bieringer | Email | September 23, 2019 |
| I-BRAD | Brad | Hearing Transcript | September 12, 2019 |
| I-BURGGRAF | Alex Burggraf | Email | September 23, 2019 |
| I-BUTTON | Gary Button | Email | September 12, 2019 |
| I-CIABATTONI | Kathleen Ciabattoni | Email | September 12, 2019 |
| I-COLLINS1 | Monica Collins | Hearing Transcript | September 12, 2019 |
| I-COLLINS2 | Monica Collins | Email | September 11, 2019 |
| I-COLLINS3 | Monica Collins | Email | September 22, 2019 |
| I-CRONE | Phil Crone | Email | September 12, 2019 |
| I-CROSBY | Liana Crosby | Email | September 11, 2019 |
| I-CUTTEN | Merritt Cutten | Email | September 16, 2019 |
| I-DELROSARIO | Ronnie Del Rosario | Email | September 11, 2019 |
| I-E.HANSON | Edward Hanson | Email | September 23, 2019 |
| I-EVANS1[b] | Rita Evans | Hearing Transcript | September 12, 2019 |
| I-EVANS2 | Rita Evans | Email | September 23, 2019 |

**TABLE RTC-3**
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

| Commenter Code | Name and Title of Commenter | Format | Date |
|---|---|---|---|
| I-EVBUOMA | Marria Evbuoma | Email | September 19, 2019 |
| I-FISHER | Allan Fisher | Email | September 12, 2019 |
| I-FRAKNOI | Andrew Fraknoi | Email | September 21, 2019 |
| I-FREY1 | Laura Frey | Hearing Transcript | September 12, 2019 |
| I-FREY2 | Laura Frey | Email | September 22, 2019 |
| I-GOMEZ | Wilson Gomez | Email | August 28, 2019 |
| I-GONZALEZ | Daniel Gonzalez | Email | September 12, 2019 |
| I-GOODMAN | Aaron Goodman | Email | September 12, 2019 |
| I-HALFORD1 | Daniel Halford | Email | September 9, 2019 |
| I-HALFORD2 | Daniel Halford | Email | September 16, 2019 |
| I-HALL | Robert Hall | Email | August 21, 2019 |
| I-HANSON1 | Christine Hanson | Hearing Transcript | September 12, 2019 |
| I-HANSON2 | Christine Hanson | Email | August 8, 2019 |
| I-HANSON3 | Christine Hanson | Email | September 11, 2019 |
| I-HANSON4 | Christine Hanson | Email | September 23, 2019 |
| I-HANSON5 | Christine Hanson | Email | September 23, 2019 |
| I-HEGGIE1 | Jennifer Heggie | Hearing Transcript | September 12, 2019 |
| I-HEGGIE2 | Jennifer Heggie | Email | September 23, 2019 |
| I-HONG | Dennis Hong | Email | September 11, 2019 |
| I-HOUWER | Michell Houwer | Email | September 12, 2019 |
| I-JA1 | Alvin Ja | Hearing Transcript | September 12, 2019 |
| I-JA2 | Alvin Ja | Email | August 8, 2019 |
| I-JA3 | Alvin Ja | Email | August 13, 2019 |
| I-JA4 | Alvin Ja | Email | August 26, 2019 |
| I-JA5 | Alvin Ja | Email | August 26, 2019 |
| I-JA6 | Alvin Ja | Email | August 30, 2019 |
| I-JA7 | Alvin Ja | Email | September 5, 2019 |
| I-JA8 | Alvin Ja | Email | September 7, 2019 |
| I-JA9 | Alvin Ja | Email | September 10, 2019 |
| I-JA10 | Alvin Ja | Email | September 10, 2019 |
| I-JA11 | Alvin Ja | Email | September 11, 2019 |
| I-JA12 | Alvin Ja | Email | September 14, 2019 |
| I-JA13 | Alvin Ja | Email | September 14, 2019 |
| I-JA14 | Alvin Ja | Email | September 16, 2019 |
| I-JA15 | Alvin Ja | Email | September 22, 2019 |
| I-JOHNSON | Eric Johnson | Email | September 11, 2019 |

**TABLE RTC-3**
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

| Commenter Code | Name and Title of Commenter | Format | Date |
|---|---|---|---|
| I-KAUFMYN1 | Wynd Kaufmyn | Hearing Transcript | September 12, 2019 |
| I-KAUFMYN2 | Wynd Kaufmyn | Email | September 22, 2019 |
| I-KOPP | Quentin Kopp | Email | September 23, 2019 |
| I-KOWALSKI | Kevin Kowalski | Hearing Transcript | September 12, 2019 |
| I-LEGION | Vicki Legion | Email | September 22, 2019 |
| I-LOHR | Janet Lohr | Email | August 10, 2019 |
| I-MAGNUSON | Sally Magnuson | Email | September 23, 2019 |
| I-MARABELLO1 | Brian Marabello | Email | September 23, 2019 |
| I-MARABELLO2 | Brian Marabello | Email | September 23, 2019 |
| I-MARTINEZ | Anita Martinez | Email | September 23, 2019 |
| I-MARTINPINTO | Stephen Martinpinto | Email | September 23, 2019 |
| I-MAURO | Jacqueline Mauro | Email | September 11, 2019 |
| I-MEDAL | Tomasita Medal | Email | September 23, 2019 |
| I-MUELLER1 | Madeline Mueller | Email | September 23, 2019 |
| I-MUELLER2 | Madeline Mueller | Email | September 23, 2019 |
| I-MUHLHEIM | Fred Muhlheim | Email | September 23, 2019 |
| I-NGUYEN | Jess Nguyen | Hearing Transcript | September 12, 2019 |
| I-OSAWA | Ed Osawa | Email | September 22, 2019 |
| I-OSTEN | Scott Osten | Email | September 19, 2019 |
| I-PEDERSON1 | Christopher Pederson | Hearing Transcript | September 12, 2019 |
| I-PEDERSON2 | Christopher Pederson | Email | September 23, 2019 |
| I-RANDOLPH | Yonathan Randolph | Email | September 23, 2019 |
| I-RHINE | Marcie Rhine | Hearing Transcript | September 12, 2019 |
| I-SAPPHIRE | Sophie Sapphire | Hearing Transcript | September 12, 2019 |
| I-SCHNEIDER1 | Benjamin Schneider | Email | September 11, 2019 |
| I-SCHNEIDER2 | Benjamin Schneider | Hearing Transcript | September 12, 2019 |
| I-SIMON | Leslie Simon | Email | September 17, 2019 |
| I-SMITH | Aaron Smith | Email | September 12, 2019 |
| I-SUBIN | Zack Subin | Email | September 11, 2019 |
| I-T.RANDOLPH | Theodore Randolph | Hearing Transcript | September 12, 2019 |
| I-TARQUINO | Eve Tarquino | Email | September 12, 2019 |
| I-TASSE | Dan Tasse | Email | September 11, 2019 |
| I-TIMA | Etta Tima | Hearing Transcript | September 12, 2019 |
| I-TRIPATHI | Priti Tripathi | Email | September 11, 2019 |
| I-VESSELENYI | Hold Sall Vesselenyi | Email | September 23, 2019 |
| I-VICKY | Vicky | Hearing Transcript | September 12, 2019 |

**TABLE RTC-3**
**INDIVIDUALS COMMENTING ON THE DRAFT SEIR**

| Commenter Code | Name and Title of Commenter | Format | Date |
|---|---|---|---|
| I-WEIBEL | Christine Martinez Weibel | Email | September 19, 2019 |
| I-WEYER | Andy Weyer | Email | September 20, 2019 |
| I-WHITE | Kathleen White | Email | September 19, 2019 |
| I-WILENSKY | Debra Wilensky | Email | September 23, 2019 |
| I-WORLEY | Jennifer Worley | Email | September 23, 2019 |
| I-ZELTZER | Steve Zeltzer | Hearing Transcript | September 12, 2019 |
| I-ZONTA1 | Mike Zonta | Email | August 8, 2019 |
| I-ZONTA2 | Mike Zonta | Email | September 3, 2019 |

NOTES:

[a] The commenter left a copy of materials at the planning commission hearing. These materials were also submitted via email and are addressed in response to Comment I-BERNSTEIN3.

[b] The commenter left a copy of their comments at the planning commission hearing. The comments were also submitted via email and are addressed in response to Comment I-EVANS2.

# CHAPTER 4
# Comments and Responses

## Introduction

This section presents the substantive comments received on the draft SEIR and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the draft SEIR, with general comments on the SEIR, including comments on the merits of the proposed project and project alternatives, grouped together at the end of the section. Comments unrelated to a specific impact category are also classified as general comments. Comments on the draft SEIR Summary chapter or on specific mitigation measures are included under the comments regarding the relevant topical section of the draft SEIR. The order of the comments and responses in this section is shown below, along with the prefix to the topic codes (indicated in square brackets):

- CEQA [CEQA]
- Project Description [PD]
- Transportation and Circulation [TR]
- Noise [NO]
- Air Quality [AQ]
- Alternatives [AL]
- Cumulative Impacts [CU]
- Initial Study Topics
  - Plans and Policies [PP]
  - Land Use and Land Use Planning [LU]
  - Population and Housing [PH]
  - Wind [WI]
  - Shadow [SH]
  - Utilities and Service Systems [UT]
  - Public Services [PS]
  - Biological Resources [BI]
  - Geology and Soils [GE]
- General Comments [GC]
- Merits of the Project [ME]

Within each subsection under each topic area, similar comments are grouped together and identified using the topic code prefix and sequential numbering for each subtopic. For example, Project Description comments [PD] are listed as PD-1, PD-2, PD-3, and so on. Each topic code has a corresponding heading that introduces the comment subject; these subsections present quotes of comments and include the commenter's name and the comment code as provided in Attachments 1 and 2 of this RTC document. The reader is referred to Attachments 1 and 2 for the full text and context of each comment letter or email, as well as the public hearing transcript. In those attachments, the comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment and to clarify or augment information in the draft SEIR as appropriate. Response numbers correspond to the topic code; for example, the response to Comment PD-1 is presented under Response PD-1. The responses may clarify the draft SEIR text or revise or add text to the SEIR. Revisions to the draft SEIR are shown as indented text. New or revised text, including text changes initiated by planning department staff, is <u>double underlined</u>; deleted material is shown in ~~strikethrough~~.

# 4.A CEQA

The comments and corresponding responses in this section relate to general comments on the draft SEIR. The comments in this section include the following:

- Comment CEQA-1: Type of EIR, Tiering, and Focusing Second-Tier Review
- Comment CEQA-2: Existing Setting and Baseline
- Comment CEQA-3: Administrative Record

## *Comment CEQA-1: Type of EIR, Tiering, and Focusing Second-Tier Review*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-BARISH3-5 | I-BIERINGER3-1 | I-HEGGIE2-3 |
| I-BARISH3-20 | I-E.HANSON-2 | I-JA6-1 |
| I-BARISH3-33 | I-HANSON2-1 | I-JA6-2 |
| I-BERNSTEIN2-1 | | |

"Effects Found Not to be Potentially Significant (p. B-10)

In some cases, the Initial Study identified mitigation measures in CEQA topic areas that would reduce potentially significant impacts to a less-than-significant level, supporting the conclusion that these topic areas do not need CEQA review under this SEIR.

The Initial Study found that the only effects found to be potentially significant in the Project were Transportation and Circulation; Noise; and Air Quality. All other potential individual and cumulative environmental effects considered in the PEIR were found to be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures in the DSEIR. These impacts that are not studied in this DSEIR are: Land use and land use planning; Population and housing; Cultural resources; Tribal cultural; resources; Greenhouse gas emissions; Wind; Shadow; Utilities and service systems; Public services; Biological resources; Geology and soils; Hydrology and water quality; Hazards and hazardous materials; Mineral resources; Energy; Agricultural and forestry resources; Wildfire.

However, for the reasons set forth below, the basis for these determinations are flawed. The effects below should, in fact, be analyzed in this DSEIR."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [*I-BARISH3-5*])*

"According to 2.D.1, the area plan PEIR estimated the area plan would result in a net increase of 1,780 residential units, and that as of Sept., 2018, 273 units have been built and excluding the Balboa Reservoir project, an addition 209 units are planned. (P. 2-6) Therefore, of the 1,780 total number of

units, 482 are already accounted for, leaving 1,295 units as the maximum number that could be built at the Balboa Reservoir and still comply with the PEIR. Yet the DSEIR considers one option that would have 1,550 units, 255 more than allowed in the PEIR. A Balboa Reservoir project with more than 1,298 units, therefore, would be inconsistent with the PEIR, and should not be permitted."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [*I-BARISH3-20*])*

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"**The DSEIR must consider the impact of increasing the number of units from the original recommendation in the PEIR**

The Reservoir Project's two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR's Housing option for the Reservoir referred to 425-500 units. From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-33*])*

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"Can you tell me, is this report going to be an original EIR or will it be based on some other EIR that's been done elsewhere in the immediate area?"

*(Harry Bernstein, Email, August 11, 2019 [*I-BERNSTEIN2-1*])*

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"2) The notice did say a 'subsequent EIR'. What is it subsequent to? Does this current analysis take the place of a previous EIR? What is the relationship between the previous one and this subsequent one?"

*(Garry Bieringer, Email, August 16, 2019 [*I-BIERINGER3-1*])*

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"1. The very fact that this process utilizes a Subsequent EIR is obfuscation. If the project from day 1 started with an impact assessment of 1550 units of housing on such a small footprint of 17 acres than it would be clear that the surrounding environment and neighborhoods would be severely impacted, as it stands the original plan has been expanded within the existing process of a previous EIR as a means to mitigate public concern."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [*I-E.HANSON-2*])*

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"Until the release of the draft SEIR we were told to expect a DEIR.

What is the difference and why has this difference been applied to the Balboa Reservoir project?"

*(Christine Hanson, Email, August 8, 2019 [*I-HANSON2-1*)*

"Noise and vibration were not addressed in the PEIR, and we thank the Planning Department for recognizing that the earlier Balboa area plan offered a high level view, not a project view, anticipating that they could not take into account every change to the area before a project is ready for consideration. Since the time the PEIR was developed, many new buildings; educational, service-oriented, commercial and residential; have been constructed near and adjacent to the Balboa Reservoir. At the time of the PEIR, there was an expectation that no more than 500 housing units would be constructed in the Balboa Reservoir."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-3*])*

"The Initial Study discounts almost all environmental factors as needing assessment except for Transportation, Air Quality, and Noise."

*(Alvin Ja, Email, August 30, 2019 [*I-JA6-1*])*

"The Initial Study erroneously carries over the program-level determinations of the Balboa Park Station FEIR/PEIR to the project-level Balboa Reservoir SEIR."

*(Alvin Ja, Email, August 30, 2019 [*I-JA6-2*])*

## Response CEQA-1: Type of EIR, Tiering, and Focusing Second-Tier Review

The comments request clarification regarding the type of EIR, disagree with the use of the initial study, and state that the draft SEIR must consider the impact of increasing the number of units from the original numbers analyzed in the PEIR.

The response below is organized by the following subtopics:

- Program EIRs and Tiering
- Use of Program EIR for Purposes of Focusing Second-Tier Review

Regarding the comment that states that increase in units at the project site between the PEIR and the SEIR constitutes substantial unplanned growth, see Response PH-1, Population Growth, on RTC p. 4.H-17.

### *Program EIRs and Tiering*

The Balboa Reservoir project-level SEIR was appropriately tiered from the Balboa Park Station Area Plan PEIR. Draft SEIR Section 1.B, Type of EIR, discusses the relationship between the project-level SEIR and the PEIR. As stated on draft SEIR pp. 1-2 to 1-3, the area plan PEIR is a program EIR under CEQA Guidelines section 15168. The PEIR provided a first-tier, plan-level analysis of the environmental impacts associated with the development program proposed for the entire plan area,

including the project site. The Public Resources Code allows for the preparation of multiple types of EIRs, based primarily on the level of detail available about the project at the time of an agency's first discretionary decision on the project. An EIR should "be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences."[10] At the same time, the level of detail in an EIR should "correspond" to the "degree of specificity involved in the underlying activity which is described in the EIR."[11] Thus, an EIR for a construction project will necessarily be more detailed than an EIR prepared for a large-scale plan, "because the effects of the construction can be predicted with greater accuracy."[12] As discussed in draft SEIR Section 1.C, the PEIR evaluated the potential environmental effects of development of the 210-acre plan area at a "program" level of detail, based on the plan information available at the time, and thus is described as a "program" EIR.

A program EIR is commonly used in conjunction with "tiering" – "the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussion from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."[13] Tiering is appropriate and agencies are encouraged where an EIR is completed for a large-scale plan at an early stage, and further analyses will be prepared at later stages as individual projects are proposed that implement the plan, enabling the agency to consider broad policy alternatives and cumulative impacts early in the process and to defer analysis of project-level details until specific projects are proposed.

The PEIR analyzed a large-scale area plan, and the department is now analyzing a project with more specific details on one of the sites in the PEIR – the Balboa Reservoir. Thus, the SEIR is an appropriate level of environmental review for the project.

The area plan and the PEIR do not place a cap on the number of housing units within the plan area or the project site. The PEIR acknowledges that aside from the project-level analysis for the Phelan Loop Site and Kragen Auto Parts Site (which are now built as 1100 and 1150 Ocean Avenue), the other sites identified for the plan area, including the Balboa Reservoir site, are "part of the reasonably foreseeable development program for the Area Plan; however, they will be analyzed at a program level of detail because no specific development proposals have been presented."[14] In order to conduct a program-level analysis, the department made appropriate development assumptions at the time of the PEIR. The PEIR analyzed a development program of 500 residential units and 100,000 square feet of open space for the Balboa Reservoir site.[15]

The draft SEIR is a project-level environmental review that includes more details on the currently proposed project at the Balboa Reservoir than were in the PEIR. The purpose of the draft SEIR is to analyze the proposed development at the project site compared to the development assumed in the

[10] CCR Title 14 Section 15151
[11] CCR Title 14 Section 15146
[12] CCR Title 14 Section 15146
[13] CCR Title 14 Section 15152(a)
[14] City and County of San Francisco Planning, *Balboa Park Station Area Plan Final Environmental Impact Report,* Planning Department File No. 2004.1059E, certified December 4, 2008.
[15] Ibid. pages 100, 107.

PEIR to determine whether it would be within the scope of the program-level analysis or whether the project would result in new significant impacts or substantially more severe significant impacts than those identified in the PEIR. The draft SEIR then analyzes the new significant impacts or substantially more severe significant impacts in the PEIR. The use of the PEIR and initial study to focus the second-tier review, and applicable principles in the CEQA Guidelines, are explained below.

### *Use of Program EIR for Purposes of Focusing Second-Tier Review*

The CEQA Guidelines address how a lead agency is to use a certified first-tier EIR when analyzing a specific development proposal within the area covered by the plan. CEQA Guidelines section 15152 provides general guidance regarding tiering. Section 15152 states in pertinent part:

> d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:
>
> (1) Were not examined as significant effects on the environment in the prior EIR; or
>
> (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.
>
> e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.
>
> f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of section 15070 are met.
>
> (1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR, that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.
>
> (2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see section 15064(i).
>
> (3) Significant environmental effects have been "adequately addressed" if the lead agency determines that:
>
> (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or
>
> (B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

CEQA Guidelines section 15168 provides similar guidance regarding the use of a program EIR to focus analysis of a later project carried out under the plan for which the program EIR was prepared. Section 15168 states:

c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

   1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in section 15152.

   2) If the agency finds that pursuant to section 15162, subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

   3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

   4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

   5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

d) Use with Subsequent EIRs and Negative Declarations. A program EIR can be used to simplify the task of preparing environmental documents on later activities in the program. The program EIR can:

   1) Provide the basis in an Initial Study for determining whether the later activity may have any significant effects.

   2) Be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.

   3) Focus an EIR on a later activity to permit discussion solely of new effects which had not been considered before.

In response to comments that question the use of an SEIR or claim that the topics in the initial study should be studied in the SEIR, the department appropriately uses the draft SEIR and initial study. All lead agencies may, prior to preparing any type of EIR, prepare an initial study to "[a]ssist in the preparation of an EIR, if one is required, by… [f]ocusing the EIR on the effects determined to be significant … [and] [e]xplaining the reasons for determining that potentially significant effects would not be significant…" (CEQA Guidelines section 15063(c)(3)(A), (C)). Thereafter, CEQA only

requires the EIR to "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study" (CEQA Guidelines section 15128).

A later subsequent EIR is required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR (CEQA Guidelines section 15152(f)). In other words, topics found to have less than significant or less than significant impacts with mitigation do not need to be carried forward into the subsequent EIR. In determining the categories of environmental impacts to address in the draft SEIR, the planning department relied on processes and principles drawn from section 15152, section 15168, and section 15180 of the CEQA Guidelines, with the goal of determining whether the proposed project could cause potentially significant effects not adequately addressed in the PEIR. This process is documented in the initial study prepared for the proposed project (SEIR Appendix B).

For each resource topic area, the initial study explains why the PEIR provides an adequate analysis of these issues. In the language of the CEQA Guidelines, second-tier, project-specific review should focus on those impacts that were not "adequately addressed" in the first-tier document (CEQA Guidelines section 15152(f)) or "not examined in the program EIR" (CEQA Guidelines section 15168). The initial study addresses each resource area, and examines whether the PEIR provides an adequate analysis of the project's impact on that resource area. Where the project might have significant impacts that have not been adequately addressed in the PEIR, either due to the nature of the project, or due to new information that was not previously available, those issues were carried forward for detailed analysis. Where the PEIR provided adequate analysis of a particular resource or the initial study determines that the impacts would be less than significant (with or without mitigation), those issues are "scoped out" from analysis in the SEIR. That is consistent with the scoping process (whether or not the EIR tiers from prior EIRs), and with the approach called for under CEQA Guidelines sections 15152 and 15168.

In draft SEIR Appendix B, the analysis focuses on whether the prior analysis remains valid and whether the proposed project would cause site-specific impacts not anticipated by the previously prepared programmatic analysis in the PEIR. To the extent that the prior "first-tier" analysis (e.g., of the general consequences of developing the overall area plan) remains valid, the planning department concludes that there was no need for additional, duplicative analysis. Where existing analyses or existing standards or mitigation requirements were insufficient to ensure the avoidance of significant effects or the mitigation of such effects to less than significant levels, the planning department address the topics in further detail in the draft SEIR.

As stated on draft SEIR p. 1-3, the planning department determines that one or more of the conditions for a subsequent EIR are met for the proposed project, and that a SEIR is therefore warranted, including the fact that the proposed project would result in new significant impacts and substantially more-severe significant impacts than previously identified in the PEIR for transportation and circulation, air quality, and noise.

SEIR Appendix B determines that the proposed project options would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR on the following resources: Land Use and Land Use Planning (SEIR Appendix B, Section E.1); Aesthetics (Section E.2); Population and Housing (Section E.3); Cultural Resources (Section E.4); Greenhouse Gas Emissions (Section E.9); Wind (Section E.10); Shadow (Section E.11); Recreation (Section E.12); Utilities and Service Systems (SEIR Section E.13); Public Services (Section E.14); Biological Resources (Section E.15); Geology and Soils (Section E.16); Hydrology and Water Quality (Section E.17); and Hazards and Hazardous Materials (Section E.18).

The PEIR did not specifically address impacts associated with tribal cultural resources, mineral resources, agriculture and forest resources, and wildfire, which are included in the planning department's current checklist. Draft SEIR Appendix B determines that the proposed project would result in either no impact, less-than significant impact, or less-than-significant impact with mitigation on these resources: Tribal Cultural Resources (Section E.5); Mineral Resources (Section E.19); Energy (Section E.20); Agriculture and Forest Resources (Section E.21); and Wildfire (Section E.22).

In each of these sections, draft SEIR Appendix B properly explains why the project would not have new significant impacts or substantially more severe significant impacts than those previously identified in the PEIR. The draft SEIR acknowledges the conclusions of the initial study on p. 1-3 and refers to draft SEIR Appendix B, for further details.

The proposed project constitutes a later project within the scope of the PEIR. However, the planning department did not rely on this conclusion to avoid preparing a project-specific EIR for the proposed project or to scope out any impact that remained potentially significant after mitigation identified in the initial study or the PEIR. The preparation of the draft SEIR fully complies with CEQA, the CEQA Guidelines, and chapter 31 of the San Francisco Administrative Code.

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## *Comment CEQA-2: Existing Setting and Baseline*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-15
I-BARISH3-21
I-BELBIN-1
I-BELBIN-4
I-BERNSTEIN1-2
I-BERNSTEIN1-4
I-BERNSTEIN3-1
I-BERNSTEIN4-3
I-BERNSTEIN5-2
I-E.HANSON-4
I-E.HANSON-5
I-E.HANSON-8
I-HANSON4-2
I-JA1-2
I-JA11-2
I-JA12-1
I-JA14-1
I-JA4-1
I-KOPP-3
I-RHINE-1
I-SIMON-1
I-SIMON-5
I-TARQUINO-3
I-TIMA-2
I-VESSELENYI-1
I-WILENSKY-1
I-WORLEY-1
O-WPA3-4

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"Current Reservoir student parking is an existing physical condition. This physical reality cannot be ignored. Removal of student parking will have significant impact on student enrollment and attendance."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [*I-BARISH3-15*])*

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"Project Overview, 2.A

The DSEIR does not conform to California Code of Regulations, Title 14, 15125 (a) and (c).

According to the DSEIR, p. 2-1: The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

This Project Overview is inadequate, and does not conform to California Code of Regulations, Title 14, 15125 (a) which states: An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. . . . The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

City College, Archbishop Riordan High School, and Lick Wilmerding High School are all large institutions in the vicinity of the Project. But the DSEIR does not always consider impacts of the Project on these institutions. Accordingly, the DSEIR is inadequate and must be revised to comprehensively review all the environmental impacts on these locations.

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [*I-BARISH3-21*])*

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""An EIR is supposed to give a description of the existing vicinity. Yet the Reservoir EIR Project SEIR's (Subsequent EIR) description limits it to the Reservoir lot/site itself.

This failure to place CCSF in the description will undermine CCSF's future.

Once the Reservoir Project gets built, the City and developers will establish the Project to be the "baseline existing condition." And at that point any future CCSF FMP projects will have to answer for CCSF's adverse impacts on the Reservoir Project.

BOT and Administration need to change its stance of being antagonistic to students, while being servile to the Reservoir Project. BOT and Administration need step up to defend CCSF interests, instead.

During the accreditation crisis many of us fought diligently to restore the BOT to power. Please don't continue to disappoint us.

To address the deliberate exclusion of CCSF from the description of the "Existing Setting", I have submitted the attached written comment. Here are excerpts:

INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already stated the following:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

Project Description

2.A Project Overview

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

California Code of Regulations Title 14 section 15125

California Code of Regulations Title 14 section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the

significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

In order for the public and decision-makers to acquire the "most accurate and understandable picture possible of the project's impacts", we are left with the SEIR's 2.A Project Overview contained in Chapter 2, Project Description. Contrary to § 15125's requirement for a description of the existing condition "in the vicinity of the project", SEIR 2.A only provides a description of the project site:

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

THIS FAILS § 15125's REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY. requirement

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context."

*(Charles Belbin,Email, September 22, 2019 [*I-BELBIN-1*])*

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"THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c)."

*(Charles Belbin,Email, September 22, 2019 [*I-BELBIN-4*])*

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"A separate topic. The description of the project setting baseline existing condition is inadequate. The primary use of the lower reservoir, since 1946, has been parking. Today, it's spillover student parking. Except for the years 1946 to 1954 and that was the time that the college, itself, occupied the entire Balboa Reservoir site."

*(Harry Bernstein, CPC Hearing, September 12, 2019 [I-BERNSTEIN1-2])*

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"I'm sorry there was an oversight for my comments. You have an empty lot on the cover of this SEIR. I'd like to give this, copies of this for the record and for the members. If there a possibility to do that?"

*(Harry Bernstein, CPC Hearing, September 12, 2019 [*I-BERNSTEIN1-4*])*

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"The cover image for the Draft SEIR of the Balboa Reservoir Project, case no. 12018-007883ENV, shows a large and nearly empty lot and thus does not fairly represent the actual usage of the Lower Reservoir site when City College is in session.

To support this contention, I append the following newspaper story from the Guardsman newspaper (CCSF) from September 13, 2017 titled "Parking crisis raises Balboa Reservoir Project concerns." The story was written by Bethaney Lee; photo credits for Otto Pippenger.

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN3-1*])*

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"One of the greatest inadequacies of the Draft SEIR is that it is obligated to define existing conditions, not only at the site of the proposed development but also in the vicinity. The description is limited to the physical location and the perimeters of the lover Balboa Reservoir lot. It fails to mention that except for the approximately two years when the Reservoir site was excavated for the purpose of creating a possible reservoir (1956-1958), the land was used by City College since 1946—

From September 13, 1946 to 1954, the College occupied for the site, taking over the former WAVES barracks—this was called West Campus. After being evicted over the years 1954-55, enabling a move to the newly built classroom, Cloud Hall, the existing facilities were razed and the Reservoir site was prepared. Parking was made available to City College again starting in 1958, first in one of the two Reservoir basins and later in both. City College spent considerable money raising the level of what is today the upper Reservoir site and eventually secured ownership of its 10+ acres in a land swap from the Public Utilities Commission. So this historic use of the site, and the impact of its loss should not be ignored in this planning process. More on this further below."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN4-3*])*

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"2) recognition of the College's long-term use of the lower Balboa Reservoir—the proposed development site—since 1946, as either part of the campus ("West Campus") and the 60+ years that the Lower Reservoir site has been used by students as a parking lot. Other factors are impacts on air quality and more pollution during construction."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-2*])*

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"The existing condition of the 17 acre PUC owned land is that it is not only surrounded on two sides by educational institutions with more schools located in close proximity, its current use is by City College and has been so since the 1940's. Historically the college has always used this public space and this fact is downplayed in the SEIR restricting the impact on the college to "Areas of Known Controversy and Issues to be Resolved". The historical uses of the site have not been documented in the SEIR in context of historical significance of the site and to the civic functions of the City have been minimized."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [*I-E.HANSON-4*])*

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"3. The SEIR does not clearly document the existing conditions of parcel sharing between the PUC and CCSF, or the lengthy agreements that went into place to split the lot when CCSF decided to build upon its half of the shared parcel. If the plan is to complete the lot spilt when the land is transferred to a private developer, then this should be documented with clear reference to the sharing of the parcel in its existing condition, and spell out the consequences of a potential lot split as it constitutes transfer of lands from public to private ownership. In this context there is no analysis of the amount of public lands or other public land projects in the SEIR. Land being something of very limited supply on the peninsula the impacts of public vs. private ownership is of relevance to future potential projects and civic developments."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [*I-E.HANSON-5*])*

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"6. To be more specific: The law states (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. The current SIER does not do this choosing instead to substitute an analysis restricted to the "project site" this substitution invalidates the impact analysis."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [*I-E.HANSON-8*])*

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"The SEIR also fails to account for the existing conditions."

*(Christine Hanson, Email, September 23, 2019 [*I-HANSON4-2*])*

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"Okay, so I'll go to two specifics. One is the environmental setting. Okay, that's critical for CEQA, setting up the environmental baseline setting. The description that's given in the SEIR basically just talks about the plot itself. But CEQA, in terms of the Code of California Regulations, says you have to talk about the vicinity, not just the plot, itself. So, that, already, right there is in violation of CCR 15125. You can look it up, okay."

*(Alvin Ja, CPC Hearing, September 12, 2019 [*I-JA1-2*])*

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**"COMMENT ON INITIAL STUDY:**

**LAND USE**

The Initial Study's B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*

Going to the referred Ch.2 Project Description produces this:

Project Description

**2.A Project Overview**

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

This fails to acknowledge that schools are central feature in the immediate vicinity of the Reservoir: City College, Riordan, Lick Wilmerding.

The Reservoir site has historically been used by City College for decades. The Initial Study/SEIR fail to acknowledge this fact.

City College is the main educational, economic, cultural feature of the immediate Reservoir vicinity. The Initial Study/SEIR fail to acknowledge this fact.

City College, Riordan, Lick Wilmerding are the main target destinations for the immediate Reservoir vicinity. The Initial Study/SEIR fail to acknowledge this fact.

I contend that these facts have been deliberately omitted from the description of the baseline existing condition because it is an inconvenient truth. These facts are inconvenient truths that would inhibit the privatization of public assets (though disguised misleadingly as an affordable housing project).

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

From the Association of Environmental Professional's (AEP) CEQA Portal:

*What Are Baseline and Environmental Setting?*

*Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting.*

*Why Is Baseline Important?*

*Establishing an appropriate baseline is essential, because an inappropriately defined baseline can cause the impacts of the project either to be under-reported or over-reported. A considerable number of CEQA documents have been litigated over the choice of a baseline for a given project, and many CEQA documents have been invalidated for the use of an inappropriate baseline (see Important Cases below).*

From 14 CCR 15125:

***(a)** An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

**The draft SEIR/Initial Study is fundamentally defective because it fails to recognize the baseline condition of City College's prominence and importance in the immediate vicinity of the Reservoir."**

*(Alvin Ja, Email, September 11, 2019 [*I-JA11-2*])*

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**"INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING**

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already written the following:

> The Initial Study's B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*
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> Going to the referred Ch.2 Project Description produces this:
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> Project Description
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> 2.A Project Overview
>
> *The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue*

*commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

Chapter 3 is entitled "Environmental Setting, Impacts, and Mitigation Measures." It states: *"Sections 3.B through 3.D each includes descriptions of the environmental setting and regulatory framework."*

In a careful search for descriptions of the environmental setting within Sections 3.B, 3.C, and 3.D, here are the descriptions provided:

3.B.4 Existing Conditions:

*The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land Use Planning, p. B-12.*

3.C.3: Summary of BPS Area Plan PEIR Noise Section:

**Balboa Park Station Area Plan PEIR Setting**

*The noise setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan [Program] Environmental Impact Report (PEIR) differs from the existing setting today primarily in terms of the increase in traffic volumes resulting from overall employment growth in the San Francisco area and number of noise sources that exist in the area. However, there was a decrease in annual enrollment at the adjacent City College Ocean Campus of nearly 25 percent between 2008–2009 and 2017–2018, the most recent year for which data are available.151 In addition, since the December 2008 certification of the PEIR, development has occurred adjacent to the project site. City College filled the east basin of the reservoir site and raised its grade to match surrounding terrain to the east, and constructed the Multi-Use Building.*

3.C.4 Environmental Setting:

3.C.4 contains technical information regarding noise. There is no content describing the overall existing setting.

3.D.3 Summary of BPS Area Plan Quality Section:

**Balboa Park Station Area Plan PEIR Setting**

*The air quality setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan Program EIR (area plan PEIR, or PEIR) differs from the existing setting today in terms of air quality conditions, the regulatory environment, and in the level of available information with respect to health risks and hazards. Specifically, at the time of the PEIR, localized concentrations of criteria air pollutants were higher than what are monitored today as many of the regulatory improvements implemented since then have improved air quality conditions. As an example, the PEIR reported that particulate emission standards were regularly exceeded in San Francisco. Since 2007, the*

*effect of regulatory changes has resulted in a reduction in the number of violations of the particulate matter standard despite subsequent strengthening (i.e., more health protective) of the ambient particulate standards.*

3.D.4 Environmental Setting:

3.D.4 Environmental Setting contains information regarding climate and meteorology, and pollutants. There is no content describing the overall existing setting.

**California Code of Regulations Title 14 Section 15125**

California Code of Regulations Title 14 Section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

*§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

The descriptions of the physical environmental setting in 3.B, 3.C, and 3.D are limited to descriptions involving transportation, noise, and air quality.

Thus, in order for the public and decision-makers to acquire the "most accurate and understandable picture possible of the project's impacts", we are left with the SEIR's 2.A Project Overview contained in Chapter 2, Project Description.

Contrary to § 15125's requirement for a description of the existing condition "in the vicinity of the project", SEIR 2.A only provides a description of the project site:

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

**THIS FAILS § 15125's REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.**

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

*§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

> **Subject:** Input for planning – CCSF must be considered
>
> **Comments:**
>
> **CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.**
>
> **Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!**
>
> **Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!**

**THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c).**"

*(Alvin Ja, Email, September 14, 2019 [*I-JA12-1*])*

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"The draft EIR for the Reservoir Project provides an example of the deliberate downplaying of City College's position in the vicinity of the Project.

The SEIR's description of the baseline environmental omits any mention of City College. In doing so, the SEIR violates the requirements of 14 CCR 15125 (a).

MISREPRESENTATION OF THE REQUIREMENTS OF 14CCR 15125(a)

**The Planning Dept has made what I can only interpret to be a deliberate misrepresentation of the requirements of Title 14, Division 6, Chapter 3, Article 9, Section 15125, "Environmental Setting."**

**The SEIR substitutes "project site" for "vicinity of the project" when it describes its proclaimed "consistency" with §15125(a).**

**A proclaimed consistency is not the same as compliance with a REQUIREMENT.**

**THE SEIR VIOLATES THE REQUIREMENTS OF §15125(a).**

The SEIR's 3.A.2, *Overall Approach to Impact Analysis* provides the following misrepresentation of §15125(a):

> As described in SEIR Chapter 1, Introduction, this SEIR is a project-level EIR that is tiered from a previously certified program-level EIR, namely the PEIR. As a project-level EIR and consistent with CEQA Guidelines section 15125(a), the impact analysis is generally based on potential physical effects of the project compared to existing or baseline conditions of the physical environment at the project site at the time of publication of the NOP, which was in October 2018.

Comment:

- §15125(a) is not just a "CEQA Guideline"; it is the LAW.
- The language of the §15125(a) law uses the term "must", which is a REQUIREMENT.
- The law states: *(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project.*
- The SEIR's substitution of "project site" in place of the required "in the vicinity of the project" invalidates the Balboa Reservoir Impact Analysis.

Here is §15125(a):

> *a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

**FAIL AND FUBAR.**"

*(Alvin Ja, Email, Sseptember 16, 2019 [*I-JA14-1*])*

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"3.B.4 Existing Conditions [Transportation & Circulation]

> *The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land Use Planning, p. B-12.*

This description of the existing condition is less than adequate. This description avoids and evades the existing condition of the project site being a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service.

Although 2.D.2, Project Site notes the site's use by CCSF stakeholders, it fails to acknowledge the reality that the current use of the Reservoir serves a public benefit in providing physical access to education.

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

From the Association of Environmental Professional's (AEP) CEQA Portal:

> *What Are Baseline and Environmental Setting?*
>
> *Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting.*
>
> *Why Is Baseline Important?*
>
> *Establishing an appropriate baseline is essential, because an inappropriately defined baseline can cause the impacts of the project either to be under-reported or over-reported. A considerable number of CEQA documents have been litigated over the choice of a baseline for a given project, and many CEQA documents have been invalidated for the use of an inappropriate baseline (see Important Cases below).*

**The draft SEIR is inadequate because it fails to recognize the baseline condition of the Reservoir's current use by City College to serve a public benefit for its students.**"

*(Alvin Ja, Email, August 26, 2019 [*I-JA4-1*])*

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"Moreover, if either of those two projects is built, that will constitute the "baseline existing condition". Any future City College facilities must not violate with adverse effect on the so-called reservoir project."

*(Quentin Kopp, Email, September 23, 2019 [*I-KOPP-3*])*

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"Hello. My name is Marcie Rhine. And I just wanted to say a couple quick things. I wasn't going to talk, but I was so moved by what the City College students had to offer that I wanted to just underscore that I think there is a very critical flaw in this draft EIR that it does not address City College either as a part of the overall setting, or as a vital public service."

*(Marcie Rhine, CPC Hearing, September 12, 2019 [*I-RHINE-1*])*

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"This letter is to describe an adverse impact on City College of San Francisco (CCSF) of the development in the Balboa Reservoir, which has NOT been addressed by the Draft Subsequent Environmental Impact Report (DSEIR). The Balboa Reservoir Project DSEIR fails to place CCSF as being the main feature of the vicinity's "existing or baseline conditions." Since CCSF is not made the main feature of the baseline condition, the Reservoir's impact on CCSF is discounted and minimized as "less than significant." This is an unacceptable and justifiably illegal consequence of the DSEIR."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-1*])*

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"The description of the existing condition avoids identifying the project site as a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service.

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-5*])*

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"**The DRAFT SEIR is inadequate because it fails to recognize the baseline condition of the Reservoir's current use by City College to serve a public benefit for its students.**"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-3*])*

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"In regards to the history of this lot, I was really disenchanted that your SEIR was showing such a lousy picture to mislead everybody. That's a sales pitch. Can you imagine if you have 1,200 units right at the entrance of freeway 280, and that will not solve apartments for San Francisco. They will all go down to Silicon Valley.

I asked the developer, could he put restrictions on it and he denied my request. He said that would not be possible."

*(Hedda Tima, CPC Hearing, September 12, 2019 [*I-TIMA-2*])*

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"The Draft Environmental Impact Report is not valid as it does not include City College as a primary feature of the neighborhood and does not consider the project's impact on student's access to City College."

*(Hold Sall Vesselenyi, Email, September 23, 2019 [*I-VESSELENYI-1*])*

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"As a San Franciscan, I of course recognize the need for more housing, especially affordable housing. I am however very concerned about the housing project proposed for the Balboa Reservoir, especially its impact on City College and I am especially concerned that the Draft SEIR fails to recognize CCSF as the main feature of the vicinity's 'existing or baseline conditions'"

*(Debra Wilensky, Email, September 23, 2019 [*I-WILENSKY-1*])*

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"The DRAFT SEIR is inadequate because it fails to place CCSF as the main feature of the vicinity's "existing or baseline conditions"

The DSEIR does not include CCSF as the main feature of the baseline conditions, despite the fact that CCSF abuts the parcel and has utilized it since 1946. CCSF is one of the most treasured institutions in San Francisco, offering higher public education to a wide range of communities, and a life line for many marginal and disenfranchised communities. Its value is incalculable. This omission means that, going forward, CCSF development priorities will become secondary to the interests of the Reservoir Project since the Reservoir Project will be considered the baseline condition."

*(Jennifer Worley, President, AFT 2121, Email, September 23, 2019 [*I-WORLEY-1*])*

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"The number of vehicles that currently use the East Basin and West Basin parking lots are not accurately described in the DSEIR. In fact, on the very cover of the DSEIR is a picture of only the lower West Basin with only a few cars present. Attached as Exhibit 2 is an accurate picture of both the East Basin and West Basin taken at a peak period when student classes are in session. As you can see, the parking lots are full, with numerous cars parked in the CCSF parking spaces as well as in the parking lot which is the Project site."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-4*])*[16]

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## Response CEQA-2: Existing Setting and Baseline

The comments state that the environmental setting and baseline descriptions in the draft SEIR do not sufficiently describe the project site and its vicinity, do not acknowledge current use of the site for parking, and do not describe City College as the main feature of the project vicinity's existing and baseline conditions.

The response to the existing setting and baseline comments is organized by the following subtopics:

- CEQA Requirements
- Project Site
- Transportation and Circulation
- Noise
- Air Quality
- History of Project Site
- Draft SEIR Cover

[16] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

### *CEQA Requirements*

The draft SEIR meets CEQA requirements for describing the existing or baseline physical conditions. As stated in the CEQA guidelines or statute text from which the commenters quote, the SEIR must include a description of the physical environmental conditions in the vicinity of the project, and these conditions will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. "Environment" in this context means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic significance.[17] A significant effect on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment.[18] The draft SEIR evaluates impacts on the environment, including objects of historic significance.

CEQA Guidelines section 15125(a) states that an "EIR must include a description of the physical environmental conditions in the vicinity of the project … Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published." Per CEQA Guidelines section 15125(a)(1), the physical conditions existing when the notice of preparation is published was used to establish the baseline for the project-level analysis in the SEIR and initial study. The existing setting in the draft SEIR is therefore reflective of the period on or after the October 10, 2018 notice of preparation publication date.

One commenter notes that any future City College projects will need to address impacts on the project site. As described on draft SEIR p. 3.A-10, City College would act as the CEQA lead agency to conduct the environmental review of the master plan projects. At that time, the City College facilities master plan CEQA process would be required to describe existing physical conditions, and to address cumulative conditions per CEQA Guidelines section 15130. Given future City College projects are not under construction, they are not part of the existing or near-term baseline condition.

Adjacent land uses in the site vicinity, including City College and Archbishop Riordan High School, are described on draft SEIR pp. 2-9 to 2-12. In addition, each draft SEIR section and initial study section describes the existing context of the project site and vicinity relevant to the topic's impact discussions, consistent with CEQA Guidelines section 15125. **Table RTC-4, Location of Existing Setting Descriptions for Each Topic Area**, provides the location of existing setting discussion in each topic area in the draft SEIR and initial study and page numbers showing where the existing setting is described. The subsections following the table provides a description of the existing setting in response to the comments related to the project site, transportation and circulation, noise, and air quality. The existing setting and baseline conditions are adequately described in the draft SEIR per CEQA Guidelines section 15125.

[17] Public Resources Code Section 21060.5. Aesthetics is removed here from the cited definition because the proposed project meets the criteria set forth Public Resource Code Section 21099(d) and as described in SEIR p. 3.A-3.
[18] Public Resources Code Section 21068, 21083, 21100, and 21151

*Project Site*

The use of the project site as a parking lot is acknowledged in draft SEIR Section 2.D.2, Project Site (draft SEIR p. 2-7) and as an existing land use on draft SEIR Appendix B, p. B-13 under Impact LU-1. Impact PS-1 also includes a discussion of the loss of parking at the project site, on draft SEIR Appendix B, pp. B-87 to B-90. Refer to Response TR-6: Parking, on RTC p. 4.C-55 and Response PS-2: Public Services and Secondary Impacts, on RTC p. 4.H-59 as it relates to City College.

**TABLE RTC-4**
**LOCATION OF EXISTING SETTING DESCRIPTIONS FOR EACH TOPIC AREA**

| Topic | Location in Draft SEIR |
|---|---|
| Transportation and Circulation | Draft SEIR pp. 3.B-5 to 3.B-31 |
| Noise | Draft SEIR pp. 3.C-6 to 3.C-11 |
| Air Quality | Draft SEIR pp. 3.D-3 to 3.D-21 |
| Land Use and Land Use Planning | Draft SEIR Appendix B, p. B-13 |
| Aesthetics | Not Applicable. Public Resources Code section 21099(d) provides that aesthetic impacts of a residential mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment. |
| Population and Housing | Draft SEIR Appendix B, p. B-18 (construction jobs)<br>Draft SEIR Appendix B, p. B-19 to B-21 for the Balboa Park Priority Development Area and citywide (population, housing, and employment) |
| Cultural Resources | Draft SEIR Appendix B, p. B-27 (site history and past reconfiguration)<br>Draft SEIR Appendix B, p. B-28 (archeological resources) |
| Tribal Cultural Resources | Draft SEIR Appendix B, p. B-34 |
| Greenhouse Gas Emissions | Draft SEIR Appendix B, pp. B-37 to B-28 |
| Wind | Draft SEIR Appendix B, p. B-42 |
| Shadow | Draft SEIR Appendix B, pp. B-46 to B-47 |
| Recreation | Draft SEIR Appendix B, pp. B-52 to B-54 |
| Utilities and Service Systems | Draft SEIR Appendix B, pp. B-59 to B-60 (water supply)<br>Draft SEIR Appendix B, pp. B-73 to 75 (wastewater/stormwater collection and treatment)<br>Draft SEIR Appendix B, pp. B-76 to B-77 (solid waste) |
| Public Services | Draft SEIR Appendix B, p. B-82 (fire protection services)<br>Draft SEIR Appendix B, p. B-83 (police protection services)<br>Draft SEIR Appendix B, p. B-85 to B-86 (public schools)<br>Draft SEIR Appendix B, p. B-87 (public libraries)<br>Draft SEIR Appendix B, pp. B-87 to B-89 (other public facilities – City College) |
| Biological Resources | Draft SEIR Appendix B, pp. B-93 to B-94 |
| Geology and Soils | Draft SEIR Appendix B, pp. B-100 to B-101, B-104 |
| Hydrology and Water Quality | Draft SEIR Appendix B, pp. B-108 to B-110 |
| Hazards and Hazardous Materials | Draft SEIR Appendix B, pp. B-121 to B-123 |
| Mineral resources | Not Applicable |
| Energy | Draft SEIR Appendix B, pp. B-126 to B-127 |
| Agriculture and Forest Resources | Not Applicable |
| Wildfire | Not Applicable |

### *Transportation and Circulation*

Draft SEIR Section 3.B.4, Existing Conditions, defines the study area and describes aspects of the transportation network relevant for the transportation analysis. Draft SEIR pp. 3.B-5 to 3.B-31 describes regional roadways, local roadways, vehicular turning movement counts collected at the 23 study intersections (including five City College driveway locations), walking conditions, bicycle facilities and circulation, public transit conditions, emergency access conditions, vehicle miles traveled, and loading conditions.

### *Noise*

Draft SEIR Section 3.C.4, Environmental Setting, describes existing noise sources, provides short- and long-term ambient noise measurements taken on the project site and vicinity, and describes existing and future sensitive receptors. As shown on draft SEIR pp. 3.C-8 to 3.C-9, seven noise measurements were taken at the project site and surrounding area including at the City College Multi-Use Building to characterize the background noise environment in the project vicinity.

### *Air Quality*

Draft SEIR Section 3.D.4, Environmental Setting, identifies the area relevant for impacts to air quality (the San Francisco Bay Area Air Basin) and describes ambient air quality, existing sources of pollution, and sensitive receptors (draft SEIR pp. 3.D-3 to 3.D-21). The section includes a description of sensitive receptors in the vicinity of the project site. As described on draft SEIR p. 3.D-20, the sensitive receptors include a representative sample of known residents (child and adult) in the surrounding neighborhood, and other sensitive receptors (school children, daycare facilities, etc.) located *in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks within the project vicinity* [emphasis added].

### *History of Project Site*

The history of the project site, starting with purchase of the site by the City in 1930, is described under Impact CR-1 (draft SEIR Appendix B, p. B-27). As noted on draft SEIR Appendix B, p. B-27, a historic resource evaluation for the project site was prepared in October 2018. The historic resource evaluation documents the history of the site focusing on SFPUC's use and ownership of the site (1930-present), including the various reconfigurations the site has undergone over the years. The evaluation and planning department concluded that, based on the evaluation, the project site is not considered a historical resource for purposes of CEQA (draft SEIR Appendix B, p. B-27). As discussed on draft SEIR Appendix B, p. B-23, the City College campus was not evaluated for potential historic significance as part of the PEIR because City College of San Francisco is not under the jurisdiction of the City and County of San Francisco.[19] However, potential historic resources associated with City College are acknowledged on draft SEIR Appendix B, p. B-32, which also notes that the Science Building and Cloud Hall are the only two individually significant historic architectural resources located on the City College Ocean Campus.[20] The nearest potential historic resource (due to the building's age) is the City College Creative Arts

[19] San Francisco Planning Department, *Balboa Park Station Area Plan Final Environmental Impact Report*, pp. 305–307, December 4, 2008.

[20] City College of San Francisco, *CCSF Master Plan Draft EIR,* January 30, 2004.

Extension building, which is approximately 600 feet away from the project site, which is too far away to have an indirect impact on the potential historic resource (refer to draft SEIR Appendix B p. B-32).

Impact CR-1 also acknowledges that the land has been leased to various tenants since the 1950s, including City College, and describes the lot split history. As described on draft SEIR Appendix B, p. B-27, "[b]y 2004 or 2005, the east-west embankment that separated the two basins were removed, and the reservoir was reconfigured as one large basin. In 2008, the eastern half of the reservoir site was filled and raised to the Frida Kahlo Way grade, once again reconfiguring the site into western and eastern portions." The project site is now a single existing parcel separate from the east basin/City College parcel. Previous actions that have been completed prior to the initiation of the environmental analysis are considered part of the environmental setting, and not required to be analyzed under CEQA.

### *Draft SEIR Cover*

Several commenters also state that the draft SEIR cover image does not fairly represent the existing land use because the parking lot in the image is empty. The cover image fairly represents existing conditions.

The images provided by the commenters show the parking conditions at the Balboa Reservoir site on August 28, 2017, at 9:30 a.m., 11:30 a.m., and 12:30 a.m. from different vantage points. These images are included in **Figure RTC-1, Parking Occupancy Photos Provided by Commenters**, for reference.[21] These photos were taken within the first week of instruction at City College.[22] It is acknowledged on draft SEIR Appendix B, p. B-88 that campus parking occupancy is highest during the first week of instruction in August and around 11 a.m., with an occupancy range of 78 to 90 percent during the limited peak period. Therefore, the images provided by the commenters are consistent with the occupancy patterns during the first week of instruction and disclosed in the draft SEIR.

As noted on draft SEIR Appendix B, p. B-89, campus parking occupancy during 10 a.m. to 4 p.m. is in the 50 to 60 percent range during other periods of the school year. At other times of the day and year, the existing project site has less parking occupancy. **Figure RTC-2, Parking Occupancy at the Project Site**, is provided for informational purposes to show the occupancy of the parking lot during other periods of the year during regular instruction times[23] (i.e., not during holidays, midterms, or finals), including those periods with less parking occupancy. The cover image is from April 18, 2018, and intended to depict the project site. It is not necessary to depict several different time periods with different parking occupancies on the cover image. Further, the department did not rely upon the cover image alone for the environmental impact analysis, and the comments on the cover image do not raise issues concerning the adequacy or accuracy of the SEIR's coverage of environmental impacts under CEQA.

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[21] The images provided in the commenters submittal appear to be a black and white scan of a printed article. Figure RTC-1 includes the same photos (in color) obtained from the same article available online.

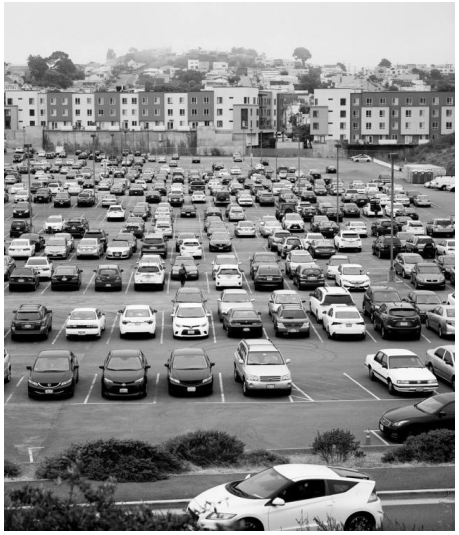
[22] In 2017, fall instruction began on August 21. *https://www.ccsf.edu/en/educational-programs/class-schedule/fall_semester_calendar.html.* Accessed December 22, 2019.

[23] The 2017 and 2018 schedules are available at *https://www.ccsf.edu/en/educational-programs/class-schedule/fall_semester_calendar.html* and *https://www.ccsf.edu/en/educational-programs/class-schedule/spring_semester_calendar.html*, respectively.

August 28, 2017 - 9:30 am

August 28, 2017 - 10:30 am

August 28, 2017 - 11:30 am



August 28, 2017 - 12:30 pm

SOURCE: Taken on August 28, 2017 by Otto Pippenger.
https://sunnysideassociation.wordpress.com/2017/09/26/guardsman-parking-crisis-raises-balboa-reservoir-project-concerns/

Case No. 2018-007883ENV: Balboa Reservoir Project

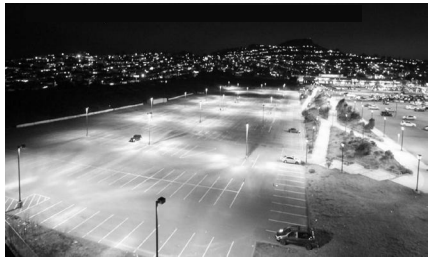
**Figure RTC-1**
Parking Occupancy Photos Provided by Commenters

Thursday December 7, 2017 - 9 am

Thursday December 7, 2017 - 12 pm

Thursday December 7, 2017 - 4 pm

Thursday December 7, 2017 - 7 pm



Wednesday January 31, 2018 - 9 am

Wednesday January 31, 2018 - 11 am

Wednesday January 31, 2018 - 4 pm

Wednesday January 31, 2018 - 7 pm

Wednesday April 18, 2018 - 9 am

Wednesday April 18, 2018 - 11 am

Wednesday April 18, 2018 - 4 pm

Wednesday April 18, 2018 - 7 pm

SOURCE: AvalonBay Communities + Bridge Housing, July 9, 2018

Case No. 2018-007883ENV: Balboa Reservoir Project

**Figure RTC-2**
Parking Occupancy at the Project Site

## *Comment CEQA-3: Administrative Record*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HANSON1-1
I-HANSON5-1

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"Thank you for your time. My name's Christine Hanson. And I don't know if you can see this, but the cars in this lot -- I don't think you're showing the picture. I'll just do my comment, then.

The administrative record and the draft SEIR has little information about the pressure that City agencies have exerted upon the creation of City College's Facilities Master Plan. The meetings, ongoing today, began during the time of the state takeover of the school. City agencies began meeting then with the state-imposed administration. The administrative record in the draft SEIR makes a very slim mention of those meetings.

A public records search in 2017 showed that by then at least 17 of these private meetings had occurred, mostly at SF Planning. It was news to the board of trustees, and news to Trustee Davila, who sits on the Balboa Reservoir CAC, representing City College.

Kitchell, City College's facility planners, whose work is included in this SEIR, answers to the question: What is the appropriate place for city agencies to address the Facilities Master Plan was; in public comment.

If you take the administrative record presented in the draft SEIR at face value, you would get the impression that this, indeed, has been the behavior of city agencies. But this is not what the collection of emails, agendas, meetings, and notes surrounding these meetings show. The agendas for those meetings are mostly similar, with the top item being the City College Facilities Master Plan.

Your planner, Jeremy Shaw, even attended one of the consultant job interviews on June 8th, 2015, with the blessing of a former state appointed facilities head at City College. The Facilities Master Plan has been upgraded twice and rebooted once. The intrusion of city agencies into a plan that should have been focused on the school's Education Master Plan and focused on the needs of students has, instead, been formed around a private development that has literally cost the taxpayers millions in bond money.

The collection will be forwarded to you as written public comment. Thank you."

*(Christine Hanson, CPC Meeting, September 12, 2019 [*I-HANSON1-1*])*

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"The Administrative record of the draft SEIR, is incomplete and misleading in regards to a portion of the communications between multiple City agencies and City College Administrative staff. The communications NOT INCLUDED in the draft SEIR were based on multiple subjects including the creation of the City College Facilities Master Plan (FMP), communications around transportation,

parking and the presentation of the City's Transportation Demand Management (TDM) plan. They show that the administrative interaction between City Agencies and City College Administrators has been about the exertion of control upon the school's sovereign process, focusing pressure and attention on a small minority of administrators— most of who were hired by the State imposed Trustee and NONE of whom had any experience or even operational knowledge of the school during its robust days before the accreditation crisis.

The entries INCLUDED in the Administrative record of the draft SEIR in regards to City College consist primarily of more recent communications between City agencies, City College Chancellor Mark Rocha, City College's Facilities planner Kitchell, and consultant Charmaine Curtis. The Facilities Master Planning process at City College which begun during the state takeover of the school, is barely noted in the DSEIR Administrative record even though many meetings were held at that time between City agencies and City College staff.

A public records search by City College Community members in August 2017 showed that by that time at least 17 of these earlier meetings had occurred at SF Planning offices or by phone. The Board of Trustees did not know of these meetings, including Trustee Davila who represents City College on the Balboa Reservoir CAC.

The use and frequent appearance of the City College Facilities Master Plan throughout the draft SEIR cannot be separated from the Administrative record, therefore the Administrative record of transactions between City Agencies and City College staff is INCOMPLETE. Even when considering all of the communications in this public comment the Administrative Record will still fall short of accurately depicting the depth of influence that San Francisco Planning, San Francisco Municipal Transportation Agency, SF Office of Employment and Workforce Development, and San Francisco Public Utilities Commission have inflicted upon the planning for City College in the interests of a private development, in the name of, but instead of, the educational planning needs of the school.

The bottom line is that most of the stakeholders at City College know very little about the true potential impact of this project and when the effects play out it will affect the overall health of the school and the people who support it. **For this reason, Planners evaluating this DSEIR must take a close and careful look at the administrative record and make inquiries into the process that has brought the DSEIR for Balboa Reservoir to this stage because the Administrative record that SF Planning staffers have submitted is incomplete.**"

*(Christine Hanson, Letter, September 23, 2019 [*I-HANSON5-1*])*[24]

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[24] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

## Response CEQA-3: Administrative Record

The comments state that correspondence regarding development of the City College facilities master plan must be included in the administrative record of the proposed project.

The commenter requests that additional correspondence and meeting materials relevant to a separate project, the City College facilities master plan, be included in the administrative record for the proposed project. Pursuant to Public Resources Code section 21167.6(e), the record of proceedings consists of many project documents and materials, including all written evidence or correspondence submitted to, or transferred from, the respondent public agency with respect to the proposed project, and any other written materials relevant to the respondent public agency's decision on the merits of the proposed project. The administrative record must contain the record of proceedings for a project from the time the project application was deemed complete by the planning department.

The Balboa Reservoir project's administrative record contains the draft SEIR and all other documents submitted to, directly cited by, or relied on by the lead agency and its environmental consultants in the preparation of the draft SEIR following the project's environmental application submittal on May 31, 2018. The planning department consulted with Rueben Smith of City College (Interim Vice Chancellor of Facilities, Planning, and Construction), and relevant communications and reference materials regarding City College cumulative projects are included in the project's administrative record, as appropriate.

The additional correspondence submitted by the commenter do not represent materials relevant to the preparation of the draft SEIR. The planning department and other city agencies regularly collaborate with other agencies that could impact the city. The correspondence and materials related to City College's facilities master plan date back to 2015 through 2017, and occur prior to the proposed project's environmental review. The facilities master plan is a separate project undertaken by a different lead agency (City College) that could impact the city, and has independent utility to the proposed project. Therefore, the materials provided by the commenter are not part of the project's administrative record. The planning department will continue to include materials required under Public Resources Code section 21165.6(e) in the record of proceedings that are relevant to the city's decision on the merits of the proposed project.

These comments do not raise significant environmental points or identify issues related to the adequacy or accuracy of the analysis contained in the draft SEIR.

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# 4.B Project Description

The comments and corresponding responses in this section cover topics in draft SEIR Chapter 2, Project Description. These include topics related to:

- Comment PD-1: Construction Schedule
- Comment PD-2: Project Description

## *Comment PD-1: Construction Schedule*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-11

"9. In the Notes section at the bottom of Table 2-2 on p. 2-38, "Phases 1 and 2 could occur simultaneously for a duration of two years following Phase 0." But above, in the same table, Phase 1 and Phase 2 are each estimated to have a duration of 2.5 years. Please explain how the condensed schedule would take two years rather than 2.5 years for Phases 1 and 2."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-11*])*

### Response PD-1: Construction Schedule

The comment requests clarification regarding the compressed construction schedule and why Phases 1 and 2 would be 2.5 years under the six-year scenario, but two years under the compressed schedule.

The construction durations for both scenarios described on SEIR pp. 2-38 to 2-39 are correct and were provided by the project sponsor team. Under the compressed schedule, the vertical construction phases (Phases 1 and 2) would follow Phase 0 and occur concurrently over a shorter period of two years, and assumes weekend work. As acknowledged on SEIR p. 2-39, "a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity."

The text on SEIR p. 2-39 is revised as follows to clarify the compressed schedule:

> As stated in the footnote to Table 2-2, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 under a compressed schedule or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity. Phase 0 would

occur in 2021, followed by Phases 1 and 2 occurring simultaneously for approximately 24 months from 2022 to 2023, and completed by early 2024. The construction analysis in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, is generally based on conservative assumptions where appropriate and described in the "Approach to Analysis" section of the resource topic area.

The above changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

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## *Comment PD-2: Project Description*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-BARISH3-19 | I-PEDERSON2-6 | I-PEDERSON2-8 |
| I-GOMEZ-1 | I-PEDERSON2-7 | O-WPA3-14 |
| I-OSAWA-2 | | |

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"Figures in DSEIR Figures 2-1 through 2-8; Figures 2-9 through 2-12; Figure 2-16; Figures 2-18 through 2-21; Figure 3.B-4; Figures 5-1 through 5-4; Figure 6-1; and Figure 6-2 are inadequate and incorrect. They do not show the alterations to the Upper Lot, where the CCSF Multi Use Building is located, that are included in the Facilities Master Plan, approved by the CCSF Board of Trustees in March, 2018, and the subsequent Plan that was presented to the Board of Trustees for consideration of a San Francisco Bond Measure. Table 3.A-2 describes the New Facilities planned for this area. (P. 3,A-13). Accordingly, these Figures are all misleading and do not accurately represent buildings on the land adjoining the proposed project. The FSEIR must use accurate, updated Figures."

*(Jean B. Barish, Letter, September 23, 2019 [*I-BARISH3-19*])*

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"1) I noticed the impact report mentions the decrease in parking needs after the first week of a semester, and the proposal of a new parking lot that accommodates 750 vehicles. How many spaces would be reserved for students as opposed to residents who would live in the new development?"

*(Wilson Oswaldo Gomez, Email, August 28, 2019 [*I-GOMEZ-1*])*

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"Most critically, according to the proposal the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue. **This would seem to be wholly inadequate**."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-2*])*

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"The Draft is also silent about how the public parking garage will be financed. If the developer will fund the garage with proceeds from the residential development, that raises the question about why those proceeds couldn't instead be used to fund more below-market rate housing. If the public parking garage will be paid for with public funds (either the City's or City College's), that should be disclosed as well. The Draft should address how any subsidy (whether public or private) for the garage would reduce the parking fees and thereby generate additional parking demand, VMT, and GHG emissions.

If the public parking garage will be financed entirely by parking fees paid by users of the garage, the Draft should address whether the garage will be financially viable. Those who currently commute to City College either park for free or pay nominal fees. It is unlikely that they would be willing to pay the kind of substantial fees that would be necessary to pay for construction of a 750-space garage."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-6*])*

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"If the users of the parking garage are instead anticipated to be the residents of the Balboa Reservoir project, that would be an end run around the City's and the developer's agreement that the overall parking ratio for the residential component of the project would by 0.5 parking spaces per residence. Using the public parking garage as residential parking would also mean that the project would exceed the zoning code's maximum 1:1 parking ratio for the site."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-7*])*

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"Finally, the Draft is entirely silent about how the parking rates for the garage would be structured. For example, would the daily rate be lower than 8 hours of the hourly rate? Would weekly, monthly, semester, or annual rates be allowed? If rates for periods longer than one day would be allowed, the Draft should address whether such rates would reduce incentives for commuters to take transit, walk, or bike on days during those periods when the commuter doesn't need to drive. Finally, would the rates and any leasing arrangements be structured so that any employer who pays for spaces within the garage on behalf of its employees would be subject to California's parking cash-out statute? (See Cal. Health & Safety Code, section 43845.) The Draft should address how the fee structure and the applicability of the parking cash-out statute would affect VMT and GHG emissions."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-8*])*

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"A representative of the developer has informed the Chair of the BRCAC that the developer will not develop the 1,550 unit Additional Housing Option. The Planning Department should verify the accuracy of this representation to the BRCAC. If correct, the 1,550 Unit Project option should be added to the list of alternatives considered but rejected by the Planning Department since its development will not be undertaken by the developer."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-14*])*

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## Response PD-2: Project Description Comments and Questions

This group of comments are regarding the project description, figures, or require clarification of the proposed project.

Regarding the project description figures, Figures 2-1 through 2-12, Figure 2-16, Figures 2-18 through 2-21, Figure 3.B-4, Figures 5-1 through 5-4, and Figures 6-1 through 6-2 in the SEIR depict the plan-view diagrams of the proposed project. As described in Response CEQA-2: Existing Setting and Baseline, on RTC p. 4.A-22, per CEQA Guidelines section 15125(a)(1), the physical conditions existing when the notice of preparation is published was used to establish the baseline for the project-level analysis in the SEIR and initial study. The figures in the SEIR reflect the existing conditions and the proposed project. The commenter's statement that the facilities master plan projects should be shown is incorrect, as the City College projects are considered under cumulative future conditions and do not represent existing or near-term baseline conditions.

The 1,550 Additional Housing Option was developed by the City to fulfill the objectives of the general plan to maximize affordable housing and housing in transit-rich neighborhoods (draft SEIR p. 2-1). The draft SEIR analyzes the environmental impacts of the Developer's Proposed Option and Additional Housing Option as proposed.

One comment incorrectly states that the project would have one vehicular inlet point. The proposed circulation of the project site is described in SEIR Section 2.E.8, Transportation and Circulation Plan (SEIR pp. 2-26 to 2-30). As described in SEIR Section 2.E.8 and as shown in Figure 2-12, Proposed Street Type Plan (SEIR p. 2-27), there would be two access points to the project site. Lee Avenue would provide a vehicle travel lane in each direction from Ocean Avenue, and North Street would provide a vehicle travel lane in each direction from Frida Kahlo Way.

The assertion that the use of the public parking as residential parking would exceed the zoning code's 1:1 parking ratio is incorrect. Residential parking would be provided at a 0.5:1 parking ratio. Vehicle parking is described on draft SEIR p. 2-23, and all residential parking would be unbundled (that is, parking would be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units) with the exception of the townhomes, as required by San Francisco Planning Code section 167. As stated on draft SEIR p. 2-23 and as updated in Chapter 2 of this RTC, up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks A, B, C, D, F, and G and in the townhomes. As described in Chapter 2 of this RTC, the proposed up to 750 public parking spaces could be provided in a garage that would be located under Blocks A and B, or in dedicated public parking areas within several of the residential garages, all of which would be separate from the residential parking. The public parking garage spaces would not be sold or leased to project residents and would instead be available to the public (including students). The use of the proposed public parking garage, like the other components of the proposed project, would be addressed through the special use district and/or conditions of project approval.

Two comments ask about financing of, and parking rates that would be charged at the public parking garage that could be developed as part of the proposed project. Project financing, including financing of any potential parking garage, is not directly related to any potential physical effects of

the project and, therefore, financing of the project, including its components, is not a subject of CEQA analysis.

The following is provided for informational purposes. It is anticipated that the public parking garage would be publicly funded but would be financed based on anticipated parking fees; rather, public subsidies for project development are anticipated to be devoted to the affordable housing component and possibly to infrastructure improvements, such as utilities. Rates charged for use of the public parking garage could also be governed by the special use district and/or conditions of approval; it is noted, for example, that rates for new non-accessory parking garages in and near downtown San Francisco and in mixed-use districts throughout the City are subject to planning code sections 155(g) and 303(t), which requires that the rate charge for four hours of parking duration is no more than four times the rate charged for the first hour, and the rate charge for eight or more hours of parking duration is no less than 10 times the rate charge for the first hour. In addition, discounted parking is not permitted for weekly, monthly or similar time-specific periods. This pricing structure is designed to discourage commuter parking, consistent with the City's Transit First Policy (San Francisco Charter, section 8A.115).

Concerning the recommendation that funds used for the proposed public parking garage be instead directed to more housing, this is not the proposed project that is under analysis in the SEIR. However, the draft SEIR acknowledges that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with such projects that provide more off-street vehicular parking. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90 references research that the availability of parking increases vehicular travel and that parking supply can undermine incentives to use transit. In the case of the proposed project, however, the public parking garage(s) included under the Developer's Proposed Option would provide fewer public parking spaces (750) than currently existing on the site (approximately 1,000), meaning that the garage itself would not increase VMT compared to existing conditions. Because of this, and because of existing travel patterns in the project area and the site's transit proximity, infill nature, and mix of uses, the draft SEIR identifies a less-than-significant impact with respect to VMT (Impact TR-5, p. 3.B-79). To the extent that less parking would be provided on site, VMT effects would likely be reduced per capita and would remain less than significant.

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# 4.C Transportation and Circulation

The comments and corresponding responses in this section cover topics in draft SEIR Section 3.B, Transportation and Circulation. These include topics related to:

- Comment TR-1: Existing Conditions
- Comment TR-2: Travel Demand
- Comment TR-3: Walking and Biking Impacts
- Comment TR-4: Transit Impacts
- Comment TR-5: Loading Impacts
- Comment TR-6: Cumulative Impacts
- Comment TR-7: Parking
- Comment TR-8: Increased Traffic Congestion and Associated Impacts
- Comment TR-9: General Comments

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## *Comment TR-1: Existing Conditions*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-GOODMAN-6
I-HOUWER-2
I-KOWALSKI-1
I-OSAWA-4

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Currently muni buses cannot pull over at Howth to drop passengers and delays in bus services occur regularly at this area. A proposed solution to off-ramp directly into a parking garage on the eastern edge of CCSF could directly alleviate some traffic from heading up Ocean Ave to the existing lots at the reservoir. It should be considered as an alternative, and a feasible solution that lessens the impacts of traffic and on public transit that runs along Ocean Ave.

Please take into consideration the impacts on MUNI systems and the need to address the impacts on transit as a serious concern that garners a broader and possible larger solution or alternative that includes cummalative projects and impacts as the main concern and solution to lessen pedestrian injuries, traffic impacts, and ensuring more rapid flow of public transit systems in this area due to the impacts on the second largest transit hub in SF."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-6*])*

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"First of all, anyone who lives in the area understands what a nightmare traffic is already in the morning, afternoon and after work. The busses are already overcrowded with students and commuters. Parking is already virtually impossible with the two existing parking lots for the college."

*(Michell Houwer, Email, September 12, 2019 [*I-HOUWER-2*])*

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"I live along Plymouth Avenue with my wife of 18 years, between San Ramon and Ocean. I can attest to the situation of the violence level due to the parking and driving situation.

Westwood Park was built for Model T's and Model A's. Cars have to pull over all the time. The violence level goes on all the time, day and night.

I leave for work at 4:00 o'clock in the morning. People are going at 40 miles per hour on that street and they're bypassing the stop signs at San Ramon Way. They're also running the red light at Ocean Avenue and Plymouth Avenue."

*(Kevin Kowalski, CPC Hearing, September 12, 2019 [*I-KOWALSKI-1*])*

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"Ocean Avenue is already beset with heavy traffic at most hours of the day. Traffic is often down to a single lane due to Muni traffic, cars turning left, and double-parked vehicles. This will now become intolerably congested. The existence of several offset intersections (at Ocean/Geneva/Frida Kahlo, Ocean/Brighton, and Ocean/Plymouth) also contributes to poor traffic flow and to vehicular safety issues."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-4*])*

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## Response TR-1: Existing Conditions

The comments opine on existing traffic and parking conditions near the project site. These comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comments regarding traffic congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding of the secondary effects of parking conditions with development of the proposed project are addressed in Response TR-7, Parking, on RTC p. 4.C-61.

The response to the existing conditions comments is organized by the following subtopics:

- Existing Conditions
- Parking

### *Existing Conditions*

The draft SEIR adequately and accurately describes the existing traffic, transit, pedestrian, bicycle, loading, and emergency access conditions around the project site in section 3.B.4, Existing Conditions, on draft SEIR pp. 3.B-5 to 3.B-25, and existing conditions on Plymouth Avenue on draft SEIR p. 6-29. Vehicular turning movement counts are presented in Table 3.B-2, Vehicular Counts at Study Intersections on draft SEIR p. 3.B-10. These conditions have been taken into account in the analysis of the proposed project and in the development of mitigation measures.

The transportation study area and study intersections are discussed starting on draft SEIR p. 3.B-5. The transportation study area covers the transportation network within generally two blocks of the project site and includes Ocean Avenue and Plymouth Avenue. The selected 23 intersections within the transportation study area represent access points to the regional highway system, are located along major street corridors serving the project site, and are in the immediate vicinity of the project site. As a result, these locations represent the intersections most likely to be affected by vehicle traffic generated by the project and are representative of impacts that may occur at other locations. These study intersections are identified by number in Table 3.B-2 on draft SEIR p. 3.B-10, and shown on Figure 3.B-1 on draft SEIR p. 3.B-7. Multimodal turning movement counts (i.e., vehicles, pedestrians, and bicyclists) were collected at the 23 study intersections, including existing site driveways, on Wednesday January 31, 2018, and Tuesday August 28, 2018 when City College was in session during the weekday a.m. (7 to 9 a.m.) and weekday p.m. (4 to 6 p.m.) peak periods. Intersection turning movement counts are included in the Transit Assessment Memorandum (see draft SEIR Appendix C2, Attachment A, on pp. 31 to 63).

### *Parking*

As discussed on draft SEIR p. 3.A-3 and p. 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area, and therefore parking is not an environmental impact for the purposes of CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the draft SEIR presents an analysis of secondary environmental impacts related to City College on draft SEIR Appendix B, pp. B-87 to B-90.

For informational purposes, a discussion of existing and with project parking supply and demand is provided in the Non-CEQA Transportation Analysis, which was made available to the public on August 1, 2019. This report is available as part of the administrative record and also included as RTC Attachment 3, Non-CEQA Transportation Analysis.[25] As presented in the Non-CEQA Transportation Analysis – Parking Analysis Memorandum, the observed maximum combined occupancy of the City College surface parking lots occurred between 11 a.m. and 12 p.m. when there were a total of 1,596 cars parked and 578 spaces available (the lots were 73 percent occupied). There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces were observed to be available on weekdays during a.m., midday, and p.m. periods.

[25] Balboa Reservoir – Non-CEQA Transportation Analysis, August 1, 2019. *http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf*

## *Comment TR-2: Travel Demand*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-25
I-EVANS2-6
I-HOUWER-6
I-MUHLHEIM-2
I-MUHLHEIM-6
I-OSAWA-7
O-BRCAC-1

"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 FSEIR must include a completed TDM. A Final SEIR should not be circulated until this completed TDM has been incorporated into the FSEIR.

Project travel demand refers to the number, type, and common destinations of new trips that people would take to and from the project. The memorandum containing the detailed methodology and results for the project travel demand is included in DSEIR Appendix C1, Travel Demand Memorandum.

The TDM Plan that was submitted by Kittelson in Appendix C1 is incomplete. It is a survey of trip generation and parking, but there is no analysis of alternative sources of travel or transit use. This omission is unacceptable. A complete and competent TDM Plan must be included in the FSEIR. Failure to do so would result in an inadequate EIR which should not be certified. Additionally, for the reasons set forth herewith, the Kittleson report is flawed, and does not provide a competent basis for transportation mitigation:

- The Kittelson TDM does not engage with important current transportation characteristics in the project area which would likely be impacted and transformed by the scale and intensity of the proposed development alternatives.

- The report indicates that the trip generation manual being employed is somewhat out of date but the most recent available.
- Recent academic studies in the last year have observed that there has been a very substantial increase in trips and congestion over the past two Years. They estimate that 40% of this increased congestion may be estimated to be attributed to Lyft and Uber car service trips. In the mode choice allocations the report models car service trips are treated as a small segment, less than 10%?
- Even if one estimates that car service trips are both a mode choice switch and a cause of changing traffic through increased trip generation… there are no level of service discussions LOS for morning and afternoon peaks and for off peak mid day… for the main streets serving the project. What is traffic like and what might be the impacts of increased trips on the level of service in the project area and on adjacent arterials serving the project area. And how might one assess the cumulative transportation impacts of this project and planned development adjacent to the project area?
- The expected distribution of trips for residents seems very light for peak period travel. Is there any current transportation trip generation and travel diary data that might be employed to validate the time of day assumptions for residents of the new development?
- The current assumptions for residents are quite variant from the conceptual estimate of student trips that might be estimated from the parking lot driveway analysis… where we see a high density of trips around the morning and afternoon peaks. If the apartment dwellers trip characteristics more clearly follow the patterning of student car trips there may be serious congestion and LOS impacts. How might you assess this possible outcome? Particularly where you don't provide LOS data for main circulation routes."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-25*])*

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"**C1 Travel Demand Memorandum**

This section refers repeatedly to two sources for trip generation data. One is the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th edition and the other is the *San Francisco Planning Trip Generation Workbook (SF Workbook)*. While the ITE *Trip Generation Manual* is indeed a standard source, it also is recognized as a very flawed source of information due to its reliance on datasets with very little input, generally from suburban, not urban, sources.

The *SF Workbook* is not available on the Planning Department's website nor does it appear to be available elsewhere. We are unable to determine whether it addresses any of the flaws mentioned or simply compounds them. If the SEIR and consultants are referencing this Planning Department *SF Workbook*, it must be made publicly available for review and comment.

We challenge the use of the trip generation data from the *ITE Manual* and we find the use of the *SF Workbook*, which appears not to be available to the public, as inappropriate."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-6*])*

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"No doubt techies will uber or lyft to where they need to go; therefore, you will see an influx of additional traffic in our area."

*(Michelle Houwer, Email, September 12, 2019 [*I-HOUWER-6*])*

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"<!--[if !supportLists]-->2. <!--[endif]--> I find the report's statements regarding transportation and traffic greatly underestimate the impacts of the proposed project. As a transit first person, who has commuted to CCSF on MUNI from Castro and Market for several years, I have had experience with existing delays and trouble spots. Especially troubling are statements where mitigation is not found necessary. I disagree."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-2*])*

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"<!--[if !supportLists]-->· <!--[endif]-->Many residents in the proposed project will opt for ride sharing services. We are seen the negative effects of this on congestion in other parts of the city."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-6*])*

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"The proposed site is indeed closely situated to many public transit options. However, given the proximity to I-280, the uphill walk to BART, and the remoteness from many of the attractions of the city, it is highly optimistic to assume that there will be a mass influx of non-automotive households that would mitigate the traffic and parking burden.

I appreciate the need for more housing in San Francisco, but the current proposals are out of scale for the neighborhood and have not adequately addressed critical deficiencies in traffic flow and parking."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-7*])*

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"Good evening Commissioners. My name's Jon Winston. I have the at large seat on the Balboa Reservoir CAC and I'm also the Chair.

I'm here this afternoon -- this evening, I should say, to talk about transportation and circulation. The impacts I believe will be significant, but I disagree with the report that they will be unmitigable.

Developer mitigation, including the Transportation Demand Management Plan, including measures like giving out a Fast Pass with rental packages to encourage non-car use will play a part. They will pay impact fees, which I believe should be applied at the point of impact in the neighborhood where the impacts actually occur. That's where they're needed the most.

But also, the City can and must do more Recent San Francisco history is full of projects, like the Metreon Center, the San Francisco Center, the ballpark, the Chase Center, all built without parking and they were all predicted to lead to traffic apocalypse.

But with moonshot level planning, by multiple city agencies, we got great civic and cultural amenities that, despite the naysayers, worked.

This, too, is a project that needs to have proactive planning on the neighborhood and City level to accommodate the influx of new residents in the reservoir and the projected increase in CCSF students.

New housing and businesses, like Whole Foods on Ocean Avenue, also add new car, foot and bike traffic.

SFMTA and other agencies need to begin, now, to be ready with increased transit frequency and have more of the share of the roadway to avoid even worse gridlock and in keeping with the City's transit first policy. That's the first time we've heard the words "transit first" tonight.

In addition to my role on this CAC, I also serve as the Pedestrian Safety Advisor Committee for the SFUSD. From that perch, I can see Ocean, Geneva, San Jose Avenue as vision zero high injury corridors. That means there have been enough deaths and injuries, serious injuries, due to the design of these streets that they're due and fundable for complete redesign.

In short, true transit first reimagining of transportation and circulation for the neighborhood is needed and it has to be implemented.

At our September 30th CAC meeting, the CAC will present their plans for their SFMTA Ocean Avenue Safety Project. I hope to hear about a safe, beautiful, and dignified walk to BART, and better pedestrian bicycle access to CCSF, the reservoir and the Ocean Avenue shopping district.

But in future meetings, I really hope to hear more about a comprehensive, proactive plan. The Balboa Reservoir is really a great opportunity to deal with the problems that have accumulated over many, many years and now, we have a chance to make the needed change to get a livable, sustainable community for future generations. Thank you for your time."

*(Jon Winston, Chair, Balboa Reservoir Community Advisory Committee, CPC Hearing, September 12, 2019 [*O-BRCAC-1*])*

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## Response TR-2: Travel Demand

The comments state that the travel demand analysis is inadequate, disagree with the draft SEIR findings or characterize them differently, and state that transportation network company (TNC) mode choice allocation is underestimated. Comments state that the transportation demand management (TDM) plan is inadequate and that a complete TDM plan should be included in the

draft SEIR. The comments also seek information about the travel demand workbook used to estimate travel demand for the project.

The draft SEIR addresses the relevant CEQA issues in Section 3.B, Transportation and Circulation, under "Transportation Demand Management (TDM) Plan" on draft SEIR p. 3.B-38 and "Project Travel Demand Methodology and Results" on draft SEIR pp. 3.B-40 to 3.B-46. Detailed supporting information is included in SEIR Appendix C1, Travel Demand Memorandum, and Appendix C2, Transit Assessment Memorandum. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

Comments regarding traffic congestion, including intersection delay and level of service, are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding potential impacts of the proposed project on transit operations, and the mitigation measure(s) proposed to address any such impacts, are addressed in Response TR-4, Transit Impacts, on RTC p. 4.C-32. Comments regarding potential impacts of the proposed project in combination with other planned area development are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-45. Comments regarding the secondary effects of parking conditions with development of the proposed project is provided in Response TR-7, Parking, on RTC p. 4.C-61.

The response to the travel demand analysis comments is organized by the following subtopics:

- Project Travel Demand Methodology and Results
- Transportation Network Company (TNC) Mode Share
- Transportation Demand Management (TDM) Plan

### *Project Travel Demand Methodology and Results*

The San Francisco workbook (workbook) referenced by the commenter implements the travel demand methodology presented in the 2019 San Francisco Transportation Impact Analysis Guidelines for Environmental Review – Update, February 2019 (2019 TIA Guidelines).[26] The transportation analysis for the Balboa Reservoir Project used this workbook to generate the project's anticipated travel demand.

The travel demand methodology and results are presented in draft SEIR Appendix C1 and on draft SEIR pp. 3.B-40 to 3.B-46 under the heading "Project Travel Demand Methodology and Results." The analysis for the proposed project follows the methodology presented in the 2019 TIA Guidelines, to the extent applicable. The project travel demand calculations are presented in draft SEIR Appendix C1, Travel Demand Memorandum, on pp. 8-14. The specific approach used for the proposed project is provided in the Travel Demand Assumptions Memorandum, which is included in draft SEIR Appendix C1, pp. 21 to 26. The detailed travel demand calculation worksheets are presented in draft SEIR Appendix C1, Appendix A, on pp. 27 to 39. These calculation worksheets

[26] San Francisco Transportation Impact Analysis Guidelines for Environmental Review – Update, February 2019. *https://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf*. Accessed October 24, 2019.

document the input and show the calculations and distribution assumptions used to develop the travel demand estimates.

The workbook is publicly available. The detailed travel demand calculation worksheets were also made public as part of the draft SEIR's administrative record[27] and the workbook is included as RTC Attachment 4, Travel Demand Workbook. The department website includes a link to a travel demand tool (*https://sftraveldemand.sfcta.org/*) that can be used to calculate daily and weekday p.m. peak hour person trips generation using the 2019 TIA Guidelines rates, which mirrors the data in the workbook.

The travel demand tool was developed as part of the department's 2019 TIA Guidelines update. A consultant, under the direction of the department, collected and analyzed counts, intercept surveys (i.e., intercept people to ask questions), and commercial and passenger loading at San Francisco development sites in 2016 and 2017 and analyzed 2012 California Household Travel Survey data. This collection and analysis led to the 2019 TIA Guidelines travel demand updates including estimates of the number of people taking TNCs. The TIA Guidelines' Summary of Changes memorandum describes the primary changes made in the update compared to prior guidelines.[28]

Regarding the comment seeking information on the use of the ITE's Trip Generation Manual, the 10th Edition of ITE's *Trip Generation Manual* was used to develop a ratio between the Balboa Reservoir Project's a.m. and p.m. peak period trip generation rates rather than to generate an estimate of project travel. Because the 2019 TIA Guidelines provide daily and p.m. peak hour travel demand rates but not a.m. peak hour travel demand rates, the ratio from the ITE *Trip Generation Manual* was applied to p.m. peak hour rates to obtain an estimate of a.m. peak hour rates. This process is explained on draft SEIR Appendix C1, p. 4.

One commenter correctly notes that no analysis is provided in the draft SEIR for the off-peak midday period. For the purpose of environmental review, the transportation analysis is based on the period with the highest traffic volumes; this yields a more conservative or "worst case" scenario to determine project impacts. The p.m. peak hour has the highest traffic volumes when compared to the traffic volumes during the a.m. peak period; the midday period is considered an off-peak period, for which any project impacts or effects would be less acute than the peak period.

### *Transportation Network Company (TNC) Mode Share*

Transportation network company (TNC) vehicle trips are accounted for in the draft SEIR. TNC mode share is discussed and presented on draft SEIR p. 3.B-43 and Table 3.B-13, Person-Trip Generation Estimates by Mode and Land Use, on draft SEIR p. 3.B-43, and Table 3.B-16, Freight and Passenger Loading Demand by Land Use, on draft SEIR p. 3.B-51.

The comments claim that TNC use is underestimated; however, the comments do not cite references to support their claims. The SEIR analysis employs the best available information

[27] Draft SEIR Appendix C1: Travel Demand Memorandum, April 4, 2019. *http://ab900balboa.com/Draft%20EIR,%20Appendices,%20and%20Related/C1_TravelDemandMemorandum.pdf*

[28] San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review – Update, October 2019, *https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.*

regarding TNC mode share. This information was developed as part of the department's 2019 TIA Guidelines update as described above.

The increasing prevalence of for-hire vehicles like TNCs in San Francisco has changed the way people travel. The department is working with the transportation authority and SFMTA on studies that address TNC activity in San Francisco. The TNC use and passenger loading demand estimates analyzed in the draft SEIR are consistent with 2019 TIA Guidelines and are supported by substantial evidence based on available information.

### *Transportation Demand Management (TDM) Plan*

One commenter disagrees with the draft SEIR findings that the proposed project's significant and unavoidable transportation and circulation impacts cannot be mitigated to a less-than-significant level and references how the project's TDM plan would reduce vehicle trips. The 2019 TIA Guidelines travel demand data is based on substantial data collection, including at development sites in 2016 and 2017, and is described above. However, the 2019 TIA Guidelines data collection scope did not analyze the effect of development sites' TDM measures on travel demand. Thus, the department does not account for any potential reduction in vehicle trips (e.g., mode split change) that may occur with implementation of a project's TDM plan. This approach results in a conservative estimation of the number of vehicle trips that would be generated by the proposed project. The department is working with other San Francisco agencies to quantify the effects of TDM measures for use in CEQA documents as part of ongoing research in support of San Francisco Planning Code section 169. As of the publication of this RTC document, the results of that research are not available.

Transportation studies within San Francisco typically do not account for any potential reduction in vehicle trips that may occur with implementation of the TDM plan. The department acknowledges that implementation of the TDM plan would improve conditions around the project site; however, the draft SEIR and the department makes its CEQA significance determination without accounting for the implementation of the TDM measures. Aside from referencing the TDM plan, the commenter does not provide substantial evidence demonstrating how a final TDM plan is required to conduct transportation and circulation impact analysis.

It should be noted that the draft SEIR Appendix C1 referenced by the commenter is not the proposed project's TDM plan. Draft SEIR Appendix C1 is a memorandum providing the basis for the draft SEIR's analysis of project transportation impacts. The TDM plan is being developed separately and the decision makers will consider it as part of project approvals.

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## *Comment TR-3: Walking and Biking Impacts*

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list:

A-CALTRANS-1

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"**Bicycle Considerations**

The Caltrans District 4 Bike Plan identifies a "Top Tier" project at the I-280 and Ocean Avenue/Geneva Avenue interchange that would reconstruct the interchange ramps and stripe Class II buffered bike lanes. Given the anticipated increase in vehicle and bicycle traffic at this location due to the project, the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at this location."

*(Wahida Rashid, Caltrans Acting District Branch Chief, Letter, September 10, 2019 [*A-CALTRANS-1*])*

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## Response TR-3: Walking and Biking Impacts

The commenter states that the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at the I-280 and Ocean Avenue/Geneva Avenue interchange.

In accordance with the 2019 TIA Guidelines, the department adequately and accurately assessed if the project would create potentially hazardous conditions for people bicycling. The draft SEIR describes existing bicycling facilities and circulation in the project area on draft SEIR pp. 3.B-14 to 3.B-18. General impediments to existing bicycle travel within the study area, including heavy vehicle traffic volumes and high-speed uncontrolled movements at freeway ramps, are discussed on draft SEIR p. 3.B-16. The effect of the proposed project on conditions for people bicycling is discussed under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70.

Existing bicycle conditions at freeway on- and off-ramps at I-280 and at the Ocean Avenue/Geneva Avenue interchange have been taken into account in the project analysis. This location is farther from the project site than other analyzed locations (e.g., Ocean Avenue/Lee Avenue, Frida Kahlo Way/Access Road, Ocean Avenue/Frida Kahlo Way/Geneva Avenue) and thus represents a location with a smaller share of the distributed project trips. At the analyzed locations in closer proximity to the project site, the draft SEIR concludes that the proposed project would not generate activities that would create potentially hazardous conditions for people bicycling. Thus, significant impacts would not be expected at the Ocean Avenue/Geneva Avenue interchange and no mitigation measures would be required. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

## *Comment TR-4: Transit Impacts*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-BARISH3-27 | I-JA8-2 | I-MARTINPINTO-3 |
| I-BERNSTEIN5-5 | I-JA9-2 | I-MUHLHEIM-4 |
| I-COLLINS1-1 | I-JA9-3 | I-PEDERSON2-3 |
| I-EVANS2-1 | I-JA9-4 | I-PEDERSON2-9 |
| I-EVANS2-3 | I-JA10-1 | I-PEDERSON2-10 |

I-EVANS2-4
I-GOODMAN-5
I-JA1-3
I-JA7-1
I-JA13-1
I-JA15-1
I-MARTINPINTO-2
I-PEDERSON1-3
I-WORLEY-5

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"Public Transit Delay (p. 3.B – 51 et seq)

There are significant and unavoidable cumulative transit impacts identified by the DSEIR.

Impact C-TR-4: *The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. (Significant and Unavoidable with Mitigation)*

Impact C-TR-6b: *Operation of the proposed project, including proposed street network changes, in combination with reasonably foreseeable future projects, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit. (Significant and Unavoidable)*

The DSEIR also states:

Impact TR-4: *Operation of the proposed project would not substantially delay public transit. (Less than Significant)*

However, the DSEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence.

The City Charter/SFMTA late criterion is a 4 minute delay relative to the MUNI schedule.

In comparison, the Reservoir late standard as applied for the segment from Monterey/Gennessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The DSEIR appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus the DSEIR reinterprets the MUNI 4-minute lateness standard to allow the Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant. This is an invalid, flawed analysis of acceptable transit delays. The FSEIR must recalculate transit delays validly.

Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would also violate the City's Transit First Policy."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-27*])*

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"The impact that the extra traffic would have on buses—one of the common means of reaching the College (other than BART) is expected to be serious. A local retired bus driver has explained that a bus being late on one time point by four minutes results in a serious schedule problem. But for the

no. 43 bus, the only bus running on Frida Kahlo Way, the delay anticipated is more like 12 minutes, not four minutes. This would affect other lines that cross the path of the 43 bus or connect with it. And as for Ocean Avenue, it currently has a number of lines passing within 1-2 blocks of the College—nos. 8, 29, 49 and K."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-5*])*

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"Hello, Monica Collins, Sunnyside. This is prepared.

The SEIR states that transit delay induced by the Balboa Reservoir Project will be insignificant. But this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The meaning on time performance standards allows for a four-minute delay for an entire route. But the 43 Masonic travels from Balboa Reservoir, along Frida Kahlo Way, to Balboa Park in seven minutes. Using the consultant's redefinition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of 19 minutes, 171 percent increase. From any perspective, whether legal, ethical, or engineering, this is wrong.

The SEIR is in error in using this faulty, invalid method of determining transit delay."

*(Monica Collins, CPC Hearing, September 12, 2019 [*I-COLLINS1-1*])*

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"**TRANSIT DELAY**

The SEIR states that transit delay induced by the Balboa Reservoir project will be insignificant but this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The MUNI on-time performance standard allows for a 4-minute delay for an entire route. The SEIR instead allows for a 4-minute delay on any segment of a route (i.e., between two stops), a completely invalid assumption, meaning almost no amount of delay would be considered significant.

EXAMPLE: The 43-Masonic travels from the Balboa Reservoir project site on Frida Kahlo Way to the Balboa Park Station in ***7 minutes***. Using the consultants' re-definition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of ***19 minutes***, a **171% increase**, is somehow deemed "**insignificant**." No one riding that 43 would find the delay to be insignificant. And this utterly faulty reasoning is allowed to be presented in the SEIR as justification for a finding of "insignificant delay," meaning no mitigation is required.

From any perspective, whether legal, ethical or engineering, this is wrong. The SEIR is in error in using this faulty, invalid method of determining transit delay. The transit delays as a result of this

project will be significant and appropriate mitigation must be identified before the SEIR is approved."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-1*])*

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"**TRANSIT ASSESSMENT**

**C2 Transit Assessment Memorandum**

**Transit reentry delay analysis**

According to the SEIR, transit delay is calculated based on empirical data from 2010 *Highway Capacity Manual (HCM)*. Data used in the 2010 *HCM* are at least 15 years old.

In 2016, the *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis (HCM)* was published by the Transportation Research Board. This current manual the consultants should have used as '…it serves as a fundamental reference on concepts, performance measures, and analysis techniques for evaluating the **multimodal** operation of streets, highways, freeways, and off-street pathways. The Sixth Edition incorporates the latest research on highway capacity, quality of service, and travel time reliability…'

What justification did the consultants provide for using an outdated *HCM* and its outdated data? Why did they not use the most recent, comprehensive source that addresses the multimodal aspect of street use, a basic component of the area around the Balboa Reservoir project site?

Before the SEIR is adopted, the consultants must explain their data sources and methodology used to reach their conclusion that, 'Based on the findings from this corridor delay analysis, the project would not result in a substantial delay to public transit along Frida Kahlo Way, Ocean Avenue, or Geneva Avenue.' The findings and conclusion as presented in the SEIR are erroneous."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-3*])*

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"**Passenger boarding delay analysis**

What source was used to assume "two seconds per passenger boarding"? Is it again outdated data? Does it include students and instructors carrying books, supplies, and other material? Does it include students traveling with children? Disabled users? Riders carrying shopping bags or using a wheeled cart?

The consultants again are using an arbitrary and likely outdated standard—two seconds of boarding time—that does not equate to actual operating conditions.

Before the SEIR is adopted, data on the actual passenger boarding delay must be gathered and analyzed. Any transit delay analysis must be based on the actual delay experienced by riders in the project area."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-4*])*

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"The second one is regarding transit delay. Okay, transit delay is defined in this SEIR with a threshold of significance. And it's an invented threshold of significance. And what does the SEIR say: The threshold of significance is four minutes. What does that mean in terms of the reservoir? It means that, oh, the reservoir project can contribute four minutes of delay on MUNI without it being considered to be significant. So, it's BS. Okay, read it carefully before you certify it."

*(Alvin Ja, CPC Hearing, September 12, 2019 [*I-JA1-3*])*

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"The transit issue is by far the biggest concern, as was very much ignored as a concern on the SFSU-CSU and Parkmerced and Stonestown redevelopment projects, congestion has worsened along 19th, and with eventual starting of undergrounding of the M-Line, additional concerns will increase on cross-city traffic and transit impacts. It is not possible to force one development to bear the brunt of the costs of public infrastructure, however when multiple sites are involved it is critical to ensure that the publics interests and impacts are seriously addressed in regards to safety, and continuity of public transit services."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-5*])*

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"**INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY**

The City Charter/SFMTA late criterion is a 4 minute delay relative to MUNI schedule for the 43 Masonic at the Balboa Park Station (BPS). [The 4 minute lateness criterion is relative to MUNI schedule for any particular MUNI time point.]

In comparison, the Reservoir late standard as applied for the segment from Monterey/Gennessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The Reservoir Project SEIR, apparently without proper authority, appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus giving the Project the privilege of contributing 8 minutes of Reservoir-related delay before its delay is considered significant.

EXAMPLE:

If a 43 is running on time until the Reservoir Project, but the Project-related delay is allowed to be up to 8 minutes, then instead of 7 minutes to get to BPS, it would be considered by SEIR definition to be insignificant if a 43 gets to BPS in 19 minutes—an additional 12 minutes.

This constitutes a 171% increase over the scheduled running time of 7 minutes between Monterey/Gennessee and Balboa Park Station. Yet the SEIR deems a **171% increase** (from a scheduled 7 minutes to a travel time of 19 minutes to be insignificant.

**SOUTHBOUND 43 MASONIC DELAY:**

**MUNI STANDARD v. RESERVOIR STANDARD**

| | | TIME POINT | ON-TIME | ADDITIONAL DELAY TIME | |
|---|---|---|---|---|---|
| | | | MUNI on-time | MUNI late standard (4 min) | Reservoir Late standard (additional 4 min) |
| | | Monterey/Gennessee | 0:00 | 0:00 | 0:00 |
| Monterey/Genn to Bookstore Running time (r.t.) | | **4 min running time** | +4 r.t. | +4 r.t. + 4 late | +4 r.t. +4 MUNI +4 Reservoir |
| **ELAPSED TIME: Monterey/Genn to Bookstore** | | CCSF Bookstore (City College Terminal) | **0:04** | **0:08** | **0:12** |
| Bookstore to BPS Running time | | **3 min running time** | +3 r.t. | +3 r.t. (4 min standard NOT allowed to be cumulative) | +3 r.t. + 4 Reservoir (4 min standard construed to accumulate) |
| **ELAPSED TIME: Monterey/Gen to BPS** | | Balboa Park Station (Geneva/San Jose) | **0:07** | **0:11** | **0:19** |

The SEIR justifies its arbitrary and capricious use of a generously defined 4-minute delay standard by citing the MUNI on-time performance standard contained in the City Charter:

*The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*[1]

It is critically important to understand of the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

**The SEIR is inadequate and defective in its use of an egregiously generous definition of acceptable Reservoir-related transit delay. The SEIR's "less-than-significant" determination for Impact TR-4, Transit Delay cannot be considered valid.**

**The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, or by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.**

**There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay. There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant."**

**Footnotes:**

[1] *The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85 [sic--should be 8A.103 (c)1--aj], percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

*(Alvin Ja, Email, September 5, 2019 [*I-JA7-1*])*

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*"Public Transit Delay (p. 3.B-52)*

*The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*[96]

Footnote 96: *96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85* [sic--should be 8A.103 (c)1--aj]*, percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

It is critically important to understand the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

Example: The 43 line runs on a 12 minute headway. A four-minute Project-related contribution to delay added to a City Charter defined 4-minute late standard for a MUNI line's on-time performance would create an eight-minute delay. So, for the 43 line, instead of a 12-16 wait, the

Project interprets that a wait of 16-20 minutes at Kahlo/Ocean (City College Bookstore time point) is acceptable and less-than-significant.

NO! It is NOT OK to consider this to be non-significant.

The City Charter's section 8A.103(c)1 does not authorize the Project to impose an additional Reservoir-related 4 minutes of delay at the City College Bookstore time point.

The SEIR's self-defined threshold of significance would grant the Project the privilege of doubling the lateness standard relative to the MUNI schedule from 4 minutes to 8 minutes.

This violates both the language and intent of City Charter Article VIIIA's Section on Service Standards and Accountability--8A.103 (c)1.

**The draft SEIR is fundamentally flawed in highjacking and misapplying the SFMTA/MUNI 4-minute lateness standard. The 4-minute lateness standard is relative to MUNI schedules. The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, and especially by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.**

**There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay.**

**There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.**

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**Impact Evaluation**

***Existing plus Project***

***Impact TR-4: Operation of the proposed project would not substantially delay public transit. (Less than Significant)***

Transit Delay

*Developer's Proposed Option* (p. 3.B-74)

*As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.*

*The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, the Developer's Proposed Option would result in a less-than-significant impact related to transit delay.*

*The Additional Housing Option would not result in transit delay greater than or equal to four Minutes. 123 Therefore, the Additional Housing Option would result in a less-than-significant impact related to transit delay.* [FOOTNOTE 123 refers back to Footnote 122 which then refers to Fire Code 503.2.1 which has nothing to do with transit delay.—aj]

RESERVOIR-RELATED DELAY FOR 43 MASONIC

The SB Kahlo figures of **73 sec** (for Option 1), and **83 sec** (for Option 2 are presented in the SEIR as the applicable 43 delay between Judson and Ocean.

These figures fail to reflect the Transit Delay for the 43 route segment between CCSF Bookstore (Ocean) to Balboa Park Station (Geneva/San Jose). This route segment is located in the Area Plan area and must be included to properly assess Reservoir-related delay for the 43 Masonic.

In order to reflect the full effect of Reservoir-related delay in the Balboa Park Station Area Plan area, another 42 seconds (using Table 3.B-18 Transit Delay Analysis) for the 43's EB Geneva segment must be added to the 73 seconds cited by the SEIR. So instead of just 73 seconds of delay, Reservoir-related delay totals **115 seconds (1.9 min) of for Option 1**.

For Option 2, the 43's delay (using Table 3.B-18 Transit Delay Analysis) should be the sum of SB Kahlo (83 sec) and EB Geneva (58 sec), which totals **141 seconds (2.4 min) of Reservoir-related delay in the BPS Area Plan area**.

The scheduled running time between Monterey/Gennessee to Balboa Park Station is 7 minutes.

Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a **27.4% increase in travel time** for the 7-minute running time segment.between Monterey/Gennessee and Balboa Park Station.

Option 2's contribution of 141 seconds (2,4 minutes) of Reservoir-related delay represents a **33.6% increase in travel time** over the scheduled 7 minute running time between Monterey/Gennessee to Balboa Park Station.

A 115-141 second delay for this short 43 segment (from Monterey/Gennessee to BP Station) is substantial. it is NOT insignificant as the SEIR purports. Only with willful disregard for reality could a 27.4% to 33.6% increase in travel time be considered less than significant.

Relative to the City Charter-mandated MUNI on-time standard of 4 minutes:

<!--[if !supportLists]-->· <!--[endif]-->Option 1's 115 second contribution to MUNI delay constitutes **48.0%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point;

<!--[if !supportLists]-->· <!--[endif]-->Option 2's 141 second contribution to MUNI delay constitutes **58.8%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point.

Unless willfully blind, a 48.0% or a 58.8% contribution towards a 4-minute late standard is SIGNIFICANT.

The way that the SEIR tries to evade this problem of objectively contributing significantly towards MUNI's 4-minute standard is ingenious.

Incorporating Footnote 96 on p. 3.B-52, the SEIR, **insinuating City Charter and "quantitative" authority, proclaims:**

*The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*

The SEIR blows open a gigantic hole of an extra four minutes for itself before a delay "might" (!!) be significant. But contrary to the Project's arrogation to itself of a four-minute privilege to hold up MUNI before its contribution to delay counts to be significant, the City Charter citation of a 4 minute is relative to the MUNI schedule—not relative to the Reservoir Project SEIR's own standard.

So, the "less-than significant impact" to transit delay is a result of an inappropriate definition and standard of "transit delay."

I discuss this in more detail in my 9/5/2019 submission "INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY". Please refer to it.

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**City College Terminal**

*Given the considerations described above, the Developer's Proposed Option and Additional Housing Option would have a* ***less-than-significant impact*** *on transit delay.*

***Mitigation:*** *None required.*

The TR-4 section ends with the pronouncement of less-than-significant impact requiring no mitigation. This overall TR-4 conclusory statement misleadingly follows and is slid into a section that actually discusses City College Terminal.

**This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**

**The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:**

<!--[if !supportLists]-->· <!--[endif]-->**It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**

<!--[if !supportLists]-->· <!--[endif]-->**It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**

<!--[if !supportLists]-->· <!--[endif]-->**In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**

<!--[if !supportLists]-->· <!--[endif]-->**The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**********

***Comparison of Impact TR-4 to PEIR Impact Analysis* (p. 3.B-77)**

*As discussed in SEIR Section 3.B.3, Summary of Balboa Park Station Area Plan PEIR Transportation Section, p. 3.B-1, under the 2025 with Area Plan scenario, ….. Project operation would result in a less-than significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR.*

The statements that *"Project operation would result in a less-than-significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR"* **is unsupported by anything contained in SEIR 3.B.3**. It appears out of thin air. In fact, 3.B.3 states the opposite:

<!--[if !supportLists]-->· <!--[endif]-->**Transit**

*Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

Furthermore, the claimed L-T-S impact of the Introductory paragraph for this section is contradicted once again in the body on p. 3.B-78:

<!--[if !supportLists]--> <!--[endif]-->*The PEIR identified significant impacts to transit delay under the 2025 with Area Plan scenario and project-level analysis of 1150 Ocean Avenue (former Kragen Auto Parts site).*

**The introductory paragraph expresses a desired outcome of less–than-significant impact on public transit in the form of an unsupported assertion/conclusion. The SEIR is deficient by making unsupported conclusions.**

**********

*Operation of the Balboa Reservoir Project would result in a less-than-significant impact related to transit delay. Therefore, the proposed project would not have any new or substantially more-severe effects than those identified in the PEIR related to transit delay impacts.*

This concluding paragraph for TR-4 is nothing but a claim unsupported by evidence. It's a tautology: The Reservoir Project results in less-than-significant impact on transit delay……Therefore (?!!) it will not have new transit delay impacts.

Where is the logic in this conclusion?!!!

The SEIR Significance Criteria states:

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**SEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence. Rather it is based on tautology. FAIL…FUBAR! This SEIR does not qualify for certification."**

*(Alvin Ja, Email, September 7, 2019 [*I-JA8-2*])*

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***2040 Cumulative Conditions*** (p. 3.B-91)

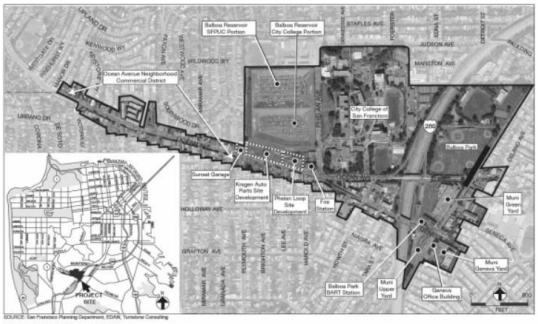
> *The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

**The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:**

> *The "Project Area" of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*




**The SEIR is deficient in its selection of the parameters of geographic context for analysis.**

*(Alvin Ja, Email, September 10, 2019 [*I-JA9-1*], [*I-JA9-3*])*

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**Impact C-TR-4: The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. (Significant and Unavoidable with Mitigation) (p. 3.B-94)**

*In the PEIR, under the 2025 with Area Plan scenario, transit delay impacts were identified at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections. However, as discussed under Impact TR-4, p. 3.B-73, operation of the proposed project would not substantially delay public transit, and this impact would be less than significant.*

In my previous submission of 9/7/2019, I had presented a picture of the real-life impact, based on SEIR/Kittelson's figures of Reservoir-related delay on the 43 Masonic. Instead of just using the delay figures for the restrictive limits of geographic context in the Figure 3.B-2 map, the submission showed **27.4 to 33.6% increases in Reservoir-related travel time** within the BPS Area Plan "Project Area".

Relative to the MUNI on-time-performance's late criterion of 4 minutes, **Reservoir- related delay contributes 48 to 58.8% of the 4 minutes.**

The only way that the SEIR can conclude a less-than-significant transit delay impact is to change the standards.

It did this by creating a quantitative "threshold of significance" of an **additional 4 minutes over and above the SF Charter's 4 minutes**. Thus, with this this creatively invented threshold of significance that totals 8 minutes, objectively significant delay relative to MUNI schedules are magically transformed into "less-than-significant."

Here's copy & paste from my previous submission:

**This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**

**The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:**

<!--[if !supportLists]--> <!--[endif]--> **It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**

<!--[if !supportLists]--> <!--[endif]--> **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**

<!--[if !supportLists]--> <!--[endif]--> **In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**

<!--[if !supportLists]--> <!--[endif]--> **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

***The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.***

**********

***As discussed in Table 3.B-18, p. 3.B-74, under Impact TR-4, under existing plus project conditions, the increase in transit delay associated with either the Developer's Proposed Option and the Additional Housing Option would not result in significant transit delay impacts. However, the transit delay contribution from City College's Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase***

***transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.***

As shown previously, that Reservoir-related delay "would not result in significant transit delay Impacts" has been shown to be objectively false.

After the false assertion that portrays the Reservoir Project as blameless for transit delay, C-TR- 4 then throws the blame for cumulative Transit Delay on City College when its Facilities Master Plan gets up and running in the future. The phrasing of the passage essentially shifts the blame for cumulative transit delay impacts on City College, instead of admitting that the primary/proximate cause for transit delay is the Project itself.

The main error in C-TR-4 is that the Reservoir is presumed to be the baseline condition when in fact City College should be treated as the baseline condition.

Crucially, City College's Facilities Master Plan is essentially a **renovation and replacement program** for existing deteriorated, end-of-useful life buildings/facilities. Other than normal growth, build-out of the FMP will not generate new, appreciably substantial vehicle trips above what exists today as the existing condition. Furthermore any parking structures in FMP would be a direct result of the Reservoir Project's elimination of student parking. Although the Planning Dept would want to categorize FMP parking as new, objectively the FMP parking will be replacement parking, not "new."

In contrast, it is the Reservoir Project's new residents that will generate new vehicle trips that would cause transit delay.

**The SEIR reverses cause and effect in C-TR-4. It does this by treating the Reservoir Project as if it's the existing setting in its assessment of cumulative effects and treats CCSF as the new kid on the block. The fact of the matter is that CCSF must be treated as the baseline condition, and the Reservoir Project as the new kid on the block. I offer as an example a critique of a 11/17/2016 Planning Dept letter that was sent to City College authorities:**

> HYPOCRISY OF BALBOA RESERVOIR PROJECT PLANNERS
>
> In reviewing Sunshine Ordinance documents, I have come across a 11/17/2016 Planning Dept letter addressed to City College BOT signed by its Director, John Rahaim (attached for your convenience).
>
> The 11/17/2016 letter provided the City's input on the City College draft FMP.
>
> Under the heading of "Access, Parking, and Transportation Demand Management", the letter states:
>
> *"CCSF has stated that it anticipates maintaining or increasing the number of parking spaces associated with the campus as on-and off-campus surface parking is replaced with buildings. This level of parking provision would have negative consequences for neighborhood congestion…"*

Further down in the letter, under the heading "Balboa Reservoir Development Access & Interface", the letter states:

"*While the design of the Reservoir site has not yet begun, roadway access to the Reservoir site* [cutting through City College property—aj] *is a critical element that needs to be considered now as part of CCSF's master planning process…*"

Back in November 2016 when you first read this letter, I assume that BOT and Administration were able to discern the brazen hypocrisy contained in this letter to SFCCD.

ONE STANDARD FOR CITY COLLEGE……

The City had the audacity in this letter to blame the FMP for negative consequences of proposed FMP parking. The City shows lack of self-awareness and dishonesty when the reason for needing replacement parking is ultimately the Balboa Reservoir's own elimination of student parking—parking which constitutes the existing condition.

……..ANOTHER STANDARD FOR BALBOA RESERVOIR PROJECT

The Planning Dept letter raises the importance for SFCCD to provide roadway access for the Reservoir Project. The letter says "roadway access is a critical element that needs to be considered now…"

Since the City planners say that the parking needs of CCSF stakeholders can be resolved with TDM, the TDM solution should obviate the need for roadway access for the Reservoir Project, too, doncha think?

But, no. A double standard applies.

Did you notice that the City's concern for "negative consequences for neighborhood congestion" only applied to City College, but not to the Reservoir Project? FYI, throughout the "public engagement process", Reservoir Project has not shown serious concern for its own negative consequences.

If BOT and Administration allow the City to abuse the City College stakeholders whose interests you are supposed to represent, you are failing in your compliance with Accreditation Standard IV.C4.

--aj 10/9/2017

*To reduce the project's considerable contribution, implementation of* ***Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay*** *was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures to keep transit travel times within four minutes of existing levels.*

***Mitigation Measure M-C-TR-4: Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay.*** *The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

***Transit Travel Time Performance Standard.*** *Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4. The routes and study segments shown in Table M-C-TR-4 represent routes and study segments most likely to have a cumulative impact to which the project would have a considerable cumulative contribution.*

What is the "transit travel time performance standard" that is to be met?

The SEIR presents Table M-C-TR-4 Transit Travel Time Performance Standard that, by appearance looks oh, so impressive and credible, and "quantitative"! The Table presents "Existing Transit Travel Time" and "Performance Standard." And it looks SOOO legitimate and objective!

But the key is literally in the fine print of Performance Standards' Footnote "b".

Footnote "b" states: b The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

As presented in earlier submissions this Performance Standard of "existing travel time plus four minutes" is based on the misappropriation and misuse of the Charter section 8A.103(c)1.

Here I present some examples of the increase in travel time that results from the generous "plus four minutes" Performance Standard based on figures from Table MC-TR-4:

| Transit Line | Study Segment | Existing Transit Travel Time--PM | Performance Standard--PM | Percent Increase in Travel Time |
|---|---|---|---|---|
| K/T | Jules Ave/Ocean Ave to Balboa Park BART | 8:42 | 12:42 | 46.0% |
| 29 | Mission St/Persia Ave to Plymouth Ave/ Ocean Ave | 9:55 | 15:10 | 52.9% |
| 43 | Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance | 4:23 | 8:23 | 91.3% |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave | 10:04 | 14:04 | 39.7% |
| | | | | |

The Planning Dept-created threshold of significance of an additional 4 minutes results in inc**reases in Reservoir-related travel times of 46%, 52.9%, 91.3%, and 39.7% respectively for the K-T, 29, 43, and 49 line segments in the Table. By any objective measure, these would be extremely substantial contributions to transit delay.**

The only legitimate standard to be used to comply with the Transit First Policy is: four minutes late as measured against a MUNI time point…….Not a "plus 4" creatively designed qualitative threshold of significance.

Regarding Mitigation Measure M-C-TR-4's *"The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments…. the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

ARE YOU KIDDING ME?!! Monitor and implement "**feasible**" measures?!!

Once the Project has been approved and built, monitoring will only confirm what people who have actual ground-level, real-life based experience in the area have been saying all along about traffic issues that would ultimately cause severe MUNI delay.

And at that point, there will be no **feasible** measures to implement because the damage will have already been done. There will be no feasible measures because the Reservoir Project the project area is characterized by streets that cannot be widened. There will be no feasible way to effectively reduce transit delay. A 2012 Haas School of Business study about a possible Reservoir Project recognized the difficulties of *"… limited access points and large influx of new residents"*. for such a project.

To think that monitoring transit delay and implementing "feasible" measures such as TDM will be able to satisfactorily mitigate the impact of the Reservoir would be ludicrous.

**Thankfully, the SEIR arrives at a realistic determination (except for the undue blame given to a City College contribution to future transit delay) for C-TR-4:**

*In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and the uncertainty of SFMTA approval of other measures under their jurisdiction, the impact of the proposed project options would remain* ***significant and unavoidable with mitigation****, even with implementation of Mitigation Measure M-C-TR-4.*

***Significance after Mitigation:*** *Significant and Unavoidable."*

*(Alvin Ja, Email, September 10, 2019 [*I-JA9-2*], [*I-JA9-4*])*

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"I had sent in a comment regarding the geographic context for analysis of transit delay yesterday, 9/9 /2019.

I said that the appropriate geographic context would be the BPS Area Plan's "Project Area."

However, on closer examination, I realized that the BPS Project Area's northern boundary was Judson and Havelock, and did not even include Riordan.

The geographic context for analysis needs to extend beyond the BPS Area Plan's northern boundary of Judson to include Monterey Blvd.

Although not inside the BPS Area Plan's boundaries, the Reservoir Project will impact areas north of the Reservoir lot itself and north of Judson."

*(Alvin Ja, Email, September 10, 2019 [*I-JA10-1*])*

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"CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY

**The "less-than-significant" determination for Impact TR-4 is invalid. It is invalid because its 4-minute threshold of significance/Performance Standard is arbitrarily high and has been arrived at with neither proper authority nor substantial evidence.**

**Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would violate the Transit First Policy.**

**Although the SEIR finds potentially significant impact for C-TR- 4, the potential impact is unfairly attributed to City College's FMP.**

**The actual real-world impact will be from the Reservoir Project; not City College. As such, the Reservoir Project's true impact to Transit Delay has been covered up by an egregiously liberal 4-minute threshold of significance. As such, the LTS determination for Impact TR-4 should objectively be invalid.**

**City College's future plans are fundamentally renovation projects to replace worn-out facilities. These renovation projects will not, in and of themselves—unlike the Reservoir Project—induce substantially greater demand for education services and resultant travel demand.**

**The SEIR blames the victim in its discussion of Impact C-TR-4.**

I wish to reinforce my earlier analysis of the inappropriateness of using a 4-minute threshold of significance in reaching a "less-than-significant" determination for Impact TR-4.

I have already provided several critiques of various aspects of the SEIR's analyses contained in Section 3.B, Transportation & Circulation.

I have already compared the numbers for "Project-Related Increase in Delay" provided in Table 3.B-18, *Transit Delay Analysis*. I compared the Project-Related Delay to scheduled MUNI running times for the 43 line.

My analysis showed:

*Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a* ***27.4% increase in travel time*** *for the 7-minute running time segment between Monterey/Gennessee and Balboa Park Station.*

*Option 2's contribution of 141 seconds (2.4 minutes) of Reservoir-related delay represents a* ***33.6% increase in travel time*** *over the scheduled 7 minute running time between Monterey/Gennessee to Balboa Park Station.*

I have analyzed the latest MUNI schedule information. I have attached a Table entitled "Reservoir-Related Delay in Relation to Reservoir Area MUNI Characteristics."

The Table compiles information gathered from official MUNI scheduling documents. The documents are "Rotations" and "Trains" that contain information on headways and timepoints.

The Table shows the percentage contribution of real-world Reservoir-related delay relative to current MUNI timepoint-to-timepoint running times, using the SEIR's 4-minute threshold of significance.

Percentage of increase in travel time over the existing MUNI running times are:

<!--[if !supportLists]--> <!--[endif]-->K Ingleside (between Geneva/San Jose and St. Francis Circle): 23.5% to 30.8%

<!--[if !supportLists]--> <!--[endif]-->8/ 8BX Bayshore/ Bayshore Express (Geneva/Mission-Unity Plaza) 50.0% to 66.7%

<!--[if !supportLists]--> <!--[endif]-->29 Sunset (19th/Holloway –Ocean/BART) 25.0% to 33.3%

<!--[if !supportLists]--> <!--[endif]-->43 Masonic (Monterey/Gennessee – Geneva BART) 44.4% to 57.1%

<!--[if !supportLists]--> <!--[endif]-->49 Van Ness (Mission/Ocean – Unity Plaza) 50.0% to 57.1%

**The lowest end of the range of Reservoir-related delay "authorized" by the SEIR is 23.5% increase over the K segment between Balboa Park Station and St. Francis Circle.**

**A threshold of significance that would allow 23.5% to 66.7% increases over existing running times is an egregiously poor threshold. FAIL and FUBAR.**"

*(Alvin Ja, Email, September 14, 2019 [*I-JA13-1*])*

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"What I was trying to, but failed to get across in the original version was that the determinations for TR-4 and C-TR-4 were reversed…..That the C-TR-4 significant impact finding should have been for TR-4; and that the CCSF FMP cumulative contribution to transit delay was being blamed disproportionately for contributions to transit delay.

C-TR-4 obscures the reality that most of the transit delay will be generated by the Reservoir Project, as opposed the City College's FMP which is mainly a renovation and replacement program."

*(Alvin Ja, Email, September 22, 2019 [*I-JA15-1*])*

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"Another significant impact to public services is in public transit, i.e. MUNI. Currently, according to city charter, if a MUNI vehicle is 4 or more minutes late to any timepoint, it is considered late. A timepoint is a MUNI passenger stop with a specific time of MUNI vehicle arrival tied to it. For

example, if a bus is scheduled to arrive at the intersection of Market and Castro Sts. at 0700 hrs, it is not considered late until it arrives after 0704 hrs.

A 4 minute delay on a bus route such as the 43 Masonic, which is a 9 mile cross town bus route will have effects that resonate throughout the entire bus line. If the 43 northbound is delayed by 4 minutes arriving to Balboa Park BART station, it would be considered significantly late by city charter standards. However, the SEIR doesn't consider MUNI to be late through the Balboa Reservoir project zone unless it is delayed by 4 minutes, independent of the city charter. Thus, if the 43 Masonic was late to Balboa Park BART station by 3 minutes and further delayed through the BR Project zone by another 3 minutes, it would not be considered significant by SEIR standards, but it would be considered significant by city charter standards. Thus the allowable delay of 4 minutes through the BR project zone could be in violation of city charter standards."

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-2*])*

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"What does the project propose to do to expedite bus service"

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-3*])*

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"<!--[if !supportLists]-->· <!--[endif]-->The central islands on Ocean Avenue are dangerous. Undergrounding the K line on Ocean would help in many areas, but is this a realistic possibility?"

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-4*])*

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"and it does not adequately address potential impacts to public transit"

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-3*])*

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"C. The Draft does not adequately address the impacts of the project on transit.

The Draft does not adequately explain how the City determined that an additional four minutes of delay for Muni routes in the vicinity of the project should be the threshold of significance for transit delays. Muni currently experiences significant delays related to traffic congestion when City College is in session and to congestion caused by drivers attempting to turn at the intersection of Ocean and Brighton, where the entrance to the Whole Foods parking garage is located. In light of already existing delays for Muni service, the threshold of significance for additional transit delays should be less than four minutes."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-9*])*

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"In addition, in order to minimize VMT and GHG emissions associated with the project and with reasonably foreseeable development and expansion at City College, the City should implement transit improvements prior to occupancy of the project. Appropriate prior-to-occupancy mitigation measures include:

<!--[if !supportLists]-->1. <!--[endif]-->Restrict left turns at the intersection of Ocean and Brighton.

<!--[if !supportLists]-->2. <!--[endif]-->Install transit signal preemption or priority at all traffic lights on Ocean between San Jose and Junipero Serra and on Geneva between San Jose and Ocean. (Preemption is preferable, though priority might be acceptable at intersections with major cross streets such as Frida Kahlo and Junipero Serra.)

<!--[if !supportLists]-->3. <!--[endif]-->Give Muni lines higher priority at St. Francis Circle and West Portal. (Although St. Francis Circle and West Portal are a fair distance away from the project, delays there significantly degrade the speed and reliability of the K.)

<!--[if !supportLists]-->4. <!--[endif]-->Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.

<!--[if !supportLists]-->5. <!--[endif]-->Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full. (This could potentially be done as part of an enforcement action to address Whole Foods' violation of loading requirements.)"

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-10*])*

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"Finally, the transit improvement mitigation measures identified in the draft should not be deferred until after the project is shown to have an adverse impact on transit service. Congestion when City College is in session and congestion associated with the Whole Foods Grocery Store are already impeding transit service. So, the project proponents should be working with MUNI, now, to implement transit improvement measures up front without waiting for proof of additional adverse impacts in the future. Thank you very much."

*(Christopher Pederson, CPC Hearing, September 12, 2019 [*I-PEDERSON1-3*])*

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"***The DRAFT SEIR is inadequate because it fails to consider the impact on public transit and recommend that public transit capacity be expanded***

The Developer is counting on a 15% reduction in City College student parking in order to achieve a special project status under AB 900. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate already unreliable and inadequate transit service. **However, the SEIR fails to mandate improvements in infrastructure for public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation.**"

*(Jennifer Worley, Email, September 23, 2019 [*I-WORLEY-5*])*

## Response TR-4: Transit Impacts

The comments opine on the transit delay significance criteria used in the draft SEIR, disagree with the draft SEIR's transit delay impact conclusion, disagree with the geographic study area used to evaluate transit delay impacts, and suggest mitigation measures to reduce transit delay.

This response provides clarification and background information related to the transit impact analysis presented in the draft SEIR. The impacts are determined to be less than significant under existing plus project conditions and significant and unavoidable under 2040 cumulative conditions.

- The significance criteria are presented on draft SEIR p. 3.B-35, and the transit analysis methodology is discussed on draft SEIR p. 3.B-52.
- Transit impacts are covered under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99.
- Additional discussion of the transit delay assessment is provided in draft SEIR Appendix C2, Transit Assessment Memorandum, and SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum. A discussion of existing conditions related to walking access to transit is provided on draft SEIR p. 3.B-11, and a discussion of the existing transit boarding islands on Ocean Avenue is presented on draft SEIR p. 3.B-21.
- An evaluation of potentially hazardous conditions for people walking to/from transit is provided under Impact TR-2 on draft SEIR p. 3.B-65.

Comments regarding project improvements that benefit public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation (i.e., transportation demand management measures) are addressed in Response TR-2, Travel Demand, on RTC p. 4.C-10. Comments regarding the inclusion of the City College facilities master plan in the cumulative conditions analysis are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-55.

The response to transit impacts analysis comments is organized by the following subtopics:

- Transit Significance Criteria Used in the Transit Delay Analysis
- Existing Plus Project Conditions Transit Delay
- Cumulative Conditions Transit Delay
- Potentially Hazardous Conditions – Transit
- Geographic Study Area for Transit
- Mitigation Measures

### *Transit Significance Criteria Used in the Transit Delay Analysis*

As stated on draft SEIR p. 3.B-35, with respect to transit impacts, a project would have a significant effect on the environment if it would substantially delay public transit. In particular, the proposed project could have a significant transit impact if transit travel time increases on a specific route would be greater than, or equal to, four minutes or half of the existing headway for Muni service,

whichever is less. The threshold for transit impacts is based on the adopted City Charter section 8A.103 (c)1, which established an 85 percent on-time performance service standard for Muni, which considers vehicles arriving more than four minutes beyond a published schedule time late, and the potential secondary impacts on the physical environment associated with riders who switch to automobile- based modes when transit becomes less convenient.

The 2019 TIA Guidelines indicate that a significant impact could occur if a project would result in transit delay greater than or equal to four minutes. This criterion is based on substantial evidence provided in Appendix I of the 2019 TIA Guidelines (p. I-26) and is explained in a July 20, 2018, SFMTA memorandum included as RTC Attachment 5. The commenters provide no substantial evidence to demonstrate that the information used to develop the criterion is flawed or inadequate.

The department applies this transit delay threshold of significance to each transit route within the study area. If the project adds four additional minutes of total additional delay from the existing condition along an individual transit route, then the project's impact to that transit route could be significant. This application accounts for sources of delay along the transit route within the study area.

Several commenters state that the department's threshold of significance is four minutes in between individual transit line stops; these comments are incorrect. The threshold is four minutes of additional delay to an individual transit line *within* the study area boundaries, which is a more stringent threshold than only *between* individual transit line stops.

For example, there are nine stops within the transit delay study area boundary for the 29 Sunset outbound route (i.e., between Plymouth Avenue/Ocean Avenue and Mission Street/Persia Avenue). Under existing conditions, the 29 Sunset (outbound) takes 12:09 minutes to travel from Plymouth/Ocean Avenue to Mission Street/Persia Avenue. The transportation analysis adjusts travel times to account for the Developer's Proposed Option trips; it is anticipated that the 29 Sunset (outbound) would take 13:07 minutes to travel from Plymouth/Ocean Avenue to Mission Street/Persia Avenue. The difference between 12:09 minutes under existing conditions and 13:07 minutes with the Developer's Proposed Option is 58 seconds. The 58 seconds difference in transit travel time between these nine stops is the total additional delay attributable to the Developer's Proposed Option; this difference is then compared to the four-minute threshold of significance. In the case of the 29 Sunset (outbound), the 58 seconds delay is not above the four-minute threshold of significance and the Developer's Proposed Option would not result in a significant delay to the 29 Sunset under existing plus project conditions.

A commenter correctly notes that footnote 96 on draft SEIR p. 3.B-52 includes a typo reference to City Charter section 8A.103. The following edit clarifies the draft SEIR text by providing reference to the City Charter statute that establishes the 85 percent on-time performance service standard. Footnote 96 on draft SEIR p. 3.B-52 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> [96] The threshold uses the adopted the Transit First Policy, City Charter section 8A.103(c)1, 85~~,~~ percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.

### *Existing plus Project Conditions Transit Delay*

As described on draft SEIR p. 3.B-52, the analysis methodology assesses three sources of project-related transit delay: traffic congestion delay; transit reentry delay; and passenger boarding delay. Changes in transit travel times were estimated to determine if the proposed project would increase existing transit travel times on individual routes so that additional transit vehicles would be required to maintain the frequency of service.

Transit impacts are discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99. Additional discussion of the transit delay assessment is provided in Appendix C2, Transit Assessment Memorandum. The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) is evaluated for transit routes operating along Frida Kahlo Way and Ocean Avenue within the transportation study area. The routes and study segments represent routes and study segments to which the project would increase vehicle trips and passenger boarding/alighting events, thereby resulting in potential increased transit delay (traffic congestion, transit reentry delay, and passenger boarding delay). As shown in Table 3.B-18, Transit Delay Analysis on draft SEIR p. 3.B-74, the proposed project would not increase transit delays by more than four minutes within the study area and, therefore, would result in a less-than-significant impact related to transit delay under existing plus project conditions.

One commenter erroneously states that the draft SEIR uses the 2010 Highway Capacity Manual and that the data are at least 15 years old. First, the draft SEIR uses the 2000 Highway Capacity Manual, not the 2010 Highway Capacity Manual, for reentry delay to transit vehicles. The draft SEIR is consistent with the guidelines in Appendix I: Public Transit, of the 2019 TIA Guidelines Update.[29] The 2000 Highway Capacity Manual includes empirical data that provides transit reentry delay times based on adjacent lane traffic. These data represent the likelihood a bus can find gaps to reenter into traffic based on the frequency of adjacent vehicle arrivals. This relationship is not expected to have changed substantively since the data were collected and published because driver acceptance of critical gaps in traffic is a constant variable and has not changed over time. Explanation of this analysis is provided under Impact TR-4 on draft SEIR p. 3.B-52.

One commenter notes that the transit delay analysis does not consider the 43 Masonic line segment between the City College Bookstore and the Balboa Park Bay Area Rapid Transit (BART) Station. The transit delay analysis has been clarified to include the segment between the City College Bookstore (50 Frida Kahlo Way) and the Geneva Avenue/Howth Street stop in both directions, which captures the geographic extent of project-related transit delays to the 43 line. The *Project-Related Change* data presented in draft SEIR Table 3.B-18 below thus accounts for this extended segment through the Ocean Avenue/Geneva Avenue/Frida Kahlo Way intersection. The *Existing Conditions, Transit Travel Times* data presented in the same table were based on travel time runs for the former analysis segment beginning or ending at the City College Bookstore and have not been reconstructed to match. Thus, the *Existing Conditions, Transit Travel Time* and *Project-Related Changes* columns in Table 3.B-18 represent the 43 line between Foerster Street/Monterey Boulevard and the City College South Entrance, with a *lower* estimate of existing travel times and thresholds than if

[29] *https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.*

they represented the segment extending to Geneva Avenue/Howth Street. The *Project-Related Change* columns in Table 3.B-18 represent increases for the whole segment and are sufficient to reach a conclusion. The revised analysis does not change the draft SEIR analysis conclusions.

At the time the transit analysis commenced in 2018 for the draft SEIR, the department was still developing the 2019 TIA Guidelines. The average per passenger boarding delay number used for the project analysis was two seconds per passenger, as identified under Impact TR-4 on draft SEIR p. 3.B-52. Subsequently, the 2019 TIA Guidelines were published and now recommend using an average of 2.5 seconds of boarding delay per passenger. This 2.5 seconds represents the average per-passenger boarding/alighting time; individual times may vary depending on passenger characteristics, the total number of passengers boarding and alighting, and the distribution within the bus of boarding and alighting events. The 2.5 seconds uses empirical data from the SFMTA's evaluation of all-door-boarding policy implementation.

For consistency with now-published guidance, the passenger boarding delay numbers are reapplied to proposed project transit delay and are represented in the revised draft SEIR Table 3.B-18, Transit Delay Analysis. The change in assumption from using 2 seconds per passenger to 2.5 seconds per passenger increased the estimated delay as presented in the modified Table 3.B-18 below.

The following clarifies the transit travel times in the draft SEIR in response to the comments and to revise the passenger boarding times. The following clarifications do not change conclusions regarding the level of significance of the project-level and cumulative transit impacts.

The text on draft SEIR pp. 3.B-22 to 3.B-23 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> Muni transit operations in the study area were evaluated using transit delay analysis. The transit delay analysis presents the delay associated with traffic congestion, transit reentry, and passenger boarding along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:
>
> - ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
> - ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
> - ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
> - K/T Third/Ingleside:
>   - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
>   - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
> - 29 Sunset
>   - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
>   - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
> - 43 Masonic
>   - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)

- Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)

- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (inbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (outbound)

The results of the transit delay analysis are summarized in **Table 3.B-8, ~~Existing Transit Delay~~ Existing Transit Travel Times**, and provided in Attachment C, Corridor Delay Analysis Synchro Worksheets, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations, of SEIR Appendix C2, Transit Assessment Memorandum. Transit ridership and capacity analysis are provided in Attachment F (transit ridership and capacity analysis) of SEIR Appendix C2 for informational purposes. Table 3.B-8 presents the estimated ~~seconds of delay a~~ transit vehicle ~~encounters~~ travel times during the a.m. and p.m. peak hours ~~along each of the study corridors~~.

**~~TABLE 3.B-8~~**
**~~EXISTING TRANSIT DELAY~~**

| ~~Corridor~~ | ~~Weekday a.m. Peak Hour (seconds of delay)~~ | | ~~Weekday p.m. Peak Hour (seconds of delay)~~ | |
|---|---|---|---|---|
| | ~~Northbound/ Eastbound~~ | ~~Southbound/ Westbound~~ | ~~Northbound/ Eastbound~~ | ~~Southbound/ Westbound~~ |
| ~~Frida Kahlo Way~~ | ~~3~~ | ~~12~~ | ~~3~~ | ~~25~~ |
| ~~Ocean Avenue~~ | ~~110~~ | ~~132~~ | ~~113~~ | ~~133~~ |
| ~~Geneva Avenue~~ | ~~70~~ | ~~48~~ | ~~66~~ | ~~41~~ |

~~SOURCE: Kittelson & Associates Inc., 2018.~~

~~NOTES:~~

~~Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.~~

**TABLE 3.B-8**
**EXISTING TRANSIT TRAVEL TIMES**

| Transit Line | Study Segment | Existing Transit Travel Time[a] | |
|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period |
| K/T | Jules Ave/Ocean Ave to Balboa Park BART (outbound) | 3:30 | 8:42 |
| | San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave (inbound) | 3:28 | 10:03 |
| 29 | Plymouth Ave/Ocean Ave to Mission St/Persia Ave (outbound) | 8:01 | 12:09 |
| | Mission St/Persia Ave to Plymouth Ave/Ocean Ave (inbound) | 7:10 | 9:55 |
| 43 | Geneva Avenue/Howth Street to Foerster St/Monterey Blvd (inbound) | 4:20 | 4:37 |
| | Gennessee St/Monterey Blvd to Geneva Avenue/Howth Street (outbound) | 4:16 | 4:23 |
| 49 | Frida Kahlo Way/City College South Entrance to Mission St/Persia Ave (outbound) | 5:39 | 10:04 |
| | Mission St/Ocean Ave to Frida Kahlo Way/City College South Entrance (inbound) | 7:18 | 11:25 |

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

As shown in Table 3.B-8, the ~~highest transit delays~~ most variability in transit travel times are experienced along Ocean Avenue ~~between Plymouth Avenue and Judson Avenue~~ in the westbound direction where there is a difference in travel times of over 6.5 minutes between the weekday a.m. and p.m. peak hours. This is primarily caused by the vehicular traffic at the Ocean Avenue/San Jose Avenue intersection during the weekday p.m. peak hour, which operates with an average intersection delay above 100 seconds. Additionally, as a result of the high volume of vehicle traffic ~~volumes~~ in the curbside travel lane on westbound Ocean Avenue (between 900 and 930 vehicles per hour) transit vehicles ~~in this corridor~~ typically experience transit reentry delays of around 11 seconds.

The text on draft SEIR pp. 3.B-73 to 3.B-74 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) was evaluated along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~

- K/T Third/Ingleside:
  - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (outbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (inbound)

The results of the transit delay analysis are summarized in **Table 3.B-18, Transit Delay Analysis**~~, and~~. Synchro travel time calculation worksheets presenting transit delay along the corridors are provided in Attachment C, Corridor Delay Analysis Synchro Worksheets~~, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations,~~ of SEIR Appendix C2, Transit Assessment Memorandum and supplementary transit analysis is provided in the SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.

**TABLE 3.B-18**
**TRANSIT DELAY ANALYSIS**

| Corridor | Weekday a.m. Peak Hour (seconds of delay) | | Weekday p.m. Peak Hour (seconds of delay) | |
|---|---|---|---|---|
| | Northbound/ Eastbound | Southbound/ Westbound | Northbound/ Eastbound | Southbound/ Westbound |
| **Transit Delay** | | | | |
| **Existing Conditions** | | | | |
| Frida Kahlo Way | 5 | 15 | 5 | 28 |
| Ocean Avenue | 121 | 143 | 124 | 144 |
| Geneva Avenue | 79 | 53 | 75 | 46 |
| **Existing plus Developer's Proposed Option** | | | | |
| Frida Kahlo Way | 18 | 74 | 29 | 101 |
| Ocean Avenue | 187 | 182 | 182 | 244 |
| Geneva Avenue | 99 | 127 | 117 | 127 |
| **Existing plus Additional Housing Option** | | | | |
| Frida Kahlo Way | 21 | 87 | 46 | 111 |
| Ocean Avenue | 183 | 207 | 208 | 272 |
| Geneva Avenue | 109 | 137 | 133 | 137 |
| **Project-Related Increase in Delay** | | | | |
| **Developer's Proposed Option** | | | | |
| Frida Kahlo Way | 13 | 59 | 24 | 73 |
| Ocean Avenue | 66 | 39 | 58 | 100 |
| Geneva Avenue | 20 | 74 | 42 | 81 |
| **Additional Housing Option** | | | | |
| Frida Kahlo Way | 16 | 72 | 41 | 83 |
| Ocean Avenue | 62 | 64 | 84 | 128 |
| Geneva Avenue | 30 | 84 | 58 | 91 |

SOURCE: Kittelson & Associates, Inc. 2018.

NOTES:

Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.

**TABLE 3.B-18**
**TRANSIT DELAY ANALYSIS**

| Transit Line | Study Segment | Transit Travel Time | | Project-Related Change | | Exceeds Four-Minute Threshold?[a] | |
|---|---|---|---|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period |
| **Existing Conditions[b]** | | | | | | | |
| K/T | Jules/Ocean to Balboa Park BART (outbound) | 3:30 | 8:42 | = | = | = | = |
| | San Jose/Geneva to Dorado/Ocean (inbound) | 3:28 | 10:03 | = | = | = | = |
| 29 | Plymouth/Ocean to Mission/Persia (outbound) | 8:01 | 12:09 | = | = | = | = |
| | Mission/Persia to Plymouth/Ocean (inbound) | 7:10 | 9:55 | = | = | = | = |
| 43 | Geneva/Howth to Monterey/Foerster[C] (inbound) | 4:50[C] | 5:07[C] | = | = | = | = |
| | Gennessee/Monterey to Geneva/Howth[C] (outbound) | 4:27[C] | 4:46[C] | = | = | = | = |
| 49 | Frida Kahlo/City College South to Mission/Persia (outbound) | 5:39 | 10:04 | = | = | = | = |
| | Mission/Ocean to Frida Kahlo/City College South (inbound) | 7:18 | 11:25 | = | = | = | = |
| **Existing Conditions + Developer's Proposed Option** | | | | | | | |
| K/T | Jules/Ocean to Balboa Park BART (outbound) | 4:36 | 9:40 | 1:06 | 0:58 | No | No |
| | San Jose/Geneva to Dorado/Ocean (inbound) | 4:07 | 11:43 | 0:39 | 1:40 | No | No |
| 29 | Plymouth/Ocean to Mission/Persia (outbound) | 9:07 | 13:07 | 1:06 | 0:58 | No | No |
| | Mission/Persia to Plymouth/Ocean (inbound) | 7:49 | 11:35 | 0:39 | 1:40 | No | No |
| 43 | Geneva/Howth to Monterey/Foerster[C] (inbound) | 5:04[C] | 5:33[C] | 0:14 | 0:26 | No | No |
| | Gennessee/Monterey to Geneva/Howth[C] (outbound) | 5:37[C] | 5:50[C] | 1:10 | 1:04 | No | No |
| 49 | Frida Kahlo/City College South to Mission/Persia (outbound) | 6:45 | 11:02 | 1:06 | 0:58 | No | No |
| | Mission/Ocean to Frida Kahlo/City College South (inbound) | 7:57 | 13:05 | 0:39 | 1:40 | No | No |
| **Existing Conditions + Additional Housing Option** | | | | | | | |
| K/T | Jules/Ocean to Balboa Park BART (outbound) | 4:32 | 10:06 | 1:02 | 1:24 | No | No |
| | San Jose/Geneva to Dorado/Ocean (inbound) | 4:32 | 12:11 | 1:04 | 2:08 | No | No |
| 29 | Plymouth/Ocean to Mission/Persia (outbound) | 9:03 | 13:33 | 1:02 | 1:24 | No | No |

| Transit Line | Study Segment | Transit Travel Time | | Project-Related Change | | Exceeds Four-Minute Threshold?[a] | |
|---|---|---|---|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period |
| | Mission/Persia to Plymouth/Ocean (inbound) | 8:14 | 12:03 | 1:04 | 2:08 | No | No |
| 43 | Geneva/Howth to Monterey/Foerster[C] (inbound) | 5:07[C] | 6:07[C] | 0:17 | 1:00 | No | No |
| | Gennessee/Monterey to Geneva/Howth[C] (outbound) | 5:39[C] | 6:07[C] | 1:12 | 1:21 | No | No |
| 49 | Frida Kahlo/City College South to Mission/Persia (outbound) | 6:41 | 11:28 | 1:02 | 1:24 | No | No |
| | Mission/Ocean to Frida Kahlo/City College South (inbound) | 8:22 | 13:33 | 1:04 | 2:08 | No | No |

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] The threshold is calculated as the existing transit travel time plus four minutes.

[b] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

[c] The Transit Travel Time column for existing conditions represents the 43 line between Geneva Avenue/Howth Street and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), with collected transit travel time data along the route segment between Frida Kahlo Way/Geneva Avenue/Ocean Avenue and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), plus the Synchro estimated delay at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The Project-Related Change columns in Table 3.B-18 represent Synchro-estimated increase for the 43 line between Foerster Street/Monterey Boulevard and Geneva Avenue/Howth Street.

### *Developer's Proposed Option*

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of ~~73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 1 minute and 40 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 6 seconds along Ocean Avenue to the 29, 49, and K/T in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, t~~T~~he majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, t~~T~~he Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, based on the established thresholds

of significance, the Developer's Proposed Option would result in a ***less-than-significant*** impact related to transit delay.

### *Additional Housing Option*

As shown in Table 3.B-18, vehicle and transit generated by the Additional Housing Option would increase transit delay by a maximum of ~~83 seconds along Frida Kahlo Way, (southbound direction, weekday p.m. peak hour), a maximum of 128 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 91 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 2 minutes and 8 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 2 seconds along Ocean Avenue to the 29, 49, and K/T in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, t~~T~~he majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Additional Housing Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, t~~T~~he Additional Housing Option would not result in transit delay greater than or equal to four minutes.[~~123~~] Therefore, based on the established thresholds of significance, the Additional Housing Option would result in a ***less-than-significant*** impact related to transit delay.

[~~123~~] ~~Ibid~~

### *Cumulative Conditions Transit Delay*

As discussed on draft SEIR p. 3.B-95, the transit delay contribution from the project, City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the threshold of significance for individual Muni routes. As a result, the proposed project, in combination with cumulative projects, could result in a significant cumulative public transit delay impact. Based on a review of the project-related increase in delay under existing plus project conditions and the potential for increased delay under cumulative conditions, the proposed project options could have a cumulatively considerable contribution to transit impacts.

The draft EIR identified a significant cumulative impact to the following transit lines: the K/T Third/Ingleside, the 29 Sunset, 43 Masonic, and the 49 Van Ness/Mission. However, upon further review of the project's contribution to cumulative transit impacts, the project would not make a considerable contribution to transit delay for the 49 Van Ness/Mission route in the study area. The contribution of project vehicle trips along the 49 Van Ness/Mission segment from the study area boundary of San Jose/Ocean avenues up to the 49 Van Ness/Mission's terminus at the City College Loop would result in a maximum increase of 13 seconds of delay with the Developer's Proposed

Option and a maximum increase of 24 seconds of delay with the Additional Housing Option.[30] This does not meet the two-minute threshold for a considerable contribution. As such, the proposed project would not result in a substantial transit delay to the 49 Van Ness/Mission and no mitigation is required. Text edits have been made to the draft SEIR to revise the conclusion related to the 49 Van Ness/Mission.[31]

To mitigate the project's considerable contribution to transit delay under cumulative conditions, the draft EIR identified Mitigation Measure M-C-TR-4. This mitigation measure requires that the project sponsor monitor and report cumulative transit travel times for the impacted route segments. The mitigation measure identifies transit travel performance standards for the impacted routes and further states that if the performance standard is not met, the project sponsor shall implement feasible measures to reduce the transit delay and meet the performance standard. The mitigation measure identifies potential measures to reduce transit delay including off-site capital improvements such as turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects.

During the preparation of the RTC, the planning department, in consultation with the SFMTA, identified specific capital improvements that would reduce transit travel time to impacted routes. These capital improvements would reduce the project's contribution to cumulative transit delay below the two-minute threshold, and as such, the project's contribution would no longer be considerable. The methods, data collection, and results of this analysis, including discussion of secondary construction and operational effects of implementing the capital improvements, are included in RTC Chapter 5 and SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.

The project sponsor would commit funding to the capital improvements that would reduce the project's cumulatively considerable contribution to transit delay. The construction of these improvements negates the need for ongoing monitoring and reporting as the project's cumulatively considerable contribution would be reduced; therefore, this component has been removed from the mitigation measure. However, given the uncertainty of SFMTA approval of these capital improvements measures, the impact of the proposed project options would remain

[30] During the weekday a.m. peak hour the Developer's Proposed Option would increase delay for the 49 Van Ness/Mission by 5 seconds in the eastbound direction and 13 seconds in the westbound direction from the study area boundary of San Jose/Ocean avenues up to the 49 Van Ness/Mission's terminus at the City College Loop. During the weekday p.m. peak hour the Developer's Proposed Option would increase delay by 2 seconds in the eastbound direction and 9 seconds in the westbound direction. During the weekday a.m. peak hour the Additional Housing Option would increase delay for the 49 Van Ness/Mission by 6 seconds in the eastbound direction and 17 seconds in the westbound direction from the study area boundary of San Jose/Ocean avenues up to the 49 Van Ness/Mission's terminus at the City College Loop. During the weekday p.m. peak hour the Additional Housing Option would increase delay by 1 second in the eastbound direction and 24 seconds in the westbound direction.

[31] For informational purposes, the project team, in consultation with the SFMTA, examined potential improvements to reduce transit travel time to the 49 Van Ness/Mission route. On Ocean Avenue, between Frida Kahlo Way and Howth Avenue, the team identified there could be potential transit time savings to the 49 Van Ness/Mission route by moving the bus stop nearest to City College into the streetcar track lane. This is a policy decision that the SFMTA is currently investigating that would not require a financial commitment from the project sponsor.

***significant and unavoidable with mitigation,*** even with implementation of Mitigation Measure M-C-TR-4.

The following edits update draft SEIR pp. 3.B-95 to 3.B-98, including **Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay**, to reflect the impact conclusion updates regarding the 49 Van Ness/Mission and transit capital improvements (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> **Mitigation Measure M-C-TR-4: ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay.** The project sponsor, under either project option, shall ~~monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall~~ implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay ~~and meet the transit travel time performance standard~~ for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.
>
> ~~**Transit Travel Time Performance Standard**~~**Routes and Study Segments.** ~~Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4.~~ The following routes and study segments ~~shown in Table M-C-TR- represent routes and study segments~~ would most likely ~~to have a~~ experience cumulative transit delay impact to which the project would have a considerable cumulative contribution.
>
> - K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)
> - K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue
> - 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue
> - 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue
> - 43 Masonic (outbound): Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street
> - 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard

**TABLE M-C-TR-4**
**TRANSIT TRAVEL TIME PERFORMANCE STANDARD**

| Transit Line | Study Segment | Existing Transit Travel Time[a] | | Performance Standard[b] | |
|---|---|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period |
| K/T | Jules Ave/Ocean Ave to Balboa Park BART | 3:30 | 8:42 | 7:30 | 12:42 |
| | San Jose Ave/Geneva Ave to Dorado Terr/ Ocean Ave | 3:28 | 10:03 | 7:28 | 11:28 |
| 29 | Plymouth Ave/Ocean Ave to Mission St/ Persia Ave | 8:01 | 12:09 | 12:01 | 16:01 |
| | Mission St/Persia Ave to Plymouth Ave/ Ocean Ave | 7:10 | 9:55 | 11:10 | 15:10 |
| 43 | Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd | 4:20 | 4:37 | 8:20 | 8:37 |
| | Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance | 4:16 | 4:23 | 8:16 | 8:23 |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave | 5:22 | 10:04 | 9:22 | 14:04 |
| | Mission St/Ocean Ave to Frida Kahlo Way/ CCSF South Entrance | 7:18 | 11:25 | 11:18 | 15:25 |

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.

[b] The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

**Monitoring and Reporting.** The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.

*Timing*. The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building[32] at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.

[32] A new major building is City College of San Francisco Ocean Avenue campus construction post-2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.

~~The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets it terms for this measure.~~

~~*Collection and Reporting Details*. For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non-holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.~~

~~For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair-share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).~~

**Implement ~~Fair-Share of~~ Capital Improvement Measures.** ~~If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the~~ The project sponsor shall ~~implement~~ contribute funds for the following capital improvement measures that reduce transit travel times. ~~These measures are subject to agency approval and could include:~~

1. **Signal Timing Modifications at Ocean Avenue/Brighton Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
2. **Signal Timing Modifications at Ocean Avenue/Plymouth Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
3. **Bus Boarding Island on Southbound Frida Kahlo Way.** The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.

The cost of these capital improvement measures is $200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment) and shall be considered

the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA[33], shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay $110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and $90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2.

If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA.

The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.

~~1. Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.~~

~~2. Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.~~

~~3. Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may include off-site capital improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.~~

~~**Term Condition A:** The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.~~

~~**Term Condition B:** The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.~~

~~In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and~~

[33] Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

Implementation of these capital improvement measures would reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. Payment of the fair share contribution levels would mitigate the project's contribution to the cumulative impacts of the estimated transit delay added by full development of the proposed project options, City College facilities master plan, and other cumulative projects. However, given the uncertainty of SFMTA approval ~~of other measures under their jurisdiction,~~ of these capital improvement measures, the impact of the proposed project options would remain ***significant and unavoidable with mitigation,*** even with implementation of Mitigation Measure M-C-TR-4**.**

**Significance after Mitigation:** Significant and Unavoidable.

### *Potentially Hazardous Conditions – Transit*

The draft SEIR includes an evaluation of potentially hazardous conditions for people accessing transit under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. As discussed on draft SEIR p. 3.B-67, under existing conditions, people walking to/from the K/T Third/Ingleside transit boarding island on Ocean Avenue at Lee Avenue were observed to cross the rightmost travel lane to access the boarding island or sidewalk instead of crossing at the crosswalk. People waited for gaps in vehicle and bicycle traffic before crossing the travel lane, and vehicles and bicycles were generally traveling slowly with sufficient gaps in traffic for people to cross. While some of the project-generated transit riders would be expected to use the crosswalk at Lee Avenue to access the boarding island, it is likely that people would continue to cross the rightmost travel lane to access the boarding island.

Several factors are considered in the evaluation of the proposed project's potential to result in potentially hazardous conditions for people walking to/from the K/T Third/Ingleside boarding island. Such factors include the presence of an existing protected crossing at Lee Avenue, that the project would add a maximum of 132 vehicles during the weekday p.m. peak hour under the Additional Housing Option, and that the anticipated vehicle speeds of project traffic approaching the Lee Avenue intersection to turn right would be less than 15 miles per hour. Based on these considerations, the proposed project options would not create potentially hazardous conditions for people walking to/from the K/T Third/Ingleside boarding island. Because the proposed project would not result in a significant impact related to conditions for people walking, no mitigation is required.

### *Geographic Study Area for Transit*

One commenter seeks clarification on how the draft SEIR geographic study area for transportation and circulation was developed. The geographic study area analyzed for the proposed project includes the overall vehicular roadway network that residents, employees, and visitors would use in traveling to and from the project site generally within 0.25 miles of the center of the project site. As described in Section 3.B.4, Existing Conditions, on draft SEIR p. 3.B-5, the transportation study area was selected to include elements of the network that:

- Represent access points to the regional highway system (e.g., freeway on- and off-ramps);

- Are located along major street corridors serving the project site (e.g., Ocean Avenue and Frida Kahlo Way); or
- Are located in the immediate vicinity of the project site (e.g., San Ramon Way/Southwood Drive/Plymouth Avenue).

Pertaining to transit, the geographic boundary of the study area includes the closest transit stops to the project site for the relevant Muni lines and includes the intersections and street segments along which project traffic would be most concentrated. Outside the geographic study area, project vehicle traffic would be more dispersed, thereby lessening the potential for impacts.

### *Mitigation Measures*

Comments include recommendations for additional mitigation measures to reduce transit delay. Section 15126.2 of the CEQA Guidelines states that "[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment … the EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected." Mitigation measures in the draft SEIR are provided only for impacts found to be significant (CEQA Guidelines section 15126.4). Under CEQA, mitigation measures in an EIR must have an essential nexus (i.e., connection) between the mitigation measure and the significant impact and the mitigation must be "roughly proportional" to the significant impacts of the project (CEQA Guidelines section 15126.4(a)(4)(a) and (b)). Mitigation measures are not required for effects which are not found to be significant (CEQA Guidelines section 15126.4(a)(3)). The draft SEIR adequately and accurately addresses public transit impacts and presents applicable mitigation measures, as appropriate.

As discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79, the proposed project options would result in a less-than-significant impact related to transit delay and no mitigation would be required under existing plus project conditions.

As discussed under Impact C-TR-4 on SEIR pp. 3.B-94 to 3.B-99, the proposed project may result in a cumulatively considerable contribution related to transit delay. To reduce the project's considerable contribution, implementation of Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay, was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures (e.g., modifying signal phasing or restricting certain movements for general traffic that delay transit vehicles at locations along given routes) to maintain transit travel times. for each individual transit route within the study area to, within four minutes of existing levels.

While the proposed mitigation measure and the timing of the mitigation measure is appropriate and meets CEQA requirements, the project sponsor worked with SFMTA and planning department staff to identify treatments that could be implemented in the short term to prevent a cumulatively significant contribution and reduce potential for project-related transit delay impacts.

As documented in the revised Mitigation Measure M-C-TR-4 shown on RTC p. 4.C-45, the project applicant would fund the design and construction of the following capital improvement measures:

- Modification of the existing traffic signal at Ocean Avenue/Brighton Avenue to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
- Modification of the existing traffic signal at Ocean Avenue/shall to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
- Bus boarding island on southbound Frida Kahlo Way.

As documented in the Transit Delay Analysis and Capital Improvements Memorandum in RTC Chapter 5 and as new SEIR Appendix C4, these capital improvements would reduce delay and prevent a cumulatively significant project contribution to cumulative impacts on the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.

As previously discussed on RTC p. 4.C-43, upon further review of the project's contribution to cumulative transit impacts, the project would not make a considerable contribution (defined as two minutes or more under cumulative conditions) to transit delay for the 49 Van Ness/Mission route in the study area and no mitigation measures are required.

One commenter proposes a series of mitigation measures to reduce the project's impact to transit delay; responses to each are provided below. The responses are provided for informational purposes, because as described above, feasible project measures were identified for the project's considerable contribution to the significant cumulative transit delay impact. However, the impact remains significant and unavoidable due the uncertainty in the SFMTA adopting such measures.

- **Restrict left turns at the intersection of Ocean Avenue and Brighton Avenue.** Eastbound left turn prohibitions are included as a capital improvement measure in the revised Mitigation Measure M-C-TR-4 to reduce transit delay for routes operating along Ocean Avenue.
- **Install transit signal priority at all traffic lights on Ocean Avenue between San Jose Avenue and Junipero Serra Boulevard and on Geneva Avenue between San Jose Avenue and Ocean Avenue.** The draft SEIR identified capital improvement measures that would reduce the project's considerable contribution to transit delay under cumulative conditions; no additional measures are necessary. As described above in Mitigation Measure M-C-TR-4, should the SFMTA adopt a strategy to reduce transit travel times to the impacted routes that does not involve the proposed signal timing modifications or bus boarding islands identified, the project's fair share contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed by the SFMTA.
- **Give Muni lines higher priority at St. Francis Circle and West Portal to improve speed and reliability of the K/T line.** CEQA requires that mitigation measures proposed for a project have a nexus to the physical environmental effect that occurs as a result of the project. Transit operations and any transit delays at these locations and associated delay are outside of the study area and reflect existing conditions. The commenter does not provide substantial evidence demonstrating a nexus between the Balboa Reservoir Project and measures proposed at the St. Francis Circle and West Portal.

- **Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.** Modifying stops (i.e., extending boarding islands) to accommodate two-car boarding would allow for enhanced passenger boarding and alighting but would not address the more substantive causes of transit delay (i.e., additional vehicles in the study area) as a result of the project. The proposed project would also not have significant impacts related to potentially hazardous conditions that would necessitate this is a mitigation measure.
- **Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full.** The Whole Foods grocery store on Ocean Avenue is part of the existing condition and is not under the purview of the proposed project.
- **Undergrounding the K Muni line.** This measure would represent a significant infrastructure project. The City is currently undertaking a transit corridors study as part of ConnectSF.[34] The study will develop and prioritize initial concepts for subways, bus rapid transit lines, and other improvements to create a rapid, reliable transit network. The results of this study are not yet known, and, thus, the feasibility of a project that undergrounds the K Muni line is unknown as of the publication of this document. Further, this sort of mitigation would not be roughly proportional to the project's considerable contribution to a significant cumulative transit delay impact.

## *Comment TR-5: Loading Impacts*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-OSAWA-3
I-PEDERSON2-12

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"Most critically, according to the proposal ***the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue***. **This would seem to be wholly inadequate.** Additionally, that single lane on Lee will also be potentially occupied by truck loading activities for Whole Foods and neighboring businesses."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-3*])*

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"The Draft should clarify why potential loading impacts caused by Whole Foods' failure to comply with permit requirements are treated as impacts caused by the Balboa Reservoir project. The City could resolve those impacts by simply requiring Whole Foods to comply with existing legal requirements."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-12*])*

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[34] City and County of San Francisco, ConnectSF, *https://connectsf.org/about/components/studies/*, accessed March 27, 2020.

## Response TR-5: Loading Impacts

One commenter incorrectly characterizes the project's vehicular access points and further states that existing loading operations on Lee Avenue would affect the vehicular inlet to the project. Another commenter requests that the draft SEIR clarify why the freight loading impacts identified on Lee Avenue are treated as impacts caused by the proposed project.

Comments regarding specific elements of the project description are addressed in Response PD-2, Project Description, on RTC p. 4.B-4.

### *Project Description Clarification*

In addition to Lee Avenue, vehicular access to the project site would also be provided via an access road that would connect to the north end of the project site via Frida Kahlo Way as discussed on draft SEIR p. 2-26. As discussed on draft SEIR p. 2-26 and shown in Figure 2-13a on draft SEIR p. 2-28, the proposed project would include a 10-foot-wide northbound lane and would reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one 10-foot-wide southbound through/right-turn lane and one 10-foot-wide southbound left-turn lane. This change from two to three travel lanes would preclude the continued use of curb space along Lee Avenue for freight loading because trucks stopped for loading would obstruct one of the travel lanes.

### *Existing Freight Loading on Lee Avenue*

Project-related freight loading analyses are typically limited to an evaluation of the effects of project-related loading demand on loading conditions within the study area. However, the proposed project includes the extension of Lee Avenue with resulting changes to the areawide on-street loading supply. Therefore, the analysis looks beyond the project-related loading demand and evaluates secondary effects on areawide loading resulting from proposed streetscape modifications and access to the project site. This analysis of the effect of the proposed project on off-site loading activities is presented under Impact TR-6b, on draft SEIR pp. 3.B-85 to 3.B-91; a brief summary of the discussion is provided below as well.

As discussed under Impact TR-6b, under existing conditions, Lee Avenue is a dead-end street with no through traffic. In its current condition, Lee Avenue functions as a loading zone that provides convenient on-street loading to meet Whole Foods' loading demand and accommodate deliveries and passenger loading activity related to other nearby businesses along Ocean Avenue. The proposed project would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area. The proposed project would thereby reduce the supply of on-street loading available to Whole Foods and nearby land uses, creating a loading deficit, which is determined to result in secondary effects on people bicycling and public transit delay. For these reasons, the draft SEIR identifies a significant and unavoidable impact related to freight loading that is attributable to the project.

As stated on draft SEIR p. 3.B-88, in recognition that the Balboa Reservoir would change the conditions of Lee Avenue, the 1150 Ocean Avenue property owner is working with Whole Foods to internalize loading demand to the extent possible.

Furthermore, as acknowledged on draft SEIR p. 3.B-88 and further restated by the commenter, the planning department has the authority to enforce the 1150 Ocean Avenue conditions of approval. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

## *Comment TR-6: Cumulative Impacts*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

O-WPA1-2
O-WPA3-6
I-JA9-1

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"Second, we will discuss the failure to properly take into consideration the cumulative transportation impacts of the projected increase in City College enrollment. There's an increase, as the DSEIR correctly notes, by I think 26 to 56 percent over the next few years, and it fails to take that into consideration."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-2*])*

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"CCSF Enrollment Increase

CCSF has stated that the need for upgraded facilities is based on an approximately 55% increase in anticipated enrollment by 2026 but the cumulative transportation impact discussion is projected to year 2040. The additional enrollment between 2026 and 2040 for CCSF is not discussed. It can be assumed that the annual increase hence forth would be substantially greater than the annual percentage increase used by the Department based on a citywide average. The extraordinary growth in the student enrollment at CCSF as a consequence of free tuition mandates a cumulative analysis that accurately reflects the impacts of the cumulative growth of CCSF on transportation. We believe the DSEIR impact analysis is understated."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-6*])*

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"***2040 Cumulative Conditions*** (p. 3.B-91)

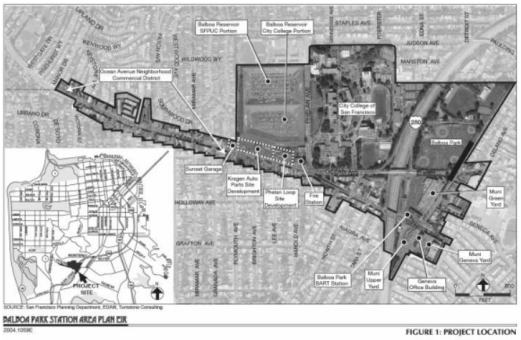
*The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

**The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:**

*The "Project Area" of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*




<!--[if !vml]--><!--[endif]-->

**The SEIR is deficient in its selection of the parameters of geographic context for analysis.**"

*(Alvin Ja, Email, September 10, 2019 [*I-JA9-1*])*

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## Response TR-6: Cumulative Impacts

The comments allege that City College growth impacts are not adequately addressed in the cumulative impact analysis and that the cumulative impact analysis geographic study area is inadequate.

The draft SEIR describes 2040 cumulative conditions on draft SEIR pp. 3.B-55 to 3.B-60 and the cumulative impact analysis on draft SEIR pp. 3.B-91 to 3.B-102. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

The cumulative conditions analysis for transportation topics accounts for active development and transportation projects in the vicinity of the project site in various stages of planning, design, or construction. As explained on draft SEIR p. 3.B-56, the City College Board of Trustees published

its facilities master plan in March 2019 and presented an update at a May 30, 2019, Board of Trustees meeting related to a bond measure that may fund identified projects.[35]

The draft SEIR is consistent with CEQA guidance on level of detail necessary to discuss cumulative impacts. CEQA Guidelines section 15130(b) states that, "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness,…"

As of publication of the notice of preparation and the draft SEIR, City College had not conducted CEQA analysis for the proposed projects, and these projects may change or be further refined. Therefore, the cumulative analysis in the draft SEIR and discussed in this document qualitatively assesses impacts of the facilities master plan projects in the study area using the best available information, consistent with CEQA. It is not practical or reasonable for this SEIR to expand the analysis, based on available information. As a result, the cumulative analysis, as described in under Impact C-TR-4 on draft SEIR p. 3.B-56, adequately and accurately identifies cumulative impacts to public transit delay.

The geographic context for cumulative transportation analysis generally includes the transportation network within 0.5 mile of the project site. This radius accounts for the area in which project-related travel would be most concentrated; beyond this area, trips are more dispersed and the likelihood of any impacts that the project could combine with are diminished.

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## *Comment TR-7: Parking*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| O-WPA1-1 | I-BARISH3-26 | I-KAUFMYN2-3 |
| O-WPA3-1 | I-BARISH3-38 | I-LOHR-1 |
| O-WPA3-2 | I-BERNSTEIN5-6 | I-PEDERSON2-5 |
| O-WPA3-3 | I-HONG-3 | I-PEDERSON1-2 |
| O-WPA3-5 | | |

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"Good afternoon. My name is Michael Ahrens. I am President of the Westwood Park Association, Homeowners Association. I am also a member of the Balboa Citizens Advisory Committee, sometimes called the CAC. And thank you for hearing our comments.

On behalf of the Board of Directors of the Westwood Park Association, the neighborhood that is most affected by this whole development, I'm glad to tell you I will be brief. We will put our comments on the DSEIR in writing.

[35] The City College Facilities Bond (Measure A) passed on March 3, 2020.

But I will say this that the DSEIR is severely flawed and we will tell you why in writing.

I will outline, now, only a series of some of the flaws, and you've heard some of the hints of these things from other speakers tonight. First, we will discuss the failure of the DSEIR to accurately address the cumulative secondary parking impacts caused by the loss of existing parking, including the impacts on transit, Lyft and Uber drivers."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-1*])*

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"Most significant impact of project is the loss of parking for City College. Although parking not an environmental impact under CEQA, SEIR must include analysis of secondary impacts caused by loss of existing parking, including impacts on public transit, and private ride share. Explain where the secondary impact of elimination of virtually all existing available parking on east and west basins on public transit and local traffic is analyzed and why the impact on SFMTA ridership and capacity analysis are presented in the appendices "for information" only. Secondary impacts related to City College on transit and transit delay are not based on most recent information related to foreseeable FMP projects prior to SEIR publication."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-1*])*

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"SEIR doesn't analyze secondary impacts of elimination of parking as part of cumulative impacts on transportation. Non-CEQA parking study by Kittelson anticipates parking shortages caused by project and City College development will lead to increased reliance on public transportation and increase in drivers looking for parking spaces in adjacent residential neighborhoods."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-2*])*

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"Many of the streets within Westwood Park provide on-street parking that results in narrowing the effective roadway width and making two-way vehicle traffic difficult. (DSEIR, p. 6-34) This potentially hazardous condition would be exacerbated by additional vehicles looking for parking due to the shortage created by cumulative development. This is a potentially significant secondary transportation impact that is not adequately addressed in the DSEIR."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-3*])*

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"The developer has stated on its website that there will be a public garage on the site "sized to meet City College demand". The number and location of the replacement parking spaces should be discussed as should the elimination of the off-street parking spaces from the CCSF Master Plan development."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22,2019 [*O-WPA3-5*])*

- There is an aerial analysis of parking lot volumes by time of day. But there is no assessment of the current on-street parking supply. It is known from other campuses and from parking lots serving rail transit like Bart and Cal Train or from light rail in other cities that campuses and large developments put pressure on parking supply, particularly when TOD seeks to provide less parking to support alternative mode choice and to lower development costs. The scoping section has no assessments of the interactive impacts of the college, new apartments and regional parking supply/demand on neighborhood parking conditions post-Development."

*(Jean Barish, Letter, September 23,2019 [*I-BARISH3-26*])*

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"***The DSEIR must consider the impact of reduced parking without first putting viable transportation options in place***

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school.

The goal of increasing ridership levels on the nearby public transportation services is laudable but not realistic. Both MUNI and BART have problems with capacity. They have more riders than they can handle. Regular riders of the 43 and 29 will be able to recount stories of crowded conditions and being passed up by buses. New Reservoir residents will only aggravate unreliable service on public transit.

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College."

*(Jean Barish, Letter, September 23,2019 [*I-BARISH3-38*])*

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"5) The question of having a shuttle provided for City College students and others needing access for that last mile from the BART station has been raised repeatedly at public meetings, such as the Balboa Reservoir CAC. The idea has consistently met with resistance. It's not considered to be a bad idea per se, but it appears to be a financial challenge. Representatives from the City and from the developer have dutifully written the suggestion on white boards but have never embraced it or advocated it. YET THERE HAS TO BE MITIGATION FOR THE IMPACTS ON THE EXISTING CONDITION OF ESSENTIAL PARKING FOR STUDENTS AND FACULTY —for parking which may become unavailable due to a housing development. If there is a development, there will be impacts and consequences which can't just be ignored."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-6*])*

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"2. We need to address the parking for the college."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-3*])*

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"The Draft SEIR speculates that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day…" The assumption that those students and contingent faculty will transition to public transportation services is not realistic as both MUNI and BART have capacity issues. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate the already unreliable service."

*(Wynd Kaufmyn, Email, September 22, 2019 [*I-KAUFMYN2-3*])*

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"I am shocked that the report does not take into account the need for parking at CCSF. There are no dorms at City College. Everyone needs transportation to get there. Muni service is inadequate, especially for night classes. Students and teachers need to be able to park. The loss of this much parking will be devastating to City College."

*(Janet Lohr, Email, August 10, 2019 [*I-LOHR-1*])*

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"B. The Draft fails to identify and evaluate the environmental impacts of the proposed public parking garage.

The Draft's assertion that the public parking garage included in the Developer's Proposed Option will not have any environmental impacts because it is replacing parking that already exists is fundamentally flawed.

According to the City College of San Francisco Transportation Demand Management (TDM) and Parking Plan (March 15, 2019), City College currently has excess parking even during the peak parking demand period of the first week of each semester. It has almost 1,000 excess parking spaces on typical semester days. It has an excess supply even though City College provides parking for free to its employees and at very low cost to its students ($40 per semester, $20 per semester for those receiving financial aid, or $3 for a daily pass).

In light of its glut of free or low-cost parking, it is unsurprising that City College has very high rates of commuting by solo drivers. 66 percent of City College employees drive alone to the Ocean campus. This is almost double the citywide average of 34% (Metropolitan Transportation Commission data for 2018). Similarly, only 5 percent of City College employees walk or bike to the Ocean campus in comparison to the citywide average of 10%, even though a substantial portion of City College employees and students live within three miles of the Ocean campus. A lower percentage of students drive alone to campus (33%), but the TDM and Parking Management Plan concludes that student drivers are especially likely to switch modes of transportation if parking is restricted or becomes more expensive.

Projecting into the future, assuming 25% growth in student enrollment, the TDM and Parking Management Plan projects that a robust TDM program would be sufficient to avoid any parking shortfall on a typical semester day even if the Balboa Reservoir is developed without any replacement parking. If the Performing Arts and Education Center (PAEC) is constructed on an existing City College-owned parking lot, there might be unserved parking demand of up to 415 spaces on a typical semester day, but that assumes no shift in parking demand due to limited supply. According to surveys of employees and students, up to 60% of drivers are likely to shift modes if parking becomes more difficult to obtain. Adding that shift in demand, the unserved parking demand if the Balboa Reservoir is developed without replacement parking, the PAEC is constructed, and enrollment increases by 25% is only 166 spaces.

The Draft has no discussion whatsoever about how construction of a 750-space public parking garage would affect parking demand or the effectiveness of City College's TDM program. Given that the availability of parking encourages more people to drive, the Draft should be revised to address how the proposed public parking garage is likely to result in more VMT and GHG emissions than if it weren't included in the project.

The Draft is also entirely silent about the rationale for the size of the public parking garage. Even if both the Balboa Reservoir project and the PAEC are constructed and the student body increases by 25%, the unserved parking demand on a typical semester day (either 415 spaces or 166 spaces, depending on how supply constraints affect demand) would be far less than 750 spaces if City College implements a robust TDM program. Given that the peak parking demand during the first week of each semester occurs only about 20 hours each year, the peak parking demand hardly seems a plausible rationale for the size of the garage. The only remaining rationale would appear to be a desire to perpetuate current commute patterns and parking demands despite the VMT and GHG emissions that those generate. The Draft should be revised to explain the reason for the size of the proposed public parking garage, the environmental impacts of a garage of that size (e.g., increased VMT and GHG emissions), and whether those environmental impacts could be reduced by shrinking or eliminating the public parking garage."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-5*])*

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"To reduce the amount of housing would increase pressure on housing in areas that are more automobile dependent and have more extreme climate. To provide more public parking would undercut efforts to address climate change by reducing automobile use.

That said, this draft fails to evaluate how the developer's proposed public parking garage would undercut City College's efforts to reduce automobile use. The College's 2019 Transportation Demand Management and Parking Plan concludes that TDM measures would be sufficient to address the loss of parking spaces caused by this project. The only exception will be during a few hours of the first week of each semester. Even then, the shortfall would be less than one-third of the 750 spaces proposed in the public parking garage.

There is, therefore, no need for such a large public parking garage. It would undercut the City's and the College's efforts to respond to the climate crisis by reducing automobile use."

*(Christopher Pederson, CPC Hearing, September 12, 2019 [*I-PEDERSON1-2*])*

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## Response TR-7: Parking

The comments state that the draft SEIR does not adequately analyze the primary and secondary impacts of parking, and that the draft SEIR does adequately analyze the impacts of the up to 750-space public parking garage.

The draft SEIR covers the topic of parking on draft SEIR pp. 3.A-3 and 3.B-31 and draft SEIR Appendix B, Section E.14, on p. B-87. A discussion of the effect of construction of a public parking garage with up to 750 vehicle parking spaces on parking demand and the City College sustainability plan is provided on draft SEIR Appendix B, p. B-90. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

Comments regarding project travel demand and the project analysis approach to TNCs as they relate to the proposed project are addressed in Response TR-2, Travel Demand, on RTC pp. 4.C-6 and 4.C-9. Comments regarding transit delay associated with project vehicle trips are addressed in Response TR-4, Transit Impacts, on RTC p. 4.C-33. Comments regarding the cumulative conditions analysis are addressed in Response TR-6, Cumulative Impacts, on RTC p. 4.C-55. Comments regarding vehicle congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71.

The response to parking comments is organized by the following subtopics:

- Approach to Analysis
- Parking Supply and Utilization

### *Approach to Analysis*

As discussed on draft SEIR pp. 3.A-3 and 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area, and therefore parking is not an environmental impact for the purposes of CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the SEIR presents an analysis of secondary environmental impacts of potential parking shortages as related to City College in draft SEIR Appendix B on p. B-87. For informational purposes, a discussion of existing and project parking supply and demand within the site and within the neighborhood, is provided on RTC Attachment 3, pp. 1 to 3.

### *Parking Supply and Utilization*

As discussed on draft SEIR Appendix B p. B-90, under the Developer's Proposed Option, up to 750 public parking spaces would be constructed near the southern end of the project site or at the northern end of the project site under Variant 2. Alternatively, public parking spaces could be provided in dedicated public parking areas within several of the proposed residential garages. Given that the proposed parking garage would replace an existing 1,007-space surface parking lot, the project would reduce the amount of parking available on site by a total of at least 257 parking spaces. Based on the parking supply and utilization data collected and provided on draft SEIR Appendix C1, p. 12, the east basin parking lot would be able to accommodate the combined number of vehicles in both the project site and east basin during most periods throughout the weekday, with the exception of the peak period of demand during which there would be a maximum shortfall of 239 spaces. This shortfall would be accommodated within the proposed public parking spaces on the site under the Developer's Proposed Option. As discussed on draft SEIR Section 3.A.6, Approach to Cumulative Impact Analysis, p. 3.A-8, the cumulative conditions scenario assumes construction of projects identified in Table 3.A-2 collectively as the "City College Facilities Master Plan," which include potential development on the east basin parking lot.

One commenter asserts that the analysis of secondary effects related to the up to 750 public parking spaces is inadequate and argues that the secondary effects would be greater than the effects of a version of the project without public parking. The analysis of secondary impacts related to parking, as with other environmental analysis topics, compares the proposed project and project variants to existing conditions and also evaluates whether the proposed project and variants would be in conflict with plans and policies adopted for the purpose of mitigating an environmental effect. No significant impacts were identified and, pursuant to CEQA, no alternative garage sizes are necessary to explore.

Further, the VMT impact analysis on pp. 3.B-79 and 80 also found less-than significant impacts for the proposed project and public parking garage. As stated on p. 3.B-80, this conclusion was because, in part, the public parking garage "would replace an existing facility and would not increase the amount of parking available." The discussion above compares effects relative to existing conditions. A discussion of whether the proposed project and variant would conflict with plans and policies adopted for the purpose of mitigating an environmental effect is discussed below, following the text change.

A typo was identified on draft SEIR p. 3.B-79. The last sentence on draft SEIR p. 3.B-79 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> The Developer's Proposed Option would construct an up to ~~650~~750-space public parking garage to partially replace the existing 1,007-space surface parking lot on the project site.

As discussed on draft SEIR Appendix B, p. B-90, the City College Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. Studies show that the removal of parking would likely cause some drivers to shift to another mode of travel. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90, and included in the project's administrative record: City and County of San Francisco,

*Transportation Demand Management Technical Justification*, June 2016 (updated January 2018), references research that the availability of parking increases vehicular travel and that parking supply can undermine incentives to use transit. Additionally, this document summarizes research conducted in San Francisco that found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar context that provide more off-street vehicular parking.

For informational purposes, a discussion of existing and with project parking supply and demand is provided starting on RTC Attachment 3, pp. 1 to 3. As presented in RTC Attachment 3, the observed maximum combined occupancy of the City College surface parking lots occurred between 11 a.m. and 12 p.m. when there were a total of 1,596 cars parked and 578 spaces available (the lots were 73 percent occupied). During the weekday midday peak hour of parking demand, assuming parking was available only at the East Basin (Upper Lot), there would be a shortfall of up to 239 parking spaces. There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces were observed to be available on weekdays during any given time period (a.m., midday, and p.m.). Therefore, the potential parking shortfall for City College students could be accommodated within available on-street parking spaces within the study area without construction of a public parking garage on the project site. The projected parking use generated by the Developer's Proposed Option could be met within available on-site parking spaces during all time periods of the day. With the Additional Housing Option, there would be an approximately 101-space parking shortfall during the overnight period.

One commenter proposes a shuttle to address first- and last-mile connectivity between the proposed project site and the Balboa BART station. The provision of a shuttle would not reduce the project's significant and unavoidable transportation impacts and is therefore, not a CEQA issue. RTC Attachment 3 included analysis of potential shuttle operations and feasibility, indicating that a shuttle would provide limited utility not already provided by Muni service for people traveling to and from the project.[36]

As described in RTC Chapter 5, Draft SEIR Revisions, the Balboa Reservoir project sponsor may fund a portion of a study addressing the potential City College garage on the east basin, if the college decides to consider pursuing such a project.

## *Comment TR-8: Vehicle Traffic Congestion and Associated Impacts*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| A-CALTRANS-2 | I-HONG-4 | I-MUHLHEIM-7 |
| I-AISSA-1 | I-JA3-4 | I-OSAWA-6 |
| I-BARISH3-24 | I-JA8-1 | I-SIMON-6 |
| I-BERNSTEIN5-4 | I-MUELLER1-4 | I-TARQUINO-6 |

[36] Balboa Reservoir – Non-CEQA Transportation Analysis, August 1, 2019, *http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf*

I-COLLINS3-7 I-MUHLHEIM-3 I-ZELTZER-5
I-EVANS2-5 I-MUHLHEIM-5
I-HANSON4-3

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"**Construction-Related Impacts**

Potential impacts to the I-280 from project-related temporary access points should be analyzed. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: https://dot.ca.gov/programs/traffico~erations/transportation-permits."

*(Wahida Rashid, Caltrans Acting District Branch Chief, Letter, September 10, 2019 [*A-CALTRANS-2*])*

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"We are already dealing with tremendous congestion on a daily basis. Our street [Plymouth] cannot tolerate the additional traffic that will be created by the plan proposed. Parking is impossible for existing residents now. Please do not allow the proposed opening of San Ramon!"

*(Sharon Aissa, Letter, September 13, 2019 [*I-AISSA-1*])*

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"Transportation Demand Management (TDM) Plan (-p. 3B-38)

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

*(Jean Barish, Letter, September 23,2019 [*I-BARISH3-24*])*

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"4) Also related to access is further traffic congestion. Circulation and congestion would be worse than they are today because of the impact of the approximately 2500-3000 additional people, the access to the development through only to entrances, one coinciding with the road just south of Riordan High School—unless this is reconfigured—and the other via the extension of Lee Avenue. The interference of a through Lee Street extension with the operations of Whole Foods egress could become quite a serious problem. The extra cars and people from the development will likely make traffic on Ocean Avenue considerably worse."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-4*])*

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"16. The effects on the neighborhood would be horrifying and ridiculous. As written Frida Kahlo Way is jammed on school days and nights now. Add thousands of residents (who will lack infrastructure, decent grocery and other shopping- prepare for tons of catering vans, Amazon vans, also Uber/Lyft as parking is limited on development). You will see, as a firefighter friend points out, that the firefighters and EMS or SFPD can't reach the housing development let alone reach other blocks nearby. They can't FLY over traffic that's jammed. Please don't do this to us."

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-7*])*

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"**City College Loop analysis**

The consultant concludes that despite increases in traffic volume, no additional delay will be generated. Consultant makes repeated reference to "existing signal timing coordination and optimization." As anyone who travels these corridors knows, having actuated signals and having those signals actually work are two different things. Broken and mis-timed signals have plagued traffic on Phelan/Frida Kahlo for years and the city has either ignored the problems or addressed them only after years of complaints.

There is no assurance that the signal timing problems experienced on Frida Kahlo Way will not recur. We have no reason to believe the city will be more responsive to addressing timing and optimization problems in the future than they have been in the past.

It is erroneous for the SEIR to assume that the presence of actuated signals and signal optimization will address traffic delay in the project area. A firm commitment from the city for regular, scheduled monitoring and maintenance of the traffic signals in the area is a necessary component of addressing transportation issues in the project area. Such a commitment must be in place before the SEIR is approved."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-5*])*

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"The current plan for the proposed development will access Lee Avenue, which serves as a route to Ocean Avenue. Within 100 feet of Ocean Avenue, traffic on Lee Avenue will pass the outlet of the parking lot for Whole Foods. Data from Kittleson's queue analysis and intersection total delay analysis on pages 10-13 in Appendix C of the SEIR shows The SEIR states:

During the weekday p.m. peak hour, the greatest increase in total delay would occur for southbound movements on Lee Avenue, increasing by 91.3 seconds. This increase in delay would not directly impact transit, as the southbound approach on Lee Avenue is not a transit route.

The data collected by Kittelson however took place on January 31, 2018 which is at least 6 months before Whole Foods began offering 2 hour free delivery to Amazon Prime customers and the traffic passing through the Whole Foods parking lot increased, especially during the evening rush hour which showed 100 cars traveling South on Lee Avenue—presumably cars leaving Whole Foods parking lot since there are no residences or through ways currently connected to Lee Avenue. Now

however, periodically throughout the day and week, traffic is so bad in the Whole Food lot that employees must direct traffic using walkie-talkies. Even with this extra help at times there is not enough parking to accommodate the cars trying to park, and so the cars back up at the entrance all the way out to Ocean Avenue. Because there is a Muni stop near the entrance to Whole Foods in the left lane, the cars in the right lane cannot pass and so all traffic stops in the right lane until the traffic inside the parking lot begins to move.

The entrance to Whole Foods is one half block from Lee Avenue. Because no traffic comes from residences on Lee Avenue now the cars leaving the Whole Foods parking lot are only delayed by their own burgeoning numbers, but if traffic is added from the proposed Reservoir development this parking lot traffic will have to wait for the reservoir traffic to pass in order to leave the parking lot and create space for more cars waiting out on Ocean avenue (headed south) to turn right into the parking lot. The queue on Lee Avenue as shown in the DSEIR completely blocks the driveway from the parking lot.

This will back up the cars further attempting to enter the Whole Foods lot a half block away and so this combination will create its own gridlock and subsequent nuisance.

**In fact it will be beyond a nuisance because when the anticipated 91.3 second delay happens on Lee Avenue South, the cars heading into and out of Whole Foods parking lot will be stuck and create a blockage which will indeed affect the transit system behind it.**"

*(Christine Hanson, Email, September 23, 2019 [*I-HANSON4-3*])*

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"3. I'm concerned with the traffic exiting this site on to Ocean Ave. and how it may impact this retail section."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-4*])*

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From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.

*(Alvin Ja, Email, August 8, 2019 [*I-JA2-2*])*

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"3.A.2 Overall Approach to Impact Analysis

*As a subsequent EIR to the PEIR certified in 2008, this SEIR, including the initial study, identifies and considers all mitigation measures that were identified in the PEIR and determines their applicability to the currently proposed project.*

Considering mitigation measures contained in the PEIR is insufficient. The Initial Study and DEIR has failed to identify and consider the PEIR rejection of the Lee Extension that had been proposed by CCSF.

**The fact that the PEIR had rejected the Lee Extension has direct relevance and "applicability to the currently proposed project."**

Here's what the PEIR says about the Lee Extension (westbound Ocean onto northbound Lee into Reservoir):

*Access Option #1: Under this option, CCSF would be allowed westbound right-turn-only ingress on Lee Avenue.*

*It should also be noted that Option #1, the provision of westbound right-turn-only ingress to CCSF, would be expected to result in secondary design and operational issues at the Ocean/Lee intersection. With access provided into CCSF from Lee Avenue, it would not be possible to fully restrict access from other directions, such as the eastbound left-turn movement or the northbound through movement. As a result, vehicles would be unable to directly access the Phelan Loop or the Balboa Reservoir development sites from the west. Instead, these vehicles (approximately 44 vehicles during the weekday PM peak hour) would be required to divert into the residential neighborhood south of Ocean Avenue to be able access Lee Avenue from the south or the west. In addition, approximately 75 vehicles destined to CCSF during the weekday PM peak hour are anticipated to come from the west. With the restriction of the eastbound left-turn movement, it is likely that a portion of these vehicles would also divert into the residential neighborhood south of Ocean Avenue instead of using the Phelan Avenue access. The prohibition of the eastbound left turn movement would affect the access and circulation patterns of residents and visitors of the Phelan Loop and Balboa Reservoir development sites. In*

*addition, the rerouted traffic from these two projects and CCSF would noticeably increase traffic volumes on the adjacent neighborhood streets, potentially affecting access into individual residences and resulting in other secondary impacts.*

*To discourage these vehicles from using neighborhood streets as a means to enter Lee Avenue, the northbound and southbound approaches to the Ocean/Lee intersection would need to be reconfigured to provide left-turn and right-turn movements only, precluding northbound through movements altogether. This would require the installation of a physical barrier (such as a channelizing island) at both approaches. Conversely, it may be possible to turn the south leg of the Ocean/Lee intersection into a right-in/right-out configuration. By prohibiting these through movements on Lee Avenue, it would no longer be advantageous for CCSF-destined vehicles to cut through the neighborhood south of Ocean Avenue. However, such a restriction in access would negatively affect access and circulation for the adjacent residences and would further complicate access routes for the Phelan Loop Site and Balboa Reservoir development traffic from the west by requiring these vehicles to cut further into the neighborhood south of Ocean Avenue to make a northbound left turn from Harold Avenue, and enter the westbound right-turn queue at Lee Avenue.*

*Therefore, as a result of the excessive queuing that would affect operations at the Ocean/Phelan/Geneva intersection and the secondary effects that the provision of westbound right-turn-only ingress would cause, the provision of CCSF westbound right-turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Restricting CCSF ingress would allow normal access to Area*

*Plan projects and would avoid potential spillover effects on neighborhoods south of Ocean Avenue. As a consequence, Access Option #1 is rejected from further consideration as part of the Area Plan.*

3.B.3 Summary of Balboa Park Station Area Plan PEIR

Transportation Section

**Balboa Park Station Area Plan PEIR Impacts and Mitigation**

**Measures**

**Program-Level Impacts**

**Transit**

*Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

The BPS Area Plan PEIR contains a comprehensive analysis of the Lee Extension. The Lee Extension analysis is directly applicable to the Balboa Reservoir Project.

Crucially, all Lee Extension options were eliminated from the BPS Area Plan.

Although the Lee Extension is referenced in the "Traffic" Section, the "Transit" Section only mentions Ocean/Geneva/Kahlo and the two Geneva/I-280 on/ off ramps.

It is only with willful disregard for objectivity that the BPS Final EIR's rejection of a Lee Extension has not been incorporated into the Reservoir SEIR and Initial Study as it relates to transit delay.

The Kittelson Memorandum pales in comparison to the analysis that had been contained in the BPS PEIR.

**The Lee Extension analysis contained in the PEIR cannot be legitimately omitted from Transit Delay analysis. Thus the SEIR/Initial Study is defective and inadequate.**"

*(Alvin Ja, Email, September 13, 2019 [*I-JA3-4*])*

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"**Operation** (p. 3.B-35)

**Approach to Analysis**

Roadway Network Features (p. 3.B-36)

*Circulation changes implemented by the proposed project include the extension of Lee Avenue…*

The operational impact analysis includes the following significance criteria:

<!--[if !supportLists]-->· <!--[endif]-->*Cause substantial additional VMT or substantially inducing additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network;…*

<!--[if !supportLists]-->· <!--[endif]-->*Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit*

**Despite the fact that the Lee Extension would induce "additional automobile travel by increasing physical roadway capacity in a congested area" and would substantially delay many MUNI lines on Ocean Avenue, no mention is made here regarding impacts on these significance criteria. (And as mentioned before, the PEIR had already rejected a Lee Extension from being included in the BPS program-level FEIR because its adverse impact on transit. The PEIR's discussion regarding the Lee Extension is brought up in 3.B.3. Yet, its relevance and applicability to the Reservoir Project's Lee Extension is omitted.)**"

*(Alvin Ja, Email, September 7, 2019 [*I-JA8-1*])*

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"Plus, traffic gridlock in an area, already at the most negative level possible, would with a large additional population pose tremendous problems (and dangers!) to both the college and all of the surrounding neighborhoods. The area is not "transit rich", it is 'transit gridlocked'."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER1-4*])*

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"<!--[if !supportLists]--> 3. <!--[endif]-->Here are some areas where I find mitigation will be necessary if based on the already overburdened streets and transit options. It is my fear that in many of these cases, satisfactory mitigation is not feasible.

<!--[if !supportLists]-->· <!--[endif]-->Over the last year my commute has frequently gone from 35 minutes to over an hour.

<!--[if !supportLists]-->· <!--[endif]-->Heading to CCSF I can take the Muni K directly from Castro and Market to Lee Avenue station or transfer at Forrest Hill to the 43.

Unfortunately K cars frequently stop for up to 10 minutes at St Francis Circle to reconfigure and even during non peak times, the ride down Ocean Avenue is very slow. Also there are frequent delays in the tunnel. Busline 43 has its own set of issues. Scheduled busses frequently fall out. Much of the route is on curvy or very narrow streets and traffic on Frida Kahlo way can pack up to the point that walking from the Judson/Kahlo stop to the Bookstore stop can be faster than staying on the bus."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-3*])*

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"<!--[if !supportLists]-->· <!--[endif]-->When I walk past Lee Ave, it is clear to this non-professional eye that entry to the housing project via Lee Ave. extension will be a disaster. Traffic and loading in and out of the Parking lot off Lee is already problematic. Vehicular entry onto Ocean Ave. off neighboring side streets is also already difficult."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-5*])*

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"To date there is not a plan in place to provide mitigation for exacerbated traffic and transportation conditions that will be caused by construction of a project that is many times denser that the surrounding neighborhoods."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-7*])*

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"There will also be significant impact to freeway traffic. Even today, the off-ramp from NB280 to Geneva is frequently backed up well onto the main traffic of NB280, resulting in extremely hazardous traffic conditions. It is noted that most of the exiting cars are turning east onto Geneva away from the proposal site, as this ramp is the primary access to the Outer Mission and Cow Palace areas – with the project site added as a destination in the westbound direction from the ramp, one can expect a bad situation to grow much worse. The off-ramp from SB280 to Ocean is likewise backed up onto the freeway proper during most commute hours."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-6*])*

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"In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways.

From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-6*])*

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"2. It is already almost impossible to get home to Westwood Park, get into City College Ocean Campus as the traffic is already impacted by new growth. There is usually stopped traffic, sometimes backed up onto the 280 south bound freeway going to the Ocean Ave. exit. With any more than the original 425 -500 units, it will be a more dangerous and frustrating situation."

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-6*])*

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"So, we say to the public of San Francisco, stop this corrupt, rotten development, the more gridlock on Ocean Avenue. There's no way of getting mass transportation out there. The MTA has said they can't provide the extension of the Ocean Avenue, which means there will be gridlock. There is gridlock now, and you want to encourage more gridlock for the people of San Francisco."

*(Steve Zeltzer, CPC Hearing, September 12, 2019 [*I-ZELTZER-5*])*

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## Response TR-8: Vehicle Traffic Congestion and Associated Impacts

The comments discuss existing traffic congestion and opine on the primary and secondary effects that vehicles trips associated with the construction and operation of the Balboa Reservoir Project will have on traffic congestion.

Many comments regarding vehicle traffic congestion identify secondary issues as a result of traffic congestion such as freight loading or emergency access impacts.

The draft SEIR concluded the proposed project would have a less-than-significant transportation impact related to construction; potentially hazardous conditions for walking, bicycling, driving, and public transit operations; accessibility or emergency vehicle access; and freight loading within the site, and no mitigation measures would be required for these topics. The draft SEIR concludes that the proposed project would have a significant and unavoidable impact related to off-site freight loading on Lee Avenue between Ocean Avenue and the project site. The comments received on the draft SEIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the draft SEIR or a substantial increase in the severity of impacts identified in the draft SEIR.

Comments regarding existing conditions are addressed in Response TR-1: Existing Conditions, on RTC p. 4.C-2. Comments regarding the project's contribution to transit delay are addressed in Response TR-4, Transit Impacts, on RTC pp. 4.C-33 and 4.C-33. Comments regarding the impact to loading conditions associated with the Lee Avenue extension are addressed in Response TR-5, Loading Impacts, on RTC p. 4.C-53. Comments regarding parking conditions and the secondary effects of project parking are addressed in Response TR-7, Parking, on RTC pp. 4.C-61 and 4.C-61. Comments regarding the relationship between program and subsequent EIRs are addressed in Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. 4.A-3.

The response to vehicle traffic congestion and associated impacts topics is organized by the following subtopics:

- Existing Conditions
- Automobile Delay and Parking
- Lee Avenue Extension

- City College Loop Analysis
- Emergency Vehicle Access
- Construction-Related Transportation Traffic

### *Existing Conditions*

The draft SEIR adequately and accurately described existing conditions surrounding the project site. Further, CEQA requires analysis of the significant effects of the proposed project on the environment. This includes the significant environmental effects the project might cause or risk exacerbating.[37] A project cannot be required under CEQA to mitigate conditions that the project does not connect to or is not roughly proportional to the impact of the project.[38] Thus, the proposed project can't through CEQA mitigate existing conditions or existing system deficiencies unless it exacerbates such existing significantly environmentally affected conditions.

Regarding the comment seeking information for how existing signals are monitored and maintained, the following is provided for informational purposes. The SFMTA routinely monitors traffic signal operations throughout the city and makes adjustments where warranted and possible. These reviews occur as part of transportation projects, through routine transit and signal operational review, and in response to community comments. This is expected to include review during upcoming safety and transit reliability projects planned along the Ocean Avenue corridor. When reviewing traffic signal timing, the SFMTA balances multiple needs, including meeting required pedestrian crossing time, prioritizing transit and minimizing congestion, which may reduce the opportunities for changes.

### *Automobile Delay and Parking*

Automobile delay and parking shall not be considered as significant impacts on the environment pursuant to CEQA. As discussed on draft SEIR p. 3.B-25, the San Francisco Planning Commission adopted Resolution No. 19579 on March 3, 2016, removed automobile delay (traffic congestion), as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as significant impact on the environment pursuant to CEQA. Further, CEQA removed automobile delay statewide in December 2018.[39]

Comments include mention of project-related congestion and possible hazards. Potential project-related transit delay is discussed in the following locations: Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79, Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99, and Response TR-4: Transit Impacts, on RTC p. 4.C-33.

[37] CCR Title 14 Section 15126.2.
[38] CCR Title 14 Section 15126.4.
[39] Public Resources Code section 21099(b)(2) states: "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." The secretary certified the guidelines in December 2018.

With respect to potential vehicle hazards, the draft SEIR finds that the proposed project would not result in potentially hazardous conditions to people driving, walking, bicycling, or public transit operations. This finding is discussed in Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70.

As discussed on draft SEIR pp. 3.A-3 and 3.B-31, the proposed project meets the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area; therefore, parking shall not be considered a significant impact on the environment pursuant to CEQA. However, the planning department acknowledges that parking conditions may be of interest to the public and decision makers. Therefore, the secondary environmental impacts related to City College are addressed in draft SEIR Appendix B, Section E.14, Public Services. For informational purposes, a description of existing and with project parking conditions is provided on RTC Attachment 3, pp. 1 to 3.

Regarding the comment that the draft SEIR must evaluate impacts on lower-income City College students who likely reside further away and must use automobiles, the commenter does not provide evidence of this general statement. Further, socioeconomic effects are generally beyond the scope of the CEQA. An exception is if a link can be established between anticipated socioeconomic effects of a proposed action and adverse ***physical environmental impact*** [emphasis added] (CEQA Guidelines section 15131(a), CEQA section 21082.2). The comment does not provide evidence showing such a link.

### *Lee Avenue Extension*

Project vehicle trip assignment at the Ocean Avenue/Lee Avenue intersection is illustrated in Figure 3.B-6a and Figure 3.B-7a on draft SEIR pp. 3.B-47 and 3.B-49, respectively. The effect of project-generated vehicle traffic along Lee Avenue and Ocean Avenue/Lee Avenue intersection operations are discussed under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. As discussed in this section, proposed project would not increase the frequency, duration, or length of queues along westbound Ocean Avenue such that it would increase instances of blockages at the City College Terminal or fire department station 15, or substantially delay transit. Intersection operations analysis is summarized in draft SEIR Appendix C2, Transit Assessment Memorandum, and Synchro operations worksheets are provided on draft SEIR Appendix C2, Attachment E, pp. 87 to 142.

The project proposes to reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one southbound through/right-turn lane and one southbound left-turn lane. This reconfiguration of Lee Avenue would increase the space for vehicle queue storage on the southbound approach, thereby increasing the capacity of the intersection on the southbound approach and reducing the southbound queue lengths under project conditions relative to existing conditions. Proposed additional loading spaces along Ocean Avenue would alleviate the associated reduction in loading spaces along Lee Avenue with this proposed reconfiguration.

Discussion of the impact to loading conditions associated with the Lee Avenue extension are included in the following locations: Impact TR-6b, on draft SEIR pp. 3.B-85 to 3.B-91, Impact C-TR-6b, on draft SEIR pp. 3.B-101 to 3.B-102, and Response TR-5, Loading Impacts, on RTC p. 4.C-53.

The PEIR's conclusion regarding Lee Avenue is relevant to the proposed project in that CEQA allows subsequent project-level analyses to tier off of previous general-level analysis. The PEIR analysis is at an area plan level, with different details than are available for the present project-level analysis. For example, the draft SEIR analysis uses more recent traffic counts to reflect existing baseline conditions than the PEIR, which was certified in 2009. Using newer and more relevant information allows for more accurate analysis and is consistent with the tiering approach for environmental analysis. Decision makers did not make any approval or take any action that prevented future extensions of Lee Avenue when they certified the PEIR and adopted the area plan.

The commenter correctly states that data collection took place on January 31, 2018 prior to Whole Foods offering two-hour free delivery to Amazon Prime customers. However, intersection turning movement counts at Ocean Avenue/Brighton Avenue, the ingress to the Whole Foods parking lot, were also collected on Tuesday August 28, 2018 (see draft SEIR Appendix C2, pp. 32–33 of Attachment A, Intersection Turning Movement Volumes), after Whole Foods began offering two-hour free delivery to Amazon Prime customers. Loading data along Lee Avenue was collected on Tuesday March 26, 2019 (see draft SEIR Appendix C3).

Existing freight loading conditions are discussed on draft SEIR p. 3.B-27, and the effect of project-generated vehicle traffic on Whole Foods operations (including freight loading and garage egress) is discussed under Impact TR-6b on draft SEIR pp. 3.B-85 to 3.B-91. As discussed in these sections, under existing conditions Lee Avenue is a dead-end street with no through traffic. In its current condition, Lee Avenue functions as a loading zone that provides convenient on-street loading supply to meet Whole Foods' loading demand and accommodate deliveries and passenger loading activity related to other nearby businesses.

Based on field observations, the existing freight loading operations at Whole Foods do not fully adhere to the measures outlined in the 1150 Ocean Avenue project conditions of approval that requires Whole Foods to utilize the off-street area for all loading activity. The proposed project would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area for passengers and freight deliveries. The project also proposes to reconfigure the southbound Lee Avenue approach to Ocean Avenue from one all-movement lane to one southbound through/right-turn lane and one southbound left-turn lane. This reconfiguration of Lee Avenue would reduce the supply of on-street loading available to Whole Foods and nearby land uses and increase vehicle storage on the southbound approach. As stated on draft SEIR p. 3.B-90, the off-site loading impact of the proposed project would be significant and unavoidable.

### *City College Loop Analysis*

Regarding the comments on the City College Loop analysis that no delay would be generated and that a nuisance will be generated around the Whole Foods parking lot causing delay, transit delay is considered for potential significant impacts on the environment and are evaluated for potential impacts. As further explained in Impact TR-4 on SEIR pp. 3.B-73 to 3.B-79, the proposed project

would not cause significant transit delays, but as described in Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99, may contribute to transit delays in the cumulative condition.

The City College Loop (also referred to as City College Terminal) analysis is presented on draft SEIR Appendix C2, pp. 7 to 13. The evaluation assesses the change in queue lengths at Ocean Avenue/Lee Avenue and Ocean Avenue/Frida Kahlo Way/Geneva Avenue and potential for queues to spillback and block transit vehicle access or egress to the terminal. As discussed in this analysis, the increase in queue lengths would not result in queue spillback such that access/egress to the terminal would be blocked. The intersection operations analysis was performed using Synchro software and conducted using the planning department's Transportation Impact Analysis Guidelines for Synchro Intersection LOS Analysis. The Synchro model was calibrated to existing conditions based on observations conducted in the field. The signal timing cards were provided by SFMTA, and the analysis results and Synchro inputs and assumptions, including signal timing coordination and optimization, were reviewed by the department and SFMTA.

### *Emergency Vehicle Access*

A discussion of emergency vehicle access is provided under Impact TR-3 on draft SEIR pp. 3.B-71 to 3.B-73. The nearest fire department station (station 15) is located approximately 350 feet east of the Ocean Avenue/Lee Avenue intersection. As discussed in this section, under existing conditions, vehicle queues were observed to occasionally partially block the fire station driveway. With the addition of vehicle trips, the proposed project would not be expected to increase the frequency or duration of vehicles blocking the fire department station 15 entrance or result in inadequate emergency access. Synchro operations worksheets are provided on draft SEIR Appendix C2, Attachment E, pp. 87 to 142.

### *Construction-Related Transportation Traffic*

Construction-related transportation impacts are analyzed under Impact TR-1 starting on draft SEIR p. 3.B-60. As stated on draft SEIR p. 3.B-64, construction activities would be conducted in accordance with the public works code, public works department orders, and the blue book, as applicable, to minimize the potential for hazardous conditions and to ensure safe travel in and around the site. At this time, it is not anticipated that the project would require movement of oversized or excessive load vehicles. However, should project work require movement of oversized or excessive load vehicles on state roadways, the project sponsor would obtain a transportation permit from Caltrans.

As a result, SEIR section 2.I.1, State and Regional Agencies on SEIR p. 2-50 is revised as follows:

> <u>California Department of Transportation</u>
>
> - <u>Transportation permit for oversized or excessive load vehicles</u>

## *Comment TR-9: General Comments*

This response addresses comments from the commenters listed below; each comment on this topic is quoted in full below this list:

I-COLLINS3-3
I-GOODMAN-1
I-OSAWA-1

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"4. Frida Kahlo/ Phelan is a one way street, which like many regular streets in our city, such as Bernal Cut or Teresita, connect two parts of town. Our city not being flat, doesn't have a lot of rectangular grid, which means that one street is the one direction to get from one neighborhood to another.

5. No one wants to have to depend on cars! However we depend on reasonable, viable, practical alternatives. Muni can be a mess and too many buses zoom by at rush hour. "Road diets" converting two lanes down to one, create MORE traffic jams that confuse desperate motorists stuck in traffic, filling up crosswalks, endangering pedestrians and cyclists. You'd punish the wrong people and create angry cross traffic that can't move, and more calamityies

6. Buses are full of wonderful environmentally conscience non drivers who also get stuck in horrid traffic. Don't punish them!"

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-3*])*

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"My concerns have always focused on the concerns about capacity, and if we are really seeing significant transit infrastructural planning to deal with the capacity concerns of growth and growth population impacts including traffic, pedestrian, and multi-modal concerns. Safety is also another major concern due to the concerns of schools and traffic injuries in and around the Balboa Park Station area."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-1*])*

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"The SEIR acknowledges that for all options there will be 'significant and unavoidable negative impact to traffic that cannot be mitigated'. While this statement is diluted in the SEIR by other boilerplate environmental analyses, and while the CEQA guidelines have unfortunately replaced 'automotive delay' with a less-meaningful 'vehicular miles traveled' (VMT) metric, it is undoubtedly the greatest single impact to the environment and to the safety of the neighborhood of the proposed site."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-1*])*

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## Response TR-9: General Comments

The comments disagree with or mistakenly describe the draft SEIR's findings, state there is a need to redesign the area as a transit first corridor which minimizes pedestrian injuries, discuss existing conditions on Frida Kahlo and within the project study area, and express concern regarding transit capacity.

Comments regarding transit impacts are addressed under Response TR-4, Transit Impacts, on RTC pp. 4.C-33 to 4.C-33. Comments regarding automobile delay (traffic) and its evaluation in the SEIR are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-72.

The response to general transportation comments is organized by the following subtopics:

- Draft SEIR Analysis and Findings
- Redesign of Roadways Within and Nearby to Balboa Station Area Plan
- Existing Conditions
- Transit Capacity

### *Draft SEIR Analysis and Findings*

One commenter states the draft SEIR identified the project would have, "significant and unavoidable negative impact to traffic that cannot be mitigated." Automobile delay (traffic), by itself, is not a significant impact on the environment pursuant to CEQA (for more information, refer to Response TR-7, Parking, on RTC p. 4.C-61). The draft SEIR finds significant and unavoidable project-level and cumulative impacts related to freight loading operations on Lee Avenue and a significant and unavoidable cumulative impact to transit. The draft SEIR found all other transportation impacts to be less than significant.

Regarding traffic and for informational purposes, a discussion of existing and with project vehicle operations and delay is provided in RTC Attachment 3.

### *Redesign of Roadways Within and Nearby to Balboa Station Area Plan*

An evaluation of potentially hazardous conditions for people walking to/from transit is provided under Impact TR-2 on draft SEIR pp. 3.B-65 to 3.B-70. The draft SEIR concludes that the project would not generate activities that would create potentially hazardous conditions for people walking, bicycling, driving or public transit operations, and that impacts of the proposed project would be less than significant.

### *Existing Conditions*

The draft SEIR describes local roadways on p. 3.B-8. The existing plus project impact evaluation is presented in the draft SEIR on pp. 3.B-60 to 3.B-91. The 2040 cumulative conditions impact evaluation is presented in the draft SEIR on pp. 3.B-91 to 3.B-102. The effect of the proposed project options on transit are discussed under Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79 and Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the draft SEIR, or that impacts would be substantially more severe than those

identified in the draft SEIR. One comment incorrectly states that Frida Kahlo Way is a one-way street. As shown in draft SEIR Table 3.B-1, Roadway Facilities in the Study Area, Frida Kahlo Way is a two-way, two-lane street (one lane in each direction) with Class II bicycle facilities.

The comment regarding viable transportation options is acknowledged. As described on draft SEIR p. 3.B-38, the proposed project would include a TDM plan that would implement measures to reduce vehicle trips and encourage sustainable modes of transportation.

### *Transit Capacity*

Pursuant to the 2019 TIA Guidelines Update, transit capacity for environmental review is no longer an analysis criterion. This change is consistent with guidance from the Governor's Office of Planning and Research, which recommends not treating the addition of new users on a transit system as a significant impact. Transit analysis instead considers potentially hazardous conditions for public transit operations as separate transit significance criteria. San Francisco also considers transit delay as a separate transit significance criterion. Transit impacts are presented and discussed in the following locations: Impact TR-4 on draft SEIR pp. 3.B-73 to 3.B-79; Impact C-TR-4 on draft SEIR pp. 3.B-94 to 3.B-99; and Response TR-4, Transit Impacts, on RTC p. 4.C-33.

For informational purposes, the draft SEIR provides, in Appendix C2, Transit Assessment Memorandum, a discussion of project ridership and capacity. As shown there, all Muni routes, except for the K, would operate below 85 percent capacity utilization during the weekday p.m. peak hour. The project (both options) would contribute less than 35 riders to either direction for that route.

# 4.D Noise

The comments and corresponding responses in this section cover topics in draft SEIR section 3.C, Noise. These include topics related to:

- Comment NO-1: Noise Baseline
- Comment NO-2: Methodology
- Comment NO-3: Construction Noise Impacts
- Comment NO-4: Construction Vibration
- Comment NO-5: Operational Noise Impacts
- Comment NO-6: Noise Mitigation Measure
- Comment NO-7: Cumulative Noise

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## *Comment NO-1: Noise Baseline*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE1-2
I-HEGGIE1-3
I-HEGGIE2-4
I-HEGGIE2-7

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"My focus today is going to be on noise.

Noise effects on residents and childcare centers in adjacent Sunnyside have been ignored, although they are located within the 900-foot zone of the project noise considerations. Two childcare centers and preschools were identified in the EIR, in this east side of the project.

The sensitive receptors are closer to parts of the development than the studied 24-hour LT.3 location in Westwood Park. And Sunnyside sites lie in an area that is typically downwind of the construction site.

Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way -- I've forgotten the name of the mini location. It's for children. Serves as a residence, as well as childcare center and preschool center. It needs a 24-hour noise study."

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [*I-HEGGIE1-2*])*

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"Additionally, we suggest noise testing at the corner of Judson and Frida Kahlo Way, formerly Phelan Avenue, where a replacement City College daycare center is planned for the future."

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [*I-HEGGIE1-3*])*

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"1. Noise effects on residences and child care centers in adjacent Sunnyside have not been tested although they are located within the 900 foot zone of project noise consideration. Two childcare centers and preschools were identified in the EIR in this area Northeast of the project. The sensitive receptors in this area are closer to some parts of the development than the studied 24-hour LT-3 location in Westwood Park, and the Northeast sites lie in an area that is typically downwind of the construction site. Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way Mighty Bambini location at the border of Sunnyside and Westwood Park appears to be a residence as well as childcare and preschool center. Like other childcare centers in surrounding residential neighborhoods, it deserves a 24-hour noise study. Additionally, noise testing will be needed at the corner of Judson and Frida Kahlo Way (formerly Phelan Avenue) where a replacement City College childcare center is planned within the construction timeframe, according to Dr. James Sohn of the City College of San Francisco."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-4*])*

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"5. Additional noise studies need to be made to create a noise baseline at all noise monitoring sites. Long term (24-hr) sound assessments were made on the Western side of the project. Only short-term sound assessments were made on the East side at the City College MUB and Riordan High School, which is also a boarding school, and that testing was for a short period, less than half an hour before 9:30am. Not only will 24-hour noise monitoring enable an apples to apples comparison with the other 24-hour noise tests, 24-hour monitoring should be included to take into account the wide variation in sound levels as the City College lot fills, empties, and refills at different times of the day."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-7*])*

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## Response NO-1: Noise Baseline

The comments express concern that the noise analysis of the draft SEIR did not specifically address the potential noise impacts at childcare facility receptors to the northeast of the project site and that additional 24-hour measurements should be taken at all noise monitoring sites.

The construction noise impacts of the proposed project are analyzed on draft SEIR pp. 3.C-23 through 3.C-31. Table 3.C-8 on draft SEIR p. 3.C-27 presents the predicted construction-related noise levels at the nearest sensitive-receptor locations to the project site where the maximum combined noise levels from construction equipment would occur.

As described on draft SEIR p. 3.C-25, the closest sensitive receptors to the project site are: residences along Plymouth Avenue and San Ramon Way approximately 50 feet from the west side of the proposed buildings; Archbishop Riordan High School approximately 80 feet from the eastern property line; and the 1100–1150 Ocean Avenue residences approximately 50 feet from the Lee

Avenue extension area and the Phase 0 demolition activity area. The predicted construction-related noise levels at sensitive receptors are evaluated to determine whether the project would result in: (1) an increase in sustained noise levels that are 10 dBA above the ambient background noise levels over a substantial period of time, or (2) noise levels above the Federal Transit Administration's limit of 90 dBA. The analysis and disclosure of maximum potential project-specific increases over existing ambient environments (i.e., a "worst-case" assessment) follows standard methodology for the evaluation of noise impacts.

Mighty Bambinis Childcare and Preschool and the future City College daycare planned near Judson Avenue and Frida Kahlo Way were not included in this impact table because they are substantially more distant than the receptors shown in Table 3.C-8 of the draft SEIR; thus, impacts would be less than those used to identify noise impacts.

In response to these comments, **Table RTC-5, Estimated Daytime Construction-Related Noise Levels at Offsite Receptor**, presents the resultant construction noise levels at Mighty Bambinis Childcare receptor, which is approximately 560 feet from the project boundary. As shown in Table RTC-5, construction-related noise levels at the Mighty Bambinis Childcare facility would be less than the FTA's limit of the most stringent daytime standard of 90 dBA, which applies to residential uses. The resultant noise level increase at this receptor would also be less than the "Ambient + 10 dBA" standard applied for this analysis. Consequently, construction noise impacts for the existing northeasterly childcare receptor would be less than significant. Nevertheless, **Mitigation Measure M-NO-1: Construction Noise Control Measures**, identified to address significant impacts to other, closer receptors, would further reduce the construction noise impact at this receptor and other receptors more distant from construction activities.

**TABLE RTC-5**
**ESTIMATED DAYTIME CONSTRUCTION-RELATED NOISE LEVELS AT OFFSITE RECEPTOR**

| Construction Phase and Noisiest Combined Construction Activities | Hourly Leq in dBA at 50 Feet[a] | Minimum Distance between Receptor and Closest Equipment (feet) | Project Noise Level (Leq) Adjusted for Distance[b] | Daytime FTA Standard at Residential Uses (dBA) | Does Noise Level Exceed FTA Standard? | Ambient (62 dBA) + 10 dBA Standard[c] at Closest Receptor | Does Noise Level Exceed Ambient + 10 dBA Standard? |
|---|---|---|---|---|---|---|---|
| **Existing Noise Receptor: Mighty Bambinis Childcare at Phelan and Staples avenues** | | | | | | | |
| Phase 0 – Surface Preparation and Demolition | 85 | 560 | 65 | 90 | No | 72 | No |
| Phase 1 Building Construction | 81 | 560 | 60 | 90 | No | 72 | No |
| Phase 2 Building Construction | 81 | 560 | 60 | 90 | No | 72 | No |

SOURCE: ESA, 2019.

NOTES:

dBA = A-weighted decibel; FTA = Federal Transit Administration; noise levels in **bold** exceed the indicated standard.

[a] As calculated with the RCNM model with no attenuation for intervening berms or buildings.
[b] Combined hourly noise levels were attenuated 6 dB for every doubling of distance from the source.
[c] People often perceive 10 dBA as a doubling of loudness. The daytime ambient noise levels of 62 dBA were estimated using roadway noise modeling data for Judson Avenue between Frida Kahlo Way and Gennessee Street.

**Table RTC-6, Estimated Daytime Construction-Related Noise Levels at Cumulative Offsite Receptor**, presents the resultant construction noise levels the future City College daycare receptor as an extension of the cumulative construction noise analysis on draft SEIR pp. 3.C-38 and 3.C-39. This future receptor would be located approximately 750 feet from the project boundary. As shown in Table RTC-6, construction-related noise levels at the future City College daycare receptor would be less than the FTA's limit of the most stringent daytime standard of 90 dBA, which applies to residential uses. The resultant noise level increase at this receptor would also be less than the "Ambient + 10 dBA" standard applied for this analysis. Consequently, construction noise impacts for the future northeasterly childcare receptors would be less than significant.

**TABLE RTC-6**
**ESTIMATED DAYTIME CONSTRUCTION-RELATED NOISE LEVELS AT CUMULATIVE OFFSITE RECEPTOR**

| Construction Phase and Noisiest Combined Construction Activities | Hourly Leq in dBA at 50 Feet[a] | Minimum Distance between Receptor and Closest Equipment (feet) | Project Noise Level (Leq) Adjusted for Distance[b] | Daytime FTA Standard at Residential Uses (dBA) | Does Noise Level Exceed FTA Standard? | Ambient (62 dBA) + 10 dBa Standard[c] at Closest Receptor | Does Noise Level Exceed Ambient + 10 dBba Standard? |
|---|---|---|---|---|---|---|---|
| **Future City College daycare receptor at Judson Avenue and Frida Kahlo Way** | | | | | | | |
| Phase 0 – Surface Preparation and Demolition | 85 | 750 | 63 | 90 | No | 72 | No |
| Phase 1 Building Construction | 81 | 750 | 58 | 90 | No | 72 | No |
| Phase 2 Building Construction | 81 | 750 | 58 | 90 | No | 72 | No |

SOURCE: ESA, 2019.

NOTES:

dBA = A-weighted decibel; FTA = Federal Transit Administration; noise levels in **bold** exceed the indicated standard.

[a] As calculated with the RCNM model with no attenuation for intervening berms or buildings.

[b] Combined hourly noise levels were attenuated 6 dB for every doubling of distance from the source.

[c] People often perceive 10 dBA as a doubling of loudness. The daytime ambient noise levels of 62 dBA were estimated using roadway noise modeling data for Judson Avenue.

Traffic noise impacts to these northeasterly childcare uses are addressed on draft SEIR pp. 3.C-36 through 3.C-38. Specifically, Table 3.C-11 on draft SEIR p. 3.C-37 presents the roadside noise level increases on Judson Avenue resulting from the proposed project operations. As can be seen from this table, noise levels at receptors along Judson Avenue would increase by 0.4 dBA or less, which would not be a perceptible increase and would be a less-than-significant operational noise impact. Traffic noise impacts to the future childcare use may be also be assessed using this same table which shows the increases along Frida Kahlo Way to also be less than significant (0.6 dBA or less).

The commenter also suggests that long-term (24-hour) noise monitoring should be conducted at receptor locations on the east side of the project site, as was done for the receptors on the west side of the project site and included in the draft SEIR Noise setting discussion.

No long-term noise monitoring is required for off-site locations east of the project site under CEQA. The long-term noise monitoring cited in the draft SEIR is not used for the CEQA noise analysis but instead provides planners with information to understand the compatibility of the project's proposed land use with the current long-term (DNL) noise environment set forth in the Environmental Protection Element of the San Francisco General Plan, which is a non-CEQA noise assessment.

As stated on draft SEIR p. 3.C-23, construction activity would generally occur during daytime hours. Nighttime construction noise is not expected to occur frequently or regularly. As stated on draft SEIR p. 3.C-23, while certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, construction activities would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

The text on draft SEIR p. 3.C-23 is revised as follows to clarify nighttime noise-generating activity (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> Construction activities would generally occur between the hours of 7 a.m. and 8 p.m., up to seven days a week. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity ~~and would not occur during nighttime hours~~. Consequently, construction activities would be consistent with San Francisco Police Code section 2908.

### Construction-Related Noise Sources

> Project implementation would result in operation of heavy equipment on the project site for the demolition of the west side berm, and north and east embankments, construction of new structures and associated infrastructure, and open space improvements. Construction activities would occur intermittently on the project site over the six-year construction duration and could expose nearby existing and future sensitive receptors to temporary increases in noise levels substantially in excess of ambient levels. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity. ~~Construction activity is only proposed to occur during daytime hours and nighttime construction noise impacts would not occur and are not assessed herein. While c~~Certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, and could include one concrete pour per building, which could occur a total of 12 times throughout the project construction period. Such construction activities ~~that extend beyond normal hours have not been specifically identified by the applicant and~~ would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

The above changes and additional analysis do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

## *Comment NO-2: Methodology*

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below:

I-HEGGIE2-2

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"In addition, some of the testing reports appear to provide inconsistent testing. This makes it difficult for non-professionals to compare apples to apples, track the meaning of the data and encourages misinterpreting possibly impactful conclusions. For example, adding a note below the Balboa Reservoir truck Roadway Noise Analysis on Page 1of 2, in Appendix D2, would provide clarification of why the numbers of road segments tested differ depending on whether the test is for the existing environment, the existing plus developer's project, the existing plus additional housing scenario, or the cumulative plus developer's project."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-2*])*

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## Response NO-2: Methodology

The commenter requests clarification regarding the difference in the number of roadway segments analyzed in the traffic modeling spreadsheets between the various scenarios in Appendix D2 of the draft SEIR.

Page 1 of Appendix D2 of the draft SEIR contains the inputs and results for the roadway noise analysis. Operational traffic noise impacts are addressed on draft SEIR pp. 3.C-36 through 3.C-38 while the cumulative traffic noise impacts are addressed on draft SEIR pp. 3.C-40 through 3.C-41. The differences in the number of roadway segments analyzed depends on several factors, including whether sensitive receptors are present along a given roadway and whether the extent of traffic distribution warrants an analysis of a roadway segment. Draft SEIR p. 3.C-36 states that "[n]oise modeling was completed to estimate existing (baseline) and future (with the proposed project) traffic noise levels along seven street segments that have sensitive receptors in the project area based on traffic volumes presented in SEIR Section 3.B, Transportation and Circulation." The seven road segments are shown on Table 3.C-11 on draft SEIR p. 3.C-37.

Initially, two segments of Ocean Avenue extending in either direction from the access point were included in the analysis. These two roadway segments were included in an initial draft of the analysis but were removed because existing roadway noise rendered the project contribution negligible. The traffic model spreadsheet inadvertently retained rows for the two Ocean Avenue segments in the appendix even though the analysis for this roadway were not included in the draft SEIR. Pages 1 and 2 of draft SEIR Appendix D2 have been revised to reflect the deletion of these roadway segments from the analysis.

Therefore, cumulative line items have been deleted from Appendix D2 as shown below and are not cited in the draft SEIR. The appendices serve as supporting information to the draft SEIR and the relevant data and analysis are presented in the draft SEIR; therefore, additional clarification

within the appendices is not necessary. The clarifications to the appendices have been shown below (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline). These changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

Pages 1 and 2 of SEIR Appendix D2 are revised as follows:

**Existing**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1179 | 97 | 1143.6 | 2 | 23.58 | 1 | 11.79 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 55.5 | 60.1 | 64.1 | 40 | 59.8 | 12.1 | 39.7 |
| F. Kahlo | C. Coll N. | Judson | 914 | 97 | 886.58 | 2 | 18.28 | 1 | 9.14 | 25 | 40 | 25 | 40 | 25 | 40 | 59.6 | 54.4 | 59.0 | 63.0 | 40 | 58.7 | 9.4 | 30.8 |
| Lee | Ocean | Site | 167 | 97 | 161.99 | 2 | 3.34 | 1 | 1.67 | 25 | 40 | 25 | 40 | 25 | 40 | 52.2 | 47.0 | 51.6 | 55.6 | 40 | 51.3 | 1.7 | 5.6 |
| Lee | Ocean | Holoway | 166 | 97 | 161.02 | 2 | 3.32 | 1 | 1.66 | 25 | 40 | 25 | 40 | 25 | 40 | 52.2 | 47.0 | 51.6 | 55.6 | 40 | 51.3 | 1.7 | 5.6 |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| City Coll N | F. Kahlo | Site | 323 | 97 | 313.31 | 2 | 6.46 | 1 | 3.23 | 25 | 40 | 25 | 40 | 25 | 40 | 55.1 | 49.9 | 54.5 | 58.4 | 40 | 54.2 | 3.3 | 10.9 |
| Judson | F. Kahlo | Genesee | 670 | 97 | 649.9 | 2 | 13.4 | 1 | 6.7 | 25 | 40 | 25 | 40 | 25 | 40 | 58.2 | 53.0 | 57.7 | 61.6 | 40 | 57.4 | 6.9 | 22.6 |
| ~~Ocean~~ | ~~Plymouth~~ | ~~Miramar~~ | ~~1399~~ | ~~97~~ | ~~1356.9~~ | ~~2~~ | ~~33.9~~ | ~~1~~ | ~~16.9~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.8~~ | ~~57.6~~ | ~~61.7~~ | ~~65.5~~ | | | ~~17.8~~ | ~~58.5~~ |
| ~~Ocean~~ | ~~F. Kahlo~~ | ~~I 280~~ | ~~1979~~ | ~~97~~ | ~~1919.7~~ | ~~2~~ | ~~37.4~~ | ~~1~~ | ~~18.7~~ | ~~55~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.7~~ | ~~57.6~~ | ~~62.1~~ | ~~66.1~~ | | | ~~15.8~~ | ~~52.0~~ |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Developer's Project**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1179 | 97 | 1143.6 | 2 | 23.58 | 1 | 11.79 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 55.5 | 60.1 | 64.1 | 40 | 59.8 | 12.1 | 39.7 |
| F. Kahlo | C. Coll N. | Judson | 997 | 97 | 967.09 | 2 | 19.94 | 1 | 9.97 | 25 | 40 | 25 | 40 | 25 | 40 | 60.0 | 54.8 | 59.4 | 63.3 | 40 | 59.1 | 10.2 | 33.6 |
| Lee | Ocean | Site | 387 | 97 | 375.39 | 2 | 7.74 | 1 | 3.87 | 25 | 40 | 25 | 40 | 25 | 40 | 55.8 | 50.6 | 55.3 | 59.2 | 40 | 55.0 | 4.0 | 13.0 |
| Lee | Ocean | Holoway | 209 | 97 | 202.73 | 2 | 4.18 | 1 | 2.09 | 25 | 40 | 25 | 40 | 25 | 40 | 53.2 | 48.0 | 52.6 | 56.6 | 40 | 52.3 | 2.1 | 7.0 |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| City Coll N | F. Kahlo | Site | 368 | 97 | 356.96 | 2 | 7.36 | 1 | 3.68 | 25 | 40 | 25 | 40 | 25 | 40 | 55.6 | 50.4 | 55.1 | 59.0 | 40 | 54.7 | 3.8 | 12.4 |
| Judson | F. Kahlo | Genesee | 700 | 97 | 679 | 2 | 14 | 1 | 7 | 25 | 40 | 25 | 40 | 25 | 40 | 58.4 | 53.2 | 57.9 | 61.8 | 40 | 57.5 | 7.2 | 23.6 |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Additional Housing Scenario**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1179 | 97 | 1143.6 | 2 | 23.58 | 1 | 11.79 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 55.5 | 60.1 | 64.1 | 40 | 59.8 | 12.1 | 39.7 |
| F. Kahlo | C. Coll N. | Judson | 1063 | 97 | 1031.1 | 2 | 21.26 | 1 | 10.63 | 25 | 40 | 25 | 40 | 25 | 40 | 60.2 | 55.0 | 59.7 | 63.6 | 40 | 59.4 | 10.9 | 35.8 |
| Lee | Ocean | Site | 434 | 97 | 420.98 | 2 | 8.68 | 1 | 4.34 | 25 | 40 | 25 | 40 | 25 | 40 | 56.3 | 51.1 | 55.8 | 59.7 | 40 | 55.5 | 4.5 | 14.8 |
| Lee | Ocean | Holoway | 226 | 97 | 219.22 | 2 | 4.52 | 1 | 2.26 | 25 | 40 | 25 | 40 | 25 | 40 | 53.5 | 48.3 | 52.9 | 56.9 | 40 | 52.6 | 2.3 | 7.6 |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| City Coll N | F. Kahlo | Site | 479 | 97 | 464.63 | 2 | 9.58 | 1 | 4.79 | 25 | 40 | 25 | 40 | 25 | 40 | 56.8 | 51.6 | 56.2 | 60.2 | 40 | 55.9 | 4.9 | 16.1 |
| Judson | F. Kahlo | Genesee | 733 | 97 | 711.01 | 2 | 14.66 | 1 | 7.33 | 25 | 40 | 25 | 40 | 25 | 40 | 58.6 | 53.4 | 58.1 | 62.0 | 40 | 57.7 | 7.5 | 24.7 |

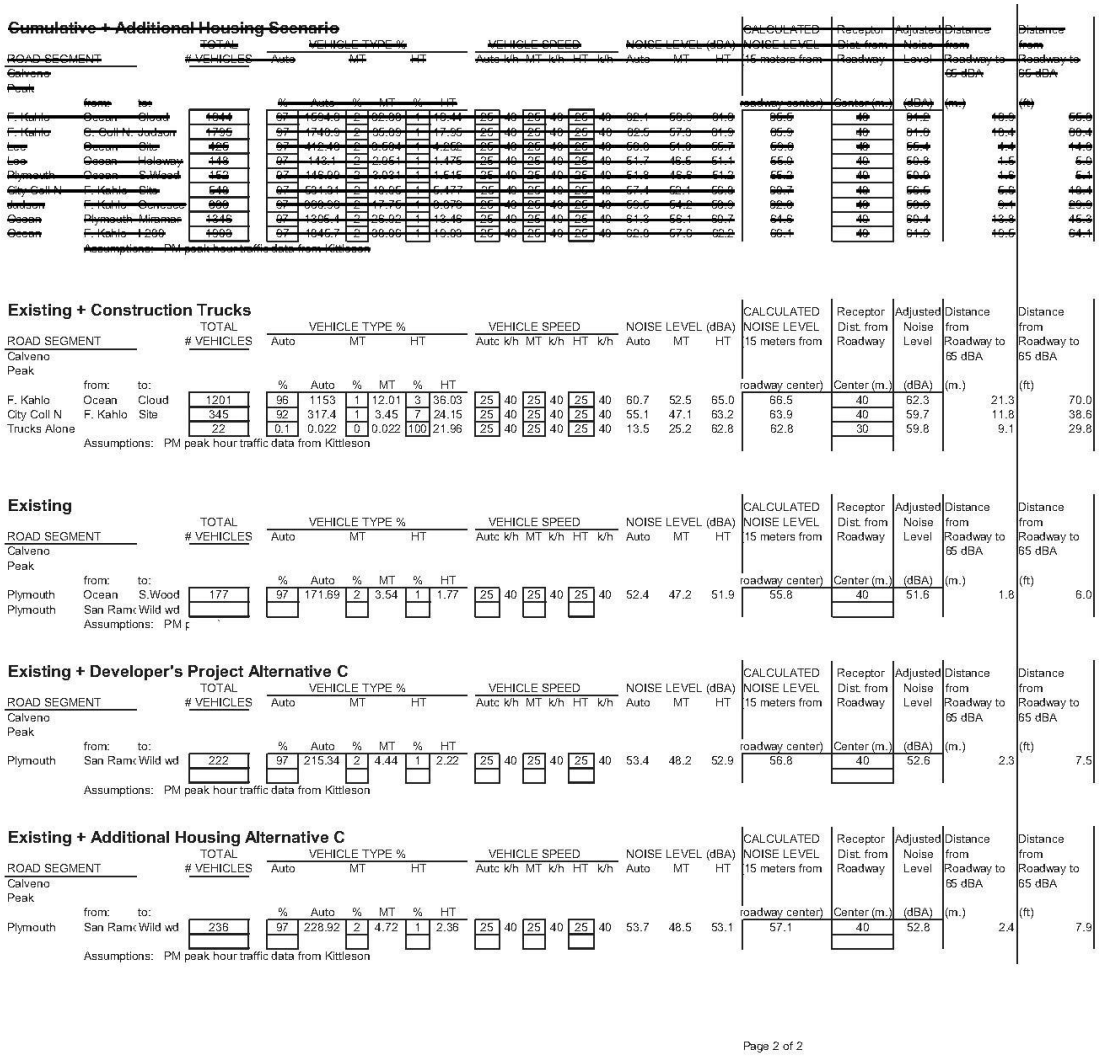
Assumptions: PM peak hour traffic data from Kittleson

**~~Cumulative + Developer's Project~~**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ~~Calveno Peak~~ | | | | | | | | | | | | | | | | | | | | | | | |
| | ~~from:~~ | ~~to:~~ | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| ~~F. Kahlo~~ | ~~Ocean~~ | ~~Cloud~~ | ~~1944~~ | ~~97~~ | ~~1884.8~~ | ~~2~~ | ~~38.88~~ | ~~1~~ | ~~19.44~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.1~~ | ~~56.9~~ | ~~61.5~~ | ~~65.5~~ | ~~40~~ | ~~61.5~~ | ~~19.5~~ | ~~65.5~~ |
| ~~F. Kahlo~~ | ~~C. Coll N.~~ | ~~Judson~~ | ~~1759~~ | ~~97~~ | ~~1706.1~~ | ~~2~~ | ~~35.11~~ | ~~1~~ | ~~17.59~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.4~~ | ~~57.2~~ | ~~61.9~~ | ~~65.9~~ | ~~40~~ | ~~61.5~~ | ~~18.9~~ | ~~62.1~~ |
| ~~Lee~~ | ~~Ocean~~ | ~~Site~~ | ~~959~~ | ~~97~~ | ~~948.41~~ | ~~2~~ | ~~7.184~~ | ~~1~~ | ~~3.592~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~55.5~~ | ~~50.3~~ | ~~55.0~~ | ~~58.9~~ | ~~40~~ | ~~54.6~~ | ~~3.7~~ | ~~12.1~~ |
| ~~Lee~~ | ~~Ocean~~ | ~~Holoway~~ | ~~499~~ | ~~97~~ | ~~197.58~~ | ~~2~~ | ~~3.991~~ | ~~1~~ | ~~1.315~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~51.8~~ | ~~46.8~~ | ~~50.6~~ | ~~54.5~~ | ~~40~~ | ~~50.3~~ | ~~1.9~~ | ~~6.1~~ |
| ~~Plymouth~~ | ~~Ocean~~ | ~~S.Wood~~ | ~~459~~ | ~~97~~ | ~~446.88~~ | ~~2~~ | ~~3.991~~ | ~~1~~ | ~~1.515~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~51.8~~ | ~~46.6~~ | ~~51.0~~ | ~~55.0~~ | ~~40~~ | ~~50.6~~ | ~~1.9~~ | ~~6.1~~ |
| ~~City Coll N~~ | ~~F. Kahlo~~ | ~~Site~~ | ~~599~~ | ~~97~~ | ~~493.48~~ | ~~2~~ | ~~19.47~~ | ~~1~~ | ~~5.987~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~57.0~~ | ~~51.8~~ | ~~55.5~~ | ~~59.4~~ | ~~40~~ | ~~55.2~~ | ~~5.2~~ | ~~17.1~~ |
| ~~Judson~~ | ~~F. Kahlo~~ | ~~Genesee~~ | ~~979~~ | ~~97~~ | ~~945.44~~ | ~~2~~ | ~~17.49~~ | ~~1~~ | ~~9.719~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~59.4~~ | ~~54.2~~ | ~~58.9~~ | ~~62.9~~ | ~~40~~ | ~~58.5~~ | ~~9.9~~ | ~~29.9~~ |
| ~~Ocean~~ | ~~Plymouth~~ | ~~Miramar~~ | ~~1944~~ | ~~97~~ | ~~1399.5~~ | ~~2~~ | ~~26.99~~ | ~~1~~ | ~~13.44~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~61.8~~ | ~~56.6~~ | ~~60.7~~ | ~~64.6~~ | ~~40~~ | ~~60.4~~ | ~~13.9~~ | ~~45.8~~ |
| ~~Ocean~~ | ~~F. Kahlo~~ | ~~I 280~~ | ~~1979~~ | ~~97~~ | ~~1919.7~~ | ~~2~~ | ~~37.4~~ | ~~1~~ | ~~18.7~~ | ~~55~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.7~~ | ~~57.6~~ | ~~62.1~~ | ~~66.1~~ | ~~40~~ | ~~61.5~~ | ~~15.8~~ | ~~52.0~~ |

~~Assumptions: PM peak hour traffic data from Kittleson~~

Page 1 of 2



**Cumulative + Additional Housing Scenario**

| ROAD SEGMENT | from: | to: | TOTAL # VEHICLES | VEHICLE TYPE % Auto | % | MT | % | HT | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from roadway center) | Receptor Dist. from Roadway Center (m.) | Adjusted Noise Level (dBA) | Distance from Roadway to 65 dBA (m.) | Distance from Roadway to 65 dBA (ft) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ~~Calveno~~ | | | | | | | | | | | | | | | | | | | |
| ~~Peak~~ | | | | | | | | | | | | | | | | | | | |
| ~~F. Kahlo~~ | ~~Ocean~~ | ~~Cloud~~ | ~~1041~~ | ~~97~~ | ~~1554.9~~ | ~~2~~ | ~~62.09~~ | ~~1~~ | ~~16.14~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.1~~ | ~~59.5~~ | ~~61.9~~ | ~~95.5~~ | ~~40~~ | ~~91.2~~ | ~~(m.)~~ | ~~19.5~~ | ~~(ft)~~ | ~~65.0~~ |
| ~~F. Kahlo~~ | ~~B. Coll N.~~ | ~~Judson~~ | ~~1795~~ | ~~97~~ | ~~1748.9~~ | ~~2~~ | ~~85.89~~ | ~~1~~ | ~~17.95~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.5~~ | ~~57.9~~ | ~~61.9~~ | ~~85.9~~ | ~~40~~ | ~~91.9~~ | | ~~19.4~~ | | ~~90.4~~ |
| ~~Lee~~ | ~~Ocean~~ | ~~Site~~ | ~~495~~ | ~~97~~ | ~~412.49~~ | ~~2~~ | ~~8.594~~ | ~~1~~ | ~~4.252~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~59.9~~ | ~~51.9~~ | ~~55.7~~ | ~~55.9~~ | ~~40~~ | ~~56.4~~ | | ~~1.4~~ | | ~~14.8~~ |
| ~~Lee~~ | ~~Ocean~~ | ~~Holoway~~ | ~~149~~ | ~~97~~ | ~~149.1~~ | ~~2~~ | ~~2.951~~ | ~~1~~ | ~~1.475~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~51.7~~ | ~~45.5~~ | ~~51.1~~ | ~~55.9~~ | ~~40~~ | ~~50.8~~ | | ~~1.5~~ | | ~~5.0~~ |
| ~~Plymouth~~ | ~~Ocean~~ | ~~S.Wood~~ | ~~163~~ | ~~97~~ | ~~146.99~~ | ~~2~~ | ~~3.031~~ | ~~1~~ | ~~1.515~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~51.8~~ | ~~45.5~~ | ~~51.2~~ | ~~55.9~~ | ~~40~~ | ~~50.9~~ | | ~~1.5~~ | | ~~5.1~~ |
| ~~City Coll N~~ | ~~F. Kahlo~~ | ~~Site~~ | ~~549~~ | ~~97~~ | ~~591.91~~ | ~~2~~ | ~~10.95~~ | ~~1~~ | ~~5.477~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~57.4~~ | ~~50.1~~ | ~~56.9~~ | ~~90.7~~ | ~~40~~ | ~~55.5~~ | | ~~5.0~~ | | ~~19.4~~ |
| ~~Judson~~ | ~~F. Kahlo~~ | ~~Genesee~~ | ~~888~~ | ~~97~~ | ~~956.93~~ | ~~2~~ | ~~17.76~~ | ~~1~~ | ~~8.878~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~59.6~~ | ~~54.2~~ | ~~59.5~~ | ~~89.0~~ | ~~40~~ | ~~59.0~~ | | ~~5.1~~ | | ~~89.6~~ |
| ~~Ocean~~ | ~~Plymouth~~ | ~~Miramar~~ | ~~1215~~ | ~~97~~ | ~~1305.4~~ | ~~2~~ | ~~26.02~~ | ~~1~~ | ~~13.45~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~61.3~~ | ~~55.1~~ | ~~59.7~~ | ~~84.5~~ | ~~40~~ | ~~80.4~~ | | ~~13.8~~ | | ~~45.3~~ |
| ~~Ocean~~ | ~~F. Kahlo~~ | ~~I-280~~ | ~~1599~~ | ~~97~~ | ~~1946.7~~ | ~~2~~ | ~~38.96~~ | ~~1~~ | ~~19.99~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.8~~ | ~~57.6~~ | ~~62.2~~ | ~~88.1~~ | ~~40~~ | ~~84.5~~ | | ~~19.6~~ | | ~~64.4~~ |

~~Assumptions: PM peak hour traffic data from Kittleson~~

**Existing + Construction Trucks**

| ROAD SEGMENT | from: | to: | TOTAL # VEHICLES | VEHICLE TYPE % Auto | % | MT | % | HT | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from roadway center) | Receptor Dist. from Roadway Center (m.) | Adjusted Noise Level (dBA) | Distance from Roadway to 65 dBA (m.) | Distance from Roadway to 65 dBA (ft) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno | | | | | | | | | | | | | | | | | | | |
| Peak | | | | | | | | | | | | | | | | | | | |
| F. Kahlo | Ocean | Cloud | 1201 | 96 | 1153 | 1 | 12.01 | 3 | 36.03 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 52.5 | 65.0 | 66.5 | 40 | 62.3 | | 21.3 | | 70.0 |
| City Coll N | F. Kahlo | Site | 345 | 92 | 317.4 | 1 | 3.45 | 7 | 24.15 | 25 | 40 | 25 | 40 | 25 | 40 | 55.1 | 47.1 | 63.2 | 63.9 | 40 | 59.7 | | 11.8 | | 38.6 |
| Trucks Alone | | | 22 | 0.1 | 0.022 | 0 | 0.022 | 100 | 21.96 | 25 | 40 | 25 | 40 | 25 | 40 | 13.5 | 25.2 | 62.8 | 62.8 | 30 | 59.8 | | 9.1 | | 29.8 |

Assumptions: PM peak hour traffic data from Kittleson

**Existing**

| ROAD SEGMENT | from: | to: | TOTAL # VEHICLES | VEHICLE TYPE % Auto | % | MT | % | HT | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from roadway center) | Receptor Dist. from Roadway Center (m.) | Adjusted Noise Level (dBA) | Distance from Roadway to 65 dBA (m.) | Distance from Roadway to 65 dBA (ft) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno | | | | | | | | | | | | | | | | | | | |
| Peak | | | | | | | | | | | | | | | | | | | |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | | 1.8 | | 6.0 |
| Plymouth | San Ramo | Wild wd | | | | | | | | | | | | | | | | | | | | | | | |

Assumptions: PM p

**Existing + Developer's Project Alternative C**

| ROAD SEGMENT | from: | to: | TOTAL # VEHICLES | VEHICLE TYPE % Auto | % | MT | % | HT | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from roadway center) | Receptor Dist. from Roadway Center (m.) | Adjusted Noise Level (dBA) | Distance from Roadway to 65 dBA (m.) | Distance from Roadway to 65 dBA (ft) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno | | | | | | | | | | | | | | | | | | | |
| Peak | | | | | | | | | | | | | | | | | | | |
| Plymouth | San Ramo | Wild wd | 222 | 97 | 215.34 | 2 | 4.44 | 1 | 2.22 | 25 | 40 | 25 | 40 | 25 | 40 | 53.4 | 48.2 | 52.9 | 56.8 | 40 | 52.6 | | 2.3 | | 7.5 |
| | | | | | | | | | | | | | | | | | | | |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Additional Housing Alternative C**

| ROAD SEGMENT | from: | to: | TOTAL # VEHICLES | VEHICLE TYPE % Auto | % | MT | % | HT | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from roadway center) | Receptor Dist. from Roadway Center (m.) | Adjusted Noise Level (dBA) | Distance from Roadway to 65 dBA (m.) | Distance from Roadway to 65 dBA (ft) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno | | | | | | | | | | | | | | | | | | | |
| Peak | | | | | | | | | | | | | | | | | | | |
| Plymouth | San Ramo | Wild wd | 236 | 97 | 228.92 | 2 | 4.72 | 1 | 2.36 | 25 | 40 | 25 | 40 | 25 | 40 | 53.7 | 48.5 | 53.1 | 57.1 | 40 | 52.8 | | 2.4 | | 7.9 |
| | | | | | | | | | | | | | | | | | | | |

Assumptions: PM peak hour traffic data from Kittleson

Page 2 of 2

## *Comment NO-3: Construction Noise Impacts*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| O-ARHS-1 | I-HEGGIE2-6 | I-HEGGIE2-14 |
| O-ARHS-2 | I-HEGGIE2-8 | I-HEGGIE2-15 |
| I-BIERINGER1-3 | I-HEGGIE2-12 | I-HEGGIE2-17 |
| I-HEGGIE2-4 | I-HEGGIE2-13 | I-OSAWA-11 |

"Good afternoon. That's a tough one to follow, but I've got a few concerns. My name's Dr. Andrew Currier. I'm representing Archbishop Riordan High School, as its President.

There's a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It's a specialized designed learning area for

students with diagnosed learning needs that they can't -- we can't move them elsewhere in the building.

So, we're worried that there's not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don't have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can't go elsewhere to receive this help."

*(Andrew Currier, PhD, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [*O-ARHS-1*])*

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"So, we need more information about the noise impact. How is this all -- how is the hammering, the excavation, the drilling, all of that noise, all of that disruption, the trucks when they're beeping to back up, the backhoes, all that noise, how is that going to impact -- is that going to be two years lost on 170 students' education, who are trying despite learning needs and differences, to prepare themselves for college.

They're paying, in some cases, $60,000 a year to attend Riordan for this specialized care. That's all going to be disrupted for two plus years? That's unacceptable to us. So, we need more detail on this."

*(Andrew Currier, PhD, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [*O-ARHS-2*])*

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"One example. The draft SEIR fails to include the City College multi-use building as a sensitive receptor, which I think is a euphemism for young kids, okay.

The multi-use building is 150 feet from the construction site and is used for childcare classes, for children and classes on the site.

The short term measurement location information in the SEIR, which is on page 3, section C.9, notes that, and I quote from the DEIR: The college campuses are generally not considered a noise-sensitive receptor.

The MUB has been used for childcare classes, for children on site for years and will continue to be used that way. Therefore, it qualifies as a noise-sensitive receptor. And the DEIR completely ignores that, as they ignore the impact to City College, and the impact on Riordan College."

*(Garry Bieringer, CPC Hearing, September 12, 2019 [*I-BIERINGER1-3*])*

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"4. The draft SEIR fails to include the City College Multi-Use Building (MUB) as a sensitive receptor. MUB is approximately 150 feet from the construction site (per the scale of Figure 2-1, p. 2-2) and is used for childcare classes where children attend classes on site. The short-term measurement location information in the SEIR for ST-3 (page 3.C- 9) notes that "The Multi-Use Building is the nearest City College building to the project site; however, college campuses are generally not considered a noise-sensitive receptor." The MUB has been used for childcare classes for children on site for several years and is expected to continue to be used for that purpose and therefore needs to be recognized as a noise-sensitive receptor site that qualifies as such for noise testing."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-6*])*

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"6. During Phase 0 of construction, there will be up to 200 one-way trips per day during peak activity, and the noisiest period will continue for two months (page 3.C-26). 22 truck trips are anticipated per hour. This is a truck trip every two to three minutes between the hours of 7am and 4pm. The noisiest period in Phase 1 would last four months. There is no school vacation that lasts for four months; so, even without including the seven-month noisiest period of Phase 2, during Phases 0 and 1, the level of truck hauling activity will occur during class hours and disturb classes as well as access to classes due to equipment VMT."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-8*])*

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"10. We would appreciate a clear understanding of the noise impact of cutting the construction period from six to three (or four) years. Would the noisiest period of construction occur in the first two or three (or four) years whether the time period of the project is three (to four) or six years?"

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-12*])*

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"11. We understand the same equipment will be used whatever the time schedule. But will a compressed time schedule mean more equipment will need to be operated simultaneously, increasing the noise level at certain times? It is to be expected that construction compressed into two phases would increase the level of disruption along community streets due to more frequent construction truck hauling near multiple sensitive receptors, residences, and education institutions."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-13*])*

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"12. If the construction schedule is compressed, please address the likelihood of the need for additional hours of work per day or night required to meet the compressed timeframe. Will compressing the time frame into three years increase the risk of emergency requests for special permits for night work?"

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-14*])*

"13. If the City grants special work permits for periods outside of the standard allowable 7 am to 8 pm construction hours, boarding school students at Riordan HS and residents living along Plymouth, Ocean, Lee and on the Northeast side of the development in Sunnyside and Westwood Park, will likely experience sleep disturbance. The SEIR leaves open the possibility for special night permitting. This will affect the health, wellbeing and productivity of all concerned, and negative night permitting impacts should not be acceptable in this residential area."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-15*])*

"15. In general, although SF Planning doesn't include City College students in their learning environment as sensitive receptors in noise assessments, due to the type of activity and the duration and amount of noise exposure, they should be considered in this category. Per the World Health Organization, as stated in the SEIR document, a known health effect from noise is decreased performance on complex cognitive tasks (reading, attention, memorization and problem solving.)"

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-17*])*

"Consideration must be given to the impact of construction noise on the classrooms at Riordan High, as work will be done during school hours."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-11*])*

## Response NO-3: Construction Noise Impacts

The comments express concern regarding noise impacts to sensitive receptors, hauling trips along North Access Road, nighttime construction, and the compressed construction schedule.

Comments regarding noise monitoring at childcare facility receptors are addressed in Response NO-1, Noise Baseline, on RTC p. 4.D-2.

The response to the construction noise impacts analysis is organized by the following subtopics:

- City College Multi-Use Building
- Archbishop Riordan High School
- North Access Road
- Nighttime Construction
- Compressed Construction Schedule

### *City College Multi-Use-Building*

Commenters expressed concern that the City College Multi-Use-Building is not identified and analyzed as a sensitive receptor because the commenter states the child care classes would include child care and the presence of children. As stated on draft SEIR p. 3.C-4, the planning department defines noise-sensitive receptors as occupants of residences, schools, daycare centers, hotels, hospitals, places of worship, and nursing homes. Although not cited in the draft SEIR, the planning department uses the Governor's Office of Planning and Research's *General Plan Guidelines 2017* for defining noise-sensitive uses.[40] The guidelines identify noise-sensitive receptors to include residential land uses, hospitals, convalescent homes, schools, churches, and sensitive wildlife habitat, including the habitat of rare, threatened, or endangered species. The guidelines define noise-sensitive uses. The guidelines do not define uses such as City College classes as a noise-sensitive receptor. Thus, the draft SEIR does not include City College as a noise-sensitive receptor.

The planning department consulted with City College regarding the classes identified by the commenter.[41] Based on information from City College, these classes are child behavior observation classes. The classes at the Multi-Use Building are three hours in duration and are offered daily. However, parents may opt to bring their child once a week, or up to five times a week. There is no outdoor space for children associated with the Multi-Use Building. Locations where a land use is designed for children to receive instruction on a regular basis (i.e., are enrolled) such as an elementary or pre-school are typically considered to be noise-sensitive.

In an effort to disclose potential construction noise impacts at the exterior of the Multi-Use Building, an analysis of the construction noise impacts at the exterior of the Multi-Use Building is provided in **Table RTC-7, Estimated Daytime Construction-Related Noise Levels at the Multi-Use Building**. As can be seen from this table, exterior noise levels would be below the 90 dBA standard applicable to residential uses but would exceed the applicable 65 dBA "Ambient + 10 dBA" standard for this location by 10 dB during Phase 0 and 5 dB during Phases 1 and 2. As stated above, there are no outdoor space for children associated with the Multi-Use Building, and construction noise heard inside the building would be further attenuated by the building which is of recent construction. Additionally, **Mitigation Measure M-NO-1: Construction Noise Control Measures** would further reduce the construction noise impact heard inside the building at this receptor. Nevertheless, as stated on draft SEIR p. 3.C-31, the overall construction noise impact of the proposed project is significant and unavoidable with mitigation.

[40] Governor's Office of Planning and Research, *State of California 2017 General Plan Guidelines*, 2017, p. 136. Available at: *http://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf*

[41] Rosario Villasana, Department Chair of Child Development and Family Studies, City College. Phone correspondence with Jeanie Poling, San Francisco Environmental Planning, on October 1, 2019.

**TABLE RTC-7**
**ESTIMATED DAYTIME CONSTRUCTION-RELATED NOISE LEVELS AT THE MULTI-USE BUILDING**

| Construction Phase and Noisiest Combined Construction Activities | Hourly Leq in dBA at 50 Feet[a] | Minimum Distance between Receptor and Closest Equipment (feet) | Noise Level (Leq) Adjusted for Distance[b] | Daytime FTA Standard at Residential Uses (dBA) | Does Noise Level Exceed FTA Standard? | Ambient + 10 dBa Standard[c] at Closest Receptor | Does Noise Level Exceed Ambient + 10 dBa Standard? |
|---|---|---|---|---|---|---|---|
| **Existing Noise Receptor: City College Multi-Use Building** | | | | | | | |
| Phase 0 – Surface Preparation and Demolition | 85 | 175 | 75 | 90 | No | 65 | **Yes** |
| Phase 1 Building Construction | 81 | 175 | 70 | 90 | No | 65 | **Yes** |
| Phase 2 Building Construction | 81 | 175 | 70 | 90 | No | 65 | **Yes** |

SOURCE: ESA, 2019.

NOTES:

dBA = A-weighted decibel; FTA = Federal Transit Administration; noise levels in **bold** exceed the indicated standard.

[a] As calculated with the RCNM model with no attenuation for intervening berms or buildings.
[b] Combined hourly noise levels were attenuated 6 dB for every doubling of distance from the source.
[c] People often perceive 10 dBA as a doubling of loudness. The daytime ambient noise levels of 62 dBA were estimated using roadway noise modeling data for Judson Avenue.

### *Archbishop Riordan High School*

One commenter expresses concern about construction noise impacts to students at Archbishop Riordan High School. As discussed on draft SEIR p. 3.C-25, Archbishop Riordan High School would be the receptor nearest to the project site's eastern property line. The receptor is actually located along the northern property line of the project site. The text on draft SEIR p. 3.C-25 is revised as follows to correct the location of this receptor (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> Archbishop Riordan High School would be the receptor nearest to the ~~eastern~~ northern property line. Archbishop Riordan High School would be located approximately 80 feet from Phase 0 demolition activities which would last approximately two months.

The high school is a land use designed for children to receive instruction on a regular basis and is therefore considered a noise-sensitive receptor for the analysis. Impacts from fugitive dust generated during construction are addressed under Impact AQ-1 on draft SEIR pp. 3.D-44 to 3.D-45. The construction noise impact analysis applies three separate noise criteria.

Archbishop Riordan High School would be located approximately 80 feet from Phase 0 demolition activities, which would last approximately two months. The high school is also about 80 feet from the peak construction haul truck activity along North Access Road, which would occur over a four-month period. During Phase 1 and Phase 2, the high school would be approximately 50 feet from standard construction activities for Lee Avenue and Block G, respectively. Construction noise

impacts are identified as a significant impact in the draft SEIR based on the increase of noise levels over existing ambient levels and the duration of the overall construction period.

Predicted noise levels are conservative in that they assume activity at the closest point to each sensitive receptor, which would occur for only a fraction of the entire duration of demolition and construction activity. As demolition progresses away from the receptor location, noise levels experienced by the closest receptor would be less than the noise levels in draft SEIR Table 3.C-8, which reflect demolition activity as a worst-case analysis.

**Mitigation Measure M-NO-1, Construction Noise Control Measures**, is identified in the draft SEIR to reduce the severity of construction noise impacts to the degree feasible. This mitigation includes measures that would be directly applicable to reducing noise impacts at Archbishop Riordan High School, such as locating noisy activities as far from receptors as feasible, shielding noisy stationary equipment, and erecting temporary plywood noise barriers around the construction site, particularly where a site adjoins noise-sensitive uses such as Archbishop Riordan High School. The required project-specific noise control plan would also include identification of a community liaison to address noise complaints and preparation of a weekly noise monitoring log reports for any noise complaints received. The report must document noise levels, exceedances of threshold levels, if reported, and corrective action. However, even with implementation of this mitigation measure, given the extended duration of construction phases and given that noise levels would substantially exceed existing noise levels at Archbishop Riordan High School, the construction noise impact is identified in the draft SEIR as significant and unavoidable with mitigation.

### *North Access Road*

A comment expressed concern that the frequency and duration of truck hauling trips along North Access Road would extend beyond potential summer break periods and disturb classroom operations at Archbishop Riordan High School. The SEIR identified the impact as significant and unavoidable with mitigation.

The commenter is correct that during Phase 0 of construction, there would be up to 200 one-way trips per day during peak activity, and the noisiest period would continue for two months. As further stated on draft SEIR p. 3.C-26, 22 truck trips are anticipated per hour during peak demolition periods with a frequency of a truck trip every two to three minutes between the hours of 7 a.m. and 4 p.m. Table 3.C-8 on draft SEIR p. 3.C-27 presents the contribution of both haul trucks and equipment during each phase of construction, and shows that the contribution of haul trucks to hourly noise levels would be 63 dBA at Archbishop Riordan High School, which is approximately 6 dBA greater than existing noise levels. However, as indicated in this same table, the noise contribution from demolition equipment would be up to 82 dBA when occurring at the nearest point to Archbishop Riordan High School, which would have the greater potential for causing temporary increases in noise levels that could be disturbing to classes. As stated above, predicted off-road equipment noise levels are conservative in that they assume activity at the closest point to each sensitive receptor, which would occur for only a fraction of the entire duration of demolition and construction activity. This impact would primarily occur during demolition and excavation in Phase 0, when on-road trucks would be travelling on North Access Road. (The

permanent relocation of North Access Road is described in Variant 4: North Street Extension on draft SEIR p. 5-22 and depicted in Figure 5-4 on draft SEIR p. 5-20.)

To further address this comment with respect to potential noise impacts to Riordan High School and a temporary or permanent relocation of North Street, the text of Mitigation Measure M-NO-1 on draft SEIR p. 3.C-30 is modified, as indicated in Response NO-6: Noise Mitigation Measure, on RTC p. 4.D-21, below.

Mitigation Measure M-NO-1, Construction Noise Control Measures, is identified in the SEIR to implement all feasible mitigation to reduce the severity of construction noise impacts to the degree feasible as required by CEQA Guidelines section 15126.4(a)(1). Mitigation includes preparation and implementation of a project-specific noise control plan. Even with implementation of this mitigation measure, the project as analyzed in the draft SEIR and as revised above, given the extended duration of construction phases and given that noise levels would substantially exceed existing noise levels at Archbishop Riordan High School, the construction noise impact is identified in the draft SEIR as significant and unavoidable with mitigation. These revisions do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

### *Nighttime Construction*

One comment raises concerns regarding potential impacts to sleep disturbance from nighttime construction work. As stated on draft SEIR p. 3.C-23, construction activity would generally occur during daytime hours. Nighttime construction noise is not expected to occur frequently or regularly Accordingly, no hauling of materials, equipment warm-up, or any other activity is anticipated during nighttime hours except in unusual circumstances such as large concrete pours, which may require earlier start or later finish times, as explained on draft SEIR p. 2-39. The project sponsor has indicated that each building would require one concrete pour. If nighttime work after 8 p.m. were needed, a special nighttime construction permit would be required and subject to review, permitting, and approval by the San Francisco Department of Building Inspection. Mitigation Measure M-NO-1 also includes a requirement for the project sponsor to notify the planning department's development performance coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred. The text on draft SEIR p. 3.C-23 is modified as indicated in Response NO-1, Noise Baseline, on RTC p. 4.D-2, to clarify nighttime work. As noted in Response NO-1, the text changes do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

### *Compressed Construction Schedule*

Several comments express concerns that a compressed schedule would result in increased intensity of construction and therefore greater construction noise levels. Compression of the construction schedule from six to three years would increase the intensity of construction and may result in more individual pieces of equipment operating simultaneously than under the proposed six-year construction period.

Under the compressed scenario, Phase 0 would occur over a 12-month period, the same as under the six-year construction scenario; therefore, the construction noise impacts for Phase 0 would be the same. Under the compressed scenario, Phases 1 and 2 would be constructed simultaneously after Phase 0 and would involve more equipment operation but not at the same location, as Phase 1 and Phase 2 are in separate geographic areas of the project site. Consequently, construction noise impacts at Archbishop Riordan High School as assessed in Table 3.C-8 of the draft SEIR would increase by 3 dBA and only if development of Blocks G and TH2 would occur simultaneously (see Figure 2-18, draft SEIR p. 2-40). Other Phase 1 development would be over 300 feet away from Archbishop Riordan High School, such that construction noise would be attenuated by distance so as not to contribute considerably to construction noise from concurrent development of Phase 2 area under the compressed schedule.

Additionally, because construction noise analysis involves consideration of the simultaneous operation of the two noisiest pieces of equipment, the compressed construction scenario would not appreciably result in a change in the character of the significant and unavoidable construction noise impact identified in the draft SEIR. Therefore, due to the attenuation between the project construction and nearest sensitive receptors, the compressed construction scenario would have a potential for only a modest increase in noise levels over those predicted for the proposed schedule.

Similar to the proposed six-year schedule, the truck trips would be phased over the duration of the planned construction activities but compressed into three years. As described in Section 3.B, Transportation and Circulation, draft SEIR pp. 3.B-60 to 3.B-61, under the compressed schedule, the average number of construction-related truck trips would increase by approximately 20 percent. Therefore, the peak volume of truck trips under the compressed schedule would also occur over four months in 2022 and would be 1.2 times greater than the six-year schedule due to the simultaneous construction of Phase 1 and 2. As indicated in Table 3.C-8 on draft SEIR p. 3.C-27, the noise contribution of truck trips would be much less than that of off-road construction equipment. As for the proposed construction schedule and as acknowledged on draft SEIR p. 3.C-29, the compressed construction schedule would result in a construction noise impacts from off-road equipment and haul trucks that would be *significant and unavoidable*. There would not be a substantial increase in the severity of construction noise impacts under the compressed schedule compared to that of the proposed project.

The text on draft SEIR p. 3.C-29 is revised as follows to clarify the noise analysis under the compressed construction schedule (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> As stated in the footnote to Table 2-2, p. 2-38, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity.

Compression of the construction schedule from six to three years would increase the intensity of construction and may result in more individual pieces of equipment operating simultaneously than under the proposed six-year construction period of the project. Under the compressed scenario, Phase 0 would occur over a 12-month period, as under the six-year construction scenario; therefore, the construction noise impacts for Phase 0 would be the same.

Under the compressed scenario, Phases 1 and 2 would be constructed simultaneously after Phase 0 and would involve more equipment operation but not at the same location, as Phase 1 and Phase 2 are in separate geographic areas of the project site. Consequently, construction noise impacts at Archbishop Riordan High School as assessed in Table 3.C-8 would increase by 3 dBA and only if development of Blocks G and TH2 would occur simultaneously (see Figure 2-18). All other Phase 1 development would be over 300 feet away, such that construction noise would be attenuated by distance so as not to contribute considerably to construction noise from concurrent development of Phase 2 area under the compressed schedule. Additionally, because construction noise analysis involves consideration of the simultaneous operation of the two noisiest pieces of equipment, the compressed construction scenario would not appreciably result in a change in the character of the significant and unavoidable construction noise impact identified. Therefore, due to the distances involved, the compressed construction scenario would only have a potential for a modest increase in noise levels over those predicted for the proposed schedule.

The peak volume of truck trips under the compressed schedule would also occur over four months in 2022 and would be 1.2 times greater than the six-year schedule due to the simultaneous construction of Phase 1 and 2. As indicated in Table 3.C-8 on SEIR p. 3.C-27, the noise contribution of truck trips would be much less than that of off-road construction equipment. There would not be a substantial increase in the severity of construction noise impacts under the compressed schedule compared to that of the proposed project. ~~The same pieces of equipment would be operating under a compressed construction schedule. Therefore, the maximum noise level would not change based on the methodology above combining the operation of the noisiest pieces of equipment with each phase.~~ Under the compressed construction schedule, the construction noise impact from off-road equipment would be *significant*.

These changes and additional analysis do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

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## *Comment NO-4: Construction Vibration*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-16
I-TIMA-6

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"14. Construction-related vibration impacts were not addressed in the PEIR. Studies do not include an evaluation of the vibration impact of construction equipment although as noted on p. 3.C-32, equipment used for demolition, site preparation and excavation activities, including the hoe ram and vibratory roller/compactor, which will be used, could generate varying degrees of temporary groundborne vibration.

Per Table 3.C-6 on page 3.C-14, older buildings may be damaged at .1 PPV (in/sec) if they are fragile though old buildings or residential structures would normally be able to withstand a maximum of 0.25 to 0.3 PPV when subjected to continuous or frequent intermittent sources. The Vibratory Roller/Compactor, a piece of equipment that will be used, creates 0.21 PPV (in/sec) at 25 feet. Although it may not be likely, it is possible there are homes along Plymouth Avenue that are in close enough proximity and fragile enough to be damaged by vibration. Have the homes along Plymouth been evaluated for their distance and fragility for possible vibration impacts?"

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-16*])*

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"And in regards to building, the shaking of the construction element way above the viability demands of construction. And my house is old and I do not want to have cracks in my stucco. Thank you."

*(Hedda Tima, CPC Hearing, September 12, 2019 [*I-TIMA-6*])*

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## Response NO-4: Construction Vibration

The comments express concern that the project could result in construction-related vibration impacts that may cause damage to structures. The commenter is correct that construction vibration was not analyzed in the Balboa Park Station Area Plan PEIR, and this is acknowledged on draft SEIR p. 3.C-2.

The draft SEIR did, however, analyze construction-related vibration impacts under Impact NO-2 on draft SEIR pp. 3.C-32 to 3.C-33. The methodology is provided on draft SEIR pp. 3.C-20 to 3.C-21 and 3.C-32 to 3.C-33, and is based on the California Department of Transportation and Federal Transit Administration guidance. Table 3.C-6, Vibration Guidelines for Potential Damage to Structures, on draft SEIR p 3.C-14, identifies the vibration level at which different structure types (i.e., from "extremely fragile historic buildings, ruins, ancient monuments" to "modern industrial/commercial buildings") would be subject to potential damage.

As noted on draft SEIR p. 3.C-22, construction equipment such as hoe rams and bulldozers could generate temporary groundborne vibration. As shown in Table 3.C-9 on draft SEIR p. 3.C-33, vibration levels at the Plymouth Avenue residences would be expected to be 0.21 in/sec peak particle velocity (PPV), which is below the 0.5 in/sec PPV standard for structural damage applicable to modern buildings. The Plymouth Avenue residences are considered older residential structures; therefore, the 0.3 in/sec PPV standard should be applied. Even with the 0.3 PPV standard, the Plymouth Avenue residences 25 feet away from the project site would experience less-than-significant vibration levels.

The second paragraph of draft SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> This analysis evaluates the significance of construction-related vibration on structures and people (receptors), specifically cosmetic damage effects on structures and sleep disturbance and associated health effects on people. For building damage, the threshold limit depends on the architectural characteristics of the potentially affected structure (see Table 3.C-6, p. 3.C-14)~~, but.~~ ~~f~~For modern residential, industrial and commercial buildings, a standard of 0.5 in/sec PPV is applied, while for older residential structures, a standard of 0.3 in/sec PPV is applied. Potential nighttime concrete pours would not involve the use of vibration-generating equipment. The potential for sleep disturbance vibration effects are evaluated only when construction activities are proposed during the nighttime hours, which would not occur under the proposed project, therefore, there would be no sleep disturbance vibration impacts.

The fourth paragraph of SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> As shown in Table 3.C-6, p. 3.C-14, depending on the type of vibration (transient versus continuous), groundborne vibration generated by project-related demolition and construction activities above ~~0.5~~ 0.3 in/sec PPV could cause cosmetic damage to new or older nearby structures. As shown Table 3.C-9, estimated vibration levels of PPV's would be ~~well~~ below the ~~0.5~~ 0.3 in/sec threshold and this impact would be ***less than significant***.

These changes and additional analysis do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts.

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## *Comment NO-5: Operational Noise Impacts*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-MUELLER1-3

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"It should be obvious that proposing an unsafe density of housing units next to one of the largest and most successful Community Colleges in the State is not appropriate. It was wrong 30 years ago and it's wrong now. The sheer noise factor of thousands of new residents warehoused next to a college with a daily enrollment the size of a small city makes the educational environment totally compromised."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER1-3*])*

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## Response NO-5: Operational Noise

This comment expresses concern that operational noise from the proposed dense residential uses would be incompatible with the adjacent community college.

Operational noise impacts of the proposed project are assessed on draft SEIR pp. 3.C-33 to 3.C-38.

Impact NO-3 discusses the potential for the project to generate operational noise from fixed mechanical equipment. **Mitigation Measure M-NO-3, Fixed Mechanical Equipment Noise Controls**, on draft SEIR p. 3.C-36, is identified to reduce this potentially significant operational noise impact to a less-than-significant level by establishing a performance standard consistent with the noise limits established in section 2909(a) and (d) of the San Francisco Noise Ordinance.

The operational noise analysis in Impact NO-3 of the draft SEIR uses the noise exposure limits established in section 2909(a) and (d) of the San Francisco Noise Ordinance, which are land use based. Figure 3.C-3 on draft SEIR p. 3.C-16 presents the land use compatibility chart from the City and County of San Francisco General Plan Noise Element. As shown on this chart, the normally acceptable noise environment for residential uses within the City is up to 60 dBA, Ldn, while the normally acceptable noise environment for a school use is up to 65 dBA. Consequently, the Noise Element of the San Francisco General Plan considers multifamily residential uses to be compatible with the same noise environment as for educational uses, and the operational noise analysis and mitigation of the draft SEIR would be applicable to both residential and school land uses.

Impact NO-4 presents the operational traffic analysis associated with implementation of the proposed project. As can be seen from Table 3.C-11 on draft SEIR p. 3.C-37, there would not be a significant traffic noise increase along any roadways adjacent to sensitive land uses. Therefore, operation of the proposed project would not have a significant operational noise impact or land use compatibility impact with respect to noise exposure to adjacent school and collegiate land uses.

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## *Comment NO-6: Noise Mitigation Measure*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE1-4
I-HEGGIE2-5

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"The first mitigation measure for noise recommends selecting truck haul routes that, quote: Avoid the north access road and adjacent Riordan High School and residential uses along Lee Avenue.

But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, the Harmony Family Childcare. A high school, nursery schools and daycare centers are located at or near all of the identified possible entrances and exit site points.

The Lee Avenue alternative is already identified in the Cumulative Transportation Items 4 and 6.B, as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation.

Mitigation measure for Noise Number 1 would only exacerbate another unmitigatable project issue. The first mitigation of the report also recommends undertaking the noisiest activities during times of least disturbance to surrounding residents and occupants, which are identified as 9:00 a.m. to 4:00 p.m. This coincides with the period when daycare centers and nursery schools are in session. Riordan High School holds classes and afterschool activities. And the majority of City College classes, including child development classes in the multi-use building, are in session.

The times of least disturbance need to be redefined."

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [*I-HEGGIE1-4*])*

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"2. The first Mitigation Measure for noise recommends selecting truck haul routes that "avoid the North Access Road and adjacent Riordan High School and residential uses along Plymouth Avenue." But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, Harmony Family Childcare. A high school, nursery schools and daycare centers are located at, or near, all the identified possible entrance and exit points of the project. The Lee Avenue alternative is already identified in Cumulative Transportation Items 4 and 6b [C-TR-4 and C-TR- 6b] as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation. It appears that the mitigation measure for noise #1 would exacerbate another unmitigable project issue.

3. The first mitigation measure of the Report also recommends undertaking the noisiest activities during "times of least disturbance" to surrounding residents and occupants which are identified as from 9am-4pm [per page 3.C-30], a period prior to the maximum existing use of the adjacent land at City College, which is between 11am and 1pm. This coincides with the period when daycare centers and nursery schools are in session, Riordan HS holds classes and after school activities, and the majority of City College classes, including child development classes in the Multi-Use Building, are in session. The times of least disturbance needs to be redefined. There may be no time of least disturbance for the many diverse uses of the area, and if that is the case, that should be noted."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-5*])*

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## Response NO-6: Noise Mitigation Measure

Comments regarding construction impacts on sensitive receptors and potential impacts to childcare classes in the Multi-Use Building are addressed above in Response NO-3, Construction Noise Impacts, on RTC p. 4.D-11.

The comment expresses concern regarding the haul truck route cited in Mitigation Measure M-NO-1. The commenter also raises concerns that the identified times of least disturbance

suggested in Mitigation Measure M-NO-1 on SEIR p. 3.C-30 may not be appropriate for surrounding land uses near the Lee and Ocean avenue intersection.

The commenter is correct that if Lee Avenue were to be used as an alternative route, truck travel on this roadway could be a potentially significant impact to existing receptors along Lee Avenue. Lee Avenue already accommodates truck deliveries for the adjacent Whole Food Market, is adjacent to sensitive receptors with no setback, and is limited in width; thus, Lee Avenue does not represent a viable alternative as an alternate route for construction haul trucks. The draft SEIR identifies construction-related noise impacts as significant and unavoidable with mitigation, and Mitigation Measure M-NO-1 is intended to provide consideration to construct a temporary roadway to and from Frida Kahlo Way to avoid such impacts. The sixth bullet of Mitigation Measure M-NO-1 on draft SEIR p. 3.C-30 is modified as follows:

- Undertake the noisiest activities (e.g., demolition using hoe rams) during ~~times of least disturbance to surrounding residents and occupants~~ the hours of ~~(~~9 a.m. to 4 p.m.~~)~~; and select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street.

The feasibility of implementing either a temporary or permanent North Street extension is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College. Consequently, the second full paragraph on draft SEIR p. 3.C-31 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> **Significance after Mitigation:** Significant and Unavoidable. Implementation of construction-related noise control measures in Mitigation Measure M-NO-1 would reduce the project's temporary or periodic increases in ambient noise levels. However, given that there would still be periods of peak construction activity exceeding the "Ambient + 10 dBA" standard at the nearest sensitive receptor locations for occasional periods when activity would be conducted at the property lines nearest to receptors, these occurrences would occur in all three phases of construction over an extended period of up to six years.
>
> Plywood barriers or moveable sound barrier curtains can provide, at best, 10 to 15 dBA of sound attenuation but would not be effective for elevated receptors in the 1100–1150 Ocean Avenue residences. The feasibility of implementing either a temporary or permanent North Street extension is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College.
>
> If construction were to be conducted under the compressed schedule and be complete as early as 2024, a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity. Therefore, in either case the construction noise impacts would be significant and unavoidable with mitigation.

This would not change the conclusions of the draft SEIR as the draft SEIR identified this impact as significant and unavoidable with mitigation.

The modifications to Mitigation Measure M-NO-1 clarify that the project sponsor should select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street; the permanent relocation is described in Variant 4: North Street Extension on draft SEIR p. 5-22 and depicted in Figure 5-4 on draft SEIR p. 5-20. The feasibility of implementing the North Street extension, as envisioned in Variant 4, is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College.

As the commenter states, there is likely no set period where all noise-sensitive receptors would be unlikely to be present. Mitigation Measure M-NO-1 would require that the noisiest activities be conducted during daytime hours, and the intent of this mitigation is to restrict the noisiest activity to hours when a majority of receptors such as residential uses along Plymouth Avenue may be less impacted by construction noise. With respect to alternative hours of hauling, it is infeasible to assign truck trip hauling activities during nighttime periods when residents are more likely to be asleep. It is also infeasible to shorten or require different daytime hour of hauling, as they would not align with contractor worker hauling schedules, or such hours would prolong the construction period such that noise impacts may be prolonged too.

Notwithstanding these efforts, the construction noise impact is identified as significant and unavoidable with mitigation.

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## *Comment NO-7: Cumulative Noise*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-18

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"16. As you note, because City College has been making changes to their master plan, checking in with them for their most current plans for development in the areas closest to the Balboa Reservoir is an ongoing process. A recent plan calls for constructing a Performing Arts Education Center building twice as tall as the one indicated in the DEIR on the City College-owned "upper reservoir." Please take into account the cumulative impact to noise of new plans."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-18*])*

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## Response NO-7: Cumulative Noise

As discussed on draft SEIR p. 3.C-40, although City College adopted a facilities master plan in March 2019, this facilities master plan does not provide adequate information to develop a quantitative cumulative impact analysis as part of the draft SEIR. The approach to the cumulative impact analysis with respect to City College is also described on draft SEIR pp. 3.A-10 to 3.A-14. This section describes the available information of the facilities master plan projects and the potential bond measure, and acknowledges that the facilities master plan projects may change depending on funding availability. The draft SEIR noise section qualitatively assesses the impacts of the various City College Ocean Campus projects.

The cumulative construction noise impacts are analyzed based on the closest cumulative project where concurrent construction would have the potential to cumulatively increase noise levels at existing sensitive receptors. Archbishop Riordan High School is the closest sensitive receptor to the project site and east basin where some City College facilities master plan projects could be constructed (see draft SEIR p. 3.C-38). As described in the draft SEIR, on p. 3.A-14, the City College bond measure project list presented to the City College Board of Trustees in 2019 does not include the East Basin Parking Garage. The garage is the closest cumulative project to Archbishop Riordan High School but may not be constructed concurrently with the proposed project. The new Diego Rivera Theater and a smaller STEAM building, which were identified as potential bond-funded projects when presented to the City College Board of Trustees in 2019, replaced the Performing Arts Education Center on the east basin. These projects would be approximately 300 feet from Archbishop Riordan High School. The analysis in the draft SEIR is therefore conservative, in that it assumed that City College would construct the East Basin Parking Garage concurrent with the Balboa Reservoir project, and that it would be the closest cumulative project to a sensitive receptor at 80 feet away. Therefore, the cumulative analysis appropriately considers the growth and development information available for the City College Ocean Campus at the time of the draft SEIR preparation.

# 4.E Air Quality

The comments and corresponding responses in this section cover topics in draft SEIR Section 3.D, Air Quality. The comments are further grouped according to the following air quality issues that the comments raise:

- Comment AQ-1: Sensitive Receptors
- Comment AQ-2: Construction Schedule
- Comment AQ-3: Mitigation Measure

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## *Comment AQ-1: Sensitive Receptors*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-ARHS-1
I-HANSON3-1
I-HEGGIE2-19
I-MARABELLO1-1

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"Good afternoon. That's a tough one to follow, but I've got a few concerns. My name's Dr. Andrew Currier. I'm representing Archbishop Riordan High School, as its President.

There's a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It's a specialized designed learning area for students with diagnosed learning needs that they can't -- we can't move them elsewhere in the building.

So, we're worried that there's not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don't have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can't go elsewhere to receive this help."

*(Andrew Currier, PhD, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [*O-ARHS-1*])*

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"The Draft SEIR discusses risks in the APEZ, which is the Air Pollutant Exposure Zone. The risk is highest for children, referred to as "sensitive receptors," at Childcare Centers, and the SEIR identifies Childcare Centers in the area and their distance to the construction zone. The Childcare Center at City College, located in the bungalows is identified and though it is not the closest in

proximity it is the only center noted that lies within the APEZ, sits to the East and is in the prevailing path of the wind.

The draft SEIR fails to note the Childcare classes that are centered in the City College Multi-Use Building (MUB), which teaches classes with children on site. Though these children are not playing outside of the building, the MUB sits approximately 150 feet away from the proposed development (per figure 2-3) is to the East of the construction site, and downwind.

Because of the proximity of the MUB to the construction site, its location is comparable to the planned childcare site within the proposed construction area. The SEIR classifies the danger to those children for future health impacts as being significant but says that because the development's future daycare centers won't be up and running during construction this isn't likely to be an issue as follows:

From the draft SEIR page 3.D-71: 'in the unlikely event that the daycare would be completed in Phase 1 and be operational during Phase 2 construction, the potential for future health risk impacts from exposure of daycare receptors to Phase 2 construction TAC emissions would be potentially significant, especially given the potential that the project could be developed under an accelerated construction schedule of as little as three years' duration, increasing the DPM exposure of daycare receptors.'

The proposed project must study the potential danger to the children who participate in the classes in City College's MUB. The data shows that they are not included in this study. Because the draft SEIR identifies significant health impacts for children at the future daycare centers located within the construction area, those concerns must be addressed as well with the children in the MUB whose proximity and direction of location put them at similar risk. These children in the MUB are within the APEZ and the building they are in is to the East, and downwind of the proposed project. The danger to these children is also increased with the potential for an accelerated construction schedule for both alternatives, **after studying the impacts**; the SEIR must offer mitigations for these children for all of the alternatives studied in the draft SEIR."

*(Christine Hanson, Email, September 11, 2019 [*I-HANSON3-1])

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"Please include the sensitive receptors identified above for noise in assessments of air quality as appropriate, although air travels farther than noise." [42]

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-19*])*

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**"FAILURE TO INCLUDE A SIGNIFICANT SENSITIVE RECEPTOR — STUDENT-ATHLETES**

1. Both the PEIR (page 251) and BAAQMD guidelines (http://www.sparetheair.org/understanding-air-quality/air-pollutants-and-healtheffects/whos-at-risk) include persons engaged in strenuous exercise as sensitive receptors.

[42] The comment is referring to Mighty Bambini, childcare classes at the Multi-Use Building, and the future City College replacement childcare center.

The SEIR does not do so similarly for a sizable group that exercises routinely and strenuously adjacent to the project area — CCSF athletes. It does not designate them, many of whom train and compete outdoors within 1/4 mile of the BR, as sensitive receptors. It fails to mention this significant group altogether. Thus they were not included in any of the analyses, including the Health Risk Assessment.

This is a violation of San Francisco Administrative Code chapter 31.

There are hundreds of CCSF student-athletes exercising strenuously, outdoors and indoors, who need to be factored in to required air quality analyses.

Plus there are many more who are strenuously exercising in CCSF Ocean Campus physical eduction courses that should be accounted for.

Also, if health risk assumptions used in the SEIR's air quality analyses are different for athletes than they are for students, and they probably are, then the athletes among the student body at Archbishop Riordan should be their own receptor type in the analyses."

*(Brian Marabello, Email, September 23, 2019 [*I-MARABELLO1-1*])*

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## Response AQ-1: Sensitive Receptors and Construction

The comments relate to concerns about construction-related air quality impacts, and request that additional sensitive receptor locations and types of sensitive receptors be included in the air quality analysis.

Comments regarding noise impacts to sensitive receptors are addressed in Response NO-1, Noise Baselines, on RTC p. 4.D-2 and Response NO-3, Construction Noise Impacts, on RTC p. 4.D-11.

The response to the sensitive receptors and construction analysis comments is organized by the following subtopics:

- Sensitive Receptors Included in the Analysis
- City College Multi-Use Building Occupants as Sensitive Receptors
- Additional Sensitive Receptors
- Student Athletes as Sensitive Receptors

### *Sensitive Receptors Included in the Analysis*

As described on draft SEIR p. 3.D-20, some population groups are more susceptible to adverse health effects from air quality than others. These sensitive groups are known as "sensitive receptors." As stated on draft SEIR p. 3.D-20:

> "More sensitive population groups include: the elderly and the young; those with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and those with other environmental or occupational health exposures (e.g., indoor air

> quality) that affect cardiovascular or respiratory diseases. The air district defines sensitive receptors as children, adults, and seniors occupying or residing in residential dwellings, schools, daycare centers, hospitals, and senior-care facilities."

The health risk assessment (HRA) prepared for the draft SEIR includes all sensitive receptor locations within 1,000 meters of the project boundary. These include residential areas (based on residential land use and/or zoning data), daycares, and schools (for children under 16 years of age). As discussed on draft SEIR p. 3.D-20, sensitive receptors include a "representative sample of known residents (child and adult) in the surrounding neighborhood, and other sensitive receptors (school children, daycare facilities, etc.) located in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks within the project vicinity." Table 9 on draft SEIR Appendix E, p. 20, presents the location of daycares and schools within 1,000 meters of the project site, and whether each receptor is located within the Air Pollutant Exposure Zone (APEZ).

Comments state that the air quality analysis should include children present at childcare classes at the City College Multi-Use Building as sensitive receptors in the HRA. The commenter claims that due to the Multi-Use Building's proximity to the site and its location in the APEZ, and because the draft SEIR finds a significant impact for new onsite daycare receptors that would be comparable to the Multi-Use Building receptors, receptors at the Multi-Use Building should be evaluated in the draft SEIR. Another comment requests that planned sensitive receptor locations at City College be included in the air quality analysis. A City College childcare center is proposed to be located at the corner of Judson Street and Frida Khalo Way. Another childcare/nursery school, the Mighty Bambini childcare/nursery school, is located at the corner of Staples and Frida Kahlo Way.

The potential presence of children in a given land use does not necessarily indicate that such a land use is a sensitive receptor for TAC emissions. Locations where a land uses is designed for children to receive instruction on a regular basis (i.e., are enrolled) such as an elementary or pre-school are considered to be sensitive receptors, and are analyzed as such in the draft SEIR. Adult education facilities, such as City College, are not considered to be sensitive receptors with the exception of dedicated childcare facilities that may be present on such uses. This is because dedicated childcare facilities may have children present for many hours each day over five to seven days per week, and children are considered sensitive receptors due to their elevated breathing rates and susceptibility to TAC emission exposure.

### *City College Multi-Use Building Occupants as Sensitive Receptors*

The commenter is correct that the Multi-Use Building is in the APEZ. The draft SEIR p. 3.D-66, notes that the only APEZ locations in the study area (1,000-meter radius of the proposed project boundary) are receptor locations within 500 feet of I-280. However, since publication of the draft SEIR, the San Francisco Department of Public Health issued an updated APEZ map and health risk assessment database. Based on these new data, the Multi-Use Building is located within the 2020 APEZ.[43]

[43] San Francisco Planning Department, San Francisco Property Information Map, *https://sfplanninggis.org/PIM/*, accessed April 2020.

The commenter is also correct that the childcare center in the bungalows at City College is in the 2020 APEZ.

The commenter states that child attendees at the Multi-Use Building childcare classes would be present long enough in the building to be exposed to significant TAC emissions from project construction and operation. The planning department consulted with City College regarding the classes.[44] Based on information from City College, these classes are child behavior observation classes. The classes at the Multi-Use Building are three hours in duration and are offered daily. However, parents may opt to bring their child once a week, or up to five times a week. The children are only brought in for the duration of the class. Thus, the presence of children at the Multi-Use Building would not occur for extended periods of time (i.e., eight hours per day, seven days per week, as do typical daycare and school receptors). Even if the children attended these classes five days a week, their time spent in the Multi-Use Building (e.g., 15 hours per week) would be much less than the time children would spend at the daycare locations evaluated in the SEIR (e.g., 56 hours per week). Thus, the exposure duration of potential children who participate in the classes at the Multi-Use Building would be much lower than the exposure duration for the daycare, school, and residential receptors included in the draft SEIR.

For daycare uses, the draft SEIR assumes exposure to project-generated TACs would occur eight hours per day, seven days per week (250 days per year). For schools, the SEIR assumed eight hours per day, five days per week (180 days per year). For residents, the SEIR assumed 24 hours per day, seven days per week (350 days per year).[45] Children who participate in the classes at the Multi-Use Building would be expected to be exposed to project-generated TACs a maximum of three hours per day, five days per week (180 days per year). On an annual basis, this is 73 percent less than the exposure currently modeled for daycare receptors, 63 percent less than the exposure currently modeled for school receptors, and 94 percent less than the exposure currently modeled for residential receptors. In addition, childcare classes at the Multi-Use Building would not last more than a year, and any children present at the Multi-Use Building would only be exposed to a fraction of the entire six-year construction period. Therefore, the exposure for potential Multi-Use Building children receptors would be substantially lower than what was modeled in the draft SEIR for receptors located at a similar distance from the proposed project's boundaries.

Further, the Multi-Use Building daycare receptors are located farther from the project site than four daycare locations evaluated in the draft SEIR. The Multi-Use Building is approximately 175 feet from the project site boundary. The HRA modeled 16 offsite daycare sensitive receptor locations, four of which are located within 160 feet of the project site, including Shining Stars Family Child Center, Harmony Family Childcare, Blooming Child Care, and Cel Coalition Center (see Table 9 on draft SEIR Appendix E, p. 20). Four of the 16 nearby daycares are located in the APEZ (Star Sky Childcare and Preschool, Harmony Family Childcare, Cel Coalition Center, and the City College of San Francisco Ocean Campus Child Development Lab School) along with the Multi-Use Building.

[44] Rosario Villasana, Department Chair of Child Development and Family Studies, City College. Phone correspondence with Jeanie Poling, San Francisco Environmental Planning, on October 1, 2019.
[45] See Table 10 on draft SEIR Appendix E, pp. 21 to 23.

In an effort to disclose potential health risk impacts for a child attendee at the Multi-Use Building, maximum mitigated lifetime excess cancer risk and annual average $PM_{2.5}$ concentrations were estimated for a child attendee. The results of this analysis are presented in **Table RTC-8, Mitigated Lifetime Excess Cancer Risk for the Multi-Use Building Child Attendee and Select Daycare, School, and Residential Sensitive Receptors for the Additional Housing Option**, and **Table RTC-9, Mitigated Annual Average PM2.5 for the Multi-Use Building Child Attendee and Select Daycare, School, and Residential Sensitive Receptors for the Additional Housing Option**. For comparative purposes, the lifetime excess cancer risk at similar nearby sensitive receptor locations, as analyzed in the SEIR, are also presented in the table below. Results are presented for the Additional Housing Option because TAC emissions and health risks are greater for the Additional Housing Option than for the Developer's Proposed Option. It should also be noted that the background and total background plus project risk values in the tables below have been updated to reflect the update to the Citywide Health Risk Assessment database conducted in February 2020 by the City.[46] The key health risk results using the 2020 APEZ database are provided as new SEIR Appendix I, Updated Health Risk Assessment for the Balboa Reservoir Project, and included in RTC Chapter 5, *Draft SEIR Revisions*.

**TABLE RTC-8**
**MITIGATED LIFETIME EXCESS CANCER RISK FOR THE MULTI-USE BUILDING CHILD ATTENDEE AND SELECT DAYCARE, SCHOOL, AND RESIDENTIAL SENSITIVE RECEPTORS FOR THE ADDITIONAL HOUSING OPTION**

| Receptor | Location Relative to the Proposed Project | Mitigated Lifetime Excess Cancer Risk for the Additional Housing Option (in One Million)[a,b] | | | RTC Chapter 5, *Draft SEIR Revisions*, Table Source |
|---|---|---|---|---|---|
| | | Project | Background[c] | Total | |
| Multi-Use Building child attendee[d] | 140 feet east[e] | 4.9 | 37.8 | 42.7 | n/a |
| Archbishop Riordan High School | 30 feet north | 1.9 | 28.0 | 29.9 | 3.D-13b |
| Shining Stars Family Child Center | 30 feet west | 12.8 | 62.0 | 74.8 | 3.D-13b |
| Harmony Family Childcare | 50 feet southeast | 4.2 | 123.9 | 128.1 | n/a |
| Mighty Bambinis Childcare & Preschool | 750 feet northeast | 1.0 | 29.6 | 30.6 | n/a |
| Residential | directly west/south | 9.4 | 49.8 | 59.1 | 3.D-13b |

SOURCE: ESA 2020

NOTES:

SEIR = Subsequent Environmental Impact Report; n/a = not applicable (not presented in the draft SEIR tables).

a Cancer risks are presented for the construction plus operational emissions scenario (Scenario 3), as this exposure scenario results in the highest risks. These values are all for receptors not located in the APEZ.

b Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

c Background values have been updated using the 2020 City of San Francisco Citywide Health Risk Assessment database.

d Cancer risks for the Multi-Use Building child attendee were calculated assuming a child is present three hours per day, five days per week (180 days per year), for the full six years of project construction, from birth (age zero) through age six. All other exposure and risk parameters are the same as the daycare receptors analyzed in the draft SEIR and detailed in draft SEIR Appendix E.

d Although the westernmost façade of the Multi-Use Building is approximately 175 feet from the project site's eastern boundary, the receptor grid was extended slightly westward as a conservative analysis.

[46] San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020.

**TABLE RTC-9**
**MITIGATED ANNUAL AVERAGE PM2.5 FOR THE MULTI-USE BUILDING CHILD ATTENDEE AND SELECT DAYCARE, SCHOOL, AND RESIDENTIAL SENSITIVE RECEPTORS FOR THE ADDITIONAL HOUSING OPTION**

| Receptor | Location Relative to the Proposed Project | Mitigated Annual Average PM2.5 Concentration for the Additional Housing Option (µg/m³) [a,b] | | | SEIR Appendix I[c] Table Source |
|---|---|---|---|---|---|
| | | Project | Background[d] | Total | |
| Multi-Use Building child attendee | 140 feet east [e] | 0.07 | 8.74 | 8.81 | n/a |
| Archbishop Riordan High School | 30 feet north | 0.03 | 8.29 | 8.32 | 5 |
| Shining Stars Family Child Center | 30 feet west | 0.04 | 8.92 | 8.96 | 5 |
| Harmony Family Childcare | 50 feet southeast | 0.02 | 9.72 | 9.74 | n/a |
| Mighty Bambinis Childcare & Preschool | 750 feet northeast | <0.01 | 8.32 | 8.32 | n/a |
| Residential | directly west/south | 0.04 | 9.19 | 9.23 | 5 |

SOURCE: ESA 2019 and 2020

NOTES:

$PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; µg/m³ = micrograms per cubic meter; HRA = health risk assessment; n/a = not applicable (not presented in the HRA tables).

a $PM_{2.5}$ concentrations are presented for the construction plus operational emissions scenario (Scenario 3), as this exposure scenario results in the highest annual average $PM_{2.5}$ concentrations. These values are all for receptors not located in the APEZ.

b Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

c From SEIR Appendix I, *Updated Health Risk Assessment Memorandum*.

d Background values have been updated using the 2020 City of San Francisco Citywide Health Risk Assessment database.

e Although the westernmost façade of the Multi-Use Building is approximately 175 feet from the project site's eastern boundary, the receptor grid was extended slightly westward as a conservative analysis.

As described on draft SEIR p. 3.D-66, a project would result in a significant health risk impact if a receptor point meets the APEZ criterion[47] that otherwise would not meet the criterion without the project, and if the project would contribute to $PM_{2.5}$ concentrations at or above 0.3 µg/m³ or result in an excess cancer risk at or greater than 10.0 per one million persons exposed. In addition, a project would result in a significant health risk impact for receptors currently located in areas that meet the APEZ criteria if the project would contribute to $PM_{2.5}$ concentrations at or above 0.2 µg/m³ or result in an excess cancer risk at or greater than 7.0 per one million persons exposed.

As shown in Table RTC-8, the maximum mitigated lifetime excess cancer risk at the Multi-Use Building child attendee receptor location is 4.9 per million from the Additional Housing Option (less for the Developer's Proposed Option). When combined with the background risk of 37.8 per million, the cumulative total mitigated risk is 42.7 per million. Therefore, because the cumulative total risk is less than the APEZ criterion of 100 per million, the impact at the Multi-Use Building child attendee receptor would be less than significant with mitigation. Also as shown in Table RTC-8, none of the nearby receptors analyzed in the draft SEIR are placed into the APEZ with the project's mitigated contribution, nor does the cumulative total mitigated risk for any of these receptors exceed the APEZ criterion of 100 per million, with the exception of the Harmony

[47] The APEZ criterion for this location is based on: (1) cumulative $PM_{2.5}$ concentrations greater than 10 µg/m³, and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population. See draft SEIR pp. 3.D-39 to 3.D-40 for more detail.

Family Childcare which is already in the APEZ (and the project's contribution at this location is 4.2 cancers per million, which is also less than the threshold of 7.0 cancers per million).

As shown in Table RTC-9, the maximum mitigated annual average $PM_{2.5}$ concentration at the Multi-Use Building child attendee receptor location is 0.07 $\mu g/m^3$ from the Additional Housing Option (less for the Developer's Proposed Option). When combined with the background annual average $PM_{2.5}$ concentration of 8.74 $\mu g/m^3$, the cumulative total maximum mitigated annual average $PM_{2.5}$ concentration is 8.81 $\mu g/m^3$. Therefore, because the cumulative total concentration is less than the APEZ criterion of 10.0 $\mu g/m$, the impact at the Multi-Use Building child attendee receptor would be less than significant with mitigation. Also as shown in Table RTC-9, none of the nearby receptors analyzed in the draft SEIR is placed into the APEZ with the project's contribution, nor does the cumulative total risk for any of these receptors exceed the APEZ criterion of 10.0 $\mu g/m^3$.

The commenter states that the draft SEIR finds significant health impacts for new onsite daycare receptors, and because the Multi-Use Building receptors are similar to these onsite receptors, the SEIR must study the Multi-Use Building. The draft SEIR concludes on p. 3.D-70 that without mitigation, "the impact with regard to increased cancer risk would be significant for onsite receptors not located in the APEZ," which includes the new onsite daycare receptors. To address this impact, the draft SEIR identifies Mitigation Measures M-AQ-4a (Diesel Backup Generator Specifications), and M-AQ-4b (Install MERV 13 Filters at the Daycare Facility), which would "reduce impacts related to TAC emissions at the daycare facility to a less-than-significant level" (draft SEIR p. 3.D-73). In addition, Mitigation Measure M-AQ-2a (Construction Emissions Minimization) would reduce TAC emissions from construction and therefore also the impact on these receptors. The draft SEIR concludes on p. 3.D-72 that with implementation of Mitigation Measures M-AQ-2a, M-AQ-4a, and M-AQ-4b, "Even with worst-case construction phasing assumptions for the onsite daycare receptor… health risks to onsite daycare sensitive receptors would be less than significant." Thus, while the impact to onsite receptors is determined to be significant without mitigation, the impact on new daycare receptors sited by the project would be less than significant with mitigation measures identified in the SEIR. Mitigation Measures M-AQ-2a and M-AQ-4a would similarly reduce TAC exposure at the Multi-Use Building receptor location.

The draft SEIR concludes that all impacts for sensitive receptors not located in the APEZ, including impacts under the compressed three-year construction schedule, would be less than significant (see draft SEIR pp. 3.D-69 to 3.D-71 for cancer risk impacts and pp. 3.D-76 to 3.D-77 for $PM_{2.5}$ impacts). The draft SEIR concludes that impacts would be significant and unavoidable only for those sensitive receptors already located in the APEZ under the compressed three-year construction schedule. As stated on draft SEIR p. 3.D-78, "the health risks to existing offsite sensitive receptors [located in the APEZ] may exceed the cancer risk thresholds under the worst-case three-year construction phasing scenario, as presented in draft SEIR Table 3.D-12a and Table 3.D-11b; therefore, this impact would be significant and unavoidable with mitigation." As discussed above, the Multi-Use Building receptor is now located in the 2020 APEZ. However, the project's maximum contribution of 4.9 cancers per million at the Multi-Use Building receptor is less than 7.0 cancers per million. Additionally, although the Multi-Use Building is in the APEZ, the background cancer risk value of 37.8 is well below the APEZ criteria of 100 cancers per million, and therefore this receptor does not technically meet the criteria for the APEZ and the project would not substantially increase the severity of the cancer risk

for this receptor even under the worst-case three-year construction phasing scenario, nor does the project expand the geography of the APEZ.[48] As such, even under the compressed three-year construction schedule, the impact at the Multi-Use Building receptor would be less than significant.

Mitigation measures that would reduce TAC emissions from construction and therefore also the impact on these receptors would be enforced through a mitigation monitoring and reporting program (MMRP). In addition, certain mitigation measures have reporting and monitoring components to ensure their implementation. For example, Mitigation Measure M-AQ-2a (Construction Emissions Minimization) requires the project sponsor to submit a construction emissions minimization plan to the Environmental Review Officer (ERO) on a quarterly basis demonstrating how Mitigation Measure M-AQ-2a and Mitigation Measure M-AQ-2c (On-Road Truck Emissions Minimization for the Compressed Construction Schedule) are implemented at the site.

### *Additional Sensitive Receptors*

A commenter requests that the air quality analysis include additional sensitive receptor locations, including where the future City College replacement childcare center is planned at the corner of Judson Street and Frida Khalo Way and the Mighty Bambini childcare/nursery school at the corner of Staples and Frida Kahlo Way.

With regard to the future City College replacement childcare center, the HRA includes this location as a residential sensitive receptor in the analysis. In addition, the HRA includes daycare receptors at Little Lemon nursery school, which is located 200 feet west of the corner of Judson Street and Frida Khalo Way, at the corner of Judson Street and Gennessee Street. The maximum lifetime excess residential cancer risk at the corner of Judson Street and Frida Khalo Way was estimated to be 1.1 per million from the project, and the maximum lifetime excess school cancer risk at the Little Lemon nursery school was estimated to be 0.35 per million from the project. Therefore, the daycare risk at the corner of Judson Street and Frida Khalo Way for the future City College replacement childcare would be equal to or lower than these values.

Regarding the Mighty Bambini childcare/nursery school at the corner of Staples and Frida Kahlo Way, the HRA does include this childcare/nursery school as a sensitive receptor; see Table 9 on draft SEIR Appendix E, p. 20. Also see Table RTC-8 and Table RTC-9, above. Therefore, additional analysis at these potential receptor locations is not warranted.

In summary, the draft SEIR adequately evaluates all sensitive receptor locations within 1,000 meters of the project site. The Multi-Use Building, if treated as a sensitive receptor, would have much lower exposure to project-generated TAC emissions and a lower health risk than the nearby daycare receptors evaluated in the SEIR, as presented in Table RTC-8 and Table RTC-9. The Multi-Use Building is located farther away from the project boundary than a number of daycare receptors

[48] The 2020 APEZ at this location is determined at the parcel level. If any receptor point within a parcel meets the APEZ criteria of 100 cancers per million or 10.0 μg/m$^3$ annual average $PM_{2.5}$ concentration, the entire parcel is classified as within the APEZ. In addition, if any receptor point within a 20-meter "buffer" of the parcel meets the APEZ criteria, the entire parcel is also classified as within the APEZ. In the case of the Multi-Use Building, there are no receptor points within this parcel that meet the APEZ criteria. However, because there are receptor points within the 20-meter "buffer" on the south side of the parcel near Ocean Avenue that exceed the APEZ criteria, the entire parcel is classified as within the APEZ.

identified in the draft SEIR, including new onsite daycare receptors, and the draft SEIR concludes a less-than-significant impact with mitigation for all of these sensitive receptors. In addition, although the Multi-Use Building is located in the 2020 APEZ, because the background cancer risk values are well below the APEZ criteria of 100 cancers per million, the project would not substantially increase the severity of the cancer risk for this receptor even under the worst-case three-year construction phasing scenario. The draft SEIR adequately analyzes impacts on nearby sensitive receptors for the proposed project and alternatives and includes all feasible mitigation measures to address these impacts. No additional analysis or mitigation measures are necessary.

### *Student Athletes as Sensitive Receptors*

A commenter states that the air quality analysis should include student athletes at Archbishop Riordan and City College as sensitive receptors in the health risk assessment (HRA). The commenter cites the Area Plan PEIR and the air district's "Spare the Air" website as evidence that student athletes should be considered sensitive receptors in the HRA. The draft SEIR appropriately analyzes the impacts to sensitive receptors.

The air district's "Spare the Air" website is not the air district's guidelines for CEQA analysis. The Spare the Air website describes people most at risk for the general impacts of air pollution, and includes children, seniors, and active adults. These receptor types are specifically identified as more susceptible to *acute* and *short-term* health effects due to elevated concentrations of ozone and particulate matter.

The HRA evaluates lifetime cancer risk and annual average particulate matter concentrations, per the air district's thresholds and CEQA Guidelines, and does not evaluate acute and short-term health effects. The air district's CEQA guidelines define sensitive receptors as "facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas."[49] The air district's CEQA Guidelines further describes sensitive receptors as the following:

> *Sensitive individuals refer to those segments of the population most susceptible to poor air quality: children, the elderly, and those with pre-existing serious health problems affected by air quality (ARB 2005). Examples of receptors include residences, schools and school yards, parks and play grounds, daycare centers, nursing homes, and medical facilities. Residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers. (BAAQMD CEQA Guidelines, page 5-8)*

The ARB 2005 source cited by the air district states, "Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are

[49] BAAQMD, *California Environmental Quality Act Air Quality Guidelines*, May 2017, *http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en*, accessed February 2019.

most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses)."[50]

In order to evaluate nearby student children as sensitive receptors, the HRA evaluates student receptors at Archbishop Riordan High School, which is located immediately adjacent to the project site boundary to the north, approximately 30 feet away (see Table 9 on draft SEIR Appendix E, p. 20). The HRA also evaluates eight additional school and 16 daycare locations as sensitive receptors, including the City College Child Development Lab School. See Table RTC-8 and Table RTC-9 above. Therefore, the HRA already assesses health risks at nearby schools with children receptors.

The commenter states that the PEIR also states that persons engaged in strenuous exercise are sensitive receptors. The PEIR states on p. 251 that certain land uses, including "schools, children's day care centers, playgrounds, hospitals, and convalescent homes" are considered "more sensitive than the general public to poor air quality." The PEIR also states on p. 251, "Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality."

Increased sensitivity to poor air quality is not the sole criterion for what defines a sensitive receptor, as discussed above with regard to the air district's CEQA Guidelines. The air district does not consider adult or student athletes as sensitive receptors for purposes of the CEQA analysis. The PEIR goes on to state on p. 251, "Residential areas are considered more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with associated greater exposure to ambient air quality conditions." The HRA includes residential receptor locations within 1,000 meters of the project site, in addition to schools and daycares within the same radius.

The commenter accurately claims that strenuous activities, such as those conducted by student athletes, would result in higher exposure to air pollution than the general student population. Exercise raises an individual's breathing rate, and a higher breathing rate means a higher exposure to air pollution. Age plays a significant role in the impacts of air pollution on health; the younger a student or child, the higher the exposure to air pollution and the higher risk of cancer or other health effects.[51] For example, children age 0 to 2 have an "age sensitivity factor" of 10, which means their risk of cancer from the same TAC exposure is ten times higher than an adult receptor; children age 2 to 16 have an age sensitivity factor of three. At age 16, the age sensitivity factor is one, because the student is considered an adult. Younger receptors also have higher average breathing rates, increasing their exposure as compared to older receptors with lower average breathing rates.

Because of this age sensitivity in younger populations, the HRA conservatively characterizes school receptors as within the 2- to 16-year age group, including high school receptors at Archbishop Riordan High School. This is conservative from an exposure perspective because the breathing rate used in the HRA for these receptors is the average breathing rate for children ages

[50] CARB, *Air Quality And Land Use Handbook: A Community Health Perspective*, April 2005, https://ww3.arb.ca.gov/ch/handbook.pdf, accessed October 2019.

[51] California Environmental Protection Agency (CalEPA), Office of Environmental Health Hazard Assessment (OEHHA), *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessment*, February 2015, *https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf*, accessed March 26, 2018.

2 to 16, and most or all high school students would be ages 13 to 18; the average breathing rate for children ages 13 to 18 is much lower.

In addition, the HRA assumes that school receptors would be exposed to 14 years of construction and operational TAC emissions, representing the full age group duration from ages 2 to 16. Again, this is conservative because no individual student receptor at Archbishop Riordan High School would likely be exposed to the project's TAC emissions for greater than four years. These exposure parameters are consistent with BAAQMD HRA guidelines.[52] Refer to Table 10 on draft SEIR Appendix E, p. 21, for additional discussion of the exposure parameters used in the HRA.

The City College student athlete receptor would be potentially exposed to 4 to 6 years of construction and/or operational emissions during the ages of 18 to 24, which represents a lower exposure than the current school and daycare receptors included in the HRA due to the age difference (as discussed above). Although breathing rates are greater for individuals engaged in exercise or other strenuous activities, the breathing rates for young adults engaged in strenuous activities are *lower* than the breathing rates used for the Archbishop Riordan High School receptors. See **Table RTC-10, Daily Breathing Rates for Sensitive Receptors at Schools**, for a comparison of breathing rates.

**TABLE RTC-10**
**DAILY BREATHING RATES FOR SENSITIVE RECEPTORS AT SCHOOLS**

| Receptor Type | Daily Breathing Rate (L/kg-8hrs) | Age Group | Activity Type |
|---|---|---|---|
| Student – Used in draft SEIR [a,b] | 520 | 2 to <16 years | moderate intensity |
| Male Student – High School Athlete | 456 | 11 to <16 years | high intensity |
| Male Student – College Athlete | 341 | 16 to <21 years | high intensity |

SOURCES:
BAAQMD, *Air Toxics NSR Program Health Risk Assessment Guidelines*, December 2016, *http://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en*, accessed October 2019.
U.S. EPA, *Metabolically Derived Human Ventilation Rates: A Revised Approach Based Upon Oxygen Consumption Rates*, May 2009, EPA/600/R-06/129F, https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=202543, accessed December 2019.

ESA 2019

NOTES:

L = liter; kg = kilogram; hrs = hours; DSEIR = Draft Supplementatl Environmental Impact Report;

[a] This breathing rate was used in the DSEIR for all student receptors, including those at the Archbishop Riordan High School.

[b] The reason the moderate-intensity activity average breathing rate for the 2<16 age group is 520 L/kg-8hrs, which is higher than the age-specific high-intensity activity average breathing rates for the 11<16 and 16<21 age groups presented here, is because of the very high breathing rates for younger children. For example, the high-intensity activity average breathing rates are 1,387 L/kg-8hrs for age 2, 1,041 L/kg-8hrs for age 3<6, and 677 L/kg-8hrs for age 6<11.

[c] Female breathing rates are lower than male breathing rates; to be conservative, the male breathing rates were used in this document. For reference, the female breathing rates are 422 for 11 to <16 years (high school athlete) and 336 for 16 to <21 years (college athlete).

[52] BAAQMD, *Air Toxics NSR Program Health Risk Assessment Guidelines,* December 2016, *http://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en,* accessed October 2019.

As presented above, the HRA uses an average breathing rate of 520 liters per kilogram body weight per eight-hour period (L/kg-8hrs) (the time period during which the student receptor is present), as recommended by BAAQMD.[53]

Males ages 11 to 16 who are engaged in high-intensity activities have a breathing rate of approximately 456 L/kg-8hrs, which would represent a high school student engaged in strenuous activities. Males age 16 to 21 have a breathing rate of approximately 340 L/kg-8hrs, which would represent a college student engaged in strenuous activities. When compared with the exposure duration of 14 years and a breathing rate of 520 L/kg-8hrs used in the HRA for all school receptors, a college-age student athlete exposed for five years would have an exposure that is approximately ten percent of the exposure than the school receptors included in the draft SEIR would have (i.e., 90 percent less exposure).[54] Therefore, the general exposure assumptions used in HRA for school receptors are already more conservative than age-specific exposure assumptions for potential high school and college student athletes engaged in strenuous activities.

In addition, the City College student receptor would likely be located at the Community Health and Wellness Center, the swimming pool, or the track, which are approximately 1,150 feet, 1,000 feet, and 1,300 feet east of the project site, respectively. For comparison, the closest school receptor included in the HRA is 30 feet north of the site (Archbishop Riordan High School) and the closest daycare receptor included in the HRA is 30 feet west of the site (Shining Stars Family Child Center). Therefore, the TAC concentrations at the City College athlete receptor would be much lower than the concentrations at the receptor locations currently analyzed because concentrations decline substantially with distance, and health risks correlate directly with TAC concentrations for the same age groups and other exposure parameters.

The commenter's assertion that not including City College athletes in the HRA is a violation of San Francisco Administrative Code chapter 31 is incorrect. Chapter 31 of the San Francisco Administrative Code consists of implementing procedures for the City and administrative actions to be performed by the San Francisco Planning Department. As described above, the air quality and HRA analysis have been conducted in accordance with the CEQA Guidelines and the air district's CEQA Guidelines.

For these reasons, the HRA conservatively estimates health risks at sensitive receptor locations most susceptible to the project's TAC emissions, and any health risks for a City College student athlete receptor would be lower than those already reported in the HRA and draft SEIR for school and daycare receptors.

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[53] BAAQMD, *Air Toxics NSR Program Health Risk Assessment Guidelines,* December 2016, *http://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en*, accessed October 2019.

[54] Based on a breathing rate that is 88 percent of a school receptor (456 vs. 520), total hours that are 36 percent of a school receptor (7,200 vs. 20,160), and an age sensitivity factor that is 33 percent of a school receptor (1 vs. 3).

## *Comment AQ-2: Construction Schedule*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-20
I-MARABELLO2-1

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"The EIR construction modeling of air quality in Appendix D assumes three years. Again, six years is the Developers Option and should be the default, not three years which is not recommended due to air quality and other impacts."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-20*])*

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**"INADEQUACY OF ESTIMATED NUMBER OF CONSTRUCTION WORKING DAYS PER YEAR**

To calculate Average Daily Emissions of ROG, NOx, PM10, and PM2.5, the SEIR's analyses use a multiplier of 260-262 days. This would grossly underestimate the emissions in the very likely scenario where construction happens on more than 262 days per year. Commercial construction sites all around the city are routinely working 6 or even 7 days a week.

And this project will be no different. As you know, the developer is allowed to construct seven days a week, which is consistent with San Francisco Police Code section 2908.

And to keep this project on schedule and keep costs in line, the developers will work many weekends.

Thus, the estimates for emissions and necessary mitigation offsets should account for more working days.

If construction happens on just an additional 27 Saturdays and/or Sundays, this will increase all emissions by 10%. If developers average 6 construction days a week, this will inflate emissions by 19.8%. That percentage doubles if construction averages 7 days a week.

Let's assume a very likely average of construction occurring 6 days a week. This would cause the NOx levels to cross the significance threshold for both the Developers Proposed Option and the Additional Housing Option under both the six-year and compressed three-year schedules. As well, PM10, and PM2.5 will increase significantly. Thus, all lifetime excess cancer risks should be adjusted.

All four of the proposed option-schedule scenarios would trigger the implementation of Mitigation Measure M-AQ-2d. Thus, mitigation offsets would need to increase dramatically.

It's deceptive to use an unrealistic construction working days per year. Why not use a more realistic number so the developer and the public know the maximum or at least truer impacts? Should they

come in under the number of estimated days, great. The monitoring will support them and they'll save money and lives."

*(Brian Marabello, Email, September 23, 2019 [*I-MARABELLO2-1*])*

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## Response AQ-2: Construction Schedule

The comments opine on the construction schedule assumptions in the air quality modeling, state that the analysis should account for weekend construction, and that the analysis underestimates air quality impacts.

The response to the construction schedule and air quality analysis is organized by the following subtopics:

- Construction Schedule Analyzed in the Draft SEIR
- Emissions Associated with Weekend Construction Activities
- Construction Emissions Impacts in the Draft SEIR

### *Construction Schedule Analyzed in the Draft SEIR*

One comment states that the air quality analysis should have assumed six years in the emissions modeling, not three years. The air quality analysis includes both a six-year and a three-year construction schedule; the results for both schedules are presented in the draft SEIR. Regarding the six-year construction schedule, as stated on draft SEIR p. 3.D-45, "With regard to construction schedule and phasing, the analysis assumed that Phase 0 (site preparation and grading) would require a full year, followed by Phase 1 construction for 30 months, followed by Phase 2 construction for 30 months, for a full construction duration of six years." Regarding the three-year construction schedule, this option represents the shortest possible construction schedule for the project.

The project sponsor developed a detailed construction schedule based on the number of anticipated work days and the equipment fleet necessary for construction. This schedule and total equipment hours are based on an average of five days of construction during the week, and conservatively lasts for a total of six years. According to the project sponsor, the vast majority of construction would occur five days per week, with occasional work on Saturdays. However, weekend days are rarely full eight to 10 hour days of activity and are more typically two to six hours of activity. The draft SEIR assumes that soil export would occur six days per week for two months during excavation activities. This includes some weekend activity.

Air quality impacts are also shown assuming that the project could be constructed over three years instead of six years. The draft SEIR estimates emissions and health risks under the three-year construction schedule, which includes weekend days of construction, and represents the shortest possible construction schedule. This compressed schedule was developed in consultation with the project sponsor and includes the amount of construction activity required to build the project in three years, which would require more weekend work than assumed under the six-year construction schedule. Impacts are based on both weekday and weekend days of construction.

### *Emissions Associated with Weekend Construction Activities*

One comment states that the air quality analysis should have accounted for weekend days of construction, instead of the 260 to 262 annual construction work days assumed in the analysis, which represents weekdays only. The commenter claims that if construction occurred six or seven days per week to include weekend work, emissions would increase by 10 to 40 percent from what was reported in the draft draft SEIR, and $NO_x$ would likely exceed the significance thresholds. If construction would occur six or seven days per week, the total number of equipment hours would not change; either 1) the average daily construction equipment hours would decline and the total duration would remain the same, or 2) the average daily construction equipment hours would remain the same and the total duration of construction would decrease. In the first case, the average daily emissions would *decrease* from what was analyzed in the draft SEIR, because average daily equipment hours would decrease. In the second case, average daily and total construction emissions would not change; only total annual emissions may increase for the years when construction occurs, which would be less than six years for the reasons identified above. Neither case would result in increased criteria air pollutant or health risk impacts presented in the draft SEIR.

### *Construction Emissions Impacts in the Draft SEIR*

As stated on draft SEIR pp. 3.D-50 to 3.D-51 with regard to criteria pollutant impacts, "because the construction schedule could be compressed into three years, average daily combined construction and operational emissions could increase substantially, increasing the reactive organic gas (ROG) and nitrous oxide (NOx) emissions. It is estimated that this shortened construction schedule could result in average daily criteria pollutant emissions that are 1.5 to 2.5 times greater than those presented in draft SEIR Table 3.D-8a. Therefore, the potential condensed project construction schedule and phasing would likely increase the NOx impact." With regard to health risk impacts, the draft SEIR states on pp. 3.D-75 to 3.D-76 that under the three-year construction schedule, "the excess lifetime cancer risk at offsite sensitive receptor locations would increase" and the "the annual average PM2.5 concentrations at offsite sensitive receptor locations would increase, contributing further to the impact."

To mitigate impacts associated with the three-year construction schedule, Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) requires $NO_x$ offsets based on the amount of $NO_x$ that exceeds the air district's threshold of 54 pounds per day over the duration when this threshold is exceeded. As explained on draft SEIR pp. 3.D-53 to 3.D-56, this measure would require a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. This calculation assumes 260 to 262 work days of construction per year. However, emissions are based on total equipment hours, not work days (as discussed above). Additional weekend days of construction would not increase the equipment hours, it would only reduce the number of equipment hours occurring per day (e.g., fewer hours on weekdays, more hours on weekend days). In this event, average daily emissions would go *down*, not up, and Mitigation Measure M-AQ-2d would be sufficient to reduce ozone precursor emissions to less than the threshold of signficance as long as an offset project to reduce these emission is identified and implemented prior to or during the period in which the impact occurs. However, as stated on draft SEIR p. 3.D-56, this Impact AQ-2a is conservatively considered significant and unavoidable with

mitigation because implementation of the emissions offset project would be outside the jurisdiction and control of the City, no specific emission reduction project has been identified, and the project may be constructed over a much shorter timeframe resulting in higher ozone precursor emissions.

The commenter further claims that if construction occurs over six or seven days per week, the total amount of $PM_{10}$ and $PM_{2.5}$ would increase, and health risks would also increase. As discussed above, construction activities on weekends would not increase total emissions, it would only change when the emissions occur throughout the construction period (i.e., more emissions over a shorter overall duration with the same number of workdays). The total TAC emissions for the project would remain approximately the same. This could mean, however, that more TAC emissions could occur during more susceptible sensitive receptor age groups, such as the 0 to 2 age group. Thus, the draft SEIR conservatively assumes that construction could occur over a compressed three-year period with regard to health risks, which would already account for this shift in emissions timing. As stated on draft SEIR p. 3.D-80, "… the project may be constructed over a shorter timeframe than assumed in this analysis. This could result in increased cancer risks to offsite receptors as well as increased $PM_{2.5}$ concentrations for both offsite and onsite receptors. Therefore, potential changes in the construction schedule could result in a significant and unavoidable impact."

In order to present the maximum impact of the proposed project, the three-year construction schedule was used to determine air quality impacts. Because this is a possibility due to the unknowns associated with construction phasing depending on market conditions and other unanticipated factors, the draft SEIR conservatively uses this scenario to determine the air quality impacts of the proposed project. The draft SEIR concludes on pp. 3.D-56 and 3.D-80 that both criteria air pollutant impacts and health risk impacts would be significant and unavoidable with mitigation under the compressed three-year construction schedule. Therefore, construction occurring six or seven days per week would not result in a new $NO_X$ exceedance or a new impact. Thus, the draft SEIR finds a significant and unavoidable impact due to the uncertainty associated with the construction schedule, and this uncertainty incorporates the potential for accelerated construction activities that may include weekend construction.

Mitigation measures that would reduce criteria pollutant emissions from construction and operations that exceed any thresholds of significance will be enforced through the MMRP. In addition, certain mitigation measures have reporting and monitoring components to ensure their implementation. For example, Mitigation Measure M-AQ-2d, Offset Construction Emissions for the Compressed Schedule, requires that the project sponsor must either submit the offset project to the ERO for approval prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, or provide the offset agreement to the ERO prior to issuance of the first site permit. However, this measure may not be feasible if an adequate offset project is not identified and implemented, as discussed above and as stated on draft SEIR p. 3.D-56; therefore, the impact is conservatively considered significant and unavoidable with mitigation.

## *Comment AQ-3: Mitigation Measure*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

A-BAAQMD-1

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"However, even with these Project design features and on-site mitigation measures, the DSEIR finds that air quality impacts from the Project still exceed the City's thresholds of significance for the compressed schedule. Therefore, Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule (M-AQ-2d) proposes that the Project applicant provide funds to achieve additional emission reductions to reduce air emissions below the thresholds of significance. To this end, M-AQ-2d states that the Project applicant would provide funding to the Air District to fund emissions reduction projects in the region in order to offset the remaining criteria pollutant emissions generated by construction during the compressed schedule.

Please be aware that the Air District does not currently have a fee program for offsetting emissions. These are occasionally conducted on a case-by-case basis based on available projects. We recommend that M-AQ-2d replace "Air District" with "governmental entity." This will allow the project applicant to seek additional options if the Air District has no available projects at the time."

*(Greg Nudd, Deputy Air Pollution Control Officer, BAAQMD, Letter, September 23, 2019 [*A-BAAQMD-1*])*

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### Response AQ-3: Mitigation Measure

The City incorporated the air district's Clean Air Foundation into Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule), like the City has presented as mitigation for other projects in San Francisco, including the Potrero Power Station Mixed-use Project (Mitigation Measure M-AQ-2f), the Golden State Warriors Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 (Mitigation Measure M-AQ-2b), and the Seawall Lot 337 and Pier 48 Mixed-Use Project (Mitigation Measure M-AQ-1.5). All of these mitigation measures reference the air district's Clean Air Foundation and ozone precursor emissions offsets projects. In addition, based on correspondence with the air district, the air district provided the City with an "Offsite Mitigation Program Questionnaire" for the City to complete and submit to the air district.[55] Upon submitting the questionnaire, the air district indicated that they would follow up with a "fee calculation analysis, should the program be administered through our Clean Air Foundation," and that their "offsite mitigation program" could also include PM emission offsets if needed.

In addition, in 2016, the air district issued a mitigation project agreement for the Faria Preserve Residential Development and VTM 9342, through the Clean Air Foundation, with the purpose of assisting "Faria Preserve in satisfying the requirements of Mitigation Measure 3.3-l(b)," which is the EIR's ozone precursor offsets mitigation measure. The agreement would also "ensure the proper funding and management of an emissions reduction program to offset ozone precursor

emissions attributable to construction of the Faria Preserve Residential Development" to address Faria Preserve's obligation to satisfy the requirements of Mitigation Measure 3.3.l(b).

Based on this correspondence, it was the City's understanding at the time it prepared the draft SEIR that the air district had a grant program for offsetting ozone precursor emissions. However, in response to the air district's request, acknowledging that the air district's emissions reduction grant program is evolving, and because individual emission reduction projects needed to support the ozone precursor offsets required by Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) have not yet been identified, Mitigation Measure M-AQ-2d is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):

> **Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule.** Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, the project sponsor, with the oversight of the Environmental Review Officer (ERO), shall either:
>
> 1. *Directly fund or implement a specific offset project within San Francisco if available* to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or
>
> 2. *Pay mitigation offset fees* to the Bay Area Air Quality Management District Bay Area Clean Air Foundation or other governmental entity or third party. The mitigation offset fee~~, currently estimated at approximately $30,000 per weighted ton, plus an administrative fee of no more than 5 percent of the total offset,~~ shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the ~~planning department~~ ERO, the project sponsor, and the ~~air district~~ governmental entity or third party responsible for administering the funds, and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions below significance levels after implementation of other identified mitigation measures as currently calculated.
>
>    The agreement that specifies fees and timing of payment shall be signed by the project sponsor, the governmental entity or third party responsible for administering the funds ~~air district~~, and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the

Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c.

The total emission offset amount ~~is~~ presented above was calculated by summing the maximum daily construction emissions of ROG and NOx (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated construction-related ROG and NOx emissions offsets required. No reductions are needed for operations or overlapping construction and operations.

The second paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:

Mitigation Measure M-AQ-2d would offset emissions of ROG and NOx that would exceed the respective thresholds of significance for these pollutants. Thus, these offsets, if implemented, would reduce impacts to less-than-significant levels. The measure allows the project sponsor to directly fund or implement an offset project; however, no such project has yet been identified. Additionally, implementation of the emissions reduction project could be conducted by the ~~air district~~ governmental entity or third party responsible for administering the funds and is outside the jurisdiction and control of the City and not fully within the control of the project sponsor. Therefore, the residual impact of project emissions during construction is conservatively considered ***significant and unavoidable with mitigation***, due to some limited uncertainty in its implementation. This finding does assume that the project sponsor would implement Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c, in addition to Mitigation Measure M-AQ-2d. Although the specific offset projects are not known, it is anticipated that implementation of this mitigation measure would not result in any adverse environmental effects.

The last paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:

The Developer's Proposed Option would be ***less than significant*** under the assumed six-year construction schedule. The Additional Housing Option under the assumed six-year schedule would be reduced to ***less than significant with mitigation*** through the implementation of Mitigation Measure M-AQ-2a and M-AQ-2b. Given the potential that the project could be developed under an accelerated construction schedule of three years' duration, the potential exists that construction emissions of NOx would exceed the daily and annual significance thresholds even with mitigation, which would be a ***significant impact*** (see Table 3.D-8b). Therefore, in the case of the Developer's Proposed Option or the Additional Housing Option under the compressed three-year construction schedule, the project sponsor would also be required to implement Mitigation Measure M-AQ-2c, which requires that all heavy-duty trucks greater than 19,500 pounds must have model year 2014 or newer engines, and Mitigation Measure M-AQ-2d, which requires the project sponsor to implement emission offsets. However, because implementation of the emissions offset project would be conducted by the ~~air district~~ governmental entity or third party responsible for administering the funds and would be outside the jurisdiction and control of the City and not fully within the control of the project sponsor, because no specific emission reduction project has been identified, and because the project may be constructed

over a much shorter timeframe resulting in higher NOx emissions than presented above, the impact with respect to criteria air pollutants is conservatively considered ***significant and unavoidable with mitigation***. These conclusions are summarized in **Table 3.D-9, Summary of Construction Criteria Pollutant Impacts (Impact AQ-2)**.

With these changes, Mitigation Measure M-AQ-2d has the same effect as before on the project's construction emissions impact. Whether the emissions offset program is implemented by the air district or another governmental agency has no effect on the actual emission reductions, as long as the offset program complies with Mitigation Measure M-AQ-2d as worded above. Mitigation Measure M-AQ-2d would still offset emissions of ROG and NOx that would exceed the respective thresholds of significance for these pollutants. Further, even with implementation of this mitigation measure, the draft SEIR determines that the air quality impact would be significant and unavoidable. Therefore, no changes to impacts would result from this change to Mitigation Measure M-AQ-2d. These changes and do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft SEIR pursuant to CEQA Guidelines section 15088.5 is not required.

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# 4.F Alternatives

The comments and corresponding responses in this section cover topics in draft SEIR Chapter 6, Alternatives. These include topics related to:

- Comment AL-1: Range of Project Alternatives
- Comment AL-2: Environmentally Superior Alternative
- Comment AL-3: Alternative A, No Project Alternative
- Comment AL-4: Alternative B, Reduced Density Alternative
- Comment AL-5: Alternative B, Economic Feasibility
- Comment AL-6: Alternative C, San Ramon Way Passenger Vehicle Access Alternative
- Comment AL-7: Alternative D, Six-Year Construction Alternative

## *Comment AL-1: Range of Project Alternatives*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA1-6
O-WPA2-1
O-WPA3-8
O-WPA3-15
I-ALI-2
I-BARISH3-29
I-BARISH3-35
I-BERNSTEIN4-2
I-BERNSTEIN5-8
I-BIERINGER1-4
I-BIERINGER4-3
I-COLLINS3-1
I-COLLINS3-5
I-EVBUOMA-3
I-FISHER-3
I-HALFORD1-4
I-HALFORD2-4
I-HOUWER-4
I-KAUFMYN1-2
I-LEGION-1
I-LEGION-4
I-MARTINEZ-2
I-MEDAL-4
I-PEDERSON2-11
I-RHINE-3
I-SAPPHIRE-2
I-SIMON-2
I-SIMON-11
I-SIMON-12
I-SIMON-13
I-SIMON-15
I-TARQUINO-2
I-TARQUINO-5
I-TARQUINO-9
I-VICKY-2
I-WEYER-2
I-WHITE-1
I-WILENSKY-3
I-WORLEY-2
I-ZELTZER-2

"And last, the rejection by the Planning Department of the use of the site for City College as an alternative was not appropriate. Public land should not be used for anything but public good.

Parties in the scoping process requested that this alternative of using project land for City College should be an alternative. The Planning Department rejected that and that was inappropriate under the law.

I only had two minutes. I tried to be brief. Thank you very much. We will put the rest of our comments in writing. Or, no, we will put those comments in writing."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-6*])*

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"Good afternoon Commissioners. Anita Theoharis, Westwood Park Association Board Member on behalf of Westwood Park. I know that comments should be narrowly focused on technical issues, but I do have one nontechnical observation that does have relevance to one of our -- to one of the technical objections to the sufficiency of the draft.

Our goal is to support a housing project on the reservoir that includes affordable housing for people of modest means. A project that creates a new neighborhood with sufficient open space and a welcoming environment for everyone. A project with a number of units that can be supported by the existing and planned infrastructure. And one that does not damage a crown jewel of the City, City College, or the students who attend in the hopes of a better life for themselves and their families."

*(Anita Theoharis, Board Member, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA2-1*])*

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"2. Alternatives Analysis

CEQA requires that an EIR 'consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation' (CEQA Guidelines Section 15126.6(a). The Project DSEIR considers three alternatives, plus the required 'No Project' alternative. This may be a 'reasonable range' of alternatives, but as discussed below, the WPA believes the specific alternatives selected, and the discussion of those alternatives, fails to meet the CEQA alternative analysis requirement that the alternative analysis will 'foster informed decision-making and public participation.'"

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-8*])*

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"Rejection of the Alternative to use Project Site for CCSF

Parties of interest in the Scoping Process submitted requests for Alternatives to be considered in the DSEIR. Various parties requested that one Alternative that the City should include in the DSEIR is the use of the Project Site solely for CCSF [DSEIR, page 6-60]. The Planning Department rejected this alternative on the basis that the significant impacts cannot be eliminated and that the Project Sponsor's objectives would not be implemented [DSEIR, page 6-60]. CCSF is a tuition free higher educational institution serving the educational needs of the residents of San Francisco, many of whom are immigrants. Since implementation of the free tuition policy, the student body of CCSF is estimated to increase by 55% by 2026. The new buildings in the CCSF Master Plan would occupy

the current parking lot, which is the only undeveloped portion of the CCSF Ocean Campus leaving this campus no additional room to expand. Public land should be used for public use and not private residential use. In this case, educational buildings and housing for CCSF students, staff, and teachers (both CCSF teachers and those in nearby public schools) should have been included and analyzed as an alternative use of the Project site."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-15*])*

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"I would request that the PUC place the needs of City College above those of a private developer. It should either continue to lease the land to City College or transfer it for once and all to City College to make use of according to principles of equity and relevance for the college community."

*(Amna Ali, Email, September 18, 2019 [*I-ALI-2*])*

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"***The DSEIR must consider the option of using this public land to build 100% affordable housing***

The DSEIR states the need to "Develop the reservoir in a manner that will best benefit the neighborhood, the city, and the region as a whole.

San Francisco is woefully behind in creation of affordable housing, and yet, this DSEIR does not study or offer the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would be have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco already owns this parcel, so why is the City of San Francisco planning to sell public land that it already owns to a private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense?

Policy 4.5.1 in the Balbo Park Station Area Plan says that when offering public land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income."

*(Jean B. Barish, Letter, September 23, 2019 [*I-BARISH3-29*])*

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***"The DSEIR must consider the possibility of using this public land to build dedicated educator housing***

Since approval of the PEIR the City of San Francisco has also identified a great need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers would be able to walk to work if they lived there."

*(Jean B. Barish, Letter, September 23, 2019 [*I-BARISH3-35*])*

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"Policy 4.5.1 in the Balboa Park Station Area Plan (or PEIR) says that when offering public land for development, first consideration should be given by such public agencies making the land available for the development of housing affordable to individuals or families making less than 120 percent of the area median income. This is a very low priority for the current development. Selling the valuable asset of publicly owned land is not the only or best option.

The Draft SEIR must consider the possibility of using this public land to build dedicated educator housing. This is an option that has begun to be explored more fully since the current Balboa Reservoir project was initiated just a few years ago."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN4-2*])*

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"The other option, even though rather peremptorily dismissed in the Draft SEIR, is to have the land transferred to the College, thereby retaining it as public land. At that point, modest plans might be made for some faculty or student housing without overwhelming the neighborhood or interfering significantly with traffic or parking—due to the smaller scope of the project. But this would have to be determined later."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-8*])*

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"This is public land. It should be used for the public. I strongly urge you accept alternative A, which is to do nothing and start back at the drawing board to build affordable housing for teachers and students."

*(Garry Bieringer, CPC Hearing, September 12, 2019 [*I-BIERINGER1-4*])*

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"The proposed housing project is currentlly public land. PUBLIC LAND SHOULD BE USED EXCLUSIVELY FOR THE PUBLIC!!!, and not for the bennefit of private corporations/developers.

I strongly urge the Planning Commission to adopt recommoendation A, which is to scrap the entire projoect, and then go back to the drawing board and propose a smaller scale development to be exclusively for San Francisco public school educators, CCSF Educators, and CCSF stsudents. A smaller housing development like this will keep the land for public use and will tremendoully help

those most impacated by the high cost of SF housing and it will help those who are contributing to the betterment of San Francisco.

Your proposed project is not designed for affordability. It will not help the housing shortage for lower income working San Franciscans. It will line the pockets of rich developers while crushing 2 outstanding educational institutions and destroying the vitality of this community."

*(Garry Bieringer, Email, September 23, 2019 [*I-BIERINGER4-3*])*

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"Hello. Am writing to support alternative housing projects NOT located on Balboa Reservoir. I hope to enumerate various reasons for this here.

1. There are a lot of vacant, fallow lots not being used. Evidently these are now part of a passive Real Estate Investment Trust portfolio for folks who don't know they could do better if paid market rate by developers for building. Daly City is full of blighted vacant lots & closed businesses. Forward thinking developers have put in nice big apartments and condos literally minutes from the SF county line, very conveniently located."

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-1*])*

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"9. The city definition of affordable housing, like the definition of transit rich, is frankly self serving and spurious. It has absolutely nothing to do with real lives, families, working classes, workers struggling with student loans, high rents, child care and other expenses.

10. AvalonBay developers charge $4000 now for a one bedroom apartment over Whole Foods one km away on Ocean. Not rent controlled either as it's new, I believe. Can we put to rest the false, rather offensive trope that this is affordable housing for other than the well paid?

11. "up to" 50% affordable or subsidized housing is similarly meaningless. "Up to" is another term for "LESS THAN". or "UNDER". The subsidies also very widely."

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-5*])*

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"It's a demoralizing process. If this land is to be developed into housing, the city should own the property, not Avalon Bay. We should invest in our residents, our workers in all trades- not just tech. And having publicly owned housing would do this."

*(Marria Evbuoma, Email, September 19, 2019 [*I-EVBUOMA-3*])*

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"A smaller project with 100% of the housing units affordable to low- and moderate-income residents, could merit our support."

*(Allan Fisher, Email, September 12, 2019 [*I-FISHER-3*])*

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"The best outcome to this controversy would be for the SFPUC to transfer the 'reservoir' land once and for all to the College, or at least the current lease could be extended for a 60-year contract, for the benefit of all the people of San Francisco. We look for your support in this outcome."

*(Daniel T. Halford, Email, September 9, 2019 [*I-HALFORD1-4*])*

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"The best outcome to this controversy would be for the SFPUC to transfer the 'reservoir' land once and for all to the College, or at least the current lease could be extended for a 60-year contract, for the benefit of all the people of San Francisco."

*(Daniel T. Halford, Email, September 16, 2019 [*I-HALFORD2-4*])*

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"Further, the proposed developer that you have selected is already charging a premium for the other apartments that are on ocean which is unaffordable and means that you have double or triple the amount of tenants living in these units just to be able to afford the ridiculous rents. There are other vacant lots such as the old Geneva Drive In where you could place these units."

*(Michell Houwer, Email, September 12, 2019 [*I-HOUWER-4*])*

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"Housing. This project is not addressing the real crisis in San Francisco. It's not addressing the affordability crisis of housing. Public land should be kept in public hands for public good, and it should only be used for 100 percent deeply affordable housing on the Balboa Reservoir. It certainly should not be given over to a private developer, whose CEO makes $7 million a year."

*(Wynd Kaufmyn, CPC Hearing, September 12, 2019 [*I-KAUFMYN1-2*])*

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"I believe that the DSEIR on the Balboa Reservoir has many deficiencies.

Policy 4.5.1. in the BPSAP says the when offering public land for development, first consideration should be given to the development of housing affordable to individuals families making less than 120% of AMI. Instead, the privatization of the lower Bal Reservoir will remove one of the most important resources for building affordable housing—public land owned by the city—turning it over to a large national for-profit real estate corporation that owns eight entirely unaffordable rental housing developments."

*(Vicki Legion, Email, September 22, 2019 [*I-LEGION-1*])*

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"The Draft SEIUR doe not consider the possibility of using this public land to build dedicated educator housing, taking the dominant but inaccurate point of view that 100% affordable housing is not realistic. There is already a 100% affordable building at 1100 Ocean, which was built on land previously owned by the MTA. There are many possible sources of funding for 100% affordable educator housing.

Public land is a sacred trust that must stay in public hands forever, and be used only for public good—not for the seven-million plus annual salary that goes to the AvalonBay CEO."

*(Vicki Legion, Email, September 22, 2019 [*I-LEGION-4*])*

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"A third value that we hope we share with you is that **public lands must be used for the public good**. The Balboa Reservoir should not be turned over to for-profit developers to build market rate housing and maybe some affordable housing that perhaps in reality is not for low income, working class people. There is such scant open space available for new housing that the City of San Francisco focus on more housing for those who cannot buy market rate housing: teachers and other public servants who would likely use transit or walk or bike to work at nearby schools or at City College.

We encourage the Planning Commission to **live up to these San Francisco values. Build housing on public open space, but build it for those who would otherwise be shut out of the market and who would likely use transit or walk/bike to work (nonpolluting alternatives to cars)**."

*(Anita Martinez, Email, September 23, 2019 [*I-MARTINEZ-2*])*

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"This project should be built in a different location."

*(Tomasita Medál, Email, September 23, 2019 [*I-MEDAL-4*])*

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"The Draft should address whether dedicating a substantial portion of the project to housing City College employees and/or students would minimize traffic-related impacts of the project and whether such dedication would be feasible."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-11*])*

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"The second thing I wanted to address is there's a lot of talk about affordable housing. So, I just wanted to put out a couple of figures for your consideration. If you look at the development plan, the request is for 18 percent affordable housing for people who are making 80 percent of the area median income, and that would be $66,500 a year.

Then, an additional 17 percent for moderate income. That's 120 percent over the AMI. We're talking $99,500 a year. And then, you get to 50 percent with an additional, optional moderate income

housing and that additional housing is -- there's no responsibility for the developer to build it and there's currently no funding in the plan.

So, I know this is about the EIR and not the project itself, but I just wanted you to have those figures that the actual affordable housing that will be gotten from giving away this public land to a private developer is less than one-fifth. So, and of course, the biggest cost in building housing is the land. If the public land were not given away, it could all be affordable. So, just to think about that. Thank you very much."

*(Marcie Rhine, CPC Hearing, September 12, 2019 [*I-RHINE-3*])*

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"Furthermore, there are not going to be enough units in this building for students to be able to access them. It's public land and it should be only 100 percent affordable. And if that can't be, then the situation that we have currently, with the available parking, is the best situation for the students. That's all, thank you."

*(Sophie Sapphire, CPC Hearing, September 12, 2019 [*I-SAPPHIRE-2*])*

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"This letter also asserts that the DSEIR does not adequately address the alternative for 100% affordable housing on the Balboa Reservoir site."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-2*])*

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"At most the Balboa Reservoir Project will offer 33% housing that is affordable to people with teachers salaries and below. That would provide about 350 units. An alternative plan would build **350 units only**, all of them affordable (100%) to people with teachers' salaries and below. A model for this plan exists adjacent to the Balboa Reservoir at 1100 Ocean, a development built on public land and 100% affordable. The possibility of this model must be explored.

I have attached a sketch that shows how these units would fit into the Lower Lot of the Reservoir. Alternative funding sources could include a proposed municipal bank and a reassessment of under-assessed commercial properties or a change in the Twitter tax. It is not necessary to use unneeded luxury housing, which create the need for a substantial number of additional affordable units, to fund affordable units."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-11*])*[56]

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"Until funding for 100% affordable housing for the number of units that could be established in the Lower Lot in a sequenced manner so as not to radically reduce parking before public transit

[56] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

has been improved, no housing should be built on the Balboa Reservoir because it will have an adverse impact on the enrollment and consequent health of City College of San Francisco.

The attached alternative plan shows three structures, which could be built in phases, so that when the promised better transit services are established, some of the Lower Lot could be dedicated incrementally to affordable housing. I request that this alternative plan be explored."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-12*])*[57]

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"The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing. San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR simply dismisses the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco already owns this parcel, so why is the City of San Francisco planning to sell public land that it already owns to a private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense?

A development solely devoted to affordable housing would better blend with the residents of this working class neighborhood. The proposed development of mostly market rate units leaves these residents vulnerable to displacement due to gentrification. The adjacent neighborhood, Excelsior, is also a working class neighborhood vulnerable to displacement due to gentrification.

I again refer you to an article by Joseph Smooke and Dyan Ruiz "Five Reasons Why San Francisco Must Not Give Up Public Land for Market Rate Development" (Truth-out, April 3, 2015).

Policy 4.5.1 in the BPSAP says that when offering public land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-13*])*

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[57] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

"* The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing

The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".

* The DRAFT SEIR must consider the possibility of using this public land to build dedicated educator housing"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-2*])*

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"**The City already owns this land, why sell it to developers that will not use it for affordable housing? The City can build affordable housing and instructor housing so our city dwellers can be supported.**"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-5*])*

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"**We Need affordable housing in our neighborhood, not MORE market-rate housing!**"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-9*])*

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"And I would say, I am all for affordable housing. I grew up living in Section 8s. And to me this plan is not aggressive enough. I'm sorry, it's public land. A hundred percent of it should go to affordable housing.

We know that the cost of land in San Francisco is incredibly high. Why would we take public land and privatize it? We should be asking for a more aggressive plan. If anything, to expand access to education, to provide affordable housing to students, to faculty.

I mean, unless we're addressing their ability to access education, then I'm sorry, this plan is just not good enough. Thank you."

*(Vicky, CPC Hearing, September 12, 2019 [*I-VICKY-2*])*

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"The Balboa Reservoir, as I understand it, is currently owned by the public. Given the high cost of living in this city, the number of people living on the streets or in their automobiles/campers, and the general difficulty the city has had in trying to encourage more developers to build affordable housing, it strikes me as absolutely ludicrous that the proposed project does not prioritize below-market rate housing options. We the public own this land, and this land should be used to benefit the public. While I acknowledge that it may be difficult to entice a for-profit developer to build an entirely market-rate complex, I think that at least 50% of the units should be market rate in order to serve the public good. Furthermore, why not give the land to a non-profit developer - work with

them to build a complex that is entirely for the public good. Quit lining the pockets of the developers just because they are lining the pockets of our politicians."

*(Andy Weyer, Email, September 20, 2019 [*I-WEYER-2*])*

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"Homelessness and housing insecurity impacts some of my students every semester. It is commonplace for students to leave school due to housing loss or a housing crisis. Please help our community college students by creating short term housing options for CCSF students experiencing an emergency. Short term housing for students is needed in San Francisco and the Balboa Reservoir is the best location. Prevent homelessness while supporting individuals engaged in activities that will lead to wage increases and financial self sufficiency. Support students..provide a roof over their heads while they are in school! Help them to complete their education!"

*(Kathleen White, Email, September 19, 2019 [*I-WHITE-1*])*

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"And none of this addresses future needs that CCSF might have for this land. Ideally, the SFPUC should transfer the 'reservoir' land once and for all to the College. Public land should be preserved for the public and not sold to private developers."

*(Debra Wilensky, Email, September 23, 2019 [*I-WILENSKY-3*])*

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"***The DRAFT SEIR is inadequate because it fails to consider the option of building 100% affordable housing***

The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".

San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR does not consider the option of dedicating this publicly owned property to 100% affordable housing. Nor does it even consider its own PEIR (Balboa Park Station Area Plan) which http://generalplan.sfplanning.org/Balboa_Park_Station.htm states that when offering public land for development, first consideration should be given to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco should not sell this public land to a private developer that will build mostly market rate housing.

The DSEIR accepts the unexamined premise that creating market rate housing in conjunction with some affordable housing is the only path forward. It does not explore the possibility of funding units which are 100% affordable.

***The DRAFT SEIR is inadequate because it fails to consider the possibility of using this public land to build dedicated educator housing***

> Since approval of the PEIR, the City of San Francisco has identified an urgent need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers and students would be able to walk to work/school if they lived there. The DSEIR needs to examine this alternative."

*(Jennifer Worley, President, AFT 2121, Email, September 23, 2019 [*I-WORLEY-2*])*

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"Now, the San Francisco Labor Council has said, along with the Union, AFP 21, the PUC should transfer that property to City College for development. That's what we support. It shouldn't be privatized, as you're supporting these developers to do."

*(Steve Zeltzer, United Public Workers for Action, CPC Hearing, September 12, 2019 [*I-ZELTZER-2*])*

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## Response AL-1: Range of Alternatives

The comments raise concerns regarding the range of alternatives in the SEIR and suggest additional alternatives. Other comments disagree with the rejection of using the site for City College facilities and state that because the project site is public land, development of 100 percent affordable housing units, development of dedicated educator and student housing, retention of the land in public ownership, or sale of the land to City College should be alternatives considered in the draft SEIR.

Comments regarding secondary impacts to City College are addressed in Response PS-2, Public Services and Secondary Impacts, on RTC p. 4.H-59. The alternatives presented in the draft SEIR meet CEQA requirements.

The response below describes the CEQA requirements for the alternatives analysis, the objectives used to define alternatives, and the alternatives selection process. The response is organized by the following subtopics:

- CEQA Requirements for Alternatives
- Alternatives Selection Process
- Other Alternatives and Alternatives Considered but Rejected
  - Alternative Locations
  - Public Land and Affordable Housing

### *CEQA Requirements for Alternatives*

CEQA Guidelines section 15126.6(a) provides that "An EIR shall describe a range of reasonable alternatives to the project, or location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

The alternatives need not meet all of the project objectives, but should meet most of the basic project objectives. The CEQA Guidelines recognize that the range of conceivable alternatives to a proposed project is potentially vast, and that an EIR need not consider every conceivable alternative to a project. However, it must include a reasonable range of potentially feasible alternatives that are limited by the "rule of reason" and that will foster informed decision-making and public participation (see CEQA Guidelines section 15126.6(a)).

The main purpose of presenting a range of alternatives to a proposed project is to focus on alternatives that are capable of reducing or eliminating any significant effects of the proposed project identified in an EIR (CEQA Guidelines section 15126.6(b)). The draft SEIR for the Balboa Reservoir Project meets this requirement. For example, the draft SEIR includes one alternative that eliminates the significant and unavoidable air quality impacts, as well as two alternatives that reduce but do not fully avoid the significant and unavoidable noise, air quality, and transportation and circulation impacts. Decision-makers can compare the environmental impact trade-offs among these alternatives and the proposed project.

The range of potential alternatives is limited to those that could feasibly attain most of the basic objectives of the proposed project. Among the factors to be considered in feasibility are site suitability, economic viability, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project sponsor can reasonably acquire or have access to an alternative site (CEQA Guidelines section 15126.6(f)(1)). As described below, the draft SEIR provides a discussion and analysis of the alternatives selection process that was used to identify the range of alternatives analyzed in the draft SEIR in compliance with CEQA guidelines section 15126.6.

### *Alternatives Selection Process and Project Objectives*

The draft SEIR Section 6.A.3, Alternatives Selection, on pp. 6-3 to 6-7, describes the alternatives section process. The first step is to use the project objectives in the identification, selection, and evaluation of alternatives. As shown on draft SEIR pp. 2-4 to 2-5, the City, the SFPUC, and the project sponsor has nine shared project objectives and the City and the SFPUC has one additional objective.

The second step presents a summary of all the significant and unavoidable impacts that are identified in draft SEIR Chapter 3, which consist of secondary operational loading impacts, transit delay impacts, and noise and air quality impacts during constriction.

The third step focuses on strategies to address the significant and unavoidable impacts. The strategies are summarized below:

- Alternative Strategy to Address Secondary Loading Impacts (draft SEIR p. 6-5):
  - Providing an additional point of access to the project site, which would reduce the number of project-generated vehicle trips at the Ocean Avenue/Lee Avenue intersection;
- Alternative Strategy to Address Transit Delay Impacts (draft SEIR pp. 6-6 to 6-7):
  - Providing an additional point of access to the project site, which would reduce the number of project-related vehicle trips along transit routes;

  - Reducing the density of the project would reduce the number of project-generated vehicle trips, which would reduce to some extent, the potential for a project to have a considerable contribution to increases in transit delay;

- Alternative Strategy to Address Construction-Related Impacts (draft SEIR p. 6-7):
  - Require construction be phased sequentially over a six-year period, with no compressed schedule; and
  - Reduce the scale of the project, which could reduce the magnitude of construction.

These strategies are evaluated and alternatives screened for their feasibility and ability to meet most of the project objectives. Table 6-2 on draft SEIR pp. 6-9 to 6-10 summarizes the ability of the alternatives to meet project objectives. The range of alternatives includes the No Project Alternative as required by CEQA Guidelines section 15126.6(3) and three alternatives at the project site (Reduced Density, San Ramon Way Passenger Vehicle Access, and Six-Year Construction Schedule). Together, the four identified alternatives present a reasonable range of alternatives adequate to inform decision makers.

### *Other Alternatives and Alternatives Considered but Rejected*

Several comments state that the project should be located elsewhere. Several comments state that an alternative dedicating the site only for City College uses should be considered. One comment states that the draft SEIR should consider "whether dedicating a substantial portion of the project to housing City College employees and/or students would minimize traffic-related impacts of the project and whether such dedication would be feasible."

As described in draft SEIR Chapter 6, Alternatives, and above, the consideration of alternatives carried forward for analysis was based on three factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project's basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

**Alternative Locations.** As described in draft SEIR Section 6.E.2, Alternatives Considered but Rejected, the draft SEIR considers alternative locations and included the reasons for rejecting alternative locations. As described on draft SEIR pp. 6-56 to 6-57, the reasons for rejecting alternative locations include:

- The sites would not meet the basic project objectives, which are specific to the Balboa Reservoir site based on policy considerations evaluated by the city;
- The sites would result in the same construction-related impacts as the proposed site;
- No comparable parcel of land is available within the plan area that the project sponsor could reasonably acquire, control, or otherwise have access;

- An alternative site would not meet the basic objectives related to "developing the reservoir site with a mixed-use residential neighborhood, including a substantial number of affordable housing units, site infrastructure, and bicycle and pedestrian connections"; and
- An alternative location would not meet the project objective related to "developing an underutilized side under the Public Land for Housing Program." (SEIR p. 6-57)

Alternative locations such as Daly City are not considered, as that is not within the City and County of San Francisco's jurisdiction; however, the same reasons for rejecting alternative locations above is applicable.

**Public Land and Affordable Housing.** As described in draft SEIR Section 6.E.2, Alternatives Considered but Rejected, the SEIR considers a fully affordable housing alternative. As described on draft SEIR pp. 6-58 to 6-59, the reasons for rejecting this alternative include:

- It would not meet the project objectives related to building a "mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels …, "develop a project that is financially feasible …," and "provide SFPUC's water utility ratepayers with fair market value …" and
- This alternative would arguably be a fundamentally different project given the request for qualifications process that occurred for the project site. As noted on draft SEIR p. 6-59, "… 100 percent affordable housing developments in San Francisco are typically sponsored by the Mayor's Office of Housing and Community Development, which provides substantial financial support for such projects and which typically seeks out not-for-profit developers who specialize in the production of fully affordable residential projects. Accordingly, it has never been the case that the planning for this project assumed or required a 100 percent affordable housing development, which would require a substantially different financial structure and City development partner(s)."

An alternative dedicating all of the site to City College uses would not meet the basic objective of implementing the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.

A project that dedicates housing only to educators and student housing would require affordable subsidies and thus is similar to the fully affordable housing alternative considered but rejected. The range of income levels proposed by the project could include housing for educators and students but would not preclude other professions. As described in RTC Chapter 2, the project sponsor is proposing to provide approximately 150 moderate-income dwelling units dedicated to educator households as part of the 50 percent affordable housing. The project sponsor's

commitment to the amount and type of affordable housing developed as part of the proposed project would be part of the development agreement between the City and the project sponsor.[58]

As stated, an alternative with the majority or all the site dedicated to educator and student housing would not meet the basic project objectives; therefore, it is rejected from further consideration. For informational purposes, the transportation impacts under such a scenario would still likely remain significant and unavoidable for several reasons as described on draft SEIR pp. 6-59 to 6-60:

- Providing educators and students with housing on the project site may lead to less vehicular travel than not providing such dedicated housing. However, the cumulative impact related to public transit delay (Impact C-TR-4, discussed on draft SEIR pp. 3.B-94 to 3.B-99) is based on the addition of vehicle and transit trips generated by the proposed project in combination with the City College facilities master plan projects and other cumulative development. Due to the uncertainty surrounding the development at City College's Ocean Campus and the uncertainty of SFMTA approval of other measures under its jurisdiction, cumulative transit delay impacts would be significant and unavoidable. The impacts to transit delay would occur irrespective of potential changes in travel demand or patterns from educator or student housing.
- The cumulative impact to passenger and freight loading (Impact C-TR-6b, discussed on draft SEIR pp. 3.B-101 to 3.B-102) is determined based on the impact to existing loading zones along Lee Avenue between Ocean Avenue and the project site. Under such a scenario, the Lee Avenue extension would still occur, and impacts to loading on Lee Avenue would occur irrespective of potential changes travel demand or patterns from educator or student housing. Thus, the impact conclusion would be significant and unavoidable.

Additional reasons that the transportation impacts under such a scenario would still likely remain significant and unavoidable are:

- In addition to the Ocean Campus, City College has eight centers and various other instructional sites throughout San Francisco. Providing educators and students with housing on the project site would not obviate the need for travel to and from these other sites.
- Employees and students traveling to and from the campus site only accounts for a portion of total daily travel to and from the project. Even among those students and employees who travel to and from the Ocean Campus for school and work purposes, other travel would still occur from those students and employees throughout the day.
- The co-location of student housing at one of eight City College campus centers would not prevent project-related vehicle travel from using Ocean Avenue in the project vicinity.

Such a scenario also would not reduce the significant and unavoidable noise and air quality construction impacts, as described on draft SEIR p. 6-60. The draft SEIR presents and analyzes a reasonable range of alternatives consistent with CEQA Guidelines section 15126.6(a). CEQA does

[58] The development agreement is part of the entitlement process for project approval. The development agreement requires recommendation for approval by the planning commission and approval by the board of supervisors. Pursuant to the requirements of Administrative Code Chapter 56, the proposed development agreement is subject to noticing requirements and will be made available for public review prior to presentation to the planning commission for its consideration and recommendation to the board of supervisors per standard City procedures.

not require analysis of "every imaginable alternative" but rather it gives agencies the flexibility to eliminate certain alternatives that either do not reduce environmental impacts or do not further the project's main objectives. The planning department has determined that all alternatives analyzed in the draft SEIR to be *potentially* feasible, consistent with the CEQA guidelines.

In accordance with CEQA, the draft SEIR evaluates the physical environmental effects of the proposed project. Economic, social, or quality-of-life effects of a project are not considered environmental impacts under CEQA (CCR Title 14 section 15131) unless there would be a physical impact on the environment resulting from such effects (such as impacts addressed in air quality, transportation, and noise sections of the draft SEIR), or if such effects result in the need for the construction of new or physically altered facilities that would result in significant physical environmental impacts. The alternatives proposed in the comments are not specified to reduce significant physical environmental impacts, but instead focus on socioeconomic concerns related to the project, and would not meaningfully alter the alternatives analysis completed in the draft SEIR.

The comments regarding the affordable housing ratio of the project do not concern the adequacy or accuracy of the environmental impact analysis and no further response is required. Comments on socioeconomic or quality-of-life effects will be transmitted to City decision-makers for consideration in their deliberations on the proposed project.

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## *Comment AL-2: Environmentally Superior Alternative*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA3-13
I-PEDERSON2-1
I-PEDERSON2-4

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"Environmentally Superior Alternative

The DSEIR concludes that Alternative D is the "Environmentally Superior Alternative." (DSEIR, pp. 6-49 – 6-50.) This conclusion contradicts the evidence provided in the DSEIR which states that the combination of the reduced density alternative (Alternative B) and Alternative D "***would result in less environmental impacts than the Project options and variants***." (DSEIR, p. 6-50.) Therefore, it is clear that the combination of alternatives B and D would result in fewer environmental impacts. The inescapable conclusion would be that the environmentally superior alternative is Alternative B constructed over six years in two phases. As written, the alternative section of the DSEIR is drafted to lead, or mislead, the public and decision-makers into approving the Project or the Additional Housing Option that has a higher density even though neither the Project or the Additional Housing Option is the environmentally superior alternative."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-13*])*

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"Although the Draft is sufficient in most respects, it is deficient in three different ways: it misidentifies the environmentally superior alternative"

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-1*])*

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"A. The Additional Housing Option is the Environmentally Superior Alternative.

The Draft identifies the no project alternative as the environmentally superior alternative. Aside from the no project alternative, it identifies the alternative that requires a six-year construction period as environmentally superior. It also opines that a reduced density version of the project constructed over a six-year period, if feasible, would further reduce environmental impacts.

The Draft's evaluation of which alternative is environmentally superior is fundamentally flawed because it fails to address the adverse environmental consequences of providing less housing than proposed in the Additional Housing Option and of constructing the public parking garage component of the developer's proposed option.

The most urgent environmental problem that the world and the state face today is climate change. (IPCC, Climate Change 2014, Synthesis Report; Cal. Health & Safety Code, section 38501.) In 2017, transportation accounted for 41% of California's greenhouse gas ("GHG") emissions and 46% of San Francisco's GHG emissions. (California Air Resources Board (CARB), California Greenhouse Gas Emission Inventory: 2000-2017 (2019 Edition); sfenvironment.org/carbonfootprint.) The California Air Resources Board has concluded that California cannot meet its GHG reduction goals unless it substantially reduces vehicle miles travelled ("VMT"). (CARB, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target; CARB, 2018 Progress Report, California's Sustainable Communities and Climate Protection Act (Nov. 2018), pages 5, 27-28.) A primary strategy for reducing VMT is locating multi-family housing close to major employment centers, public transit, and other amenities such as neighborhood commercial districts. Unfortunately, restrictions on residential development within the major urban cores of the state present a major obstacle to accomplishing the state's GHG emissions reduction goals. (CARB, 2018 Progress Report, pages 46, 53, 63-64.)

The Balboa Reservoir is unusually well-suited to be the location of high-density residential development because it is (1) immediately adjacent to City College, a major employment center and trip generator; (2) within easy walking distance of multiple transit lines, including BART and Muni lines KT, 8, 8BX, 29, 43, 49, 54, and 91 (and also the J, M, 28R, and 88 lines, which serve the Balboa Park BART station); and (3) adjacent to the Ocean Avenue neighborhood commercial district. To deny or reduce the amount of multi-family housing there would directly impede the state's efforts to reduce the most significant environmental impact of them all: climate change.

The potential adverse environmental impacts identified in the Draft all pale in comparison to the environmental impacts of climate change. To treat temporary construction-related noise and air quality impacts and traffic challenges associated with loading for the adjacent Whole Foods grocery store as more significant than climate change is self-evidently ludicrous. More importantly,

the Draft's failure to provide a reasonable evaluation of the magnitude and significance of the very different kinds of environmental impacts that the City's action on this project might have means that it is not adequately informing decision-makers and the public about the potential environmental consequences of the City's action.

In addition, as discussed in more detail below, the Draft fails to address how the proposed public parking garage will undercut City College's efforts to reduce automobile commuting and thereby induce more GHG emissions and VMT than would occur if the public parking garage is not constructed.

The Draft's alternatives analysis should therefore be revised to address the environmental consequences of providing less housing than proposed in the Additional Housing Option and of providing the public parking garage. Once that analysis is provided, the SEIR should conclude that the Additional Housing Option is the environmentally superior alternative because it provides the most housing in a manner that is likely to result in the lowest per capita VMT and GHG emissions, thereby advancing the state's strategy for addressing the climate crisis."

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-4*])*

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## Response AL-2: Environmentally Superior Alternative

The comments disagree with the identification of the environmentally superior alternative. Responses to the specific details of each comment as they relate to environmental issues are presented to below. Please also refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12, for more details on the development of alternatives process.

As stated in draft SEIR Section 6.D, Environmentally Superior Alternative, the environmentally superior alternative is the alternative that avoids or substantially lessens some or all of the significant and unavoidable impacts of a project. However, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines section 15126.6).

The draft SEIR concludes on p. 6-50 that "Alternative D, Six-Year Construction Schedule would meet all of the project objectives and would avoid and substantially reduce the severity of project- and cumulative-level impacts related to construction-related air quality and health risks." One comment states that the combination of Alternatives B and D would be the environmentally superior alternative and claims that the draft SEIR is drafted to lead or mislead the public and decision-makers into approving one of the proposed project options, despite neither being the environmentally superior alternative. The comment omits the preceding draft SEIR text regarding the combination of Alternatives B and D. The draft SEIR acknowledges that "[i]t is also possible that Alternative D could be combined with Alternative B by the decision makers." The draft SEIR goes on to describe that this combined alternative would lessen the severity of the significant and unavoidable adverse impacts of the proposed project.

Other comments state that the draft SEIR misidentifies the environmentally superior alternative because the analysis does not address the climate change consequences of providing less housing than the Additional Housing Option or constructing the public parking garage under the Developer's Proposed Option. Concerning VMT and GHG emissions of the project, the draft SEIR concludes impacts related to vehicle miles traveled (VMT) (draft SEIR pp. 3.B-79 to 3.B-80) and greenhouse gas emissions (draft SEIR Appendix B, pp. B-37 to B-40) to be less than significant. Accordingly, neither VMT nor GHG emissions were the main criteria in the development of alternatives because CEQA does not require that the alternatives address less-than-significant impacts.

The commenter is correct that a denser project would be more VMT and GHG efficient at this project site than a less dense project. However, none of the alternatives analyzed would have significant impacts on VMT or GHG emissions.

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## *Comment AL-3: Alternative A, No Project Alternative*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BIERINGER4-4
I-RANDOLPH-1
I-SCHNEIDER2-2

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"Please adopt Alternative A."

*(Garry Bieringer, Email, September 23, 2019 [*I-BIERINGER4-4*])*

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"However, I think it is deficient in its discussion of cumulative greenhouse gas emissions and traffic impacts.

In two tables (Table S-3, Table 6-6) and in the discussion of the alternatives in 6.C (p. 6-14), the EIR says that the No Project Alternative would have No Impact (NI) on greenhouse gas (GHG) emissions, whereas the proposed project would have a Less than Significant (LTS) impact on GHG emissions. Therefore, Section 6.D concludes that 'the No Project Alternative would be the environmentally superior alternative because it would result in no impacts to all resources'.

I believe this is in direct conflict with the Plan Bay Area 2040 FEIR, which finds that the 'No Project and Main Streets Alternatives would result in a greater number of significant and unavoidable impacts compared to the proposed Plan' of concentrating jobs and housing in Priority Development Areas (PDAs) (p. ES-8). Indeed, the whole purpose of SB 375 (2008) and Plan Bay Area was to reduce GHG emissions by concentrating jobs and housing near transit. The Plan Bay Area 2040 EIR may be used 'as the basis for cumulative analysis of specific project impacts' (Section 1.1.6).

This is relevant because the Balboa Reservoir is the biggest single development in the Balboa Park PDA (see screenshot of PDA map, below). It is minutes away by foot from the Balboa Park BART station and numerous Muni light rail and bus lines.

If the project were not built, the people who would have lived there do not simply vanish. Instead, they move further away in the Bay Area or elsewhere in the United States with worse transit service. By excluding reasonable estimates of per capita GHG emissions under the No Project Alternative, the Draft EIR makes it impossible to compare GHG impacts among the No Project, Reduced Density, Developer's Proposed Project, and Additional Housing alternatives.

The same reasoning applies to VMT, though to your credit Table 3.B-9 includes a comparison of local VMT to Bay Area VMT that shows that Balboa Park area residents are likely to drive less per capita.

In my opinion, developing the Balboa Reservoir to the highest density is likely to have lower cumulative 2040 impacts on greenhouse gas emissions and traffic than any of the alternatives, including the no project alternative."

*(Yonathan Randolph, Email, September 23, 2019 [*I-RANDOLPH-1*])*

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"And I'd also like to say that the kind of thing that isn't included in the Environmental Impact Report is the number of people who will live in these places in the future, without cars, and who will be taking public transit in San Francisco, rather than that same number of people living out in Modesto and driving into San Francisco every day, for an hour and a half. So, I think those are really important environmental considerations to make as well."

*(Benjamin Schneider, CPC Hearing, September 12, 2019 [*I-SCHNEIDER2-2*])*

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### Response AL-3: Alternative A, No Project Alternative

Two comments express support for the adoption of Alternative A, No Project. Regarding the comment that calls for building affordable housing for teachers and students, refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12.

One comment states that the draft SEIR did not include a full analysis of greenhouse gas emissions for the No Project Alternative, which then makes it impossible to compare GHGs emissions with the proposed project options and alternatives. Comments regarding affordable housing and the alternatives screening process are addressed in Response AL-1, Range of Alternatives, on RTC p. 4.F-12.

Concerning VMT and GHG emissions of the project, the draft SEIR concludes impacts related to vehicle miles traveled (VMT) (draft SEIR pp. 3.B-79 to 3.B-80) and greenhouse gas emissions (draft SEIR Appendix B, pp. B-37 to B-40) to be less than significant. Accordingly, neither VMT nor GHG emissions were the main criteria in the development of alternatives because CEQA does not require that the alternatives address less-than-significant impacts.

The commenter is correct that a denser project would be more VMT and GHG efficient at this project site than a less dense project. However, none of the alternatives analyzed would have significant impacts on VMT or GHG emissions.

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## *Comment AL-4: Alternative B, Reduced Density Alternative*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA3-10
I-BARISH2-4
I-HEGGIE2-1
I-HEGGIE2-10
I-OSAWA-8
I-SIMON-11

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"Alternative B: Reduced Density Alternative Mitigates Construction Impacts on Riordan High School and the Childcare Center

A noise monitoring report was prepared to establish the existing noise levels within 900 feet of the project site as part of the DSEIR. This report included a long term (24 hr. or longer) and a short term (15 min.) study. The closest Noise-Sensitive Receptor is Archbishop Riordan High School ("Riordan High School") which is within 80' of the North Access Road which is the route to be used by construction haul trucks for 4 months, and approximately 50' from the standard construction activities for the Lee Avenue extension and the Block G building. The estimated duration of construction noise from the project is six years.

Table 3.C-7 provides a list of equipment that generates noise between 74 (Welder, Concrete Truck) and 90 dBA (Hoe Ram, Concrete Saw, Rock/concrete Crusher) at a distance of 50' and at 110' the noise is reduced to 68 dBA (a welder) to 84 dBA (Hoe ram, Concrete Saw, Rock/Concrete Crusher). After Phase 1 is complete, in addition to the construction noise there will be an increase in noise from project related traffic. The noise impact on the Riordan High School as well as other nearby sensitive receptors such as the Ingleside Library and the Shining Stars Family Childcare Center will be significant.

The project included multiple buildings and is proposed to be constructed in two phases. Therefore, construction haul trucks will use the North Access Road not just during the estimated 4 months of the excavation and grading phase of the Project but for the full six years of the proposed construction. Although the DSEIR describes the construction noise as intermittent, these noisy periods will be disruptive to students and teachers throughout the Riordan High School day. The most effective way to mitigate construction impacts is to decrease the density of the project so as to not prolong the construction schedule and require a noise buffer zone adjacent to Riordan High School. We request that the analysis of the lower density alternative be included as a variant. A noise buffer zone next to Riordan High School and the Childcare Center should also be included as a mitigation measure."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-10*])*

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"I urge the Commission to consider reducing the project to one that is about 400 units, such as illustrated in this drawing. (Att 2)"

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-4*])*

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"Knowing that the development will cause serious risks to our educational institutions, neighbors, students and small children, I believe it is worth taking a step back and asking what is the highest good for this area that causes the least damage to the City and the immediate surroundings. In that light, please identify what number of units could be safely constructed in the Balboa Reservoir without creating significant adverse impacts to transportation and circulation, air quality, and noise, and secondary public benefits, such as educational services.

As we are aware, City College is an engine for the service jobs of San Francisco and provides opportunity including childcare and child development for students who need them while taking classes to develop skills and a better future. There are reasons that a 100% affordable housing building which houses aged-out foster youth among others was constructed next to City College at the Balboa Reservoir. Adding to the public good is an adjacent private school which is well-known as a high school, but also for its special treatment facilities for learning disabilities. Those institutions as well as many childcare, nursery school and other educational institutions are located nearby. This education hub is important for providing services to all of San Francisco. Therefore, it would benefit the City to first identify what number of units would meet City standards before shoe-horning in a project that is known in advance to have unmitigable adverse impacts."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-1*])*

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"8. Four alternatives for number of units were proposed: 0, 800, 1100, and 1550. Why is the alternative for 800 units not included in assessments? The impacts and results of mitigation on the 800-unit proposal needs to be addressed."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-10*])*

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"I would urge the adoption of the lowest density alternative option for the development."

*(Ed Osawa, Email, September 22, 2019 [I-OSAWA-8])*

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"At most the Balboa Reservoir Project will offer 33% housing that is affordable to people with teachers salaries and below. That would provide about 350 units. An alternative plan would build **350 units only**, all of them affordable (100%) to people with teachers' salaries and below. A model for this plan exists adjacent to the Balboa Reservoir at 1100 Ocean, a development built on public land and 100% affordable. The possibility of this model must be explored.

I have attached a sketch that shows how these units would fit into the Lower Lot of the Reservoir. Alternative funding sources could include a proposed municipal bank and a reassessment of under-assessed commercial properties or a change in the Twitter tax. It is not necessary to use unneeded luxury housing, which create the need for a substantial number of additional affordable units, to fund affordable units."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-11*])*

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## Response AL-4: Alternative B, Reduced Density Alternative

The comments state that the draft SEIR does not adequately analyze the impacts of the 800-unit alternative. Comments also request that additional lower density alternatives be analyzed. In response to the comment that a 100 percent affordable housing project "would better blend" with the project vicinity, refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12.

The 800-unit reduced density alternative (Alternative B) is analyzed on draft SEIR pp. 6-14 to 6-28. The 800-unit alternative is not considered a variant to the proposed project. Because, as described on draft SEIR p. 5-1, variants are "variations of the proposed project at the same project site, with the same objectives, background, and development controls, but with a specific variation that may or may not reduce environmental impacts … these variants modify limited features or aspects of the project, unlike the alternatives to the project … which analyze different approaches to developing the project site to address significant impacts that would result from the project." The 800-unit reduced density alternative is not considered a variant because it is not a variation of the proposed project with the same development controls.

As noted on draft SEIR p. 6-7, one potential alternative screening strategy to avoid or lessen construction noise impacts would be to reduce the scale of the project. Alternative B was selected to address construction-related noise and air quality effects of the proposed project options. The draft SEIR acknowledges that the "type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur. Thus, the potential to generate occasional temporary noise increases of at least 10 dBA over ambient levels at offsite locations along Ocean Avenue, Plymouth Avenue, and Archbishop Riordan High School and future onsite receptors would remain …"

One commenter states that construction impacts to Riordan High School could be reduced by decreasing the project density and requiring a noise buffer zone adjacent to the school and childcare center as a mitigation measure. As discussed in draft SEIR Section 3.D, noise impacts from construction activities would be significant and unavoidable. As with the proposed project options and as described on SEIR p. 6-21, construction noise impacts of Alternative B would be reduced with Mitigation Measure M-NO-1, which includes measures that are intended to buffer or place distance between the construction noise sources and nearby sensitive receptors. For example, Mitigation Measure M-NO-1 would require the contractor to locate stationary noise sources as far from adjacent or nearby sensitive receptors as possible; and erecting temporary noise barriers around the site, particularly where a site adjoins noise-sensitive uses (such as Archbishop Riordan High School). However, as stated on draft SEIR p. 6-21, noise impacts under Alternative B would remain significant and unavoidable with mitigation.

Several comments suggest additional reduced density alternatives, including a 400-unit alternative and a 100 percent affordable housing alternative with 350 units. The draft SEIR considers Alternative B, a reduced density alternative that would develop 800 units, or approximately 33 to 40 percent less gross square footage than the proposed project options. The draft SEIR does not consider a further reduced density alternative because it would not meet most of the basic project objectives.

A further reduced alternative of 350 or 400 units **would not meet** or **would partially meet** the following project objectives, but to a lesser extent than the proposed options and Alternative B:

- Implement the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.
- Implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.
- Contribute to the City's goal of creating 5,000 housing units each year on a site specifically identified in the general plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.

- Build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.
- Build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.

It is **unknown** if a further reduced alternative of 350 or 400 units would meet the following project objectives related to infrastructure or financing, but it is less likely to meet or fully meet them:

- Replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.
- Establish pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.
- As stated in the City's Balboa Reservoir Request for Proposals, work with City College to address parking needs by identifying substitute parking and transportation solutions.
- Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.
- Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the city's charter and applicable law.

Thus, such an alternative is considered, but rejected.

The following construction and operation analysis of a further reduced alternative is provided for informational purposes.

Construction of any number of buildings at the site would result in significant and unavoidable project-level and cumulative impacts for air quality (compressed schedule) and noise (six year and compressed schedule). Regardless of the number of units (such as 350 or 400 units), construction would require the initial phase (Phase 0) to prepare the site. Phase 0 would include the demolition of the parking lot, west side berm, and north and east embankments, followed by grading, excavation, and construction of the site infrastructure. The installation of site infrastructure and finish grading would be required for any residential construction at the site.

Like Alternative B, the type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur under a further reduced alternative. If housing is concentrated on the south side of the site, such an alternative may result in less construction-related noise impacts to Archbishop Riordan High School. However, the noise levels at the receptors nearest to the southern and western project property lines would still exceed the "Ambient + 10 dBA" standard. As stated on draft SEIR p. 3.C-29, "it should be noted that the majority of construction activity would not occur at the closest project site boundary to these closest receptors. However, given the extended duration of these phases of construction … this impact is considered significant and unavoidable with mitigation."

A further reduced density alternative would reduce project-generated traffic volumes and transit trips compared to the proposed project. However, similar to Alternative B and as discussed under Impact C-TR-4 on draft SEIR p. 3.B-94, the cumulative growth in traffic volumes and transit trips associated with implementation of the City College facilities master plan is uncertain at this time, and the transit delay contribution from City College in combination with a further reduced alternative is unknown. The addition of vehicle and transit trips generated by a further reduced density alternative in combination with the facilities master plan projects and other cumulative development would increase transit delay and may exceed the four-minute transit delay threshold. The project traffic volumes would be reduced under a further reduced density alternative, but it was not estimated if it would contribute considerably to significant cumulative transit impacts related to transit delay because this alternative was considered, but rejected. Given the potential for exponential delay under cumulative conditions (refer to draft SEIR p. 3.B-95), a further reduced density alternative could contribute considerably. Therefore, a further reduced density alternative in combination with cumulative projects could result in significant cumulative transit impacts related to transit delay.

Under a further reduced density alternative, the Lee Avenue extension would still provide an access point to the site. Similar to Alternative B and as discussed under Impact C-TR-6b on draft SEIR p. 3.B-101, this reconfiguration of Lee Avenue would reduce the supply of on-street loading available to Whole Foods and nearby land uses. A further reduced alternative would reduce project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection, however, it would affect existing freight loading activity and passenger loading/unloading, and could create potentially hazardous conditions to people bicycling or significant delay that may affect transit. Under a further reduced density alternative, operations could contribute considerably to significant cumulative secondary impacts with respect to loading. Therefore, a further reduced alternative in combination with cumulative projects could result in a significant cumulative impact with respect to loading along Lee Avenue between Ocean Avenue and the project site.

Thus, the significant and unavoidable construction-related noise and air quality impacts would occur, and cumulative transit delay and Lee Avenue loading impacts identified in the draft SEIR could occur.

Draft SEIR Chapter 6, Alternatives, discusses the impacts that would result from construction of the reduced density alternative at an appropriate level of detail and compares these impacts to the proposed project, and these comment does not raise any specific environmental issues or questions

regarding the adequacy or accuracy of the draft SEIR's analysis. The range of alternatives included in the draft SEIR is adequate under CEQA Guidelines section 15126.6.

## *Comment AL-5: Alternative B, Economic Feasibility*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA1-4
O-WPA2-2
O-WPA3-9

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"Next, there is an extreme error in the DSEIR in discussing Reduced Density Alternative B in stating that no financial analysis has been conducted. That's false and we will show why."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-4*])*

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"It doesn't accomplish these goals. However, there was a proposal, submitted by Related of California, a developer, during the RFP process, a process that Westwood Park was frozen out of by the Balboa Citizens Advisory Committee. A project that could be one we could support.

It brings me to the relevant objection. The draft concludes that the financial feasibility of a reduced option of 800 units referred to as Plan B is unknown. That is factually incorrect.

Related proposed a 680-unit project, with parking to accommodate City College. And in discussions with Related, they said they could reduce the number of units even further and still make a profit.

Yet, this document ignores that real world fact and concludes that the financial feasibility option of 800 units is unknown, even though a well-known and respected developer concluded it could make a profit with far fewer units.

The EIR must conclude that a reduced density option is financially feasible and study the impacts of that option.

We will submit in writing as well. And thank you very much for your time."

*(Anita Theoharis, Board Member, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA2-2*])*

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"<u>Alternative B: Financial Feasibility of Reduced Density Alternative</u>

The WPA objects to the conclusion regarding the financial feasibility of Alternative B, the Reduced Density Alternative, that would reduce the number of housing units from either 1550 or 1100 units

to 800 units. The DSEIR incorrectly states that "the financial feasibility of the reduced density alternative is unknown" (DSEIR, page 6-17). As noted on pages 2-5 in the Project Description/Background section of the DSEIR, the SFPUC issued a request for qualifications for development of the property in November 2016. From the submissions, SFPUC selected three developers to submit comprehensive proposals: Avalon, Emerald Fund and Related California. The proposal from Avalon and its development partners was selected by SFPUC to enter into exclusive negotiations for the development.

The Related California RFP proposal was to develop 680 units, of which 50.2% were proposed to be affordable and work force housing units, or 120 fewer units than the Alternative B project with 800 units. Therefore, there is no factual basis for the conclusion in the DSEIR that the financial feasibility of the Alternative B project is unknown as this is contrary to Related California's proposal with fewer units that they clearly considered to be financially feasible. A copy of the Related California's Response to the RFP proposal is attached to this letter as exhibit 3.

The WPA submitted a Scoping Letter on November 12, 2018, which is attached hereto as Exhibit 4. That Scoping Letter fully discussed the financial feasibility of a reduced density project. As WPA stated in that letter, the Related California proposal was for 680 units but in addition, Related California disclosed to WPA that a project with fewer units than 680 was feasible. Footnote 1 of the Scoping Letter, states that 'In discussion with the Westwood Park Community, Related California acknowledged that a 500 unit development is financially feasible'. Hence, the statements in the DSEIR that the 'financial feasibility of the reduced density alternative is unknown' are simply incorrect, contrary to the evidence, and ignores the factual evidence that is readily available to the Planning Department."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-9*])*[59]

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## Response AL-5: Alternative B, Economic Feasibility

The commenters object to the statement in the draft SEIR that the financial feasibility of the reduced density alternative is unknown. One comment provides Related California's proposal for 680 units that was submitted in response to the original SFPUC request for proposals for development of the project site (the proposal is included in its entirety in RTC Attachment B).

The commenters assert that because Related California submitted a 680-unit proposal for the SFPUC's request for proposals, a reduced density alternative by the Reservoir Community Partners, LLC, would be financially feasible. The Related California proposal is not relevant to the current project as proposed by Reservoir Community Partners, LLC, because they are different projects by different developers. A response to a request for proposals also does not prove that the respondent has a feasible project. Alternative B is considered to be a potentially feasible reduced density alternative because it meets most of the basic project objectives, and it lessens the project's significant environmental effects. The draft SEIR concludes on pp. 6-27 to 6-28 that the reduced

[59] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

density alternative would have slightly less severe significant impacts than the proposed project options, but the significant and unavoidable impacts would remain.

The planning commission will certify the SEIR if they determine that the SEIR has been completed in compliance with CEQA, including that it describes a reasonable range of *potentially* feasible alternatives. The planning commission will determine the *actual* feasibility of the alternatives after and separate from SEIR certification. The planning commission may consider non-environmental information in making the actual feasibility determination, such as an economic/financial feasibility analysis.

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## *Comment AL-6: Alternative C, San Ramon Way Passenger Vehicle Access Alternative*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| O-SNA1-1 | O-WPA3-16 | I-FREY1-4 |
| O-SNA2-1 | O-WPA3-17 | I-FREY2-4 |
| O-WPA1-5 | I-BURGGRAF-3 | I-OSAWA-5 |
| O-WPA3-11 | I-DELROSARIO-1 | I-OSTEN-2 |

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"Good afternoon Commissioners. My name is Amy O'Hare. I'm the Sunnyside representative on the Balboa Reservoir Community Advisory Committee. I'm also on the Board of Sunnyside Neighborhood Association, and I'm speaking for the Board today.

I want to address a particular aspect of the environmental report and that is Alternative C. That's opening San Ramon Way to vehicular traffic.

I want to urge the Planning Department to support this alternative. As currently planned, there are only two openings for vehicular traffic in and out of the reservoir sites. By opening San Ramon Way, a third access point would be provided, mitigating some of the locked in nature of the site.

When AECOM did the initial transportation analysis, in 2015, they conclude: Extending San Ramon Way would reduce local traffic bottleneck into the neighborhood. The extension would attract a portion of the Reservoir site traffic and it can be accommodated without resulting in substantial negative impacts on the existing neighborhood.

The draft SEIR states that opening San Ramon Way to vehicles would redistribute traffic from Ocean Avenue and Frida Kahlo Way, where it would otherwise contribute to the transit delay. Opening San Ramon Way would provide emergency vehicles better access.

Further, it would reduce project generated traffic volume at Lee Avenue, which is identified in the draft report as a troublesome intersection with a lot of projected congestion.

In 1917, Westwood Park laid out several stub-ended streets. It was laid out with several stub-end streets, including San Ramon.

In 1986, Westwood Park Association successfully blocked the opening of the one of the east -- the west side of Westwood Park and so that's just a solid wall. And on the other side of that is the El Dorado development, which happened in the 80s.

The original planners fully envisioned that these stubs would be connecting up with new streets as future residential development happened in the surrounding neighborhoods.

Connecting San Ramon Way to the Balboa Reservoir Project would seem like an obvious part of effectively developing this site. But apparently, the barrier to do so lies far in the past.

I have a conveyance real estate, which was just provided to me by the assessor today, which shows that in 1955 Westwood Park acquired a very tiny slice of San Ramon Way, as a lot. Which a lot was just made up out of public streets. And this is a barrier that's right at the edge of the Balboa Reservoir Project. And I urge the Commission to override this ownership that costs them $1.36."

*(Amy O'Hair, Board Member, Sunnyside Neighborhood Association, CPC Hearing, September 12, 2019 [*O-SNA1-1*])*

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"Please urge the Planning Dept to **open San Ramon Way to all traffic** at the Balboa Reservoir housing site, which was studied as Alternative C in the Balboa Reservoir SEIR. The current two plans include only two openings for vehicle traffic into and out of the site, at Lee Avenue and Ocean, and onto Frida Kahlo Way near Cloud Circle. By opening San Ramon Way, a third street access would be added to the building site, mitigating some of locked-in nature of the site.

When AECOM did the initial transportation analysis in March 2015, they concluded: 'Extending San Ramon Way would **reduce local traffic** at bottlenecks into the neighborhood….The extension would likely attract a portion of the reservoir site traffic heading to or from the west end and could likely be accommodated **without resulting in substantial negative effects** on the existing Westwood Park neighborhood.'[1]

The Balboa Reservoir draft SEIR states that opening San Ramon Way to vehicles would **redistribute traffic** from Ocean Avenue and Frida Kahlo Way, where it would **otherwise contribute to transit delay** (p.6-37). It would provide emergency vehicles better access to the western portions (p.6-36). Further, this alternative would **reduce project-generated traffic volumes** at the Lee Avenue-Ocean Avenue intersection (p.6-37), which is identified as a point of heavy traffic congestion (p.3.B-3).

In 1917, Westwood Park was laid out with the several stub-end streets, including San Ramon, abutting its periphery. The original planners naturally envisioned these stubs connecting up with new streets in future adjacent residential developments. Connecting San Ramon Way might seem an obvious part of effectively developing the site, but apparently the barrier to doing so lies far in the past.

In 1950s the Westwood Park homeowners association decided that a completed street at this location was something they wanted to prevent forever.

On June 30, 1955[2] the City and County of San Francisco sold a ten-foot wide strip of the public street to the Westwood Park Homeowners Association (3178/018), for just $1.36.

Thus a HOA of 600-some households, owning a thin strip of previously public land, now stands against a better distribution of traffic, better emergency vehicle access, and the alleviation of transit delay.

**The Commission can and should correct this incomplete street.** Please urge the Planning Department to pursue Alternative C. Thank you for your consideration."

**Footnotes:**
[1] Memorandum from AECOM to the SF Planning Dept about Balboa Reservoir existing conditions, dated March 17, 2015. http://default.sfplanning.org~plans-and-programs planning-for-thecity/public-sites~balboareservoir/Balboa-Reservoir-Study Existing-Conditions-Transportation.pdf.
[2] See attached conveyance from the SF Assessor's.

*(Amy O'Hair, Board Member, Sunnyside Neighborhood Association, Letter, September 12, 2019 [*O-SNA2-1*])*[60]

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"Next, there is the improper inclusion of Alternative C on San Ramon Way, on Passenger Vehicle Alternative. That should be rejected and we will say why. That has to do with Plymouth Avenue and others."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-5*])*

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"Alternative C: San Ramon Way Passenger Vehicle Alternative

It is WPA's opinion that Alternative C, the San Ramon Way Passenger Vehicle Alternative should be rejected as an alternative by the Planning Department. As described in the DSEIR, San Ramon Way currently terminates just west of the Project site and that the WPA owns the 10-foot wide parcel that separates the end of the street and the Project site. Implementation of this alternative would require purchase of this parcel by the Developer or the City.

Allowing San Ramon Way to be used for vehicle access would create significant adverse consequences. Attached to this letter as exhibit 5 is the declaration of Jenny Perez, a resident who has lived on lower Plymouth Avenue near San Ramon Way for 37 years. Ms. Perez submitted a declaration commenting on the inaccuracies in the DSEIR relating to the alternative use of San Ramon Way for vehicle traffic and to the additional adverse consequences if San Ramon is opened to through vehicle traffic.

Also attached as exhibit 6 is the declaration of Anne Chen, a resident of lower Plymouth for 40 years. Ms. Chen's declaration comments on the inaccuracies in the DSEIR relating to the alternative

[60] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

of using San Ramon Way for Vehicle traffic. WPA could have solicited many more similar declarations from WPA residences, and is willing to do so if that would be helpful.

The residents residing in WPA believes that this alternative, if implemented, would have a negative traffic and noise impact on the Westwood Park neighborhood, especially on Plymouth Avenue and San Ramon Way. WPA objects to this alternative and will not sell the WPA owned parcel to allow access to the project site. Thus, this alternative is not reasonably feasible and should have been rejected by the Department as an Alternative."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-11*])*

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"The Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project ('DSEIR') correctly notes the effective roadway width with on street parking at the lower segment of Plymouth is approximately 10 feet wide or less and two way vehicle travel is not feasible on Plymouth. (See DSEIR, page 6-34). However, the DSEIR is totally incorrect when it says as follows: 'These instances are rare and this is not an issue under existing conditions due to the low traffic volumes on the segment.'

The DSEIR also says as follows: '[T]he proposed project is not expected to pose potentially hazardous conditions due to the low traffic volumes' (DSEIR, page 6-35). The DSEIR is totally wrong in their conclusions.

At another place the DSEIR says that the addition of vehicle traffic over San Ramon would increase instances of oncoming traffic on Plymouth, but 'drivers would have sufficient opportunities to pull over into available street parking spaces or driveway curb cuts.' [DSEIR, page 6-37]

All of these comments in the DSEIR are without any basis in fact and are incorrect. At the current time there are seldom any parking spaces on the lower segment of Plymouth near San Ramon. I have witnessed many times a day, two to seven behind the main car driving up or down the hill, are meeting each other and unable or unwilling to move. Many times, these confrontations turn in road rage. They have hit each other's car, yell profanities, because of the tight squeeze of the road, will hit parked cars. The neighbors have woken up to the anger of the drivers in the morning or at night. It's all day everyday. That is the situation now.

If San Ramon is opened to traffic, 1100 from up to 1500 new units with approximately 1500-4000 people living in the complex(s), there certainly will continue to be no open spaces to park. Moreover, there will be an increase in the violent problems on Plymouth and additional problems with potential road rage, car damages for driving on the street. I disagree with the DSEIR conclusion, that if San Ramon is opened there would be sufficient opportunities to pull over into available on street parking. There are generally no parking spaces available now, and if San Ramon is opened to traffic, there would be alerications for any available parking space that would guaranty no open parking spaces.

The DSEIR concludes that the use of San Ramon as a vehicle street would not create potentially hazardous conditions for people walking, biking, driving or public transit, and this alternative is 'less

than significant.' [DSEIR 6-36]. This is a conclusion that is not based on any factual analysis. I have lived on Plymouth for 37 years, and can testify that opening San Ramon to vehicle traffic from 1100 or 1550 units and from City College would create something close to a war zone on this narrow street.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14 day of September, 2019, at San Francisco, California."

*(Jenny Perez statement attached to Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-16*])*

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"The Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project ('DSEIR') correctly notes the effective roadway width with on street parking at the lower segment of Plymouth is approximately 10 feet wide or less and two way vehicle travel is not feasible on Plymouth. (See DSEIR, page 6-34). However, the DSEIR is totally incorrect when it says as follows: 'These instances are rare and this is not an issue under existing conditions due to the low traffic volumes on the segment.'

The DSEIR also says as follows: '[T]he proposed project is not expected to pose potentially hazardous conditions due to the low traffic volumes' (DSEIR, page 6-35). The DSEIR is totally wrong in their conclusions.

At another place the DSEIR says that the addition of vehicle traffic over San Ramon would increase instances of oncoming traffic on Plymouth, but 'drivers would have sufficient opportunities to pull over into available street parking spaces or driveway curb cuts.' [DSEIR, page 6-37]

All of these comments in the DSEIR are without any basis in fact and are incorrect. At the current time there are seldom any parking spaces on the lower segment of Plymouth near San Ramon. I have witnessed many times a day, two to seven behind the main car driving up or down the hill, are meeting each other and unable or unwilling to move. Many times, these confrontations turn in road rage. That is the situation now.

If San Ramon is opened to traffic from up to 1500 new units there certainly will continue to be no open spaces to park. Moreover, there will be an increase in the problems on Plymouth and additional problems with potential road rage and simply driving on the street. I disagree with the DSEIR conclusion in the DSEIR, quoted above, that if San Ramon is opened there would be sufficient opportunities to pull over into available on street parking. There are generally no parking spaces available now, and if San Ramon is opened to traffic, there would be certain fights for any available parking spaces that would guaranty no open parking spaces.

The DSEIR concludes that the use of San Ramon as a vehicle street would not create potentially hazardous conditions for people walking, biking, driving or public transit, and this alternative is 'less than significant.' [DSEIR 6-36]. This is a conclusion that is not based on any factual analysis. I have lived on Plymouth for over 40 years, and can testify that opening San Ramon to vehicle traffic from 1100 or 1550 units and traffic from City College would create something close to a war zone on this narrow street."

*(Anne Chen letter attached to Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-17*])*

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"I especially agree with my neighbors on statements made in regards to traffic up and down on Plymouth Avenue already nowadays, which is a narrow street, with not a lot of open parking spots already and certainly not "sufficient opportunities to pull street parking spaces over into available on or driveway curb cuts", as mentioned in the DSEIR (page 6-37).

There are several incidents per week - occasionally per day - already where cars get stuck, because they cannot get out of each others way, subsequently stalling traffic both ways. This is already today's situation, that would just worsen with any alternative of the project (besides A: No Project). Parking and traffic on Plymouth Avenue - and all surrounding streets of the planned project - would increase tremendously, depending on the picked alternative, but especially, if San Ramon Way would be opened up, even just for pedestrian traffic, which would make parking in Westwood Park even more attractive to people wanting and needing parking and quick access to the new development.

Please provide evidence that backs up your statement that any project alternative – especially Alternative C (San Ramon Way Passenger Vehicle) would have a "less-than-significant impact", as my impression is to the contrary, namely that any project alternative (other than A) would have a stark impact in terms of parking and traffic on the whole surrounding neighborhood, specifically Westwood Park."

*(Alex Burggraf, Email, September 23, 2019 [*I-BURGGRAF-3*])*

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"The only ongoing headache has been the traffic through Plymouth Avenue (between Ocean Avenue and Monterey Boulevard).

I'm told and concerned that your office is considering opening San Ramon to vehicles?? The streets are very narrow as it is, causing regular arguments between drivers, and accidents to parked cars when drivers attempt to squeeze through. Please reconsider so that this issue does not get worse for residents of this neighborhood."

*(Ronnie Del Rosario, Email, September 11, 2019 [*I-DELROSARIO-1*])*

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"And then, my third concern is opening San Ramon Way. In the DEIR it downplayed and, in fact, it even said it was a positive that on Plymouth, it's basically one lane. The 1200 block of Plymouth, where I live, there's always parking cars on both streets, so it's single lane. So, you have to go into the driveways and let people pass. And this happens all day. And the driveways are small and if the car is big, or the driver isn't such a good driver, it can take a long time for people just to move down the street. And sometimes people get upset. Sometimes they get really nasty. Sometimes they scream. Sometimes they just sit.

And the EIR just sort of really downplayed this, that this would slow traffic. Well, as a previous speaker said, that sometimes people still go very fast on Plymouth and people on Plymouth regard this situation as a negative, not as a positive.

And then, just, I think the predictions of the traffic through San Ramon is inaccurately low because the EIR does not address that if that San Ramon Way was opened you'd get other traffic than just the project. Thank you."

*(Laura Frey, CPC Hearing, September 12, 2019 [*I-FREY1-4*])*

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"Thirdly, a very big concern is allowing vehicle traffic on San Ramon Way (alt. C). We live on the 1200 block of Plymouth between Ocean and San Ramon. Plymouth is the only north/south road between Monterey and Ocean, and we have cars on Plymouth all day. All parking spaces on either side of the 1200 block of Plymouth are usually filled. As stated in the Draft EIR drivers continually have to yield to each other because it is a single lane of traffic between parked cares. Usually the pullout space (the driveway) is small, and if the car is not small or the driver not great this can take awhile. Often people get impatient, sometimes they get nasty. Commute times and weekends are especially congested and nasty. It is a continual problem. The Draft EIR dismisses this problem as helping with speed, but drivers sometimes still go fast on Plymouth, which exacerbates the ONE LANE traffic problem. Getting in-and-out of driveways is difficult because of space and traffic, and side-swiping is a problem. Opening San Ramon to vehicles would increase traffic, so it would increase the problems we already have. And, I believe the predictions of traffic are inaccurately low in the Draft EIR--perhaps, resident traffic will be greater than the prediction, but the Draft EIR does not even address the traffic from non-resident cars--i.e. "cutting through" the development."

*(Laura Frey, Email, September 22, 2019 [*I-FREY2-4*])*

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"The analysis of an additional automotive access route (Alternative C, pages 6-29 to 6-44) focuses disproportionately on the impact on a short tab of a street that will access the project (San Ramon Way) rather than the broader impact on the narrow streets that would feed into that access. These feeder streets are two-way but *de facto* single lane roads due to parking, and even today cars routinely must leapfrog from driveway cutout to cutout as they pass in opposite directions. A somewhat comical argument is made in the Alternative C analysis that the increased congestion will result in safer driving conditions as traffic speed will be reduced; indeed, it is difficult to have an injurious accident in a gridlock situation. The analysis also fails to adequately account for the likely increase in bicycle traffic along Plymouth and other feeder streets, as San Ramon will become a useful shortcut for bicyclists to get to City College."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-5*])*

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"We are also opposed to the opening of San Ramon Avenue to traffic as this would directly impact parking and activity in front of our home."

*(G. Scott Osten and Ralph J. Torrez, Email, September 19, 2019 [*I-OSTEN-2*])*

## Response AL-6: Alternative C, San Ramon Way Passenger Vehicle Access Alternative

Comments include support and opposition to Alternative C, San Ramon Way Passenger Vehicle Access Alternative. Comments opposing the alternative state that Alternative C would have negative traffic and noise impact on the Westwood Park neighborhood. The comments also state the draft SEIR does not address the broader impact of the alternative and the analysis downplays potential traffic hazards impacts on San Ramon Way.

The response to the Alternative C analysis is organized by the following subtopics:

- Draft SEIR Alternative C Analysis
- Walking and Biking Impacts
- Operational Traffic Noise
- Alternative Feasibility

### *Draft SEIR Alternative C Analysis*

The analysis of Alternative C: San Ramon Way Passenger Vehicle Access is discussed starting on draft SEIR p. 6-29 and the discussion of transportation and circulation impacts begins on draft SEIR p. 6-31.

Plymouth Avenue is 24-feet wide. Between Ocean and Greenwood avenues (just north of Archbishop Riordan campus), Plymouth Avenue includes approximately 118 on-street parking spaces along both sides of the street. Collected data show that parking utilization ranges between 40 and 88 percent with between 37 and 81 on-street vehicle parking spaces available during the weekday a.m. (9 a.m.), midday (2 p.m.), and p.m. (8 p.m.) periods (draft SEIR p. 6-37). There are frequent curb cuts along the street, including at least 20 in the approximately 400-foot block of Plymouth Avenue between Wildwood Way and Greenwood Avenue.

Collected data also show a total of 268 and 226 vehicles during the p.m. and a.m. peak hours, respectively, at the San Ramon Way/Plymouth Avenue/Southwood Drive intersection. For comparison purposes, this is approximately 12 to 15 percent of the existing peak hour volumes at the Ocean Avenue/Miramar Avenue intersection and approximately 29 to 30 percent of the existing peak hour volumes at the Judson Avenue/Gennessee Street intersection (refer to Table 3.B-2 on draft SEIR p. 3.B-10).

While responding to this comment, a typo was identified in Table 3.B-2 on draft SEIR p. 3.B-10. The following edit corrects the draft SEIR text. Table 3.B-2 on draft SEIR p. 3.B-10 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in <u>double underline</u>):

**TABLE 3.B-2**
**VEHICULAR COUNTS AT STUDY INTERSECTIONS**

| Number | Intersection | Number of Vehicles[a,b] | |
|---|---|---|---|
| | | A.M. Peak Hour | P.M. Peak Hour |
| 1 | Ocean Avenue/Miramar Avenue | 1,833 | 1,876 |
| 2 | Ocean Avenue/Lee Avenue | 1,898 | 2,021 |
| 3 | Ocean Avenue/Frida Kahlo Way/Geneva Avenue | 2,090 | 2,293 |
| 4 | Ocean Avenue/San Jose Avenue | 1,376 | 1,413 |
| 5 | Ocean Avenue/Plymouth Avenue | 1,841 | 1,866 |
| 6 | San Ramon Way/Southwood Drive/Plymouth Avenue | ~~422~~268 | ~~409~~226 |
| 7 | Greenwood Avenue/Plymouth Avenue | 430 | 397 |
| 8 | Geneva Avenue/San Jose Avenue | 2,590 | 2,485 |
| 9 | Judson Avenue/Frida Kahlo Way | 1,030 | 1,040 |
| 10 | Judson Avenue/Hazelwood Avenue | 437 | 341 |
| 11 | Judson Avenue/Gennessee Street | 851 | 780 |
| 12 | Monterey Boulevard/Gennessee Street | 1,684 | 1,636 |
| 13 | Cloud Circle (N)/Frida Kahlo Way | 750 | 923 |
| 14 | Cloud Circle (S)/Frida Kahlo Way | 1,074 | 1,210 |
| 15 | City College Upper Reservoir Lot (N)/Frida Kahlo Way | 750 | 923 |
| 16 | City College Upper Reservoir Lot (S)/Frida Kahlo Way | 1,074 | 1,210 |
| 17 | I-280 SB Off Ramp/Ocean Avenue | 1,505 | 1,509 |
| 18 | I-280 SB Ramps/Geneva Avenue | 2,463 | 2,590 |
| 19 | I-280 NB Ramps/Geneva Avenue | 2,653 | 2,642 |
| 20 | I-280 NB Ramps/Ocean Avenue | 1,101 | 1,207 |
| 21 | Ocean Avenue/Brighton Avenue | 1,708 | 1,846 |
| 22 | Ocean Avenue/Harold Avenue | 1,905 | 1,981 |
| 23 | Holloway Avenue/Lee Avenue | 440 | 378 |

SOURCE: Quality Counts, 2018.

NOTES:

[a] Vehicle volume (number of vehicles) reflects the sum of all turning movements at the intersection.

[b] The weekday a.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 7 a.m. and 9 a.m. The weekday p.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 4 p.m. and 6 p.m.

The effect of the addition of project-generated vehicle traffic to surrounding streets within the Westwood Park neighborhood (e.g., Plymouth Avenue, Southwood Drive, and San Ramon Way west of Plymouth Avenue) is discussed starting on draft SEIR p. 6-35. As shown in Table 6-4 and Table 6-5 (draft SEIR pp. 6-32 and 6-33), a portion of vehicle trips generated by the project options would utilize San Ramon Way. Under the Developer's Proposed Option, 31 and 48 vehicles would use San Ramon

Way during the weekday a.m. and p.m. peak hours, representing 12 and 15 percent of project vehicle trips respectively. Under the Additional Housing Option, 41 and 62 vehicles would use San Ramon Way during the weekday a.m. and p.m. peak hours, representing 12 and 15 percent of project vehicle trips respectively. These project trips would correspond with a decrease in the same number of vehicles utilizing the Frida Kahlo Way/North Access and Ocean Avenue/Lee Avenue project access routes. The project trips likely to use the San Ramon Way access were identified based on the project vehicle trip distribution presented in Table 3.B-15 on draft SEIR p. 3.B-44.

As mentioned on draft SEIR p. 6-37, the addition of project-generated vehicle traffic would increase instances of oncoming traffic and locations where there is not space for vehicles to pass side-by-side. The frequent curb cuts and low vehicular volumes would continue to provide opportunities for drivers to pull over and let oncoming traffic pass without resulting in potentially hazardous conditions. However, the SFMTA could eliminate on-street parking on one side of Plymouth Avenue, instead of its current configuration of parking on both sides. This would result in the removal of approximately 60 spaces between Ocean and Greenwood avenues. With parking confined to one side of Plymouth Avenue, the street would provide additional clearance for two-way operation of vehicles without the need for drivers to pull over to let oncoming traffic pass.

It is possible that the project's new connection to Plymouth Avenue via San Ramon Way could encourage some existing drivers to use this new connection to avoid traveling on portions of Ocean Avenue. However, it is unlikely that this new connection would provide meaningful travel time savings, even under congested conditions, and thus not a substantial increase in existing drivers using this new connection. For existing eastbound Ocean Avenue drivers that continue north on Frida Kahlo Way, the new connection route would include a left-turn onto Plymouth Avenue, a right-turn on San Ramon Way, traveling through the proposed project's roadway network, and a left turn onto Frida Kahlo Way. For southbound vehicles on Frida Kahlo Way that continue west on Ocean Avenue, the new connection route would include traveling through the proposed project's roadway network and turning left onto Plymouth Avenue from San Ramon Way. Furthermore, even if some drivers chose to utilize this new connections route, a low number of trips would not change impact conclusions.

The draft SEIR analysis is supported by substantial evidence. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts there were not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

With respect to parking, as discussed on draft SEIR p. 3.A-3 and p. 3.B-31, the Developer's Proposed Option and Additional Housing Option meet the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area and therefore parking is not an environmental impact for the purposes of CEQA. However, given that the topic is of interest to the public and decision makers, more detail is provided in an analysis of secondary environmental impacts related to City College in draft SEIR Appendix B, Section E.14, Public Services (pp. B-87 to B-90). For informational purposes, a discussion of existing and project parking

supply and demand within the site and within the neighborhood, is provided starting on p. 1 of RTC Attachment 1, Non-CEQA Transportation Analysis.[61]

Additionally, as discussed on draft SEIR p. 3.B-25, the San Francisco Planning Commission adopted Resolution No. 19579 on March 3, 2016, removed automobile delay (traffic congestion), as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as significant impact on the environment pursuant to CEQA. Further, CEQA removed automobile delay statewide in December 2018.[62]

### *Walking and Biking Impacts*

With respect to people biking and walking, the evaluation criteria for a significant impact requires the assessment of potentially hazardous conditions. For purposes of environmental analysis, *hazard* refers to a project generated vehicle potentially colliding with people walking or biking that could cause serious or fatal physical injury, accounting for engineering aspects of a project that may cause a greater risk of collisions resulting in serious or fatal physical injury than a typical project. These engineering aspects include but are not limited to speed, turning movements, complex designs, substantial distance between street crossings, and sight lines. Human error or non-compliance with laws, weather conditions, time-of-day, and other factors are not included in such consideration.

As discussed on draft SEIR p. 6-35, the primary access point for people walking and biking to the project site would be from the northern extension of Lee Avenue, the paseos connecting to Brighton Avenue and San Ramon Way, and the shared use path connecting to Plymouth Avenue. The analysis acknowledges the potential of the addition of project-generated vehicle traffic to San Ramon Way under Alternative C to increase potential for conflicts between people driving and people walking and biking to/from the site. However, given the low vehicle speeds (less than 25 miles per hour) and the presence of unobstructed sightlines and available sight distance to see people walking on the sidewalk and biking along the roadway, Alternative C would not create potentially hazardous conditions for people walking or bicycling.

### *Operational Traffic Noise*

Operational traffic noise impacts are analyzed on draft SEIR pp. 6-39 and 6-40 and concludes that the trip distribution of traffic on Plymouth Avenue would result in an increase of roadside noise levels by 1.0 to 1.3 dBA for the proposed project. These increases would be below the threshold of significance of 5dBA, resulting in a less-than-significant impact with respect to roadside traffic noise. The comments received on the draft SEIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts there were not addressed in the draft SEIR, or that impacts would be substantially more severe than those identified in the draft SEIR.

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61 Balboa Reservoir – Non-CEQA Analysis, August 1, 2019. *http://ab900balboa.com/DEIR_to_NOD_Documents/2019-08-200000401.pdf*

62 Public Resources Code section 21099(b)(2) states: "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." The secretary certified the guidelines in December 2018.

*Alternative Feasibility*

In response to the comment regarding the 10-foot-wide parcel, as described in Response AL-5, Alternative B, Economic Feasibility, on RTC p. 4.F-29, the planning commission will certify the SEIR if it determines that the SEIR has been completed in compliance with CEQA, including that it describes a reasonable range of *potentially* feasible alternatives. The planning commission and other approval agencies will determine the *actual* feasibility of the alternatives after and separate from SEIR certification. The decision makers are required to take into consideration, as applicable, non-environmental information such as the economic, legal, social, technological considerations in determining whether alternatives are feasible (CEQA Guidelines section 15091).

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## *Comment AL-7: Alternative D, Six-Year Construction Alternative*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA3-12
I-HEGGIE2-9

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"Alternative D: Six Year Construction Alternative

Alternative D is the "Six-Year Construction Alternative". This Alternative does not meet the criteria of an alternative as it is clearly nothing more than a variant of the proposed Project with a two phase construction schedule. The discussion of Alternative D in the DSEIR does not provide any additional information or analysis of potential impacts that are not already provided in the impact analysis of the Project. A potential six year construction schedule is noted as realistic and possible in the Project description, which can be imposed as a condition of approval by the Planning Commission. For Alternative D to be a true alternative, it must also include a comparison the impacts of Alternative B that would be constructed in two phases over a six year period. This is necessary so that there will be an objective basis for determining which project variant or alternative will have the least impact on the environment. Thus, the analysis in Alternative D does not provide any meaningful comparison of potential impacts or the 'comparative merits of the alternatives', as required by CEQA Guidelines Section 15126.6(a). If the DSEIR is to include a two phase project as an alternative, then it should also include a two phase Alternative B in the Alternative D discussion."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-12*])*

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"7. The project construction is 'anticipated to occur in three main phases over the course of six years,' (page 2-3). If that is the case, then why does Table S-3 identify Alternative D: Six Year Construction Schedule' as an alternative rather than the plan? (pp s-44 to S-48.)"

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-9*])*

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## Response AL-7: Alternative D, Six-Year Construction Alternative

The comments state that Alternative D does not meet the criteria of an alternative, should be compared to Alternative B (Reduced Density Alternative), and that Alternative B should be analyzed assuming construction in two phases over a six-year period.

One comment incorrectly states that construction would occur in two phases. The proposed project would be constructed in three phases (Phase 0, Phase 1, and Phase 2) as described on draft SEIR pp. 2-38 to 2-39. Under the CEQA process, the draft SEIR analyzes the environmental impacts of the project as proposed by the project sponsor. The project as proposed by the sponsor includes a six-year and three-year compressed construction scenario and was therefore analyzed as the proposed project and not as an alternative.

As described in Chapter 6, Alternatives, of the draft SEIR and in Response AL-1, Range of Project Alternatives, on RTC p. 4.F-12 above, the consideration of alternatives carried forward for analysis was based on three factors, consistent with section 15126.6(a) of the CEQA Guidelines:

- The alternative would be potentially feasible
- The alternative would feasibly attain most of the project's basic objectives
- The alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project

Alternative D would not have a compressed construction schedule scenario and the six-year schedule was selected to avoid the significant and unavoidable impacts related to air quality. This alternative was carried forward to make it more transparent to the decision makers that an alternative with a six-year schedule is an option for their consideration during deliberations on the proposed project. Alternative D would substantially lessen the severity of significant and unavoidable impacts, reducing them to less than significant with mitigation (construction-related criteria air pollutant emissions, construction-related exposure of sensitive receptors to pollutant concentrations and resulting excess cancer risk, cumulative regional air quality impacts, and cumulative health risk impacts).

The draft SEIR presents and analyzes a reasonable range of alternatives consistent with CEQA Guidelines section 15126.6(a). CEQA Guidelines section 15126.6(d) states that an EIR "shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison *with the proposed project*." A comparison of impacts between Alternatives B and D are therefore not required under CEQA. Contrary to the commenter's assertion, the Alternative B analysis did evaluate both a six-year and compressed construction schedule on draft SEIR p. 6-18.

Table 6-1 on draft SEIR pp. 6-8 to 6-9 provides a comparison of the proposed project and alternatives, including construction schedule. Table 6-6 on draft SEIR pp. 6-51 to 6-55 provides a comparison of environmental impacts of the proposed project options to impacts of the alternatives. Regarding Alternatives B and D, as described earlier in Response AL-2: Environmentally Superior Alternative, on RTC p. 4.F-19, it is possible that Alternative D could be combined with Alternative B by the decision makers.

# 4.G Cumulative Impacts

The comments and corresponding response in this section relate to the cumulative analysis in the draft SEIR:

- Comment CU-1: Cumulative Analysis

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## *Comment CU-1: Cumulative Analysis*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA1-3
O-WPA3-7
I-BARISH3-22
I-BARISH3-23
I-BELBIN-3
I-GOODMAN-2

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"Next, the DSEIR fails to mention that City College has an agreement and will undertake to have 500 units of student housing developed on what's called the East Basin. That is not taken into consideration.

In addition, the consideration of the building of the PAEC, and the STEAM building, is going to go on simultaneously and the DSEIR does not take into consideration the tremendous environmental problems caused by a simultaneous construction on the East Basin and the West Basin, which will result in virtually no parking remaining."

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [*O-WPA1-3*])*

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"CCSF Student Housing Project

The DSEIR fails to mention in the cumulative analysis that CCSF will proceed with the construction of 500 units of student housing on the campus which was discussed at a Balboa Reservoir CAC meeting on June 10, 2019. Such a project would only exacerbate the lack of adequate parking, as well as creating additional secondary impacts on transportation, air quality and noise. The related impacts from this foreseeable Project should be included in the cumulative impact analysis."

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [*O-WPA3-7*])*

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"Further, *Antioch v. Pittsburg* (1986) 187 Cal. App. 3d 1325 (*http://resources.ca.gov/ceqa/cases/1986/antioch_121686.html*) Stands for the proposition that an EIR must consider cumulative impacts on

future projects. CCSF is planning to do additional construction on the upper parking lot adjacent to the Project, namely a Performing Arts Education Center and a STEAM building. But the DSEIR failed to consider the impact of the Project on this future construction. The FSEIR must review and evaluate this impact.

Further, California Code of Regulations, Title 14, 15125 (c) states: *Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a unique educational institution that provides services for tens of thousands of students daily, and employment for many more thousands. It is the only Community College in San Francisco, with a long and storied history of serving the entire City of San Francisco. There is no question that the Project will impact City College. The DSEIR is inadequate since it fails to comprehensively consider the environmental impacts of the Project on City College. The FSEIR must rigorously review all the substantial environmental impacts on City College in accordance with CEQA. Failure to do so would result in a flawed and inadequate FSEIR."

*(Jean Barish, Letter, September 20, 2019 [*I-Barish-22*])*

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"Approach to Cumulative Impact Analysis (p. 3.A-8) The DSEIR states: *At the time of this DSEIR preparation, the project description detail for the facilities master plan projects for the Ocean Campus is limited, City College may change those projects or their details depending on funding availability, and City College has not conducted CEQA analysis for those projects. Therefore, the cumulative analysis for this SEIR will qualitatively assess the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the "City College Facilities Master Plan" using best available information at the time of this SEIR preparation.* (p. 3.A-14)

An analysis based on "best available information" is inadequate. CEQA reviews should not be based on speculation, but on quantifiable, objective data. The fact that the City College FMP is ambiguous and uncertain at this time raises serious questions about the validity of any conclusions about Cumulative Impact Analyses."

*(Jean Barish, Letter, September 20, 2019 [*I-BARISH3-23*])*

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"Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!"

*(Charles Belbin, Email, September 22, 2019 [*I-BELBIN-3*])*

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"I had attended many of the Reservoir project meetings providing comment and concerns on the proposals. Also indicating the joint/dual nature of the Balboa Reservoir and CCSF planning efforts and that they should not be looked at independently, but jointly as cummalative impacts on an area.

This is very similar to the growth impacts of SFSU-CSU and Parkmerced and Stonestown. The growth and impacts of institutions in the areas and the flow of traffic along ocean ave is directly impacted by the ongoing developments and the increased traffic which will occur with this development. The City College masterplan is underway but does not indicate the fact that they have considerable land to redevelop, and this includes the eastern edge of their property which abuts the freeway and can easily be transformed vertically into parking with buildings above using a layering concept to allow joint use of the parking for the CCSF and other adjacent parking needs for BART, LWHS, and even the Balboa Park, and Police station across the freeway."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-2*])*

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## Response CU-1: Cumulative Analysis

Comments state that the draft SEIR cumulative analysis is inadequate because it is not based on quantifiable data, and does not analyze the proposed project's cumulative impacts on City College. The comments also state that the cumulative analysis does not take into consideration other potential City College projects such as student housing, the City College Performing Arts Education Center, and the STEAM building.

The cumulative impact analysis in the draft SEIR is consistent with CEQA. Cumulative impacts, as defined in CEQA Guidelines section 15355, refer to two or more individual effects that, when taken together, are "considerable" or that compound or increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project added to the impacts of other closely related past, present, or reasonably foreseeable future projects.

Two approaches to an adequate discussion of cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1): (a) the analysis can be based on a list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts; or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The projections model includes individual projects and applies a quantitative growth factor to account for other growth that may occur in the area. The analyses in the SEIR employ both the list-based approach and a projections-based approach, depending on which approach best suits the individual resource topic being analyzed. The cumulative impact analysis in the draft SEIR is consistent with CEQA Guidelines section 15130.

Based on review of the June 10, 2019, meeting audio recording of City College's update[63] and draft meeting notes,[64] the concept of additional housing on the east basin has been discussed at previous board meetings, but further action has not been taken to study the potential east basin housing (such as in the facilities master plan or environmental review), or to undertake or implement this project; thus this concept of additional housing is speculative and not reasonably foreseeable in the cumulative analysis. Even if this proposal were reasonably foreseeable, the cumulative impacts from this proposal would likely be covered by the draft SEIR cumulative analysis, as explained below.

Potential cumulative impacts of the facilities master plan projects construction on the east basin are considered in the draft SEIR. Section 3.A.6, Approach to Cumulative Impact Analysis on draft SEIR pp. 3.A-10 and 3.A-14, describes the recommendations for the Ocean Campus in the facilities master plan, as well as projects that could be funded by a bond measure, which passed on March 3, 2020. Because of the differences between the facilities master plan and the bond measure projects, the cumulative analysis qualitatively assess "the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the 'City College Facilities Master Plan' using best available information at the time of this SEIR preparation."

The draft SEIR appropriately considers the facilities master plan projects in its cumulative analysis. At the time the Notice of Preparation was published in October 2018, the facilities master plan had not been adopted by the City College Board of Trustees. The draft SEIR acknowledges on p. 3.A-10 that the facilities master plan was adopted in March 2019. As stated on draft SEIR p. 3.A-14 (and as updated in RTC Chapter 5), "[a]t subsequent 2019 Board of Trustees meetings, City College staff presented a facilities planning update on a potential bond measure that would be anticipated to fund construction of the facilities master plan projects…[i]n that update, a number of the facilities master plan projects were included in the list of potential bond-funded improvements. However, the East Basin Parking Garage was no longer included, the Performing Arts and Education Center was replaced by a new Diego Rivera Theater and a smaller STEAM building (both on the east basin), and a Student Development Building was proposed at the location of the existing Creative Arts Extension Building."

The bond measure, which passed on March 3, 2020, listed a range of project types that could be funded by the bond for the City College campus system: "the types of authorized projects of the measure also include…facility master plan preparation and updates, environmental studies…[i]n addition to the projects listed above, repair, renovation and constructions may include, but not be limited to, some or all of the following:…build new or renovate existing facilities such as a Science, Technology, Engineering Art and Math (STEAM) building… fine and theater arts and visual arts and performing arts facilities …construct parking facilities"[65] At the time of this RTC document publication, the City College Board of Trustees are still required to allocate and authorize bond

[63] Balboa Reservoir Community Advisory Committee City & County of San Francisco, Item 4-Updates from City College (audio), *https://media.sfplanning.org/audio/cac/balboareservoir_CAC_Audio-061019-04.mp3*, accessed January 7, 2020.

[64] Balboa Reservoir Community Advisory Committee City & County of San Francisco, Meeting Minutes, June 10, 2019, *https://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir_CAC_Unapproved_Meeting_Minutes-06102019_revised.pdf*, accessed January 7, 2020.

[65] City and County of San Francisco Department of Elections, *City College Job Training, Repair and Earthquake Safety Measure,* March 3, 2020, *https://voterguide.sfelections.org/en/city-college-job-training-repair-and-earthquake-safety-measure,* accessed March 26, 2020.

funding towards specific projects, including potentially those identified in the facilities master plan at the Ocean Campus. As noted on draft SEIR p. 3.A-14, the projects identified in the facilities master plan are still required to undergo a separate CEQA review process. The cumulative analysis in the draft SEIR is conservative in that it identifies potential facilities master plan projects or bond measure projects where appropriate. The draft SEIR acknowledges that there is no quantifiable data available from City College related to the facilities master plan projects; therefore, the analysis is based on conservative assumptions regarding what is reasonably foreseeable, and the analysis does not engage in speculation. CEQA Guidelines section 15130(b) states that the discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project along. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact."

The cumulative transportation-related construction impacts are discussed under Impact C-TR-1 on draft SEIR p. 3.B-91 and states that "construction of the proposed project or variant may overlap with construction of other cumulative development and transportation infrastructure projects, *including new development and/or modernization of existing buildings as part of the City College Facilities Master Plan* … although the City College facilities master plan projects would not be required to comply with all of the city's requirements, they would be required to adhere to the blue book regulations addressing transportation-related circulation, access, staging and hours of delivery when working on city streets."

Cumulative transportation-related operational impacts are discussed under Impacts C-TR-4 to C-TR-6b on draft SEIR pp. 3.B-92 to 3.B-102. The analysis under each cumulative transportation-related operational impact qualitatively assesses the potential impacts of the facilities master plan projects. As stated on draft SEIR p. 3.B-95, "the transit delay contribution from City College's Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology." The analysis concludes that cumulative transit delay would be significant even with the implementation of Mitigation Measure M-C-TR-4.

The cumulative air quality-related construction impacts are discussed under Impact C-AQ-2 on draft SEIR p. 3.D-92. As stated on draft SEIR p. 3.D-92, the cumulative projects "could include the City College Performing Arts Center… and is anticipated to be under construction for 24 months from 2021 to 2023." The cumulative air quality analysis states that new sensitive receptors "could potentially be exposed to the project's construction and operational toxic air contaminant emissions if the new receptors are present in the near future." The project-level health risk assessment identified sensitive receptors that are close to where the new City College facilities master plan projects might be located, and acknowledges that possibility that these projects could generate construction-related toxic air contaminant emissions at the same time as the proposed project. The analysis concludes that the proposed project in combination with nearby cumulative projects

would result in significant health risk impact on offsite and onsite sensitive receptors with respect to increased cancer risk, even with the implementation of Mitigation Measures M-AQ-2a, M-AQ-4a, and M-AQ-4b.

The draft SEIR noise section qualitatively assesses the impacts of the facilities master plan projects including the potential Performing Arts and Education Center building on the east basin under Impact C-NO-1 on draft SEIR pp. 3.C-38 to 3.C-39. As stated on draft SEIR p. 3.C-39, "with respect to existing offsite receptors, the closest cumulative project where concurrent construction would have the potential to cumulatively increase noise levels at existing sensitive receptors would be the City College East Basin Parking Structure, although the Performing Arts Center is also in the same campus area, which is located approximately 80 feet south of Archbishop Riordan High School." The cumulative noise analysis is conservative in which it considers the worst-case scenario (i.e., the East Basin Parking Structure being the closest facilities master plan project) would be constructed near Archbishop Riordan High School (sensitive receptor). The analysis concludes that the proposed project in combination with nearby cumulative projects would result in significant construction-related noise impacts on sensitive receptors, even with the implementation of Mitigation Measure M-NO-1.

As described above, where the draft SEIR determines cumulative impacts to be significant, mitigation measures to reduce those cumulative impacts to the extent feasible are identified. Therefore, the cumulative analysis appropriately considers the growth and development information available for the City College Ocean Campus at the time of the draft SEIR preparation.

# 4.H Initial Study Topics

The comments and corresponding responses in this section cover topics in the initial study (draft SEIR Appendix B). These topics are related to:

- Plans and Policies [PP]
- Land Use and Land Use Planning [LU]
- Population and Housing [PH]
- Wind [WI]
- Shadow [SH]
- Utilities and Service Systems [UT]
- Public Services [PS]
- Biological Resources [BI]
- Geology and Soils [GE]

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## Plans and Policies

The comments and corresponding responses in this section cover topics in initial study Section C, Compatibility with Existing Zoning and Plans (draft SEIR Appendix B). These include topics related to:

- Comment PP-1: General Plan, Zoning Controls, Height Limits, Balboa Park Station Area Plan; SFPUC Land Use Framework

### *Comment PP-1: General Plan, Zoning Controls, Height Limits, Balboa Park Station Area Plan, SFPUC Land Use Framework*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-ADAMS-2 | I-BARISH3-41 | I-JA11-5 |
| I-BARISH3-2 | I-BARISH3-6 | I-JA11-6 |
| I-BARISH3-3 | I-BERNSTEIN4-1 | I-TARQUINO-11 |
| I-BARISH3-36 | I-HANSON4-1 | I-TARQUINO-12 |
| I-BARISH3-37 | I-JA5-1 | I-TARQUINO-8 |
| I-BARISH3-4 | I-JA11-4 | I-WORLEY-4 |
| I-BARISH3-40 | | |

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"We've heard remarks about zoning. This project's going to require a zoning change. Spot zoning is the substance of federal lawsuits. When a neighborhood is zoned a certain way and people,

developers, come in and capture a spot, and create a spot zone exception to the normal asset value of a consistently zoned neighborhood, that's lawsuit material."

*(Michael Adams, CPC Hearing, September 12, 2019 [*I-ADAMS-2*])*

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"This DSEIR is a project-level EIR that is tiered from a previously certified program-level EIR ("PEIR")

The Project is a portion or sub-set of the Balboa Park Station Area Plan (the "Plan"). To better understand some of the defects with the DSEIR, it is important to refer to the Plan and several of its Objectives and Policies.

(http://generalplan.sfplanning.org/Balboa_Park_Station.htm#BPS_HSG)

Policy 1.4.2 states: *If the PUC should decide that the west basin is not needed for water storage, it should consider facilitating the development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. The development on the site should recognize the opportunity to knit the surrounding neighborhoods together through the creation of a community open space and pedestrian connections.*

Policy 1.4.2, therefore, states that at best, only part of the west basin would be used for housing. The development of a project with up to 1,550 units goes far beyond partial development of the reservoir. It should be scaled back to be compliant.

Policy 4.4.1 states: *"If the PUC should decide that the west basin is not needed for water storage, it should consider development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. Affordable housing should be considered a high priority per Policy 4.5.1."*

and

Policy 4.5.1 states: *"…Where publicly-owned parcels are being developed, … city policy directs that surplus public property be considered for development of affordable housing. Thus, when offering their land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income.*

Since the Project only requires the developer to provide less than 1/3 affordable units, it is not compliant with the Plan policies. This must be considered when the Final SEIR ("FSEIR") is prepared.

Policy 6.4.1 states: *Regardless of scale, new development should add to the district's character, create a human scale public realm, and fit within the city's traditional fabric; regardless of architectural style. Larger-scale development efforts must take great care to not overwhelm the scale of the area and to positively establish a pedestrian-scale pattern. Urban design guidelines have been developed for the plan area and compliance with the guidelines is mandatory.*

The Project is massive and out of scale with the surrounding neighborhoods. It will have buildings up to 8 stories high, casting shadows on public open space and Archbishop Riordan High School. It will dwarf the single family homes surrounding it, and it will remove open space that is used by City College of San Francisco ("City College") for both parking and recreational purposes. A Feasible Alternative must be considered. In view of the foregoing, the Project is not in accord with the Plan and needs to be revised accordingly."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-2*])*

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"Balboa Park Station Area Plan (p. B-3)

The area plan's land use map designates the site's land use as P (Public), and the height map indicates a 40-foot height limit (Maps 3 and 6). However, the Project will include buildings up to 78 feet in the Developer's Proposed Option and up to 88 feet in the Additional Housing Option. (B-4) The FSEIR must provide substantial evidence explaining why this increase in height limit will not have an unanticipated and significant environmental impact."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-3*])*

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"The Accountable Planning Initiative (p. B-5)

Under Proposition M, planning policies must include conservation and protection of existing housing and neighborhood character (B-5). The DSEIR fails to discuss how the will impact neighborhood character. In accordance with Proposition M, the FSEIR must provide substantial evidence explaining this analysis."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-4*])*

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"Land Use Impacts

*Impact LU-2: No conflict with applicable land use plans (p. B-14)*

According to this section, the proposed project would require rezoning to permit structures up to 88 feet tall. It would appear, therefore, that any significant land use conflict can simply be mitigated by rezoning the land. This appears to be an abuse of legislative discretion. The FEIR must consider the appropriateness of this rezoning option."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-6*])*

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"***The DSEIR must consider the impact of the change of zoning***

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-36*])*

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"***The DSEIR must consider the option of leaving open space***

The Balboa Reservoir is currently open space that allows for vistas of the Pacific Ocean to the Farralones from the CCSF Science Building. The BPS Area Plan contains a Streets and Open Space Element. Why is this consideration left out?"

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-37*])*

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"***The DSEIR must consider the option of leaving open space***

The BPSAP contains a Streets and Open Space Element. Why is this left out?"

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-40*])*

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"Objective 1.4 of the Balboa Park Station Area Plan, regarding Land Use--

'This Plan encourages the owners of this site-to develop the reservoir in a manner that will best benefit the neighborhood, the city, and even the region as a whole.'

Housing is one recommendation, along with this excerpt from the Streets and Open Space Element of the Balboa Park Area Station Plan, p. 30:

'A number of open spaces are proposed in the plan area, including the Phelan Loop Plaza, the Geneva Plaza, open space associated with the proposed freeway deck, Brighton Avenue, the Library playground and the proposed Balboa Reservoir open space."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN4-1*])*

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"***Summary of Land Use Impacts in the PEIR*** (p. B-12)

This section omits the fact that a zoning change from P (Public) to a Special Use District is A BIG DEAL. Privatizing public land by a private developer is A BIG DEAL.

Since the certification of the BPS Final EIR, there has been a major change in the housing development environment for surplus public sites.

At the time of the PEIR, only non-profit agencies were able to buy and build on public surplus lands.

2015 Prop K Public Land for Housing ended the restriction that only non-profit builders could use public lands for housing. With the passage of Prop K, private for-profit developers were allowed to cash in on a bonanza to privatize public lands.

**The change of zoning from P to SUD to enable privatization of public land is a new condition that did not exist at the time of the PEIR. A LTS determination based on conditions that did not exist at the time of the PEIR requires fresh treatment in SEIR.**"

*(Alvin Ja, Email, September 11, 2019 [*I-JA11-4*])*

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"* The DRAFT SEIR must consider the impact of the change of zoning"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-8*])*

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"The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing."

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-11*])*

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"***The DRAFT SEIR is inadequate because it fails to consider the impact of the zoning change***

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE with no analysis of the impact this would have. The change is justified by the fiction of offering "affordable housing" when, in reality, most of the units will be market-rate housing."

*(Jennifer Worley, Email, September 23, 2019 [*I-WORLEY-4*])*

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"**The entire Reservoir Project process has avoided discussion or application of the State Surplus Property Statute:**

**STATE SURPLUS PROPERTY STATUTE**

The State Surplus Land Statute 54222 says:

*Any local agency disposing of surplus land shall send, prior to disposing of that property, a written offer to sell or lease the property as follows:*

*(c) A written offer to sell or lease land suitable for school facilities construction or use by a school district for open-space purposes shall be sent to any school district in whose jurisdiction the land is located.*

PUC's principle of market rate return is not absolute. SF Administrative Code 23 for Real Property Transactions calls for:

SF Administrative Code 23.20 states

*Transfers of Real Property pursuant to this Article shall be paid for no less than 100% of the appraised value, except where the Board of Supervisors determines by resolution that a lesser sum will further a proper public purpose, and provided that the Public Utilities Commission shall be paid at least the historical cost of such Real Property.*

SF Administrative Code 23.3 for Real Property Transactions calls for:

*'… sales price of at least 100% of the appraised value of such Real Property, except where the Board determines either that (a) a lesser sum will further a proper public purpose, or…'*

The Balboa Park Station Area Plan had called for developing the Reservoir to 'best benefit the Neighborhood, City, Region as a whole.' Yet any analysis of what constitutes 'best benefit' has been bypassed. Instead, by fiat, the City declared that the Reservoir would be used for housing to be developed by private developers. And despite the teacher shortage, consideration for teacher housing by school has been minimized.

**The Reservoir Project has apparently ducked the State Surplus Property Statute's requirement that the property be offered for school facilities construction. This omission should trigger treatment in the SEIR.**"

*(Alvin Ja, Email, September 11, 2019 [*I-JA11-6*])*

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## SFPUC Land Use Framework

"***The DSEIR must consider the impact of creating a nuisance***

The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that *Land may be sold or transferred when…Use of the land sold is not to result in activities creating a nuisance.*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-41*])*

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"This section of the SEIR provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site.

3.B.5 as it is written in the SEIR, critically omits the Land Use Framework that was adopted by the San Francisco Public Utilities Commission in 2012. The lease and sale of PUC property is governed by this SFPUC document, 'FRAMEWORK FOR LAND MANAGEMENT AND USE.' The document lays down conditions for sale of SFPUC land to include Economic, Environmental, and Community criteria.

Here is the excerpt from the SFPUC Land Use Framework:

4. Use of the land sold will not to result in activities creating a nuisance.

The Balboa Reservoir Project fails enormously to uphold Condition 4 of 'Community Criteria.'"

*(Christine Hanson, Email, September 23, 2019 [*I-HANSON4-1*])*

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"3.B.5 Regulatory Framework

*This section provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site. No federal regulations, plans, or policies are relevant to the project.*

3.B.5 critically omits the Land Use Framework that was adopted by the Public Utilities Commission in 2012, attached (PUC Resolution 12-0044).

**Balboa Reservoir in context of PUC's Land Use Framework**

The lease and sale of PUC property is governed by the PUC document, 'FRAMEWORK FOR LAND MANAGEMENT AND USE.'

The document lays down conditions for sale of PUC land to include economic, environmental, and community criteria.

The Balboa Reservoir Project has been promoted as part of the Public Land for Housing Program whose purpose is to build affordable housing.

Public Land for Housing in the context of Balboa Reservoir, will fail its overarching goal of affordability. Instead, Balboa Reservoir will achieve 67% unaffordable housing, in exchange for 33% affordable housing.

The PUC Land Use document states:

*COMMUNITY CRITERIA: Land may be sold or transferred when:*

*1. The sale or transfer is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.*

*2. The sale or transfer would not significantly adversely affect the implementation of an adopted resource agency plan for the area.*

*3. The sale would not increase the risk of loss, injury or death to SFPUC employees or others on or near the parcel.*

*4. Use of the land sold will not to result in activities creating a nuisance.*

The Balboa Reservoir Project fails Condition 4 of 'Community Criteria.'

The current plan removes existing parking for City College students. It deliberately limits parking within the Reservoir to 0.5 parking spaces per residential unit in the unrealistic expectation that this will discourage car ownership by new Reservoir residents.

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance that would inhibit student enrollment and attendance at City College [The word 'nuisance' understates the problem].

The Balboa Reservoir Project fails to comply with PUC's 'Framework for Land Management and Use.'

The sale of Balboa Reservoir to private developers would provide a short–term cash infusion to PUC Water Enterprise. However the short-term gain of quick cash doesn't justify losing this valuable piece of public land in perpetuity to private developers in the guise of 'affordable housing.'

**The draft SEIR is deficient in its omission of the PUC Land Use Framework within the Regulatory Framework.**"

*(Alvin Ja, Email, August 26, 2019 [*I-JA5-1*])*

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"***Impact LU-2: The proposed project would not conflict with any applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)***

The Initial Study fails to assess the PUC Land Use Policy. The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states: '*Use of the land sold is not to result in activities creating a nuisance.'*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa

Reservoir Project will result in creating a substantial traffic and parking nuisance [The word 'nuisance' understates the problem].

From earlier submission to the Reservoir CAC and City Team:

**PUC LAND USE POLICY**

1. The RFQ's section on Applicable Land Use Policies makes no reference to the PUC's own 'Framework for Land Use and Management.'

2. From the PUC website: By adoption of the Framework, the Commission is seeking to advance the analytical and decision-making process surrounding the administration of real estate assets under the SFPUC's exclusive jurisdiction.

**3.** PUC's Land Use Framework policy allows sale only if: *'Use of the land sold will not result in creating a nuisance.'*

***4.*** Even though the PUC Land Use Framework was formulated to focus on 'Land Management Guidance for…Disposition of SFPUC Lands,' The City Team has dismissed the importance of this policy document: '*It is not necessary, or feasible, for an RFQ to name all of the City policies and procedures that apply to the project.*' [from Staff Response to '*Why doesn't the RFQ discuss the SFPUC Land Use Framework?'*]

Importantly, Staff misstated the essence of the question. **The real question was whether or not the intended disposition of the PUC Reservoir property complies with PUC's policy on 'Disposition of SFPUC Lands'; the question was not whether the Land Use Framework policy is 'named.'**

**The PUC Land Use Framework was adopted post-PEIR. Its requirement that use of the Reservoir not result in a nuisance should be enforced.**"

*(Alvin Ja, Email, September 11, 2019 [*I-JA11-5*])*

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"*** The DRAFT SEIR must consider the impact of creating a nuisance**

**The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that Land may be sold or transferred when….Use of the land sold is not to result in activities creating a nuisance.**

**Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word 'nuisance' understates the problem]. Please listen to the people of S.F. and this neighborhood.**"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-12*])*

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## Response PP-1: General Plan, Zoning Controls, Height Limits, Balboa Park Station Area Plan, SFPUC Land Use Framework

Comments state that the project is not consistent with a number of plans, policies, and regulations including, but not limited to the Balboa Park Station Area Plan, zoning, disposition of surplus property, and SFPUC's "Framework for Land Management". Other comments also state that the draft SEIR did not evaluate impacts from rezoning and impacts on neighborhood character with respect to building scale and height.

Comments regarding shadow on public open space and non-public open space (such as Archbishop Riordan High School) are addressed in Response SH-1, Shadow Impacts, on RTC p. 4.H-21, and Response SH-2, Non-CEQA Shadow Effects, on RTC p. 4.H-23, respectively.

Concerning parking and traffic generally, refer to Response TR-7, Parking, on RTC p. 4.C-61 and Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Comments regarding City College parking are addressed in Response PS-2, Public Services and Secondary Impacts, on RTC p. 4.H-59.

The response to plans and policies comments is organized by the following subtopics:

- General Plan, Zoning Controls, Height Limits
- Balboa Park Station Area Plan
- Disposition of Surplus Property

An EIR is required to discuss inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans; the EIR need not resolve them though.[66] The draft SEIR is compliant with these CEQA requirements.

### *General Plan, Zoning Controls, Height Limits*

Draft SEIR Appendix B, Section C, Compatibility with Existing Zoning and Plans, discusses potential inconsistencies of the proposed project with applicable local plans and policies, as well as conflicts with regional policies. The draft SEIR acknowledges that the proposed project would not be consistent with the site's current P (Public) zoning and would require rezoning to a new Balboa Reservoir Special Use District. As stated on draft SEIR Appendix B, pp. B-14 to B-15, inconsistencies with existing plans and policies do not, in and of themselves, indicate a significant physical environmental effect. To the extent that adverse physical environmental impacts may result from such inconsistencies, the draft SEIR evaluates the environmental impacts resulting from such inconsistencies in draft SEIR Chapter 3 and draft SEIR Appendix B. To the extent that such substantial physical environmental impacts may result from such conflicts, the draft SEIR discloses and analyzes the physical impacts under the relevant topic sections, including, but not limited to, draft SEIR Section 3.B, Transportation and Circulation; draft SEIR Appendix B Section E.10, Wind and Section E.11, Shadow.

[66] CCR Title 14 section 15125

Changes to neighborhood character are not considered significant environmental effects under CEQA unless the changes would result in a substantial adverse physical change in the environment. Physical environmental effects related to building height, such as wind and shadow, are discussed in the draft SEIR Appendix B, Sections E.10 and E.11, respectively. Concerning aesthetic impacts, including views and vistas, draft SEIR Appendix B, Section E.2, Aesthetics (B-16), explains that, pursuant to CEQA section 21099, "aesthetic impacts of a residential or mixed-use residential project on an in-fill site in a transit priority area *shall* not be considered significant impacts on the environment." [Emphasis added.] Therefore, the draft SEIR does not evaluate the effects on neighborhood character or scale. It is acknowledged that the Balboa Park Station Area Plan includes language accompanying Policy 6.4.1 stating that "new development should add to the district's character, create a human scale public realm, and fit within the city's traditional fabric." This policy consideration may be evaluated by the decision-makers, including the planning commission and board of supervisors, along with other policy matters—including those set forth by Proposition M—in their deliberations on the project.

Concerning the allegation of "spot zoning," a zoning change cannot, in itself, result in physical change. As stated above, to the extent that physical environmental effects could result from the proposed rezoning, these effects are analyzed in the applicable topic sections of the draft SEIR.

Concerning the comment that a "significant land use conflict can simply be mitigated by rezoning," thereby resulting in "an abuse of legislative discretion," this statement is incorrect. As discussed above, a project's inconsistency with an applicable plan or policy does not, in itself, lead to a significant impact under CEQA unless the conflict would result in adverse changes in the physical environment. It is also within the purview of the board of supervisors, as the City and County of San Francisco's legislative body, to make changes to various laws governing San Francisco, including the San Francisco Planning Code.

### *Balboa Park Station Area Plan*

Regarding the statement that the Balboa Park Station Area Plan called for the SFPUC to consider, if water storage at the site were determined not to be needed, "development of a mixed-use residential neighborhood" on only "part of" the Balboa Reservoir west basin (Plan policy 1.4.2). The project would not be inconsistent with this policy. The proposed project is a mixed-use residential project on part of the site.

Concerning the area plan's Streets and Open Space section, the area plan identifies anew open space to be created on the project site ("the western portion of the Balboa Reservoir"). The area plan also identifies housing on the project site ("Policy 4.4.1—Develop housing on the West basin if it is not needed for water storage"), and therefore it cannot reasonably be assumed that the area plan proposed that the entire project site would be devoted to open space. The proposed project would include approximately 4 acres of publicly accessible open space, as stated on draft SEIR p. 2-21, including an approximately 2-acre park in the center of the site. The project would also include three pedestrian connections from and through the site to Ocean Avenue and pedestrian access to Unity Plaza, Frida Kahlo Way, and San Ramon Way.

Regarding the statement that the project site "is currently open space," no portion of the project site is formally designated by San Francisco Recreation and Parks Department or other city agencies as open space under existing conditions. As described on draft SEIR p. 2-7, a large portion of the project site is occupied by an asphalt-paved 1,007-space parking lot. The parking lot is surrounded on three sides by sloping western, northern, and eastern edges. Much of the northern and western slopes are concrete-covered or, in the case of the access road to the parking lot, paved with asphalt. The tops of the northern and western slopes contain a paved pathway that is used for informal recreational purposes, while the eastern slope contains pathways and stairs that provide access to the parking lot. Further, as noted above, the proposed project would provide approximately 4 acres of publicly accessible open space as well as pedestrian connections to and through the site.

### *Disposition of Surplus Property*

The proposed project would not be inconsistent with Proposition K, approved by San Francisco voters in 2015, which states that "surplus property developments with 200 or more units would allow mixed-income projects and would also require at least 33 percent of the housing in each such development to be made permanently affordable to low- and moderate-income households." As stated on draft SEIR p. 2-13, up to 50 percent of the residential units to be developed pursuant to the project would be income-restricted; that is, affordable to persons earning between 55 and 120 percent of the area median income. As defined by the Mayor's Office of Housing and Community Development, based on state and federal guidelines, families earning up to 80 percent of area median income are classified as "low income,"[67] while those earning between 80 percent and 120 percent of area median income are classified as "moderate income." Therefore, the proposed project would exceed Proposition K's requirement with respect to affordable housing.

Regarding the potential change in ownership of the project site from a public agency to a private entity, a transfer of ownership would not, in itself, result in any physical environmental impacts. Likewise, the nature of the developer—non-profit or for-profit or, as here, a combination thereof—has no bearing on a project's physical environmental impacts.

Concerning state law governing disposition of surplus property, California Government Code section 54221(f)(1)(F)(ii) exempts from the definition of surplus property a "mixed-use development that is more than one acre in area, that includes not less than 300 housing units, and that restricts at least 25 percent of the residential units to lower income households … for a minimum of 55 years for rental housing and 45 years for ownership housing." This statute's definition of "lower income households" is the same as low income households discussed above—those earning less than 80 percent of area median income. Regardless, this comment does not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's analysis of physical environmental impacts that require a further response.

Regarding the provisions in the San Francisco Administrative Code concerning the sales price of land disposed of by the City and County of San Francisco, the SFPUC and the board of supervisors, in considering the sale of the project site to the project sponsor, would be bound by law to follow

[67] This category is further subdivided into "very low income," meaning families earning less than 50 percent of area median income. For 2019, 80 percent of area median income for a family of four was $98,500, while 120 percent of area median income was $147,800.

the administrative code. Regardless, the comment does not raise any issue with respect to the project's potential physical environmental impacts or the draft SEIR's analysis thereof, and no further response is required.

Finally, concerning the SFPUC Framework for Land Management and Use ("land use framework"), this document was adopted by the SFPUC in 2012 by Resolution 12-0042 (not the Resolution 12-0044 cited by the commenters; that resolution dealt with an agreement between the SFPUC and the San Francisco Unified School District for the installation of solar photovoltaic systems on school district sites). The analysis in the draft SEIR does not support the commenter's statement that the project's impact on traffic and parking, including elimination of the existing parking lot on the project site that is used by City College students, faculty, and others, would create a nuisance.

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# Land Use and Land Use Planning

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B, section E.1, Land Use and Land Use Planning. These include topics related to:

- Comment LU-1: Cumulative Land Use

## *Comment LU-1: Cumulative Land Use*

This response addresses the comment from the commenter listed below; the comment is quoted in full below this list:

I-BARISH3-7

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"*Impact C-LU-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative impacts to land use. (Less than Significant) (p. B-15)*

There is no objective data to support this conclusion. Rather, the DSEIR simply states that in combination with reasonably foreseeable future projects, the Project would have less-than-significant cumulative land use impacts. But absent a quantitative analysis of all the CEQA environmental impacts, it is improper to reach such a conclusion. The FSEIR must provide substantial evidence to support its conclusion. Absent an analysis of the substantial evidence, the FSEIR will be insufficient."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-2*])*

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### Response LU-1: Cumulative Land Use

The commenter states that the final SEIR must provide substantial evidence to support the conclusion that the project would not result in significant cumulative impacts to land use.

The physical environmental effects of the project are evaluated in the draft SEIR. As discussed in Response PP-1 on RTC p. 4.H-10, the project would have a significant land use impact if the project physically divides an established community or substantially conflicts with a land use plan or policy that was adopted for the purpose of avoiding or mitigating an environmental effect, such that a substantial adverse physical change in the environment related to land use would result. The initial study concluded that the project would not create physical barriers that would divide the Plan area; rather, the project would extend a network of pedestrian and bicycle facilities through the project site (see draft SEIR Appendix B, p. B-14). The draft SEIR did not identify any conflict with a land use plan or policy that was adopted for the purpose of avoiding or mitigating an environmental effect associated with cumulative development.

Regarding the comment that a quantitative analysis of all environmental impacts is required to determine that cumulative land use effects would be less than significant, the questions to be answered by the analysis are whether the project, along with cumulative development, would physically divide an established community or cause a significant effect due to a conflict with policies adopted to avoid environmental effects. With respect to the former, the draft SEIR states on draft SEIR Appendix B, p. B-15, that cumulative development, like the proposed project, would be infill development. Therefore, neither the project nor any of the cumulative projects would divide an established community. Regarding the latter, potentially significant physical environmental effects that may result from the project along with cumulative development are discussed in each topic's relevant cumulative scenario. The commenter does not provide evidence supporting the claim that the draft SEIR's less-than-significant cumulative land use conclusion is incorrect.

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# Population and Housing

The comments and corresponding response in this section cover draft SEIR Appendix B, Section E.3, Population and Housing:

- Comment PH-1: Population Growth

## *Comment PH-1: Population Growth*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-BARISH1-4 | I-JA11-1 | I-SIMON-14 |
| I-BARISH2-6 | I-JA11-3 | I-TARQUINO-7 |
| I-BARISH3-8 | | |

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"The initial study says there would be a population increase of over 100 percent in the plan area, but then concludes there would be no significant cumulative population impacts because this is just a tiny increase compared to the total population of the City as a whole. This is a flawed apples and oranges comparison and should not be accepted."

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH1-4*])*

"2) The Initial Study says there would be a population increase of over 100% in the plan area, but concludes there would be no significant cumulative population impact because this is a tiny increase compared to the population of the City as a whole. This is a flawed apples and oranges comparison, and should not be accepted."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-6*])*

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"Population and Housing Impacts

*Impact C-PH-1 The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative population and housing impacts. (Less than Significant) (p. B-21)*

The Developer's Proposed Option and Additional Housing Option would increase the onsite residential populations by 2,530 and 3,565 respectively. Compared to the increase in population analyzed in the PEIR or 1,150 residents (Table 1, p. B-19) this is an increase of over 100% in the plan area. Yet, despite this significant increase in population compared to the PEIR, the DSEIR concludes it is not significant. It justifies this decision by saying it would not be substantial for the City as a whole. While that may be true, it improperly fails to consider the impact on the immediate neighborhood. The FEIR must thoroughly analyze this population increase within the Area Plan, not within the entire City."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-8*])*

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"I have added the following addition to "Comment on Initial Study: Land Use":

**The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review.**"

*(Alvin Ja, Email, September 11, 2019 [*I-JA11-1*])*

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"***Summary of Land Use Impacts in the PEIR*** (p. B-12)

*The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR.*

For this to be accurate, the following question would have to be answered in the negative:

*Would the project result in potentially significant effects not identified in the prior EIR?* This question examines whether or not the proposed project would result in new significant or potentially significant environmental effects that were not identified in the PEIR. This could include significant effects that are due to:

Project-specific features of the proposed project.

Substantial changes with respect to the circumstances under which the project would be undertaken, such as real estate development trends in the surrounding area or major projects that were previously unanticipated.

I contend that the answer to the question is YES, thus triggering Impact treatment in the SEIR.

The section acknowledges: *The project site was located within the Balboa Reservoir Subarea and was assumed to include up to 500 residential units.*

A later paragraph states: *The PEIR concluded that implementation of the area plan would not result in significant land use impacts and did not require any mitigation measures.*

SF Planning Dept professionals are aware that a program-level determination is not the same as a project-level determination. Otherwise, the BPS FEIR would not have necessitated project-level reviews of the Kragen Project and the Phelan Loop Project within the FEIR.

It is professionally dishonest for the Planning Dept to pretend that the BPS FEIR's program-level determination for an BPS Area Plan **area-wide** target of 1,780 units could be legitimately used to insinuate that the Reservoir Project current numbers of 1,100-1,550 units had already gotten the thumbs-up from the PEIR.

Did you forget the earlier quote of the Reservoir sub-area "*assumed to include up to 500 residential units*"?

In the context of "Project-specific features of the proposed project", by any objective measure, jumping from 500 units in the program-level PEIR to 1,100-1,550 units in the current two Reservoir options is a big increase of 120% and 210% respectively.

The area-wide target of 1,780 units is shown on the Area Plan Development Status Sept 2018 Update pdf. It consists of 790 Tier 1 (0-5 yrs) units and 990 Tier 2 ( 5-20 yrs) units. The pdf shows 482 units built or underway. This leaves an area-wide shortfall of 1,298 units.

Although I can understand the desire to achieve this area-wide target, forcing a square peg into a round hole out of desperation will not succeed without imposing adverse impacts onto the Reservoir vicinity. Trying to force the Reservoir Project-- targeted for 500 units in the PEIR--in order to fulfill the 1,298 unit area-wide shortfall is an objectively significant Reservoir impact.

**The approval and certification of the program-level BPS Final EIR with an area-wide target of 1,780 units does not equate with a LTS determination for a project-level 1,100-1,550 Reservoir units. The Initial Study merely manipulates words and paragraphs to imply and assert, without evidence, that:**

*"The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR."*

**The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review.**"

*(Alvin Ja, Email, September 11, 2019 [*I-JA11-3*])*

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"The DRAFT SEIR does not consider the impact of increasing the number of units from the original recommendation in the PEIR. The Reservoir Project's two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR's Housing option for the Reservoir referred to 425-500 units.

From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-14*])*

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"From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR.

The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes 'substantial unplanned growth.'"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-7*])*

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## Response PH-1: Population Growth

Comments state the cumulative population impacts analysis is flawed and inappropriately compares population growth citywide as opposed to plan area. Comments also state the current proposal increasing the number of units between the PEIR and draft SEIR constitutes substantial unplanned growth.

As noted in Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. 4.A-3, the area plan does not place a cap on the number of units within the plan area or at the project site. The PEIR assumed 500 units at the project site for purposes of program-level analysis and this SEIR is evaluating, among other things, the potential impacts associated with the greater number of units than assumed in the PEIR. The purpose of the SEIR is to provide project-level environmental review and analyze whether the proposed development at the project site (compared to the 500 residential units and 100,000 square feet of open space assumed in the PEIR) would be within the scope of the program-level analysis or if the project would result in new significant impacts or substantially more severe significant impacts identified in the PEIR. For topic areas where the increased number of units could cause environmental impacts not adequately covered by the PEIR, the SEIR analyzes those impacts. The use of the PEIR to focus the second-tier

review and applicable principles in the CEQA Guidelines are further explained in Response CEQA-1.

The analysis relies in part on the citywide projections provided in the Plan Bay Area 2040 Final, which serve as *planned* City growth. Impact PH-2 (draft SEIR Appendix B, pp. B-19 to B-21) and draft SEIR Section 4.A, Growth-Inducing Impacts, evaluates whether the project would directly or indirectly induce substantial *unplanned* growth in the area. As discussed there, the Association of Bay Area Governments' (ABAG) population growth projection for the Balboa Park Priority Development Area is 9,855 by 2040, and the proposed project's maximum population increase would represent approximately 36 percent of this planned growth within the Balboa Park Priority Development Area during that period. The ABAG growth projections for the Balboa Park Priority Development Area represent planned growth in the area because Priority Development Areas are locally designated areas within existing communities that have been identified and approved by local cities or counties for future growth. The proposed project would result in a higher portion of anticipated growth to occur at the project site, which is within a designated regional Priority Development Area, rather than elsewhere in the city. Consistent with Plan Bay Area, development under the project would accommodate a portion of the city's share of anticipated regional growth.

Impact C-PH-1 (draft SEIR Appendix B, pp. B-21 to B-22) and draft SEIR Section 4.A, Growth-Inducing Impacts (draft SEIR pp. 4-1 to 4-3), provides an evaluation of potential cumulative growth-inducing impacts. The SEIR determines that the proposed project would not result in a significant growth-inducing impact, either directly or indirectly.

As stated on draft SEIR pp. 4-2 to 4-3, "[t]he increase in the residential and employment population on the project site would not result in a substantial or unplanned increase in the population of the project vicinity or the city because it would be located on an infill site in an urbanized area. Growth associated with the project site would be consistent with the City's identification of Balboa Park as an area of San Francisco where future growth will be focused." The proposed project would not result in substantial unplanned growth because while the project would increase the residential population on the site, this growth is accounted for within the planned growth for San Francisco.

Further, the purpose of the question is if such unplanned growth could result in physical environmental impacts. As addressed under their respective topics in the draft SEIR and draft SEIR Appendix B, this project-related growth would be served by existing infrastructure, and public services. The proposed project also would not indirectly result in growth inducement because it would be located on an infill site in an urbanized area. Although the proposed project would involve extensions of Lee Avenue and other infrastructure, such facilities would not enable additional development in other currently undeveloped areas. The project also would not remove any existing barriers to growth in the surrounding area. Thus, for the reasons summarized above and described in the draft SEIR, the project's growth inducement impacts would be less than significant.

# Wind

The comments and corresponding response in this section cover draft SEIR Appendix B, topic E.10, Wind:

- Comment WI-1: Wind Impacts

## *Comment WI-1: Wind Impacts*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HEGGIE2-23
I-MUELLER2-4

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"20. Wind Impacts:

The creation of wind tunnels is a risk of constructing buildings up to or over 80 feet. But the DEIR indicates there is no significant impact from wind. To anyone who lives, studies or works in the area, the power of the wind coming off the ocean is already well known. To mitigate the risk of tunneling already strong winds into educational and residential communities, no new building should exceed 79-80 feet. The developers' option does not exceed 80 feet, but the additional housing option is likely to create wind tunnels. If San Francisco wants to sweep the many young children who congregate in the area off their feet, the additional housing option will do it."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-23*])*

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"Also, the particular situation of the land under consideration for this extremely dense proposed housing development was not fully researched in conjunction with the high wind velocity coming directly from the ocean to that property through what is commonly called The Gap. In this DSEIR, the only comments about wind concerned the effects that may be generated involving tall buildings. It did not describe the actual complex wind situation in this particular land area."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER2-4*])*

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### Response WI-1

The comments state that existing conditions in the project vicinity are windy and that the proposed project, particularly the Additional Housing Option, would result in adverse wind conditions.

The draft SEIR Appendix B, p. p. B-42, describes the existing wind environment at the project site, making specific reference to the fact that historical wind data from Fort Funston (generally due west, and thus upwind, of the site) "show that there is reasonable consistency between the Civic Center and the Fort Funston meteorological stations, regardless of their substantially different locations. Similar to Civic Center, the majority of strong winds at Fort Funston were recorded as

blowing from the south-southwest through the north-northwest." This is relevant because San Francisco's most complete wind record is from the Civic Center meteorological station, and it is based on the Civic Center data that the initial study generally describes as the existing wind environment in San Francisco.

The question is whether the project would result in adverse changes to existing conditions. Thus, the draft SEIR Appendix B explains on p. B-42 that wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented so that a large, unarticulated wall catches a prevailing wind. In general, as noted above, new buildings less than 80 feet in height above ground surface are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Under both project options, development would result in buildings up to five or six stories (up to about 65 feet) taller than most structures west of the project site. Project buildings would step up in height from west to east, in line with the prevailing westerly winds. As a result, upwind portions of the project would therefore provide some wind shelter to the taller downwind buildings. Thus, under the Developer's Proposed Option and as stated on draft SEIR Appendix B, p. B-42, "the greatest difference in height between adjacent blocks, moving with the prevailing wind from west to east, would be less than 35 feet. This means that no portion of the proposed project, under the Developer's Proposed Option, would present a wall into the prevailing winds at a height greater than about 35 feet, which is comparable to a three-story residential building." The Additional Housing Option would add one more story, for a maximum unobstructed building wall about 45 feet tall. The design of the project under either option, with heights stepping up from west to east, would serve to limit the project's potential effects on ground-level (pedestrian) winds. Therefore, wind effects of the proposed project, under either option, would be less than significant.

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# Shadow

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B topic E.11, Shadow. These include topics related to:

- Comment SH-1: Shadow Impacts
- Comment SH-2: Non-CEQA Shadow Effects

## *Comment SH-1: Shadow Impacts*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH1-3
I-BARISH2-5
I-BARISH3-9

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"There are numerous flaws in the draft SEIR. I'd like to highlight a few that are just representative of the problem in this document.

In the initial study, Appendix B, of the draft SEIR, these are just three examples of many problems with the SEIR.

The study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25 percent of the year and there would be significant shadow on Riordan High School. No significant effect."

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH1-3*])*

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"1) The DSEIR Initial Study eliminated many environmental impacts for review by concluding they were not potentially significant. But these conclusions are flawed. The Study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25% of the year, and there would be significant shadow on Riordan High School."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-5*])*

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"Shadow Impacts

*Impact SH-1 The proposed project would not create shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces (Less than Significant) (p. B-46)*

The DSEIR states that there would be new shadow between May 1 and August 15 (B-47-50). Fig. 3 illustrates this new shadow. These are the warmer, drier summer months, when people are more likely to be outside closer to sunrise and sunset. Yet, despite any objective measure of significance and any substantial evidence, the DSEIR states that any new shadow would not be significant. The FSEIR must provide substantial evidence that such an increase in shadow is not significant."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-9*])*

## Response SH-1: Shadow Impacts

The comments take issue with the draft SEIR's conclusion that project shadow effects would be less than significant with respect to Unity Plaza and Riordan High School. In particular, the commenter states that Unity Plaza would be newly shaded for "over 25 percent of the year." Concerning shadow on Riordan High School, refer to Response SH-2, Non-CEQA Shadow Effects, on RTC p. 4.H-23.

The commenter's assertion that new shadow would reach Unity Plaza for more than one-fourth (25 percent) of the year over-represents the proposed project's impact. The project would add new shadow to the plaza about 29 percent of the number of days per year, but the project would not continuously add new shadow during the sunlight hours of those days.

As stated on draft SEIR Appendix B, p. B-50, the project would cast new shadow on Unity Plaza from about May 1 through August 15. The project would cast no new shadow on Unity Plaza for about 37 weeks of the year. When considering the hours analyzed under San Francisco Planning

Code section 295, which considers times between one hour after sunrise and one hour before sunset, the project would cast new shadow on Unity Plaza for fewer days of the year—about 10 weeks between mid-May and late July.[68] As stated on initial study p. B-47, project shadow would not reach Unity Plaza until shortly before 7:30 p.m. This means that the project would add new shadow to Unity Plaza for a maximum of a few minutes per day during the period governed by section 295 (and for a maximum of just over one hour per day overall, including non-section 295 hours of sunlight). Therefore, project shadow would fall on Unity Plaza during less than 0.5 percent of the yearly hours governed by section 295, which is far less than 25 percent of the year.[69] And because the area shaded at any given minute would be no more than 20 percent of the plaza, the total shadow as a percentage of theoretical annual available sunlight on the plaza would be far less—on the order of 0.05 percent.

As stated on draft SEIR Appendix B, p. B-46, the significance of shadow impacts is evaluated based on whether a project would "create shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces." Draft SEIR Appendix B, concludes on p. B-50:

> Given that the project would add net new shadow on Unity Plaza for a limited time of the day—early evening, during approximately the last hour or less before sunset—and limited period of the year—May through mid-August—the proposed project would not substantially affect the use of Unity Plaza, and the shadow impact would be considered ***less than significant***.

The foregoing further substantiates the draft SEIR Appendix B conclusion of a less-than-significant shadow impact on Unity Plaza.

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## *Comment SH-2: Non-CEQA Shadow Effects*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-ARHS-4
I-BARISH3-10

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"The other thing is there's not nearly enough detail about the blockage of light into our building. It was designed to have natural light coming in to warm the building, to enhance the culture of learning for our students in the classrooms. That's all going to be blocked."

*(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [*O-ARHS-4*])*

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[68] In early May and early August, project shadow would not reach Unity Plaza until a few minutes before sunset, outside the hours governed by section 295.

[69] Calculation: 10 weeks per year x 7 days per week = 70 total days of shading during section 295 hours. At a conservative average of 15 minutes per day, this would represent a total of 17.5 hours of new shadow per year, which is just under 0.5 percent of the 3,721.4 hours in the section 295 year.

*"Impact C-SH-l The proposed project … would not result in cumulatively considerable impacts related to shadow. (Less than Significant) (p. B-50)*

The DSEIR discloses that the project would cast new shadow on the athletic field at Archbishop Riordan High School Athletic Field. (p. 51) But it appears this shadow is not subject to CEQA analysis since it is not a publicly accessible open space. That, however, is a technicality which should not justify disregarding this significant shadow impact on a high school adjacent to the project. The FSEIR should evaluate and determine if the shadow on Archbishop Riordan High School's Athletic Field is a significant environmental impact."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-10*])*

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## Response SH-2: Non-CEQA Shadow Effects

The comments state that the project would cast shadow on the Archbishop Riordan High School athletic field, that such shadow is not subject to CEQA because of the "technicality" that the field is not publicly accessible open space, and that this shadow impact should be significant. The comments also state that the project would block natural light from entering the Archbishop Riordan High School building.

The draft SEIR appropriately analyzes shadow impacts consistent with city guidelines. The CEQA Guidelines does not include a reference to shadow as a potential physical environmental effect. The City and County of San Francisco analyzes shadow impacts under CEQA, partially based on the City's history of concern regarding the shading of publicly accessible space, as evidenced by voter passage of Proposition K, which added section 295 to the San Francisco Planning Code in 1985. The shadow analysis is consistent with the planning department's shadow analysis guidance and Chapter 31 of the San Francisco Administrative Code. As explained on draft SEIR Appendix B, p. B-46, the planning department's criterion for determining whether a project in San Francisco would result in a significant shadow impact is whether the project would "create shadow that substantially and adversely affects the use and enjoyment of *publicly accessible open spaces*" (emphasis added). There is no CEQA requirement in San Francisco, or elsewhere in California, for analysis of effects with respect to shadow on private property. As indicated on draft SEIR Appendix B, p. B-51, this discussion is provided under the separate heading of "Supplemental Information." This is precisely because, as explained above, effects on non-publicly accessible spaces and on private buildings are not subject to CEQA.

City decision-makers may consider the project's shadow on Archbishop Riordan High School and other adjacent or nearby private properties during their deliberations on whether to approve the project.

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# Utilities and Service Systems

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B, Section E.13, Utilities and Service Systems. These include topics related to:

- Comment UT-1: Utilities and Service Systems – Water Supply
- Comment UT-2: Stormwater and Sewer
- Comment UT-3: Other Utilities and Service Systems Comments

## *Comment UT-1: Utilities and Service Systems - Water Supply*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-BARISH3-11 | I-HEGGIE2-22 | I-MUELLER2-2 |
| I-FREY1-2 | I-MARTINPINTO-5 | I-MUELLER2-3 |
| I-FREY2-2 | I-MUELLER1-1 | I-TIMA-4 |

"Utilities and Service Systems Impacts

*Impact UT-1 Sufficient water supplies are available to serve the proposed project … unless the Bay Delta Plan Amendment is implemented … Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term … (Less than Significant) (p. B-59)*

According to the DSEIR, page B-57, SFPUC Resolution 02-0084 determined that there was sufficient water supply to serve expected development projects in San Francisco through the year 2020, and the implementation of the Area Plan was not expected to have any substantial impact on water supply. Since the Project will not be completed until approximately 2027, it appears this projection is obsolete. Please explain.

Further, in the Conclusion on page B-73, the DSEIR states that there is too much uncertainty related to the possible implementation of the Bay-Delta Plan Amendment to identify environmental effects, and such effects are, therefore, speculative at this time. Please explain how an informed decision regarding the availability of an adequate water supply for the Project can be determined in view of these uncertainties, and why, in view of these uncertainties, the DSEIR states the environmental impact is less than significant.

Further, according to a September 22, 2019 article in the *San Francisco Examiner*, a recent civil grand jury report, "Act Now Before It Is Too Late: Aggressively Expand and Enhance Our High-Pressure Emergency Firefighting Water System," raised the alarm about the lack of coverage for western San Francisco neighborhoods. According to the report, The City's high-pressure emergency water supply system "does not cover large parts of Supervisorial Districts 1, 4, 7 and 11, roughly one-third of the City's developed area," the report said. "As a result, these districts are not adequately protected from fires after a major earthquake."

(https://www.sfexaminer.com/news/report-large-parts-of-sf-not-adequately-protected-from-firesafter-majorearthquake/?fbclid=IwAR145KV4GH_CNfBJvCogj0bPF__iAYdlgyWcrmV5PyZkhjN995GTKpG6AOc)

The Project is in D 7. In view of the grand jury's report, the DSEIR is inadequate for not reviewing the environmental impact of building a massive development on a reservoir that could serve the area in case of an emergency. The DSEIR must provide substantial evidence that covering the Balboa Reservoir will not significantly impact Utilities and Service Systems."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-11*])*

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"My second issue is density. This is a downtown style project, without the downtown style streets. And has Hedda mentioned, the firefighting infrastructure, water pipes that accommodate the dense housing in the other parts of the City that have dense housing, their water structure is totally different than what we have in this area. And that lack of firefighting infrastructure would be a hazard to the residents of the development itself, but it would also be a hazard to all of the surrounding neighborhoods."

*(Laura Frey, CPC Hearing, September 12, 2019 [*I-FREY1-2*])*

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"Second issue is density. This is a very high density project--without the large streets or the firefighting infrastructure/water pipes to accommodate dense housing. (The fire-fighting infrastructure in dense parts of the City is different than in this area.) The lack of a sufficient fire-fighting infrastructure would be a hazard for the residents of any new dense housing project at Balboa Reservoir and for the residents in the surrounding areas."

*(Laura Frey, Email, September 22, 2019 [*I-FREY2-2*])*

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"19. San Francisco ensures fire safety primarily through provisions of the building code and fire code. Do those codes take into account the lack of a water supply for emergencies for the western part of the City and any need for water storage? The City has been through many fire emergencies, and it would be irresponsible to take these issues lightly. Ignoring or postponing the issue of a water supply for emergencies is not going to help us during an emergency. The potential housing loss due to a fire could be much greater than the housing gain from any one development. Is there a need for water storage for fire emergencies, and if so, there needs to be an evaluation of possible sites while they still exist, including at the Balboa Reservoir."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-22*])*

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"The loss of the 17.6 acre reservoir space will present a lost opportunity to store drinking water during an emergency, as was originally intended in 1957 when it was constructed. In San Francisco,

there are three terminal reservoirs; the Sunset Reservoir, the University Mound Reservoir, and the Merced Manor Reservoir. Together, they contain about 327 000 000 gallons of water, which represents 79% of all the water in San Francisco Reservoirs. According to the November 2018 issue of the *Westside Observer*, only 33% of this water belongs to San Francisco. State Water Code 73503 states that the water is jointly owned by San Francisco and the 27 wholesale water customers (cities on the Peninsula). This means when a disaster occurs, San Francisco is legally obligated to share the water equitably with Peninsula cities. According to the August 12, 2003 minutes of the SF Public Utilities Commission, after a major Earthquake, San Francisco could have as little as 86 000 000 gallons of water to serve a 900 000 population, or slightly less than 100 gallons of water per person.

It is important to remember that our water comes to San Francisco from Hetch Hetchy reservoir, approximately 170 miles away via transmission lines, which must cross four significant faults in the SF Bay Area alone (the Calaveras, Greenville, Hayward, and San Andreas). If a 9.0 earthquake were to occur, which is the theoretical maximum magnitude of Earthquake to occur in San Francisco, it would be about 10 times stronger than the 1906 earthquake and 100 times stronger than the 1989 earthquake. This has the potential to sever all transmission of water from Hetch Hetchy to San Francisco.

The Balboa Reservoir represents an opportunity to store an additional 110 000 000 gallons approximately (based on 17 acres x depth of 20 feet). This water storage capacity is not insignificant.

What does the project propose to do to increase our water storage when it comes to firefighting capacity?"

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-5*])*

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"San Francisco is listed as a city with housing more dense than Tokyo and Hong Kong. In America, San Francisco is second in density only to New York City. The proposed housing project for the lower Balboa Reservoir would have housing five times more dense than the surrounding area.

Thirty years ago a similar proposal involving a smaller number of housing units on the Reservoir site was rejected by San Francisco voters. One of the major concerns for housing at the site came from the fire department. The Chief had many reasons to not recommend housing in the Balboa Reservoir, citing conditions which have become even more dangerous over the years.

Increasing drought and the extreme winds coming through the reservoir gulch make a perfect storm for the type of fires that we now see devastating entire towns in California. The situation was dire before and now it's impossible to overstate the fire danger involving that particular basin (and all surrounding neighborhoods), a basin which is being proposed for impossibly dense housing. The lack of immediate water sources made and still makes the situation very bad. We've all seen what fires fed by strong horizontal winds, minus enough water, can do to houses and buildings."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER1-1*])*

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"In particular, the areas of water supply and safety have been largely ignored.

Appendix F: Water Supply Assessment contains the report given at a PUC hearing some months ago concerning the availability of water for the proposed development. I was at that hearing and clearly understood that such a supply was not actually assured except perhaps under the somewhat mythical consideration: "during normal years". However, it is pretty apparent that with climate change reality upon us, we cannot consider anything in the future to be 'normal years' (!)"

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER2-2*])*

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"At that hearing and in appendix F, it was also made clear that detailed research into water safety and the potential for urban fires was not addressed. Reports of lack of appropriate water supplies in the western half of San Francisco, should there be fires, has been reported as recently as a few days ago."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER2-3*])*

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"Then, you need emergency water in case we have an earthquake to kill the fires. There is no emergency water supply for the west and south area of San Francisco. Would you please get busy before you start building and get that done?"

*(Etta Tima, CPC Hearing, September 12, 2019 [*I-TIMA-4*])*

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## Response UT-1: Utilities and Service Systems - Water Supply

Commenters state that the draft SEIR must provide substantial evidence that the project would not significantly impact utilities and service systems, specifically as it relates to the availability of water and emergency water supplies. Several comments express concern regarding the density of the project and state that there is lack of emergency water storage and supplies in the south and west side of the city, and question how an informed water supply decision can be determined in view of uncertainties regarding the Bay Delta Plan Amendment. One comment states that the project will present a lost opportunity as a reservoir to store drinking water.

Impact UT-1 (draft SEIR Appendix B, pp. B-59 to B-73) provides background information about water supply reliability and drought planning for the city, along with three potential water supply scenarios that are evaluated in the project's water supply assessment. Updated water supply and demand projections, extending to 2040, are discussed in Impact UT-1.

In summary, the analysis on draft SEIR Appendix B, p. B-67, determines that sufficient water supplies would be available to serve the proposed project options and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. If the Bay-Delta Plan Voluntary Agreement is implemented, the resulting regional water system supply shortfalls during dry years would be less than those under the Bay-Delta Plan

Amendment and would require rationing of a lesser degree and closer in alignment to SFPUC's adopted level of service goal of no more than 20 percent system-wide during dry years (draft SEIR Appendix B, p. B-68). If the Bay-Delta Plan Amendment is implemented, the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years, but this would occur with or without the proposed project.

The analysis concludes that construction and/or operation of new or expanded water supply facilities could result in a significant cumulative impact. However, the proposed project would not contribute considerably as it would represent 0.17 percent of the total water demand in San Francisco in 2040. Thus, new or expanded dry-year water supplies would be needed under the Bay-Delta Plan Amendment regardless of whether the proposed project is constructed. Any physical environmental impacts related to the construction and/or operation of new or expanded water supplies would occur with or without the proposed project.

The analysis also acknowledges on draft SEIR Appendix B, p. B-71 that given the long lead times associated with developing additional water supplies, the SFPUC would likely address supply shortfalls through increased rationing for the next 10 to 30 years (or more). The higher levels of rationing on a citywide basis could result in significant cumulative effects, but the proposed project would not make a considerable contribution to impacts from increased rationing. Therefore, regardless of whether the Bay-Delta Plan Amendment is implemented, the conclusion in the initial study that the proposed project would result in less-than-significant water supply impacts, both individually and cumulatively, remains the same.

Comments expressing concern regarding firefighting water supply infrastructure are noted. There is a well-established regulatory framework and permitting process in place, enforced through the fire department, building department, San Francisco Building Code, and San Francisco Fire Code. Additionally, concerning wildfire, as stated in draft SEIR Appendix B, Section E.22, San Francisco County does not contain any State Responsibility Area land or lands classified as very high fire severity zones.

The proposed project would include construction of auxiliary water supply system distribution lines and fire hydrants that would serve the project site for firefighting and other emergency uses (draft SEIR p. 2-36). As described in Impact UT-1, draft SEIR Appendix B, p. B-60, the "SFPUC City Distribution Division would conduct a hydraulic analysis to confirm that the existing system is adequate to meet the project's water demands, including fire suppression system pressure and flow demands. If the existing infrastructure is found to be inadequate to meet the project's demand, the SFPUC would modify the water conveyance system, such as upsizing the water mains and appurtenances." The fire department and San Francisco Department of Building Inspection (building department) would also review building plans to ensure that the proposed project complies with the latest California Building Code requirements for fire and life safety measures as specified in the San Francisco Fire Code. As described under Impact PS-1 on draft SEIR Appendix B, p. B-83, "[t]hese requirements include measures related to emergency access and egress; fire hydrants and sprinkler systems; fire-rated design, construction, and materials; restrictions on occupant loads; emergency lighting; smoke alarms; and mechanical smoke control and emergency notification systems. The

project sponsor would work with the fire department to determine utility and access requirements for fire protection and emergency services at the project site."

As discussed in Impact UT-1, the project site has not been identified as current or future water storage in San Francisco in the city's Urban Water Management Plan. The concept of developing the site for water storage was raised during the scoping period for the draft SEIR and described on draft SEIR p. 6-61. As described there, the Balboa Reservoir site does not contribute in any way to water supply or storage, as it is not and was never a functioning reservoir as was originally intended for the site.

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## *Comment UT-2: Stormwater and Sewer*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-NAF-1
I-GOODMAN-4

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"San Francisco's sewer collection system and storm drain system are a combined sewer system (CSS). The vast majority of stormwater should be conveyed through the CSS, which includes the streets and their curbs, catch basins, and underground storm drain, which is then collected and treated. However, the sewers on Ocean Avenue between Frida Kahlo Way (formerly Phelan Avenue) and Miramar are undersized and unable to convey the combined sewage from the sewers uphill from them. Excess combined sewage flow is discharged from the sewers into the streets causing heavy overland flow along Ocean Avenue during moderate storm situations which has resulted in combined sewage, including human waste, flooding downstream of the Balboa Reservoir.

The following CCSF EIR report excerpt from the EIR report (Page 4.6-5 of *https://www.ccsf.edu/MP/Docs/046Services_DEIR.pdf*) documents that:

"The area west of Phelan Avenue is served by a 30-inch reinforced concrete sewer in Phelan Avenue that carries flow south to Ocean Avenue. Although the sewer's condition is unknown, it is severely undersized. According to the SFDPW, the sewers surrounding the Main Campus, while adequate for the dry weather flow from the campus, are inadequate for flows that occur in a 5-year storm event. Currently, the City does not have the funds to upgrade the under-sized sewers surrounding the campus. The SFPUC is in the process of revising its 1973 Wastewater Master Plan. Among other things, this Plan would include upgrading the City's hydraulically and structurally inadequate sewers."

In addition, low lying areas are already negatively impacted by flow from upstream projects like the 2011 Colon/Greenwood/Plymouth/Southwood/Wildwood/Miramar sewer system improvement project which resulted in a transfer of flood risk to Ingleside Terraces:

City and County of San Francisco 2030 Sewer System Master Plan TM505 (http://sfwater.org/modules/showdocument.aspx?documentid=592), Section 5.7.3.1, "Conveyance

along Ocean Avenue (Upsizing and Auxiliary, page 107, "This alternative will lower the HGL and alleviate flooding in the upstream portions of the reach, along Ocean Avenue between Phelan and Miramar avenues. However, the extra conveyance capacity provided by the relief and auxiliary sewers serve to move larger peak flows downstream to the Legion Court area west of Ashton Avenue. Predictably, the higher arriving peak flows will cause elevated HGLs and effectively transfer the flooding problems to this area."

Even though the Balboa Reservoir project would not "substantially" alter the existing drainage pattern, any additional waste from additional residents would increase the quantity of human waste discharged during these events and increase the exposure to residents and businesses downstream in low lying areas. The Balboa Reservoir EIR fails to address this issue and fails to fully disclose the project's dry and wet-weather impact on the existing sewer system.

The constant expansion of lines upstream, continued development, and the failure to correct the defects in the existing sewer lines have created and continues to create a nuisance and public health risk by subjecting those residents in low lying areas to the risk of exposure to hazardous waste.

The sewer lines downstream of the Balboa Reservoir project must be enlarged, and all known and foreseeable deficiencies corrected, prior to the start of this development."

*(Neighbors Against Flooding, Email, September 17, 2019 [*O-NAF-1*])*

"I am for the design and proposal of the housing development as an individual, and feel the need for 100% affordable units and a more robust look at water-use and retention on the site for reclamation and sewage issues and infrastructure must be a part of both sites (Balboa Reservoir and CCSF land developments). My concerns were raised during meetings where I attended SFPUC water games planning charrettes and we indicated the importance of water/sewer systems above sea-level that can begin to alleviate lower down systems elevation wise."

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-4])*

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## Response UT-2: Stormwater and Sewer

The comments state that the draft SEIR does not address the increase in wastewater and stormwater caused by the project. The comments also express concern regarding the existing condition and capacity of downstream combined sewer lines and how the proposed project would impact them.

Refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12 for further information regarding consideration of 100 percent affordable housing.

Impacts UT-2 and UT-3 on draft SEIR Appendix B, pp. B-74 to B-76, and Impact HY-2 on draft SEIR Appendix B, pp. B-111 to B-112, analyze impacts associated with wastewater and stormwater generated by the project. The proposed project would be subject to several regulations that require onsite water re-use and decreasing the amount of stormwater runoff from the site. The proposed

project could result in long-term changes in the volume of discharges to the City's combined sewer system in the sub-basin due to new residents, employees, and visitors who could increase the amount of wastewater generation (draft SEIR Appendix B, p. B-112). The draft SEIR Appendix B concludes on p. B-112 that all "wastewater discharges to the combined sewer system would be treated at the Oceanside Treatment Plant in compliance with the Oceanside NPDES permit … because the stormwater and wastewater discharges from the project would not result in an increase in the frequency of combined sewer discharges, the project's impacts related to changes in combined sewer discharges would be less than significant."

Regarding concerns about the downstream overflow conditions, please refer to Impact UT-3, draft SEIR Appendix B, p. B-75, which acknowledges that the Ocean Avenue sewer main is designated as high risk and slated for replacement through SFPUC's Collections System Asset Management Program (CSAMP). A CSAMP ranking of "high" indicates potential need for replacement. As further stated on p. B-75, the "project team would be required to confirm with SFPUC and the San Francisco Department of Public Works' Engineering Hydraulics Division that adjacent sewer infrastructure has adequate capacity and integrity to serve the potential development program."

Sanitary sewage (wastewater) volumes flowing into the combined sewer system are considerably smaller than stormwater flows into the same system. For example, the City's wastewater treatment system treats approximately 575 million gallons per day (mgd) of combined sanitary sewage and stormwater during storm conditions, but one eighth that volume—70 mgd—during non-storm conditions.[70]

The ratio of stormwater to sanitary sewage from the project site is substantially greater than 8:1 during storm conditions. This is because stormwater runoff flow to the combined sewer system is variable, whereas sanitary sewer flow is less so. That is, storm flow peaks during and shortly after heavy rainfall, and diminishes considerably as time elapses; as a result, stormwater volume, for purposes of sizing stormwater and wastewater conveyance piping such as that along Ocean Avenue, is typically measured in cubic feet per second of peak flow, rather than gallons per day (gpd) of total flow. Conversely, sanitary sewer flows, though considerably smaller in volume, are more consistent and typically have one or two peaks during any given day. For residential areas similar to the proposed project, flows are generally higher before and after the typical work day, although there is sewer flow throughout the day because not all working residents are on the same schedule, some residents may work at home, some residents do not work, some attend school, etc.

Moreover, under current conditions, stormwater flow from the project site (west basin) and the east basin drains to the combined sewer at a constrained rate due to the small capacity of the existing drain inlets and pipes. In particular, the great majority of the west basin drains into two undersized storm drains located along the western perimeter of the former reservoir.[71] That is, the project site, and especially the former reservoir, acts to detain peak stormwater flow into the combined sewer. Additional storm drains in the east basin and along a service road on the west

[70] San Francisco Public Utilities Commission, *Sewer System Improvement Program Fact Sheet*, June 5, 2019, https://sfwater.org/modules/showdocument.aspx?documentid=13986, accessed March 15, 2020.
[71] BKF Engineers, *Balboa Reservoir Hydrologic and Hydraulic Modeling,* January 9, 2020.

basin (the location of the proposed Lee Avenue extension) provide for more stormwater conveyance capacity.

The project's master infrastructure plan would include requirements to prevent the project exacerbating that existing condition. Those requirements would include:

- the proposed project will not increase the project site's peak stormwater discharge to the Ocean Avenue sewer system during the 5-year, 3-hour; and 100-year, 3-hour storm conditions. The peak stormwater flows are what the SFPUC and San Francisco Public Works (public works)[72] use to size the stormwater and wastewater conveyance system (the sewer pipe and street surface below top of curb), such as that along Ocean Avenue.
- the proposed project will reduce the existing peak stormwater flows further by an amount to offset the project's additional worst-case condition in which the project's peak sanitary sewage flow would occur simultaneously with peak stormwater flow. This would be achieved through infrastructure design that includes green infrastructure or a combination of green infrastructure and detention facilities.[73]

The master infrastructure plan would be part of the development agreement that must be approved by the Board of Supervisors for the project to proceed, and the design requirements would be a term within the agreement. Thus, while combined sewage overflows would continue to contribute to occasional downstream flooding, implementation of project would not exacerbate that existing condition due the project's peak discharge limitation requirements in its master infrastructure plan.

Additionally, and in compliance with the city's Stormwater Management Ordinance, the project would be required to reduce stormwater rate and volume by 25 percent for the smaller 2-year, 24-hour storm, which would result in a decrease in total flow from the project site to the combined sewer system during this storm condition.

The analysis in the draft SEIR Appendix B, Impact UT-3, as supplemented by the above, determines that the proposed project impacts related to stormwater and wastewater would be less than significant through compliance with the terms of the master infrastructure plan in the development agreement, Non-Potable Water Ordinance, the San Francisco Stormwater Ordinance, and SFPUC and public works infrastructure review.

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## *Comment UT-3: Other Utilities and Service Systems*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-MUELLER1-2

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[72] San Francisco Public Works has jurisdiction over flows in street surfaces below the top of the curb.
[73] Brian Scott, BKF Engineers, e-mail to ESA, April 24, 2020.

"The recent MUB building at City College and soon-to-be-built Performing Arts Education Center on the college portion of the reservoir use geothermal energy sources. Has there been research on the compatibility of the college's system with other projects?"

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER1-2*])*

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### Response UT-3: Other Utilities and Service Systems

The commenter asks whether research has been done on the compatibility of the college's proposed geothermal energy system with other projects.

The geothermal energy sources are not proposed as part of the Balboa Reservoir project. As described on draft SEIR p. 2-37, a portion of the Multi-Use Building hydronic wells were installed by City College beneath the location of the proposed Lee Avenue extension and right-of-way along the east side of the project site. The utility pipelines associated with the hydronic wells that extend beneath the project site would be removed during construction and the remainder of the system would be maintained. The hydronic wells under the Lee Avenue easement and project site would be removed or capped, in accordance with a Memorandum of Understanding with City College.

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# Public Services

The comments and corresponding responses in this section cover topics in draft SEIR Appendix B, topic E.14, Public Services. These include topics related to:

- Comment PS-1: Emergency Services
- Comment PS-2: Public Services and Secondary Impacts

## *Comment PS-1: Emergency Services*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-ARHS-3
I-MARTINPINTO-1
I-MARTINPINTO-4

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"The other thing is we're worried that fire trucks aren't going to be able to get to our school in case of a fire. There's not been enough detail or clarity about transportation. They've delayed that meeting. That was supposed to take place this week. That has not occurred. It's been delayed until September 30th. I need more clarity on the impact of transportation on our school."

*(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [*O-ARHS-3*])*

"This Statement [that the proposed project "would not be expected to increase demand for public services (in order to maintain acceptable service ratios, response times, or other performance objectives for public services) to the extent that it would require new or physically altered governmental facilities, the construction of which could result in significant environmental impacts"] is an erroneous assumption. Response times for emergency vehicles located at Fire Station 15 (address 1000 Ocean Avenue) will be adversely affected, as well as response times from the next nearest three fire stations (Fire Station 33 at 8 Capitol Avenue, Fire Station 39 at 1091 Portola Drive, and Fire Station 19 at 290 Buckingham Way). It is generally assumed that with new residences comes new traffic, which will undoubtedly slow response times. Although response priority 3 emergency calls (also known as code 3 calls) permit the use of emergency lights and sirens to safely bypass traffic signals and other traffic control devices, response priority 2 calls (code 2 calls) do not. Because code 2 calls require that emergency vehicles negotiate traffic at regular speeds, code 2 calls have the potential to become severely extended. Furthermore, upon arrival to the scene of a code 2 call, often times the situation is found to be more severe than previously thought, and calls are often upgraded to code 3.

With the addition of 500 – 1550 new units, an additional 1000 – 3000 or more residents will arrive. This will undoubtedly increase demand on the emergency response system, depending on the demographics of the new residents (statistically, senior citizens and low-income people are more frequent users of 911). Increased demand of the emergency response system combined with increased response times puts a strain on the ability of the SFFD to meet their 4 minute response time criteria (4 minutes from dispatch of call to patient contact)."

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-1*])*

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"what does the project propose to do to improve emergency vehicle response times?"

*(Stephen Martinpinto, Letter, September 23, 2019 [*I-MARTINPINTO-4*])*

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## Response PS-1: Emergency Services

Commenters request information about emergency vehicle access and express concern regarding emergency access to areas surrounding the project site and project impacts on emergency response times.

Draft SEIR Appendix B, Section E.14, Public Services, discusses the project's impacts related to the provision of public services associated with the project. As stated in Impact PS-1, the city's fire protection and medical emergency resources are regularly reassessed based on need in order to maintain acceptable service performance standards. The fire department and building department would review building plans to ensure that proposed buildings comply with the latest California Building Code requirements for fire and life safety measures as specified in the San Francisco Fire Code, including measures related to emergency access and egress. Such review also includes

evaluating the project site's circulation and ensure that emergency access and egress to adjacent sites are not affected. Adherence to San Francisco Fire Code requirements as part of the project design would minimize demand for future fire protection services.

As noted under Impact PS-1, the project-related increase in residents would not be considered substantial or unplanned growth and would not result in a substantial increased demand for police services, fire protection, and emergency medical services. Police, fire protection, and emergency medical services are regularly assessed as part of the City's dynamic demand-based deployment of available resources and the need to maintain acceptable service ratios and response times. While demand might increase as a result of the implementation of the proposed project, the increased demand would not be substantial, nor would it require expansion of existing police or fire stations or construction of new facilities. Therefore, no significant environmental impacts from construction or operation of new or expanded public service facilities would occur as a result of the proposed project. Thus, the incremental increase in the demand for police, fire protection, and emergency medical services would be a less-than-significant impact.

Access to Archbishop Riordan High School north of the site would be maintained. There would be no change to access to the front entrance of Riordan High on Frida Kahlo Way, nor would there be any change in vehicular access into the Riordan campus from Judson Avenue. Egress from Archbishop Riordan High School through the existing exit-only driveway that leads into the project site would also continue with project implementation. As described on draft SEIR p. 2-26, "the functionality of the existing 'exit only' driveway for Archbishop Riordan High School west of the Lee Avenue and north access road intersection would be maintained. The street connecting the 'exit only' driveway to Lee Avenue would be 20 feet wide and one-way eastbound." The emergency access impacts analysis is presented in draft SEIR Section 3.B, Transportation and Circulation, under Impact TR-3 (draft SEIR pp. 3.B-71 to 3.B-73). That analysis found that emergency access to the project site would be similar to existing conditions and that project implementation would not adversely affect fire apparatus responding from nearby San Francisco Fire Department station 15, despite the increase in traffic generated by the project. As stated on draft SEIR p. 3.B-73, the fire department conducted a preliminary review of the development plans and streetscape changes as currently proposed. Prior to finalizing the design and dimensions of the internal street network, the fire department and police department would review and approve the internal roadway configurations and dimensions to ensure emergency access to the site is acceptable.

## *Comment PS-2: Public Services and Secondary Impacts*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-BARISH1-5 | I-FREY1-1 | I-MAGNUSON-1 |
| I-BARISH2-7 | I-FREY2-1 | I-MAGNUSON-2 |
| I-BARISH3-12 | I-GOMEZ-2 | I-MEDAL |
| I-BARISH3-13 | I-HALFORD1-1 | I-MEDAL-1 |
| I-BARISH3-14 | I-HALFORD1-2 | I-MUELLER1-5 |
| I-BARISH3-16 | I-HALFORD2-2 | I-NGUYEN-1 |

I-BARISH3-18
I-BARISH3-30
I-BARISH3-31
I-BARISH3-32
I-BARISH3-39
I-BELBIN-2
I-BERNSTEIN1-3
I-BERNSTEIN4-4
I-BERNSTEIN4-5
I-BERNSTEIN5-1
I-BERNSTEIN5-3
I-BERNSTEIN5-7
I-BRAD-1
I-COLLINS3-4
I-EVBUOMA-1
I-EVBUOMA-2
I-FISHER-2
I-FISHER-4
I-FRAKNOI-1
I-FRAKNOI-2
I-HALFORD2-3
I-E. HANSON-3
I-E. HANSON-6
I-E. HANSON-7
I-HOUWER-3
I-JA2-1
I-JA2-2
I-JA3-1
I-JA3-2
I-JA3-3
I-JA4-2
I-KAUFMYN2-1
I-KAUFMYN2-2
I-KAUFMYN2-4
I-KAUFMYN2-5
I-KOPP-2
I-KOWALSKI-2
I-LEGION-3
I-RHINE-2
I-SAPPHIRE-1
I-SIMON-4
I-SIMON-7
I-SIMON-8
I-SIMON-9
I-SIMON-10
I-TARQUINO-4
I-TIMA-1
I-VESSELENYI-2
I-VICKY-1
I-WEYER-3
I-WILENSKY-4
I-WORLEY-6
I-WORLEY-7
I-ZELTZER-4

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"Finally, another example, the initial study, Appendix B, concludes the project would not result in cumulative impacts on public services, yet it did not analyze the impacts of the project on City College. Again, the draft SEIR review of this impact is inadequate."

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH1-5*])*

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"3) Finally, the Initial Study concludes the project would not result in cumulative impacts on public services. Yet it did not analyze the impacts of the project on City College. Again, the DSEIR review of this impact is inadequate."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-7*])*

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"Public Services Impacts – Failure to Consider Impact on City College of San Francisco ("City College")

*Impact C-PS-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on public services. (Less than Significant)*

By way of the Initial Study, the DSEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address the impact on student attendance and enrollment and on part-time Instructors who have to travel between multiple community college sites."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-12*])*

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"The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the less-than-significant conclusion of the Project's impact on City College. The Initial Study states: The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.

… Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.

This is incorrect. Removing parking would clearly increase demand for public services in the form of, among others, demand for increased public transit, demand for more TNC's, and demand for alternative parking in other areas of the City College campus. For the reasons set forth in the review below of the Kittelson TDM, DSEIR Appendix C, there are no effective mitigations proposed for the loss of parking due to this Project."

*(Jean Barish, Email, September 12, 2019 [*I-BARISH3-13*])*

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"City College is the central educational, economic, and cultural focus of the neighborhood. Its interests cannot be allowed to be made secondary to the Project.

City College's educational mission makes it a target destination for students, staff, faculty. This simple fact needs to be recognized as being desirable, even if CCSF students need to drive to school and need parking.

The Project must take responsibility for mitigation of its own significant cumulative impacts on City College, traffic and parking. The burden of mitigation should not be shifted onto City College and neighborhoods."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [I-BARISH3-14])*

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"Removal of student parking will have significant impact on student enrollment and attendance."

*(Jean B. Barish, Esq., MS, Letter, September 23, 2019 [*I-BARISH3-16*])*

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"The substantial impact on City College's educational mission must be comprehensively and objectively examined in the DSEIR. The omission of this examination renders the DSEIR and Initial Study inadequate."

*(Jean B. Barish, Letter, September 23, 2019 [I-BARISH3-18])*

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*"The DSEIR is inadequate because it fails to consider the impacts on the public service of City College of San Francisco.*

The Reservoir Project will have an adverse impact on higher public educational services offered by City College. According to a City College Ocean Campus Survey of City College students and workers conducted in May 2016, 45.7% commuted by car. Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules."

Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students' access to higher education services offered by City College.

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered."

*(Jean B. Barish, Esq. MS, Letter, September 23, 2019 [*I-BARISH3-30*])*

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"The DSEIR says: "… it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts…" and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the DSEIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day…" It avoids assessing the possibility that students might not be able to continue attending City College.

The DSEIR notes that the City College TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of City College. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education."

*(Jean Barish, Email, September 12, 2019 [*I- BARISH3-31*])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact on City College's ability to provide public higher educational services. It is erroneous to extend 21099's parking exemption onto the elimination of the public benefit of providing access to higher education.

The Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students' access to higher education services offered by City College."

*(Jean Barish, Email, September 12, 2019 [*I- BARISH3-32*])*

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*"**The DSEIR must consider the impact of costs incurred to CCSF***

The proposed Reservoir development has forced City College to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This secondary impact must be addressed.

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking."

*(Jean B. Barish, Esq. MS, Letter, September 23, 2019 [I-BARISH3-39])*

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"City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

Subject: Input for planning – CCSF must be considered

Comments:

CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.

Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!"

*(Charles Belbin, Email, September 22, 2019 [*I-BELBIN-2*])*

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"So, the college really has not -- the impacts on the college, the secondary impacts from parking, not the parking itself because that's an issue that's being considered in other ways, but the impacts on the college, and the access to education, which should have some priority. Thank you."

*(Harry Bernstein, CPC Hearing, September 12, 2019 [I-BERNSTEIN1-3])*

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"I feel that I cannot do better than quote another prior submission regarding the inadequacy of addressing the impact on public services in the vicinity of the Balboa Reservoir site—and public services significantly includes area schools.

"On page 7 of the ESA Scope of Work, under "Task 4. Administrative Draft Initial Study-1", the only mention of impact on schools is: "The public services section will include a discussion of public school capacity, the findings of the water supply assessment, and a discussion of the potential need for access to the SFPUC water/wastewater easement along the south side of the project site. EP will provide ESA with language regarding public schools…" This merging of two environmental effects categories of "Utilities and Service Systems" with "Public Services" is grossly deficient. The evaluation of adverse impacts on schools should not be legitimately bypassed:

The question, as per item 12a under Public Services is:

Would the project result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?

The answer is objectively yes for schools and fire protection from this list."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN4-4])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college."

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN4-5*])*

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"1) there's little acknowledgement of the effect of the development on City College as well as other nearby schools in terms of public services"

*(Harry Bernstein, Email, September 23, 2019 [*I-BERNSTEIN5-1*])*

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"3) The loss of parking in the Lower Reservoir lot is likely to have a significant impact on access to education, especially for those individuals who are tightly scheduled because they are working, going to school and perhaps having additional family responsibilities besides. That is, the loss of approximately 1000 spaces from the Lower Reservoir site will make it harder for many such people to get to the school in a timely manner. Even now many faculty members mention the difficulty

that their students often have early in the semester getting to class on time because of traffic backing up and fewer spaces available, and those quite often located in the most distant lots."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-3])*

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"Another part of the story not yet mentioned is the long promised Performing Arts Education Center (PAEC) at City College, which has been something of a political football. It was a strong component of the last two successful bond measures at the College—in 2001 and 2005—and is essential for the Music and Theatre Arts programs but also for the College as a whole. This project was shovel-ready in October, 2012, but final discussion about it was postponed and in less than a year, during a State takeover initiated in July, 2013, was abruptly canceled by the Special Trustee with Extraordinary Power. Some have doubted the legality of this takeover but the College community is still living with the consequences therefrom. That is why the future of the PAEC is still a current issue. Until about 2014, there was no doubt that the PAEC would eventually be built and that the majority of the parking for it would be in the Lower Reservoir lot. Trustees, when asked about their backup plan (in the event that the Lower Reservoir lot was sold or became otherwise unavailable) and seemed to say that they didn't know they needed such a plan. The Facilities Master Plan, which has had some interference from City agencies, has been inconsistent in pushing for the timely completion of the PAEC. After returning to power, the Board of Trustees once again advocated strongly for the PAEC's completion starting in 2016. City/City College meetings about land use, sometimes referred to as the City/City College Consortium have kept track of any progress on plans for the PAEC, and also on the Education Master Plan and Facilities Master Plan. (The former Mayor of San Francisco was in consultation with the State Chancellor of the College system at the time that the College was taken over by the State and did not oppose the maneuvers as he should have been willing to do.)

The PAEC is needed, partly because at present City College is an incomplete campus, lacking an auditorium as it does. This is an accreditation issue, but it has been so for more than 50 years. Plans for the College to complete the PAEC appear to be unclear, but the construction should begin before any housing development is approved. With or without the PAEC, it remains clear that a development of 1100 units or more is a threat to the survival of the College as presently constituted. That is one of the reasons that some have urged either to reduce the number of units of a projected Balboa Reservoir development—instead having 800 units or less, with greater emphasis on gardens and open space."

*(Harry Bernstein, Email, September 23, 2019 [I-BERNSTEIN5-7])*

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"Hi. My name's Brad. I've lived here. I grew up here. I was born here. But you have to really think about this location. It's City College. It's the main campus. So, you really have to think about what this use is for and the impact.

I'm all for, you know, affordable housing. I believe in, you know, biking. But you really have to think about all the people that can't bike here to that location. You know, it's very valuable to be

able to have a parking lot and so that it opens it to everybody that wants to be able to park there. And it's frustrating and I'm sure you guys are frustrated, too, that it's dragged on so long. But there's a reason why it's dragged on so long because people really, you know, that believe in this. I'm glad that we're really taking time to make sure that this is. And also, so I'm also disabled, and so, you have to think about the mobility of the, you know, people that need to be able to get to campus and to get to class on time.

Obviously, you know, parking's very limited. So, thanks for your time."

*(Brad, CPC Hearing, September 12, 2019 [I-BRAD-1])*

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"7. Low income CCSF students include many parents of two kids, one in day care, another miles away in school, two jobs, an academic course of study or a vacational one at the college. BART doesn't serve all of them, most- even the commuters- aren't on a BART line or within walking distance. BART fares are quite high for adults.

8. Harming these students by impacting/ threatening/ replacing that admittedly ugly and retro parking lot is a huge mistake. I've seen countless grads go from welfare to being happy independent taxpayers and they are tremendously proud and very very grateful to CCSF."

*(Monica Collins, Email, September 22, 2019 [I-COLLINS3-4])*

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"If this land is to be developed, plans should at least include parking for CCSF students."

*(Marria Evbuoma, Email, September 19, 2019 [*I-EVBUOMA-1*])*

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"Also, the land was supposed to have been the site for the Performing Arts Education Center. My son just started Kindergarten at Creative Arts Charter School in the Western Addition."

*(Marria Evbuoma, Email, September 19, 2019 [I-EVBUOMA-2])*

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"A lot of money will be made by for-profit corporation and banks, but I am deeply concerned about the negative effects on CCSF, a gem of a school that serves the community. CCSF students tend to be working class, low income, people of color and stressed between balancing school work, jobs and family life. Many need to drive to school. We must protect their parking."

*(Allan Fisher, Email, September 12, 2019 [*I-FISHER-2*])*

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"But this massive project will not be beneficial to the students who will not be able to afford these housing units. Instead they will suffer from reduced and more expensive parking and increased road congestion."

*(Allan Fisher, Email, September 12, 2019 [*I-FISHER-4*])*

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"To propose this project without a guarantee of more efficient mass-transit possibilities, and without compensation to CCSF is unconscionable."

*(Allan Fisher, Email, September 12, 2019 [*I-FISHER-5*])*

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"As a long-time San Francisco resident and voter, I am appalled that the environmental report on the plan to do away with the parking for students on the Reservoir at CCSF did NOT consider the impact it would have on the college, the students, and the neighborhood."

*(Andrew Fraknoi, Email, September 21, 2019 [*I-FRAKNOI-1*])*

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"City College, where I have taken classes, is a jewel in the crown of San Francisco, a vital community resource used by people of all economic and racial groups. It is wrong (and sneaky) to ignore its needs when planning to take away one of its key parking resources.

The planning for this project must take those issues into consideration. Not everyone has the luxury of being on a MUNI line to get to the college or the luxury of a schedule that allows waiting for a MUNI line."

*(Andrew Fraknoi, Email, September 21, 2019 [*I-FRAKNOI-2*])*

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"My name is Laura Frey, Westwood Park. Thanks for your patience with all these people. Three main concerns. My first concern, like a lot of people, is City College. I don't think the impact on City College has been really addressed in this. And I want to remind the Planning Department that the timing of the development, the process began at the same time that the accreditation crisis began. So, City College, like Chris alluded to, was out of the loop and never really caught up."

*(Laura Frey, CPC Hearing, September 12, 2019 [*I-FREY1-1*])*

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"First is City College. This is public land. I have heard from City College people, as well as long-time SF residents that the reservoir area had been set aside for City College use, if it were to be developed. This draft EIR does not sufficiently examine the long-term impact of this project on City College. Also the timing of the development should be remembered. The process for this proposed development began at the same time as City College's accreditation crisis began--this probably kept City College from having the time and resources to properly consider the impact of this development on its future at the very beginning… and it has probably been "behind" ever since."

*(Laura Frey, Email, September 22, 2019 [*I-FREY2-1*])*

"2) Do you believe that the loss of parking, both during the construction of the new development as well as once the new, smaller parking lot is built will have an impact on enrollment and retention of students at city college?"

*(Wilson Oswaldo Gomez, Email, August 28, 2019 [*I-GOMEZ-2*])*

"The proposed housing would cost City College over a thousand parking spaces, thus denying access to education to thousands of CCSF students who cannot attend classes unless they drive. The typical CCSF student is a part-time student, meaning that s/he needs to drive in order to be able to juggle a job (or two jobs), family responsibilities and classes. Therefore eliminating parking spaces seriously limits access to education. City College is still recovering from the massive loss of students caused by the accreditation crisis; we simply cannot afford to lose more students."

*(Daniel T. Halford, Email, September 9, 2019 [*I-HALFORD1-1*])*

"In 2001 and again in 2005 San Francisco voters approved bond measures to build the Performing Arts Education Center (PAEC), which was already shovel ready in fall 2013, when the state-appointed special trustee Robert Agrella put it on hold. The college has already invested $30 million toward its construction, including the basement (which the PAEC shares with the Multi-Use Building), which is already finished. The latest revision of the PAEC construction plan has extensively downsized the education portion of the PAEC because it would remove too many parking spots! Sufficient parking is so crucial that it is actually endangering the award-winning design of a long-needed building. City College is the only community college in California without a required auditorium. It also does not have the required facilities for students majoring in music. This is a disgrace in a city that is world-famous for performing arts."

*(Daniel T. Halford, Email, September 9, 2019 [I-HALFORD1-2])*

"In 2001 and again in 2005 San Francisco voters approved bond measures to build the Performing Arts Education Center (PAEC), which was already shovel ready in fall 2013, when the state-appointed special trustee Robert Agrella put it on hold. The college has already invested $30 million toward its construction, including the basement (which the PAEC shares with the Multi-Use Building), which is already finished. The latest revision of the PAEC construction plan has extensively downsized the education portion of the PAEC because it would remove too many parking spots! Sufficient parking is so crucial that it is actually endangering the award-winning design of a long-needed building. City College is the only community college in California without a required auditorium. It also does not have the required facilities for students majoring in music. This is a disgrace in a city that is world-famous for performing arts."

*(Daniel T. Halford, Email, September 16, 2019 [*I-HALFORD2-2*])*

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"We all know that our city needs more affordable housing, but affordable for whom? The private developers define *affordable* as $139,000 a year, single income! But building market-rate luxury housing on land that City College clearly needs, a need affirmed by the voters three times already, is more than immoral. It's just crazy."

*(Daniel Halford, Email, September 16, 2019 [I-HALFORD2-3])*

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"2. Accompanying this is a SEIR document that does not address the potential impacts of the development on education or access to education."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-3])*

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"4. Currently the site is the location of a motorcycle safety-training course, which is not mentioned in the SEIR. This is a direct educational use of the site, taking place right now, which would be displaced by the development."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [I-E.HANSON-6])*

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"5. Parking while not a mitigatable factor under CEQUA, is connected to historical use and the viability of the educational institutions that surround the site. If the impact of the development on parking has the potential to disrupt businesses surrounding the site causing them to close or significantly alters their future potential, than that impact needs to be documented in this report. The current report minimizes the impact report on enrollment consequences inherent in the removal of access to education. Nobody wants to argue for parking but in reality due to the unique student population and constraints of the urban environment ease of parking is related to enrollment dynamics and this factor should be taken into account in the projects impact on the surrounding institutions. Comparisons to other equivalent educational institutions should be analyzed."

*(Edward Simon Hanson, PhD, Email, September 23, 2019 [*I-E.HANSON-7*])*

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"Parking is already virtually impossible with the two existing parking lots for the college. If you were to take away the reservoir parking option this would further strain and impact students, the outlying community and other institutions in the area."

*(Michell Houwer, Email, September 12, 2019 [I-HOUWER-3])*

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"The Draft EIR concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary."

It says: "Furthermore, it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts…"

Yet to justify the "less than significant" determination, the Draft EIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, Others to rearrange their schedule to travel at other times of day…"

The draft EIR avoids assessing the possibility that students might stop attending CCSF.

And, as predicted, TDM/Sustainability Program is trotted out as justification: "The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict."

The following had been submitted during the Scoping period before the City College Fehr& Peers TDM Plan came out. My October 2018 submission refers to the Nelson/Nygaard Balboa Area TDM, but the comment still pertains.

The DEIR's assumption of the success of TDM to obviate student parking is **purely speculative**.

**DEFICIENT MITIGATIONS FOR ADVERSE IMPACTS ON PUBLIC SERVICES OF SCHOOLS, TRANSIT**

1. SCHOOLS, ESPECIALLY CITY COLLEGE

There are many schools in the surrounding area: City College, Riordan, Sunnside, Aptos, Lick Wilmerding, Denman, Balboa.

City College is a commuter school. City College students, faculty, and staff commute to school. According to a CCSF Ocean Campus Survey conducted in May 2016, these City College stakeholders—in addition to those using public transit (42%) and walking/biking (9.4%), 45.7% commuted by car.

The mission of any school is to provide education. But if access to an institution is made difficult, the goal of providing education will be curtailed due to impaired physical access.

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

The interests of students, faculty, and staff will inevitably be harmed by the Reservoir Project. Unless willfully blind, the 1100-1550 unit Reservoir Project will obviously create significant adverse impact on the public service provided by the area's schools, especially City College.

*(Alvin Ja, Email, August 8, 2019 [*I-JA2-1*])*

Transportation Demand Management As Mitigation

Consequently, the City Team ponied out a Balboa Area Area TDM Framework in response to community concern. The City Team misled the public by giving the impression that it would be an objective study of parking and circulation issues. But in reality the result was a foregone conclusion. The SFCTA contract specified the parameters of this study: "The Planning Department and SFMTA are proposing a Transportation Demand Management (TDM) study in coordination with CCSF Ocean Campus to reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents." In other words, the burden of dealing with the adverse impacts on City College and the neighborhoods of 2,200 to 3,100 new adult Balboa Reservoir residents would be shifted onto the victims.

The Nelson-Nygaard TDM Framework will undoubtedly be brought forth as support for TDM as appropriate mitigation.

The Nelson-Nygaard TDM Framework fails to rise to the standard of providing substantial evidence that TDM would be able to resolve the effects of lost student parking on student enrollment.

The Nelson-Nygaard TDM Framework, lacking substantial evidence of its efficacy, falls back on speculation and wishful thinking. Its dubious evidence in support of the efficacy of a TDM solution for City College are a couple case studies: University of Louisville's Earn-a-Bike Program and Santa Monica College's Corsair Commute Program which provide financial incentives for using sustainable transportation.

*(Alvin Ja, Email, August 8, 2019 [*I-JA2-3*])*

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NO EVIDENCE IS PROVIDED THAT A SIMILAR FINANCIAL INCENTIVE PROGRAM WOULD SUCCEED IN MAINTAINING ENROLLMENT AT CITY COLLEGE.

Please refer to the attached critique of the Nelson-Nygaard TDM Framework entitled "Balboa Reservoir's TDM Non Sequitur" (attached) and enter it into the Administrative Record, as well.

Impact on Public Service of City College and Other Schools

From my 10/11/2018 submission "Comment on Balboa Reservoir NOP re: "Summary of Potential Environmental Issues":

*Although 21099 exempts parking adequacy as a CEQA impact "for the (Reservoir Project itself) project", 21099 does not exempt the secondary parking impact on CCSF's public educational service to students from assessment and consideration.*

*Student parking, being the existing condition and setting, cannot be be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.*

*The proposed Reservoir development has forced City College to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This is the secondary [physical--aj] impact that must be addressed in the Subsequent EIR."*

*(Alvin Ja, Email, August 8, 2019 [*I-JA2-2*])*

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"**Initial Study**

*In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR. Therefore, the topics addressed in the initial study are listed below and are not analyzed in this SEIR chapter.*

Under Public Services, the PEIR did not analyze the impacts of a Reservoir Project on City College."

*(Alvin Ja, Email, August 13, 2019 [*I-JA3-1*])*

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"By way of the Initial Study, the SEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address impact on student attendance and enrollment and on gig-working part-time Instructors who have to travel between multiple community college sites."

*(Alvin Ja, Email, August 13, 2019 [*I-JA3-2*])*

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"The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the "less-than-significant" conclusion of impact on City College. The Initial Study states:

> *The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.*
>
> - Removal of parking would not conflict with CCSF sustainability plan..… **but it would conflict with access to education.**
>
> *Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.*
>
> - This is an non sequitur. Just because CCSF TDM doesn't conflict with loss of existing parking, does not mean that TDM measures will be able to solve the problem of student access to education. The success of TDM is speculative. Finally, reference to the PEIR is

mystifying because CCSF was not assessed in the BPS Final EIR's Public Services section to begin with.

The SEIR/Initial Study implicitly considers TDM to be the overriding goal of City College instead of recognizing that the main purpose of CCSF is education, with TDM being a secondary consideration.

**The SEIR's speculative possibility of success of TDM to alleviate loss of student parking in the Initial Study is an inadequate justification to come to a conclusion of less-than-significant impact on CCSF.**

**Instead of being relegated to the Initial Study, impact on City College's educational mission and on access to education must be comprehensively and objectively examined. The SEIR and Initial Study are inadequate.**"

*(Alvin Ja, Email, August 13, 2019 [*I-JA3-3*])*

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"Parking Conditions

*The proposed project meets all of the criteria, and thus the transportation impact analysis does not consider the adequacy of parking in determining the significance of project impacts under CEQA. Parking is not discussed further in this SEIR.*

My 10/11/2018 scoping comment stated:

*Although 21099 exempts parking adequacy as a CEQA impact "**for the** (Reservoir Project itself) **project**", 21099 does not exempt the secondary parking impact on CCSF's public educational service to students from assessment and consideration.*

*Student parking, **being the existing condition and setting**, cannot be be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.*

*The proposed Reservoir development has forced City Colllege to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This is the secondary impact that must be addressed in the Subsequent EIR.*

**The draft SEIR is inadequate and defective in failing to treat parking in the main body of the SEIR. Although the Initial Study does discuss the subject, the Initial Study's assessment is similarly inadequate and defective.**"

*(Alvin Ja, Email, August 26, 2019 [*I-JA4-2*])*

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"***The DRAFT SEIR for the Balboa Reservior Project is inadequate because it fails to consider the impacts of the project on the public service of CCSF***

The Reservoir Project will have an adverse impact on higher public educational services offered by City College of San Francisco, a unique and treasured institution by all of San Francisco.

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, 'The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules.'"

*(Wynd Kaufmyn, Email, September 22, 2019 [*I-KAUFMYN2-1*])*

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"Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students' access to higher education services offered by CCSF.

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered as it will likely affect these workers' access to employment."

*(Wynd Kaufmy, Email, September 22, 2019 [I-KAUFMYN2-2])*

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"***The DSEIR irresponsibly avoids assessing the possibility that students/contingent faculty will likely not be able to continue attending/working at CCSF.***

***Why is there no recommendation in the DSEIR to enhance public transit infrastructure?***

The DRAFT SEIR notes that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of CCSF. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education."

*(Wynd Kaufmyn, Email, September 22, 2019 [*I-KAUFMAN2-4*])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact on CCSF's ability to provide public higher educational services. It is erroneous to extend 21099's parking exemption onto the elimination of the public benefit of providing access to higher education.

The Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students' access to higher education services offered by CCSF."

*(Wynd Kaufmyn, Email, September 22, 2019 [*I-KAUFMAN2-5*])*

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"As a San Francisco resident since December 20, 1955, a 15-year member of the Board of Supervisors, and a 12-year State Senator representing the area in which the City College of San Francisco campus is located, a commencement speaker at City College, a lecturer in various City College classes since 1985, and public user of City College facilities, including its wellness center, the proposed EIR minimizes the effect of a horrendous private development of the Balboa Reservoir acreage. I am informed of a proposed construction of 1,100 residential units and a different plan for 1,550 residential units by the City and County of San Francisco, with heights from 25 feet to 88 feet. The affect upon City College will be enormous in terms of parking loss, and the EIR is limited to just the reservoir acreage."

*(Quentin Kopp, Email, September 23, 2019 [*I-KOPP-2*])*

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"I do not believe that the EIR takes into account the death that will happen to City College. City College needs different types of things. Some of them may be buildings. Some of them may be parking. Some of them may be an on ramp to the freeway. It needs a lot of different things. To not leads to the college animus."

*(Ken Kowalski, Member, Westwood Park Homeowners Association, CPC Hearing, September 12, 2019 [*I-KOWALSKI-2*])*

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"The Draft SEIR fails to address the fact that the Reservoir project will have a negative impact on public services, specifically City College of SF, which needs to re-grow enrollment. The proposed AvalonBay project will do this by reducing student access to education by eliminating over 1000 parking places on the lower reservoir, while hundreds of other parking places on the upper reservoir will be lost to new buildings. The DSEIR provides NO concrete plans for improving public transportation. The 43 and 29 buses and BART all have serious capacity issues already, but no concrete proposals are made to increase capacity. In this context, reducing transportation demand by 15% will only limit student and faculty/staff access and shrink City College."

*(Vicki Legion, Email, September 22, 2019 [I-LEGION-3])*

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"What I had wanted to say was that I'm deeply disappointed in the Draft EIR. I feel it is tragic that it fails to consider City College of San Francisco and its viability, health and importance to the community as a critical and important element in any plans for development of the Balboa Reservoir."

*(Sally Magnuson, Email, September 22, 2019 [*I-MAGNUSON-1*])*

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"CCSF has had use of this public PUC land for many decades and it is necessary for the students of CCSF in order for them to be able to access this life changing education that CCSF offers. Students attending CCSF need easy comfortable access to their classes and if the Balboa Reservoir is sold off for private development it will kill CCSF as we know it.

As a low income working mom I needed to use the Balboa Reservoir all the time to be able to get to my child development classes. I could not take my kids to school on the bus and then bus to CCSF and arrive on time and then get to work. It would have been an impossible. I would have had to drop out of school and not pursue the career in education that I dreamt of.

Please let CCSF do the job it does best which is offering rich and valuable educations to the people of San Francisco. Let's take care of this precious College and not threaten it all the time with greed based land grabs just because it's happening ALL over the city. This is a place for future generations also … Future generations that if they can have access to the education will be the ones able to envision and help create the changes humanity needs. Our future educators, social workers, artists, musicians, political representatives, gardeners chefs, nurses, doctors, scientists, ambassadors and parents will be able to come from this place, if we keep it safe and accessible.

Please don't let these public lands be stolen from this community college that desperately t needs it. If CCSF were a Public Hospital would we consider selling off access to the hospital … regarding it as frivolous and inconsequential and then provide no parking and thus no easy way to even BE at the hospital? Would we instead ask patients find their own way there on an erratic and congested public transit system?

CCSF offers a lifeline to at least 70,000 people per semester. It is a critical San Francisco resource and is part of the fabric of the city and it needs to be deeply considered FIRST in any type of "land grab" proposal that comes before you."

*(Sally Magnuson, Email, September 23, 2019 [*I-MAGNUSON-2*])*

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"Your SDEIR does not consider what would be the impact of this massive project on the Native American students, the Pacific Islander students, the Latina and Latino students, the Black students, the Asian students, and the disabled students of City College of San Francisco. All of these students desperately need the education that City College offers.

The SDEIR needs to consider what would be the impact of this project on the students of color, the working class students, and the disabled students of City College who need a place to park while they snatch a class among their many work and family obligations. **What will happen to them if they lose access to a parking lot that they need?**"

*(Tomasita Medal, Email, September 23, 2019 [*I-MEDAL-1*])*

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"Not having parking would make attending classes for working class students who have family and work obligations impossible."

*(Tomasita Medal, Email, September 23, 2019 [*I-MEDAL-3*])*

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"Also, since over 1,000 units of affordable student parking (available via PUC leases to CCSF since 1958) will be lost under the proposed development, doesn't it become inappropriate that in order for a commuter school like City College to survive, it must ask San Francisco taxpayers to fund parking structures on the college land. This land is already the site of one of the most densely populated campuses in the State when comparing the number of students per acre (and many of these CCSF acres are vertical)?

The State Chancellor's office for Community Colleges will not fund parking structures. The cost must be borne by local residents. So in order to maintain a Community College that adult learners in San Francisco wish and need, citizens will need to pay hundreds of millions of dollars via bond measures for parking structures!

In effect the PUC is being asked to transfer public land to private profit makers while at the same time charging the public millions of dollars to do so if they wish to maintain their college ------that truly does not make sense (!)"

*(Madeline Mueller, Email, September 23, 2019 [I-MUELLER1-5])*

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"Hi. Sorry, I'm a little nervous. This is my first time at any of these meetings and watching other people speak, it's incredibly inspiring -- sorry. My name is Jess Nguyen and I have been a student since January 2018 and a proud recipient of free City. I'm incredibly grateful for the opportunity to change my life and my career. And now, you help protect the access for future students.

I would like to echo the student disability advocate, Brad, for his statements on the already lack of available parking for disabled students. The parking lot is not just parking it's a representation of students, students carpool. They work two or three jobs just to go to school. Free city is their only option to go and actually get to the next level. They can't afford to even live -- I would -- I've heard the pictures shown in the developer's plan, of the land in question, showing the CCSF parking lot as being under-utilized. The photo was said to be taken on a Sunday. I don't know about you, but we don't offer many Sunday classes at our school or on Ocean campus. The library isn't even open. I don't think it's a fair representation of the current service this public land provides.

Nearby, Riordan uses the parking lot during the school year for band practice. The upper CCSF lot is filled by 10:00 a.m. and the Balboa Reserved Public Land has been essential for students.

Students have been posting videos on Twitter of the Balboa Reservoir being occupied by students, at ccsfstudentsays/#ccsfbottomlaw and ccsfsaid.

Students are going to experience the pain and it's going to affect the success of the community. Neighborhoods are flooded with cars. And if students are rushing to find parking in residential, surrounding areas, then you're going to increase the risk of pedestrian fatalities.

SF is known as a premier city. During the transit week, associate students surveyed students on their MUNI commute to school. One tweeted result showed that a large number of students take over an hour to get to school on MUNI. Students commute over an hour just to come here to learn. And it's not a surprise that veteran students come in droves to San Francisco. The education and higher rate of reimbursement encourages them to come all the way from Hollister, Joshua Tree, Stockton and Sacramento just to go. Where will students go?

Pushing the responsibilities -- pushing the burden on neighbors seems irresponsible.

Is this the absolute best use of the land? The school isn't perfect. It had seven to eight chancellors in the last decade. I question its management of money and how the CCSF Transportation Report represented students.

I've sat on the land. I've organized. I've advocated and I've talked to students for hours at a time. Seventy percent of the CCSF teaching staff are now part-timers. Their salaries won't even cover affordable housing that Avalon claims to build."

*(Jess Nguyen, CPC Hearing, September 12, 2019 [*I-NGUYEN-1*])*

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"This is a school that has been a part of the life of the City for generations. It's trained people for essential jobs and public services, provided enrichment to countless people through lifelong learning. And to not consider it, consider the impact seems to me a serious flaw that should be reexamined."

*(Marcie Rhine, CPC Hearing, September 12, 2019 [*I-RHINE-2*])*

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"Hi. My name's Sophie Sapphire. I was born and raised in San Francisco and I've been a City College of San Francisco student since 2012.

I recently moved near campus, so I can walk to school. But for seven years I had to drive, and that was living in the City. I lived in the outer Richmond. And to take a bus from there to City College takes an hour and a half. That's the time it takes for me to walk out of my house until I'm in my classroom. And that was what it was like for me.

So, like Vicky said, over 40 percent of students who go to City College commute.

And for those seven years that I drove to school, I always had to drive straight down to the lower lot, the language -- or, excuse me, the location that is in question, because the upper lot is always full. And as the years have progressed, this has only continued to get more and more severe. There is no access to parking on campus and, frankly, it's a necessity for many of these students who do work part and fulltime jobs, like myself, to be able to attend school."

*(Sophie Sapphire, CPC Hearing, September 12, 2019 [*I-SAPPHIRE-1*])*

"**1. Transportation**

The DRAFT SEIR says: "… it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts…" and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the Draft SEIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day…" It avoids assessing the possibility that students might stop attending CCSF. The report must consider the true impact on student attendance and enrollment and also on gig-working part-time instructors who have to travel between multiple community college sites."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-3*])*

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"The DRAFT SEIR claims that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. But just because it doesn't conflict with the TDM/Sustainability Plan doesn't mean there is no impact on the public service of CCSF. The current use of the Reservoir serves a public benefit in providing physical access to education."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-4*])*

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"Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.

**The DRAFT SEIR must consider the impact of reduced parking without first putting viable transportation options in place.** According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school."

Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules." (February 12, 2019)

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-7*])*

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"Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

The Balboa Reservoir Project will bring in 2,200 adult residents and will supplant all 1,007 spaces from the Lower Lot decreasing capacity parking for City College students by 50%. This will further erode enrollment at the College. The Balboa Reservoir Project will succeed in permanently shrinking City College, a deeply adverse impact on the College."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-8*])*

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"FYI the proposed public parking by the Balboa Reservoir Project will be too expensive (estimated cost is $12-$20/day while students now pay $3/day or $40/semester) for City College students. Instead it will serve BART commuters with high paying jobs."

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-9*])*

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"The proposed Reservoir development has forced City College to include in its Facilities Master Plan two to three new parking structures to make up for the loss of existing parking in the PUC Reservoir. This secondary impact must be addressed.

To alleviate this impact consider these proposals:

--establish a shuttle to BART from Frida Kahlo Way and offer free public transportation for college students (won for K-12 students in 2013);

--increase service on the lines serving the Reservoir area: K, 29, 43, 54, 15, and 8 Bayshore, and 49.

Only then can students with multiple responsibilities consider public transit as a means of getting to and from jobs and children's schools. Only then can they give up parking in the Balboa Reservoir allowing 100% affordable housing to be built on public land, leaving green space and enough parking for those students for whom even improved public transit will not alleviate their need to drive to school."

"The Balboa Reservoir Project is forcing City College to include new parking garages in its Facilities Master Plan (FMP). But where will the funding for the ambitious FMP come from? One of the proposed sources is a nearly billion-dollar bond measure not even on the ballot yet, let alone approved by the voters. Why force this added burden on one of the most treasured of San Francisco's institutions when it is struggling to regain its health?

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking.

When the Performing Arts and Education Center (approved by voters in bond measures in 2001 and 2005) is built on the Upper Reservoir, aka Upper Lot, at least 200 spaces will be lost, boosting usage to 80% of available space. When the 25% drop in enrollment is restored, then approximately 400 more parking spaces will be needed **pushing the combined lot's usage back to about 100% capacity.**"

*(Leslie Simon, Email, September 17, 2019 [*I-SIMON-10*])*

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"* The DRAFT SEIR must consider the impacts on the public service of City College of San Francisco educational services. The elimination of over 1,000 student parking spaces by the Reservoir development will limit students' access to CCSF-- a commuter school."

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-4*])*

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"Thank you for your invitation. My name is Etta Tima. I'm a resident for 48 years and at times old age helps to understand something. I live on Plymouth Avenue. I view the parking lot every morning. It is full. And it is necessary. And it should remain because during Ed Lee's time, he said he wanted to put another 100,000 people into the County of San Francisco.

Now, I'm asking you, where should they find education? If you reduce the parking space, this at this moment presents 4 percent of the student body. That is not very much."

*(Etta Tima, CPC Hearing, September 12, 2019 [*I-TIMA-1*])*

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"Plenty of students have no choice but to get to school by car and my peers who drive are already having a hard time finding parking on busy days."

*(Hold Sall Vesselenyi, Email, September 23, 2019 [*I-VESSELENYI-2*])*

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"Hi. My name is Vicky. I am a student at City College. And I'm here because -- I'm here to represent a lot of those who couldn't come with me. If you can imagine the 20,000 students who will be impacted by this, who are currently enrolled at City College. Twenty thousand students, yeah.

We already, as is, are a commuter school. We know that when we did a survey in 2016, it showed that over 45 percent of the students have to commute to the college. Right. And so, we already -- we're serving a population where more than 80 percent are either employed or looking for paid jobs. So, they're part-time students. Or, really, they're actually maybe taking a full course load and just working part-time.

And we know of that, there's 26 percent who work 26 plus hours. That's a survey we did in 2019.

So, if we're thinking about the population that we serve at City College, how they live in the intersections of being marginalized, having disabilities, being of color, being trans, they're probably the ones who are working these jobs.

So, if you're taking away access, physical access to education, where they have to transport themselves to the college, we're probably not going to have the same level of enrollment. These

students won't have access to educations. Is that something we're ready to take away from people? From a population that's already marginalized?"

*(Vicky, CPC Hearing, September 12, 2019 [*I-VICKY-1*])*

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"Additionally, I am concerned about how the project might impact students at City College. I frequently see cars parked in the reservoir because the main parking lot is full. City College serves a huge number of students who are juggling full or part-time jobs and do not have the ability to depend on MUNI (which is notoriously unreliable) to get to campus. If all of this parking is removed, I fear that we will be limiting the types of students that we are trying to serve in our community. There is nothing more American than people putting in extra effort and working hard to better their situation in life, and I feel that this seemingly "minor" loss of parking could result in a significant negative impact on these individuals."

*(Andy Weyer, Email, September 20, 2019 [*I-WEYER-3*])*

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"Please remember the current and future needs of City College students and faculty and the needs of the current residents of the neighborhood in regard to this plan for housing. Don't allow crisis thinking regarding the obvious need for affordable housing to push ahead with this ill-conceived plan that will have harmful consequences long into the future."

*(Debra Wilensky, Email, September 23, 2019 [*I-WILENSKY-4*])*

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"***The DRAFT SEIR is inadequate because it fails to consider the impact of monetary costs incurred to CCSF***

The proposed Reservoir development has already cost the college money due to the major redesign of the original PAEC (Performing Arts Education Center)."

*(Jennifer Worley, President, AFT 2121, Email, September 23, 2019 [*I-WORLEY-6*])*

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"***The DRAFT SEIR is inadequate because it fails to consider secondary environmental impacts***

The significant secondary environmental impacts of potential new CCSF parking construction replacing spaces eliminated by the project must be addressed."

*(Jennifer Worley, Email, September 23, 2019 [*I-WORLEY-7*])*

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"The students at San Francisco City College need that parking. There's no plans for parking for them. These are working class students who work at jobs. Where are they going to go? They're going to be driven out of City College because they won't have parking. They have to go to their

jobs. They won't be able to. They'll go to other colleges. That's part of the privatization and the destruction of City College, which is being pushed, really, by the developers and the mayor of San Francisco. And if the supervisors approve that, they're part of this actual development process."

*(Steve Zeltzer, CPC Hearing, September 12, 2019 [*I-ZELTZER-4*])*

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## Response PS-2: Public Services and Secondary Impacts

The comments assert that secondary impacts of the proposed project on City College and impacts on students, college enrollment, and the neighborhood were not addressed. Comments also disagree with the exemption from parking analysis allowed under CEQA section 21099, and state that the secondary impacts of a potential new City College parking construction replacing the spaces eliminated by the project must be addressed. Other comments disagree that because the project does not conflict with the City College TDM/Sustainability Plan does not mean the project would have no impact on the public service of City College.

Other commenters state that the project would result in shifting car usage to other schools where parking is easier, or causing students to drop out; and motorcycle safety training would be displaced by the project.

Comments regarding traffic congestion are addressed in Response TR-8, Vehicle Traffic Congestion and Associated Impacts, on RTC p. 4.C-71. Concerning the SEIR cover photo, refer to Response CEQA-2, Existing Setting and Baseline, on RTC p. 4.A-22. Regarding a BART shuttle, see Response GC-4, Scope of Project, on RTC p. 4.I-16.

The response to the public services and secondary impacts analysis comments is organized by the following topics:

- Loss of Parking
- CEQA Section 21099
- City College Awareness of the Proposed Project
- City College Not Analyzed in Balboa Park Area Plan EIR
- Scope of Utilities and Service Systems and Public Services Analysis
- Other Issues Raised

### *Loss of Parking*

The commenters do not present evidence supporting their claim that the secondary public services impact analysis is insufficient due to the project removal of parking that is currently used by City College.

Many comments state that the project would result in the loss of access to education due to the removal of parking. Another comment states that the loss of on-site parking "has the potential to disrupt businesses surrounding the site causing them to close or significantly alters their future

potential." Social and economic impacts, such as potential impacts on City College enrollment and disruption to businesses, need not be evaluated under CEQA. CEQA Guidelines sections 15064(e) and 15131 state economic and social effects are not considered significant impact under CEQA and need not be analyzed unless they could result in adverse physical effects on the environment. The commenters have provided no such evidence that such adverse physical effects could occur. The decision-makers, including the planning commission and the board of supervisors, may choose to consider such additional issues as part of their deliberations on the merits of the proposed project.

CEQA requires public agencies to identify potential direct or indirect effects on the environment that could result from a project. Direct effects are effects that are caused by a project and occur in the same time and place. An indirect or secondary environmental effect is a change in the physical environment that is caused by the project but occurs later in time or further away from the project site and is still reasonably foreseeable. The focus of CEQA is to address whether and how a proposed project's physical changes to the environment could result in adverse physical impacts on the environment, such as impacts of a project on air quality, water quality, or wildlife habitat. CEQA Guidelines section 15360 defines "environment" for the purposes of CEQA as "the *physical* conditions which exist within the area which will be affected by the proposed project…" (emphasis added).

The draft SEIR adequately addresses the direct and indirect impacts of the project. The CEQA Guidelines Appendix G question for public services, with respect to educational facilities, asks whether the project would "result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for … schools…."

This question is perhaps best looked at as a two-part question:

1. Would there be any change, as a result of the project, in a public agency's ability to "maintain acceptable service ratios, response times, or other performance objectives for … schools…?"
2. If the answer to the above inquiry is or could be yes, the second part of the Appendix G question asks whether "the provision of new or physically altered governmental facilities [or the] need for new or physically altered governmental facilities" would "result in substantial adverse physical impacts" or if "the construction of [such facilities] could cause significant environmental impacts."

The reason that this Appendix G question must be understood in this manner is that "Effects analyzed under CEQA must be related to a physical change" per CEQA Guidelines section 15358(b). This may include both direct and indirect effects; regardless, however, a CEQA impact must result from a physical change.

Accordingly, the reasoning with respect the potential effect of the removal of the surface parking lot on the project site as a parking use for City College is as follows:

a) Would the loss of the existing use of the project site for City College parking conflict with one or more performance objectives established by City College?

b) If a) is yes, would that require the need for new or physically altered City College facilities, such as TDM or replacement parking?

c) If b) is yes, would the construction or operation of such new or physically altered City facilities, such as TDM or replacement parking, result in any adverse physical effects? Examples include an increase in VMT, increased emissions of criteria pollutants and/or toxic air contaminants, increased noise, or other impacts.

Only if questions a), b), and c) were all answered in the affirmative would a significant impact result under CEQA. As shown in draft SEIR and reiterated and expanded below, the answer to question a) is no. Even if the answer to question a) and b) is yes, the answer to question c) is no as explained below.

Question a): As discussed on draft SEIR Appendix B, p. B-90, the City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. City College does not have performance objectives or other standards related to the provision of parking, except insofar as it seeks to reduce automobile trips, which would serve to decrease parking use.

For informational purposes, neither California Community Colleges nor City College use parking availability as a variable for projecting future enrollment or as an enrollment strategy. The department reviewed several California Community Colleges and City College sources for enrollment projection methodologies, enrollment strategies, and past and future enrollments. Those sources are summarized in **Table RTC-11, Community Colleges Enrollment Projection Variables and Enrollment Strategies**, and **Table RTC-12, City College Student Enrollment**. Some sources show varying enrollment projections. This is to be expected, given the multiple variables that affect enrollment and as prior enrollment projections have not been met. Specific to City College, enrollment has sometimes changed substantially over the decades, including a decline in enrollment between 2008–09 and 2016–17. City College sources did not mention parking availability as a variable for this changing enrollment.

**TABLE RTC-11**
**COMMUNITY COLLEGES ENROLLMENT PROJECTION VARIABLES AND ENROLLMENT STRATEGIES**

| Source | | Summary | Enrollment Projection Variables OR Enrollment Strategy |
|---|---|---|---|
| **Month/ Year** | **Name** | | |
| June 2011 | Research and Planning Group of California Community Colleges, "Weekly Student Contact Hours Forecast Report" | Report prepared for California Community College Chancellor's Office to explore options for forecasting enrollment at the districts that constitute the state community college system. | Enrollment Projection Variables:<br>• Population by different age group<br>• Population by ethnicity<br>• Financial and economic (e.g., recession, state budget)<br>• Population participation rate (# per thousand residents who attended college district) |
| Unknown 2018 | City College of San Francisco, "Draft Enrollment Management and Growth Plan 2018–2022" | Draft plan that established a set of benchmarks and goals to guide the City College's efforts to restore enrollment for academic years 2018/19 through 2021/22. | Enrollment strategies:<br>• Free City<br>• Online Learning<br>• Student-Centered Scheduling Practices<br>• High School Partnerships<br>• New Programs in Major Areas<br>• Centers and Major Locations<br>• Noncredit Strategies<br>• Student Development<br>• Marketing and Public Relations |
| May 2018 | Collaborative Brain Trust, "The Path to 32,000 FTES Report" | Report to the Chancellor and Board of Trustees of City College of San Francisco to validate the goal set by City College to attain a full-time equivalent student enrollment (FTES) of 32,000 by the end of the 2021–2022 academic year. They conclude "there is definitely an opportunity to grow its FTES. However, necessary changes will take time and there is no assurance that the goal can be reached in the next four years." | Enrollment strategies:<br>• Student carrying load<br>• Labor Market Analysis<br>• Free City<br>• Enrollment Management/ Scheduling<br>• Distance education |
| August 2019 | California Community Colleges Chancellor's Office, "2020–21 Five-Year Capital Outlay Plan" | The report identifies the statewide capital needs, priorities, and costs of the California Community Colleges. The report uses an enrollment projection model to identify future growth. | Enrollment Projection Variables:<br>• Student participation rates<br>• In district and out of district enrollment<br>• Weekly student contact hours to enrollment ratios<br>• Adult population projections |

**TABLE RTC-12**
**CITY COLLEGE STUDENT ENROLLMENT**

| Source | | Past and Future Fulltime Equivalent Students Enrollment – Campus Wide (academic years)[a] | | | | | |
|---|---|---|---|---|---|---|---|
| Month/Year | Name | Range between 1992–1993 and 2016–2017[b] | 2017–2018 | 2018–2019 | 2019–2020 | 2020–2021 | 2024–2025 |
| Unknown 2018 | City College of San Francisco, "Draft Enrollment Management and Growth Plan 2018–2022" | 19k to 43k (e) | 23k (p) | 26k (p) | 28k (p) | 31k (p) | — |
| March 2019 | City College of San Francisco, "Facilities Master Plan Final Draft" | | 21k (p) | 22k (p) | 23k (p) | 25k (p) | 31k (p) |
| June 2019 | City College of San Francisco, "Education Master Plan 2018–2025" | | — | | | | |
| Accessed April 2020 | City College, "Instructional Productivity" (webpage) | | 23k (e) | 23k (e) | — | — | — |
| August 2019 | California Community Colleges Chancellor's Office, "2020–21 Five-Year Capital Outlay Plan"[c] | — | | | | 24k (p) | 28k (p) |

NOTES:

Numbers rounded to nearest 1k.

e = actual prior or existing enrollment; p = projected enrollment; — = no reported value

[a] Data was not readily available to isolate only Ocean campus.

[b] The sources had variation in actual prior enrollments. The department selected the lowest of the values for this range; if the values differed. City College enrollment reached its peak in 2008–09 and experienced declines to 2016–17.

[c] The department calculated the values in this row by using the weekly student enrollment contact hours projections in Appendix E.1, divided by 15. This calculation is consistent with that presented in the City College Facilities Master Plan.

Indirect or secondary effects due to the loss of parking and City College's performance objective to reduce automobile trips are analyzed on draft SEIR Appendix B, p. B-90. The analysis concludes that under the Developer's Proposed Option, the up to 750 public parking spaces could accommodate a hypothetical typical four-hour parking shortfall of 37 to 239 parking spaces during the period that City College classes are in session. This shortfall is based on a parking occupancy data survey conducted in 2017 and 2018. This hypothetical shortfall would not be expected to occur during the other 20 hours of the day or during periods that City College classes are not in session.

Under the Additional Housing Option with no public parking garage, the draft SEIR Appendix B, p. B-90 concludes that (1) the additional time needed for drivers to find alternative spots or circling for parking would not result in significant secondary effects, and (2) it would be speculative to conclude the loss of parking would lead to substantial adverse impacts related to the construction of new or physical altered facilities at City College. Thus, the project would not result in significant impacts to the studied performance objective.

The draft SEIR states that the hypothetical shortfall in parking supply "would cause some drivers to shift to another mode of travel," among other things such as rearranging travel or parking elsewhere. Studies show that the removal of parking would likely cause some drivers to shift to another mode of travel; thus, the information in the draft SEIR regarding this shift is based on

substantial evidence. The study cited in footnote 131 on draft SEIR Appendix B, p. B-90, is included in the project's administrative record: City and County of San Francisco, *Transportation Demand Management Technical Justification*, June 2016, references research that has been used to confirm that the availability of parking increases private car ownership and vehicle travel and that parking supply can undermine incentives to use transit and travel by other modes (see p. 31). Additionally, this document summarizes research conducted in San Francisco that found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar context that provide more off-street vehicular parking. Also refer to Response TR-7, Parking, on RTC p. 4.C-61.

As further described under Impact C-PS-1 on draft SEIR Appendix B, p. B-91, the cumulative analysis considers the proposed project in combination with the City College facilities master plan projects identified in Table 3.A-2 on draft SEIR p. 3-A-13. These projects include a Performance Arts Education Center that would replace a portion of the City College parking on the east basin (or a Diego Rivera Theater), a STEAM building, and an east basin parking structure. The additional parking space shortfall from the facilities master plan would be accommodated should the east basin parking structure be developed. Additionally, according to Fehr & Peers City College of San Francisco Transportation Demand Management (TDM) and Parking Plan, the Performance Arts Education Center "performances would likely occur the evening hours, when parking is much more readily available."[74]

The draft SEIR appropriately evaluates impacts to public services, including secondary impacts related to the loss of City College parking as discussed in Impact PS-1 on draft SEIR Appendix B, pp. B-85 to B-91. Although unrelated to the public services analysis, refer to RTC Chapter 5, Draft SEIR Revisions, on RTC p. 5-10, which updates the status of the potential City College East Basin Parking Garage project.

Although the answer to question a) is no, we turn to questions b) and c) for informational purposes.

Questions b and c): A significant effect on the environment can only result from a physical change relative to existing conditions. Thus, the operational effects of replacing the existing City College parking on the project site with new parking at a nearby location such as the east basin, in and of itself, would result in little or no effect because it would effectively replace existing City College parking with replacement parking at a location close enough so as to not meaningfully change travel patterns.

The draft SEIR considers City College replacement parking on the east basin in its cumulative analysis (see discussion of City College Facilities Master Plan on draft SEIR pp. 3.A-10 to 3.A-14). As described in draft SEIR Section 3.A, Transportation and Circulation, cumulative transit delay and passenger/freight loading effects would be significant and unavoidable (Impacts C-TR-4 and C-TR-6b, respectively). Likewise, cumulative effects related to regional air quality would also be

[74] Fehr & Peers, *City College of San Francisco Transportation Demand Management (TDM) and Parking Plan,* March 15, 2019; page 33. Available at: *http://ab900balboa.com/EIR_References/2019-0315_fehr%20peers_CCSF%20TDM%20Plan_2019-03-15_FP.pdf.pdf*. Reviewed February 26, 2020.

significant and unavoidable with mitigation (Impact C-AQ-1 in draft SEIR Section 3.D, Air Quality). With respect to construction impacts, as identified in draft SEIR Sections 3.C, Noise, and 3.D, Air Quality, cumulative construction noise impacts, including development of City College parking on the east basin, would be significant and unavoidable with mitigation with respect to noise (Impact C-NO-1) and air quality (health risk; Impact C-AQ-2).

Further, if City College or the proposed project does not construct additional parking for City College users, this lack of additional parking would not result in direct or indirect physical environmental impacts not already described above or explained earlier as it relates to the Appendix G public services question. Based on the foregoing, the loss of the project site as parking for City College would have no significant effect under CEQA that was not already analyzed in the draft SEIR.

### *CEQA Section 21099*

CEQA section 21099, Senate Bill (SB) 743 was signed by Governor Jerry Brown in 2013. SB 743 added section 21099 to CEQA regarding analysis of aesthetics and parking impacts for urban infill projects. As described in draft SEIR Section 3.A (p. 3.A-3), CEQA section 21099(d)(1) states that "… parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Thus, it is state legislation, and not a unilateral City decision, that has eliminated the consideration of parking as a CEQA impact for infill projects; the City has implemented CEQA section 21099. The same holds true for removal of automobile delay (aka vehicular level of service) analysis and inclusion of vehicle miles traveled analysis, a change also made pursuant to section 21099(b).

The proposed project meets the three criteria under CEQA section 21099 because the project site is (1) located within 0.5 mile of several Municipal Railway (Muni) transit lines and the Balboa Park Bay Area Rapid Transit (BART) station; (2) located on an infill site that is developed as surface parking, and adjacent to residential and mixed uses; and (3) would include residential, retail, and community center and childcare uses meeting the definition of a mixed-use residential project. This determination and supporting analysis is documented in "San Francisco Planning Department Eligibility Checklist CEQA Section 21099—Modernization of Transportation Analysis for the Balboa Reservoir Project" (November 15, 2018), which is available for review at 1650 Mission Street, Suite 400, San Francisco, California as part of Case No. 2017-007883ENV. Therefore, CEQA section 21099 applies to the proposed project.

### *City College Awareness of the Proposed Project*

Concerning the allegation that City College staff and/or administrators may not have had "the time and resources to properly consider the impact of this development" due to the college's threatened loss of accreditation, this comment does not raise physical environmental issues. For informational purposes, planning department staff has engaged in communications with City College staff, as explained in the Response CEQA-3, Administrative Record, on RTC p. 4.A-31.

### *City College Not Analyzed in Balboa Park Area Plan EIR*

Concerning the comment that it is not appropriate to compare public services impacts to those effects analyzed in the Balboa Park Area Plan PEIR in that City College was not analyzed in the PEIR, CEQA Guidelines section 15162 states that an impact previously analyzed in an EIR need not be re-evaluated in an EIR unless one of several factors arises. One of these factors is that the project could have one or more significant effects not discussed in the previous EIR. Inasmuch as the PEIR identified no significant effects on public services and the draft SEIR Appendix B concludes that public services impacts would be less than significant, this topic—Public Services—would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR.

### *Scope of Utilities and Service Systems and Public Services Analyses*

One comment states that the merging of the Utilities and Public Service Systems and Public Services initial study checklist categories in the consultant's scope of work is deficient. The analysis contained in the draft SEIR is prepared in accordance with the CEQA Guidelines. The scope of work referred to is required as part of the project initiation phase, in accordance with the planning department's "Environmental Review Guidelines." However, the scope of work is not a replacement for the initial study checklist.

Draft SEIR Appendix B evaluates impacts on utilities and service systems in Section E.13 (starting on p. B-57) and impacts on public services in Section E.14 (starting on p. B-80), including effects on City College (Section E.14) and fire protection (Section E.13), which is also mentioned by the commenter. The scope of the public services analysis is limited by definition to services that are publicly funded pursuant to CEQA Guidelines Appendix G. Archbishop Riordan and Lick Wilmerding are private high schools. Similarly, the motorcycle classes are not considered public services.[75] Effects on these facilities and uses would be considered social and/or economic effects, which, as explained above in this response, are not considered significant effects on the environment.

### *Other Issues Raised*

One commenter states that the 43 and 29 Muni lines and BART all have existing "capacity issues" and that "reducing transportation demand by 15 percent will only limit student and faculty/access and shrink City College."

As explained on draft SEIR p. 3.B-77, the City does not consider transit ridership capacity, by itself, in CEQA analysis, consistent with state guidance to not treat the addition of new users as an adverse impact and to reflect enactment of new funding sources for and policies that encourage additional ridership. Nevertheless, the draft SEIR provides, in Appendix C2, Transit Assessment Memorandum, a discussion of project ridership and capacity. As shown there, while BART ridership does exceed capacity in the peak hours to and from downtown, neither the 29 Sunset nor the 43 Masonic Muni lines approach 85 percent capacity utilization.

[75] The Motorcycle Safety Foundation is a not-for-profit organization sponsored by U.S. manufacturers and distributors of motorcycles. *https://www.msf-usa.org/AboutMSF.aspx*.

Regarding the comment concerning reducing transportation demand by 15 percent, it is assumed that this refers to the proposed project's Transportation Demand Management (TDM) program. Reducing project-generated vehicle trips would mostly affect only project residents. If the comment is intended to refer to City College's TDM program, implementation of that plan would be the responsibility of City College.

Concerning the "Nelson-Nygaard TDM Framework," this is a document prepared by Nelson\Nygaard Consulting, Inc., in coordination with the San Francisco Planning Department and the San Francisco Municipal Transportation Agency, and with funding from the San Francisco County Transportation Authority (SFCTA) and the Metropolitan Transportation Commission. It was published by SFCTA in December 2017. The TDM Framework "was designed to initiate collaboration between the City, City College of San Francisco (CCSF), and surrounding neighborhoods in the effort to encourage sustainable transportation choices in the area," but is not a plan but rather "a supportive resource" to provide "a common foundation for TDM within the Balboa Reservoir, City College, and the surrounding neighborhoods."[76] As noted, the proposed project would be required under the San Francisco Planning Code to develop and implement a project-specific TDM Plan applicable to the project itself. Refer to Response TR-2, Travel Demand, on RTC p. 4.C-7, for additional information concerning TDM.

Regarding the comment that the draft SEIR should compare City College to comparable educational institutions, there is no requirement in CEQA for such an analysis, particularly with respect to parking, which as explained on draft SEIR p. 3.A-3, is not a CEQA impact in the case of the proposed project.

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# Biological Resources

The comment and corresponding response in this section cover draft SEIR Appendix B topic E.15, Biological Resources:

- Comment BI-1: Biological Resources

## *Comment BI-1: Biological Resources*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-HALL-1

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[76] San Francisco County Transportation Authority, Metropolitan Transportation Commission, San Francisco Municipal Transportation Agency, San Francisco Planning Department, Nelson\Nygaard Associates, Inc., *Balboa Area Transportation Demand Management (TDM) Framework*, Final Draft, December 2017. Available on the internet at: http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/BalboaPark_TDM_Final_121117.pdf. Accessed February 27, 2020.

"I'm greatly disappointed to learn that the Balboa Reservoir Draft Supplemental Environmental Impact Report fails to take into consideration San Francisco's vanishing biodiversity.

Although the reservoir was meant to be a hard surface where plants shouldn't grow, over the years native coyote brush (Baccharis pilularis), yellow bush lupine (Lupinus arboreus) and various non-native shrubs have colonized the area. The result is a patchy habitat that has attracted a thriving flock of Coastal Nuttall's white-crowned sparrows. I saw breeding evidence this Spring. About 60 of the birds were counted. A local resident, Greg Gaar, assures me that they've been breeding there since, at least, the 1970s. The attraction is the native coyote brush, an amazing plant that offers cover for our local birds and sustenance for over 54 insect species (https://plants.usda.gov/plantguide/pdf/pg_bapi.pdf). Also present are house finch, red tail hawk, California scrub jay, Anna's hummingbird, West Coast lady butterfly, bumblebee, grasshopper and various lichens.

A recent World Wildlife fund study points out that the world has lost 52% of its biodiversity since the 1970s (https://www.cbsnews.com/news/world-wildlifefund-wwf-half-the-worlds-biodiversity-gone-over-last-40-years/). This means that, in San Francisco, where habitat for biodiversity is at a premium, we need to be careful where we trod. City and state officials agree, with each entity rolling out biodiversity resolutions that have the goal of protecting flora and fauna.

(https://sfenvironment.org/policy/resolution-adopting-citywide-biodiversitygoals)

(http://opr.ca.gov/docs/20180907-CaliforniaBiodiversityActionPlan.pdf)

I urge you to hire an ecologist and make plans to mitigate by building new local native habitat in the immediate proximity of your development so biodiversity can adapt to the stark changes you're proposing. Most of the creatures on this property are non-migratory and have no where else to go. Please include biodiversity mitigation in your report."

*(Bob Hall, Email, August 21, 2019 [*I-HALL-1*])*

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## Response BI-1: Biological Resources

The commenter requests that biodiversity mitigation be included in the draft SEIR.

Draft SEIR Appendix B, Section E.15, Biological Resources, evaluates project impacts on biological resources, including the potential for adverse effects on special-status species, sensitive natural communities, protected wetlands, and wildlife movement and nursery sites. The impact of the loss of vegetation on the site was not identified as an impact on candidate, sensitive, or special-status species because on-site habitat is not suitable for those species and none were identified on the project site based on a review of the California Natural Diversity or California Native Plant Society databases (see draft SEIR Appendix B, p. B-94). Therefore, mitigation is not required.

Impact BI-4 (draft SEIR Appendix B, p. B-95) discusses potential impacts on the movement of resident or migratory wildlife species and acknowledges that trees and vegetation within the project site may provide suitable habitat for migratory and resident birds. The analysis concludes that should removal of the trees and vegetation and construction-related activities occur during

the nesting season, compliance with the requirements of the Migratory Bird Treaty Act and the California Fish and Game Code would ensure that impacts associated with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors would be less than significant; for this reason, no mitigation is proposed.

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# Geology and Soils

The comment and corresponding response in this section cover draft SEIR Appendix B topic E.16, Geology and Soils:

- Comment GE-1: Geology and Soils

## *Comment GE-1: Geology and Soils*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-TIMA-3

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"If you are building 1,200 units on an earthquake fault, and I'm sure you know because I have expressed this before, the earthquake fault runs right through City College, and Riordan High School, and Wildwood."

*(Etta Tima, CPC Hearing, September 12, 2019 [*I-TIMA-3*])*

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### Response GE-1

The comment states that an earthquake fault runs through City College, Riordan High School, and Wildwood Way in the Westwood Park neighborhood.

The comment does not specify which fault is in the project area. As stated under Impact GE-1 on initial study p. B-100 of the initial study (SEIR Appendix B), "[i]n a seismically active area, such as the San Francisco Bay Area, the remote possibility exists for future faulting in areas where no faults previously existed; however, the geotechnical investigation concluded that the risk of surface faulting and consequent secondary failure from previously unknown faults is very low." In addition, no known active earthquake faults or fault zones cross the project area, and the area is not within an Alquist-Priolo Fault Zone or a Seismic Hazards Zone. There is a well-established regulatory framework and permitting process in place, enforced through the building department's site permit process and the San Francisco Building Code. The project sponsor would work with qualified geotechnical engineers on a design-level geotechnical report as part of the building permit process. The report would reflect the latest iteration of the proposed project, and geotechnical recommendations where necessary to comply with the building code. The building department staff would review the construction plans for conformance with the recommendations in the geotechnical report as part of the building permit review process. The project sponsor and

the design team would be required to follow the geotechnical report recommendations as part of the building permit process.

# 4.I General Comments

The comments and corresponding responses in this section cover General Comments (GC) on topics throughout the draft SEIR. These include topics related to:

- Comment GC-1: General Environmental Comments
- Comment GC-2: Noticing
- Comment GC-3: Opinions Related to the Project
- Comment GC-4: Scope of Project
- Comment GC-5: Market-Rate Units

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## *Comment GC-1: General Environmental Comments*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| A-CALTRANS-3 | I-BARISH3-28 | I-HEGGIE1-1 |
| A-CALTRANS-4 | I-BARISH3-42 | I-HONG-5 |
| O-ARHS-1 | I-BERNSTEIN1-1 | I-KAUFMYN-1 |
| I-BARISH1-2 | I-BIERINGER1-2 | I-KOPP-3 |
| I-BARISH1-6 | I-BIERINGER4-2 | I-KOWALSKI-3 |
| I-BARISH2-2 | I-BURGGRAF-1 | I-MARTINEZ-1 |
| I-BARISH2-8 | I-BURGGRAF-2 | I-MUELLER2-1 |
| I-BARISH3-1 | I-E.HANSON-1 | I-MUHLHEIM-1 |
| | | I-PEDERSON2-2 |

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"**Coordination**

As the project progress, please keep Caltrans informed of any updates with the project, including but not limited to alternative selection and scope changes."

*(Wahida Rashid, Acting District Branch Chief, Caltrans, Letter, September 10, 2019 [*A-CALTRANS-3*])*

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"**Lead Agency**

As the Lead Agency, the City of San Francisco is responsible for all project mitigation, including any needed improvements to the State Transportation Network. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures."

*(Wahida Rashid, Acting District Branch Chief, Caltrans, Letter, September 10, 2019 [*A-CALTRANS-4*])*

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"Good afternoon. That's a tough one to follow, but I've got a few concerns. My name's Dr. Andrew Currier. I'm representing Archbishop Riordan High School, as its President.

There's a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It's a specialized designed learning area for students with diagnosed learning needs that they can't -- we can't move them elsewhere in the building.

So, we're worried that there's not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don't have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can't go elsewhere to receive this help."

*(Andrew Currier, President, Archbishop Riordan High School, CPC Hearing, September 12, 2019 [*O-ARHS-1*])*

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"I'm here to state my opposition to the project in general and to highlight some of the many flaws in the draft EIR. I'd like to show you a rendering of what the project will look like if it has 1,550 units. As you can see, this is an oversized project. It would squeeze up to 1,550 units of housing, mostly market rate, onto a parking lot adjoining CCSF, and a quiet neighborhood of single-family homes.

While it may be a developer's field of dreams, this project is an environmental nightmare to the surrounding neighborhoods and to City College. It will create traffic congestion, transit issues, environmental problems galore, convert public land into private property for profiteering developers, and it will not meet the growing need in San Francisco for affordable housing."

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH1-2*])*[77]

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"In these and in many other areas the draft SEIR offers no objective criteria to serve as a basis for determining that the impacts aren't less than significant.

Accordingly, it is a flawed document that must be revised before it is submitted for final review. Thank you for your consideration."

[77] The figure referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH1-6*])*

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"I am here … to highlight some of the flaws in the Draft Subsequent EIR. (Att 1)

This oversized project could squeeze up to 1,550 units of housing, mostly market rate, onto a parking lot adjoining CCSF and a quiet neighborhood of single-family homes. (Att 1)

While it may be a developer's Field of Dreams, the project is a nightmare to the surrounding neighborhoods and to City College.

It will create congestion, transit problems, lack of access to CCSF, and many other environmental problems. It will also convert public land, currently owned by the SF PUC and used by CCSF for decades, into private property for profiteering developers. And it will not meet the growing need in San Francisco for affordable housing."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-2*])*

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"In these and many other areas, the DSEIR offers no objective criteria to serve as a basis for determining that the impacts are not significant. Accordingly, the it is a flawed document that must be revised before it is submitted for final review."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-8*])*

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"After reviewing the DSEIR it is clear there will be many significant environmental impacts to that cannot be mitigated if this project is approved. Additionally, the DSEIR is flawed because it fails to consider numerous environmental impacts that should have been considered.

Following are my questions and comments regarding this DSEIR.

<u>Definitions</u>

"Substantial Evidence," as used in this letter, shall mean: "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (14 Cal Code Regs Sec. 15384(a)) "Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (14 Cal Code Regs Sec. 15384 (b) ) " Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence." (14 Cal Code Regs. Sec 15064(f)(5))

"Feasible Alternatives", as used in this letter, shall mean: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code section 21061.1; 14 CCR section 15364)"

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-1*])*

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"**NOVEMBER 12, 2018 SCOPING LETTER**

Included in this letter as Attachment 1 is the November 12, 2018 Scoping Letter submitted for this Project. Many of these issues were not addressed in the DSEIR. These comments should all be addressed during the preparation of the FSEIR."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-28*])*[78]

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

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-42*])*

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"My name is Harry Bernstein. I'm a faculty member at City College. So, I would like to provide some context to the impacts indicated in the Subsequent EIR for the Balboa Reservoir Project.

Noise, air quality and transportation from the project will cause significant and unavoidable adverse impact. You hear those words? Significant and unavoidable adverse impact. Impacts on the college students, faculty and staff, students at the adjacent Riordan High School, and students in the childcare program at the adjacent multi-use building.

So, these topics, noise, air quality, and transportation came up before the Planning Commission at their meeting in August. And this was the context I want to mention. The mayor has sought to streamline development, housing development in San Francisco. And so, she is trying to get a -- have several factors that are considered in CEQA to reduce the required mitigation. So, these, besides secondary ones like cultural and paleontological, they include noise, air quality, and transportation.

So, out of this 500-page report, the serious issues are the one that the City is trying to -- I don't know if it's put under the rug, but not have to consider. They've already done that with parking.

Okay, so that's the way we're going, just to save some months, save some dollars, but to give the public and the public health less opportunity, less consideration."

*(Harry Bernstein, CPC Hearing, September 12, 2019 [*I-BERNSTEIN1-1*])*

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[78] The attachment referenced by the commenter can be found with the original comment letter in RTC Attachment 2, Comment Letters and Emails on the Draft SEIR.

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"And I went down to the Planning Commission and I picked up this book, or this tome, as I call it. And as I read through it, I started calling this the Balboa Housing Boondoggle Project.

And I cannot separate the actual project from this SEIR. It's like they borrowed some frumies -- some Sharpies from Donald Trump, drew the lines to make their own reality, and ignored the reality that the neighbors of this project and the students of City College are going to be facing."

*(Garry Bieringer, CPC Hearing, September 12, 2019 [*I-BIERINGER1-2*])*

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"When I finally picked up a copy of the SDEIR and read through it, I was appalled at how this document minimized all the problems this would cause the community and the 2 large educational institutions closest to this proposed housing: CCSF and Riordan High School. The routes laid out for the trucks (several estimated to be 20 trucks/hr), via the north access road (right off Frieda Kecko way (formerly Phelan Ave.) would cause years of disruption to of us that must drive, walk, or use MUNI down this street and will provide massive noise pollution along with air pollution. Using Lee Avenue would totally block traffic on Ocean Ave., and there is a very large children's climbing structure about 50 yards from the proposed Lee Ave. Route. There is no way we can have children climbing on that structure with all the trucks whizzing by so closely."

*(Garry Bieringer, Email, September 23, 2019 [*I-BIERINGER4-2*])*

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"You have received a written comment via Email from Michael Ahrens and the Board of the Westwood Park Association in parallel. I am a resident of Westwood Park as well (in the 1300 Plymouth block) and I wholeheartedly agree and concur with all the comments made by the WPA board, especially with the comments made by other residents (Exhibit 5 and 6 respectively attached to the WPA comments)."

*(Alex Burggraf, Email, September 23, 2019 [*I-BURGGRAF-1*])*

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"In general, I think that a lot of the infrastructural impact (parking, traffic, noise during construction) on the neighborhood of the project - especially Westwood Park - is either not adequately addressed or drastically underestimated in the DEIR."

*(Alex Burggraf, Email, September 23, 2019 [*I-BURGGRAF-2*])*

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"I also want to express the concern that the aesthetic effects of the proposed development, including height of buildings compared to surrounding areas, is gravely underestimated and downplayed, especially considering that Westwood Park has been declared a "Residential Character District" by the Board of Supervisors."

*(Alex Burggraf, Email, September 23, 2019 [*I-BURGGRAF-4*])*

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"The DSEIR is not only inadequate, it stands as evidence to a planning process that runs contrary to the principles of good planning, fair input and democracy.

From the onset the project has been biased and selective in the way facts have been presented to the public for input. The SEIR clearly downplays and minimizes the potential impacts of the project on City College of San Francisco, and the surrounding educational institutions"

*(Edward Hanson, PhD, Email, September 23, 2019 [*I-E.HANSON-1*])*

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"My name's Jennifer Heggie. I'm from Sunnyside and representing the Balboa Reservoir Committee for the SNA.

First, I want to thank the Planning Department for this SEIR. It identifies many of our concerns that are issues that cannot be mitigated, including noise, transportation, and air quality."

*(Jennifer Heggie, CPC Hearing, September 12, 2019 [*I-HEGGIE1-1*])*

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"4. During the construction period, this massive project will need a lot of daily communication from the sponsor to the community. All too often this process fails."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-5*])*

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"Hi. I'm Wynd Kaufmyn and I've been a teacher at City College for 36 years. You know, San Francisco has always prided itself on its commitment to social justice and equity. To that end, the City's undertaking an effort to train its decision makers to be more sensitive and aware of social justice.

In fact, I know that on September 26th you, the Planning Commission, are scheduled to participate in a racial and social equity training.

In light of this, and in light of the fact that the draft Environmental Impact Report states the need to develop the reservoir in a manner that will best benefit the neighborhood, the City, and the region as a whole. In light of these things, I ask you to consider the social justice aspects of the proposed Balboa Reservoir Project with respect to housing, education, and labor."

*(Wynd Kaufmyn, CPC Hearing, September 12, 2019 [*I-KAUFMYN1-1*])*

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"And, thirdly, the environmental impact to the neighborhood will be overwhelming. When they rebuilt Ocean Avenue, they used right behind our house, which abuts to the reservoir, as a

dumping ground for the concrete and asphalt. There were over 70 filed complaints, with payoffs for damages to homes, sewer lines, et cetera, et cetera, et cetera."

*(Kevin Kowalski, CPC Hearing, September 12, 2019 [*I-KOWALSKI-3*])*

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"Has the Planning Department truly assessed the environmental impact, more cars and more pollution, on the neighbors around the Balboa Reservoir?"

*(Anita Martinez, Email, September 23, 2019 [*I-MARTINEZ-1*])*

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"The email below was sent during last year's CEQA process preceding the current Balboa Reservoir DSEIR. In it, I noted areas which should have been reviewed in this environmental impact report. Many were not; only a few were cherry-picked to be addressed. I do not believe that this is fully legal."

*(Madeline Mueller, Email, September 23, 2019 [*I-MUELLER2-1*])*

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"<!--[if !supportLists]-->1. <!--[endif]--> This is not a complete report. It does not re-study many areas of the original Balboa Station Area Plan that included a much smaller housing project. Much larger project = larger impact."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-1*])*

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"it fails to adequately evaluate the environmental impacts of the 750-space public parking garage included in the developer's proposed option"

*(Christopher Pederson, Email, September 23, 2019 [*I-PEDERSON2-2*])*

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## Response GC-1: General Environmental Comments

The comments include general statements about the City's responsibility for project mitigation and monitoring. A number of comments express general dissatisfaction with respect to the adequacy of the draft SEIR analysis of noise, air quality, and traffic. In some cases, the comment serves as an introductory paragraph for a more specific and detailed list of issues that follows (which are bracketed as separate comments and responded to elsewhere in this document under each specific topic). Specific comments on which these conclusions may be based are responded to elsewhere in this RTC document, under the relevant environmental topics. The general environmental comments here, and where these issues are addressed in the draft SEIR and this RTC document, include the following:

*Environmental Impact Report Topics*

- Congestion, transit, pedestrian, and other transportation impacts [draft SEIR Section 3.B; RTC Section 4.C]
- Noise impacts [draft SEIR Section 3.C; RTC Section 4.D]
- Air quality impacts [draft SEIR Section 3.D; RTC Section 4.E]

*Initial Study Topics*

- Effects on City College of San Francisco [SEIR Appendix B Section E.14; RTC Section 4.H]

Also refer to Response CEQA-1, Type of EIR, Tiering, and Focusing Second-Tier Review, on RTC p. 4.A-3 for further discussion of the concept of tiering from the prior EIR.

One commenter states that project construction would require communication between the project development team and the community. The comment is acknowledged, and it is noted that Mitigation Measure M-NO-1, Construction Noise Control Measures on draft SEIR pp. 3.C-30 to 3.C-31, requires the preparation of a construction noise control plan that is to be reviewed and approved by the planning department. Such a plan, to be prepared by a qualified acoustical consultant, typically requires the posting of contact information at the project site to allow nearby residents and others to lodge complaints regarding noise generated during construction. The project sponsor would be required to file weekly noise monitoring log reports with the planning department that would include listing of noise complaints and how they were resolved.

A commenter makes specific reference to a "children's climbing structure about 50 yards from the proposed Lee Ave. Route" and alleges that the project would result in a safety hazard to children using the climbing structure. This comment apparently concerns the play structure at the northern end of Unity Plaza. While the play structure is, indeed, about 50 yards east of the proposed Lee Avenue extension, the play structure is considerably closer than 50 yards (i.e., about 20 yards) to the existing Muni City College Loop. The play structure is also immediately adjacent to the paved area off of Lee Avenue that is currently used as an informal truck loading zone for the Whole Foods grocery and other retail stores. Neither of these proximate bus and truck uses has resulted in reported safety issues with respect to the play structure or Unity Plaza. Moreover, under conditions with the proposed project, with the Lee Avenue extension completed, the Unity Plaza play structure would be no closer to an active street than are many other play structures and children's playgrounds in the City. For example, in the greater project vicinity, Minnie & Lovie Ward Recreation Center has a children's playground with play structures that is 30 yards or less from Capitol Avenue. The commenter raises no specific reason why the Unity Plaza play structure should be subject to greater traffic-related effects than any other comparable recreational facilities. It is further noted that the primary haul route for construction truck traffic would be via Frida Kahlo Way and North Access Road. During construction, Lee Avenue extension may be used by non-haul trucks for material delivery. The truck routes would be subject to review and approval by San Francisco Public Works and SFMTA, and the project sponsor would be required to meet the City of San Francisco's Regulations for Working in San Francisco Streets (blue book requirements) related to safety measures, sidewalk, and lane closures.

One commenter states that aesthetic effects of the project should be considered because the adjacent Westwood Park neighborhood is a "residential character district." This designation, contained in San Francisco Planning Code section 244.1, requires that new construction and alterations within the Westwood Park Residential Character District "be consistent with the design policies and guidelines of the General Plan and with the previously adopted 'Residential Design Guidelines' as amended by portions of 'The Westwood Park Association Residential Design Guidelines.'" These planning code provisions are not applicable to the proposed project.

More generally with respect to potential aesthetics impacts of the proposed project, as stated in the SEIR, the proposed project is located in an urban infill zone and transit priority area (see draft SEIR Appendix B, p. B-16; draft SEIR p. 3.A-3). As described therein, pursuant to CEQA section 21099, aesthetics impacts of a qualifying mixed-use or employment center project on an infill site located within a transit priority area are not, as a matter of law, considered significant impacts on the environment; and consequently potential aesthetics effects on existing character, scenic vistas, or views are not part of the CEQA analysis. However, aesthetics effects of the proposed project or project variant would still be considered by decision-makers as part of the design review approvals.

Some commenters raise a concern with respect to parking. As with aesthetics, parking effects are not, as a matter of law, considered significant impacts on the environment; and consequently are not part of the CEQA analysis.

CEQA Guidelines section 15151 contains the standards used to determine whether an EIR is adequate:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

The draft SEIR complies with the standards set in CEQA Guidelines section 15151. Further, inadequacy of an EIR can be shown only when there has been a prejudicial abuse of discretion by the lead agency, either because the agency has not proceeded in the manner required by law or because the conclusions in the EIR are not supported by substantial evidence (CEQA section 21168.5). None of the comments on the draft SEIR shows failure to follow the law or demonstrate that the draft SEIR's conclusions are not based upon substantial evidence.

Finally, one commenter states that the draft SEIR does not re-evaluate some topics analyzed in the Balboa Station Area Plan PEIR. This is incorrect. Environmental topics from the Balboa Station Area Plan PEIR are included in the draft SEIR, either in chapter 3, Environmental Setting, Impacts, and Mitigation Measures, or in draft SEIR Appendix B.

## *Comment GC-2: Noticing*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BIERINGER1-1
I-BIERINGER4-1

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"Good afternoon. Garry Bieringer. I live within three blocks of this proposed project area and have lived there for 40 years. I first found out about this project and this meeting today when I was taking my dog for a walk right where the project is to be built. And I saw on these lamp posts, this kind of public notice wrapped around. So, I tried to read it and looked a little bit goofy walking around and around, because it really wasn't readable to the public. Finally, I was able to sense it's from the Planning Commission. I got a name and an email. And I wrote Ms. Poling. I told her my problem with this and asked, well, can I get more information?

So, she directed me to the website. She was very helpful."

*(Garry Bieringer, CPC Hearing, September 12, 2019 [*I-BIERINGER1-1*])*

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"I first found out about this project while walking my dog in the proposed housing area, and saw a planning notice wrapped around a light pole. I tried to read the notice but had to keep walking around and around the pole and kept losing my place. I finally got a name and phone number from the planning dept. and I called to complain about this placement. The notice was clearly intended to make it very challenging, if not impossible, for anyone to read and showed extreme insensitivity towards the community most impacted by this proposed housing development. This was a harbinger of things to come!"

*(Garry Bieringer, Email, September 23, 2019 [*I-BIERINGER4-1*])*

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## Response GC-2: Noticing

The commenter alleges inadequacy in the public notices posted concerning the availability of the draft SEIR. Public notice was given as required under both CEQA and the San Francisco Administrative Code. CEQA Guidelines section 15087(a) requires that public notice of the publication of a draft EIR be given to any person or organization who has requested such notice and shall also be given by at least one of the following: publication in a newspaper of general circulation; posting on and off the project site; or direct mailing to owners and occupants of contiguous properties. A notice must also be posted in the offices of the county clerk and notification must also be given to the Governor's Office of Planning and Research CEQA clearinghouse. San Francisco Administrative Code section 31.14(a) requires that all of the above forms of notice be provided with respect to both availability of the draft EIR and of the impending public hearing at which comments on the draft EIR may be made before the planning commission.

In addition, notice of availability of the draft EIR and public hearing is posted at the planning department.

All of the above noticing was completed in accordance with the CEQA Guidelines and the San Francisco Administrative Code and following the planning department guidelines for posting of the project site and vicinity. These planning department guidelines require the posting of one or more larger poster-size (approximately 24 inches by 36 inches) notice and at least several smaller (11-by-17-inch) notices. In the case of the proposed project, because of the relatively large size of the project site, three (3) poster-size notices were installed—one near the eastern boundary of the site, within the upper City College parking lot (west of the Multi-Use Building); one at the end of San Ramon Way, adjacent to the western boundary of the project site; and one at the end of Lee Avenue, adjacent to the project site's southeast corner. In addition to the three large posters, 19 11-by-17-inch notices were posted. These small notices were placed—generally on light standards and utility poles—within both the west and east basin parking lots; on Frida Kahlo Way, Ocean Avenue, and Plymouth Avenue; adjacent to the Ingleside Branch Public Library outdoor courtyard; and in Unity Plaza. All of the posted notices were weather-protected. As required by planning department guidelines, the notices were inspected during the draft SEIR public comment period to ensure that they were still in place and remained legible. Replacement notices were installed on at least four locations during follow up inspections.

## *Comment GC-3: Opinions Related to the Project*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-ADAMS-1 | I-COLLINS3-2 | I-HONG-6 |
| I-ADAMS-3 | I-COLLINS3-6 | I-HONG-8 |
| I-BARISH3-17 | I-CUTTEN-1 | I-KAUFMYN1-4 |
| I-BURGGRAF-4 | I-EVANS1-1 | |

"MR. ADAMS: Hello. My name is Michael Adams. I come to you as a student of City College, a former City Planner, a former Administrator of a major university in this City, and a person who lives in a walkable neighborhood.

The access from my walkable neighborhood to City College is accomplished by rapid transit. Rapid transit in San Francisco is getting in a car, driving twice as far in half the time as you can get on MUNI or BART, and getting to your destination and doing your business, and then departing on your next rapid transit journey.

That parking lot is more than a piece of asphalt. It's kind of like folks would call the runways at San Francisco Airport a parking lot. Without any context in terms of the cultural and social and economic value of that property. It's not a parking lot. It's a transit stop for people's shopping and experiencing the educational opportunity that City College provides."

*(Michael Adams, CPC Hearing, September 12, 2019 [*I-ADAMS-1*])*

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"This group, who are opposing this project, I'd like you to look at the diversity of the group and then compare that with the diversity of this panel, and then compare that with the diversity of the project sponsors, who can't find a person who looks like me to support the project.

There's something about San Francisco that gets preserved when diverse populations join together to try to make their point and presence known.

Justin Herman, who I studied under as a City Planner, destroyed the Western Addition. And that legacy has continued, unfortunately, in major decisions by this City, through this Planning Department, through this City Board of Supervisors. And it would be helpful, since you're going through a transition of administrators, to look carefully, and not repeating the ghost of Justin Herman.

Carlton Goodlett is a better ghost. And he was a friend and neighbor of ours in Omaha, Nebraska. Think about it."

*(Michael Adams, CPC Hearing, September 12, 2019 [*I-ADAMS-3*])*

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"The proposed 'solutions' to circulation, parking, and congestion problems be simply based on wishful thinking and 'creative solutions.' Conjecture and hope is not a solution for student access to education."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-17*])*

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"2. No one is allowed to do whatever they want with their property. It's a society and we are strictly governed for the benefit of the commonweal. The benefit of neighbors, and visitors as well. We are a tourist city.

3. Tourist cities that depend heavily on revenue from visitors shouldn't be encouraging dense residential clusters or towers that detract enormously from the beauty of the city and create traffic nightmares. This is why Paris France keeps the beauty in the city- they rely on tourism-and keep dense housing developments just outside city limits. Not saying it's all for the best necessarily, but it's the reason why."

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-2*])*

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"12. I'm a 3rd generation construction worker who's pro housing. But not all housing at any cost. Our tiny city isn't Los Angeles Dallas or Atlanta and can't spread at will. We can no more allow all comers physically, than the aforementioned city of Paris, and an infinite number of people would live here as they would there. These are fantasy or dream cities to so many. We're more like

Manhattan. EVERYONE in NYC knows why New York has suburbs and five boroughs, which are mostly for residential purposes. How sensible is that!

13. SF has lost working classes, families, elders, poor and people of color due to gentrification and to eminent domain. This last in the 1960's notoriously, in the now Western Addition, then the Fillmore, working class lively neighborhood heavily populated by proud African American property owners who lost their homes, their cities, their community. DON'T DO TO OMI by gentrification, what was done to the Fillmore by the bulldozer.

14. City College management is not REMOTELY the City College community. The Diego Rivera mural on campus is now threatened with being taken elsewhere permanently. Please listen not to well paid, elite college leadership, but to the actual CCSF community: neighbors, graduates, students, faculty, supporters.

15. CCSF is beloved by all San Franciscans. Please don't let rich corporate developers from elsewhere threaten or destroy it just to generate some revenue for now. This is an answer only insofar as a fix of drugs is an answer to a drug addict. Please look at the long game and the wonderful investment that is public education."

*(Monica Collins, Email, September 22, 2019 [*I-COLLINS3-6*])*

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"This proposal has nothing to do with providing benefits to anybody. It's all about the money and basically is a done deal. Most all of the objections are valid. I can't wait for the day when most of what is going on in SF implodes on the residents. Good luck!"

*(Merritt Cutten, Email, September 16, 2019 [*I-CUTTEN-1*])*

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"Lastly, the social justice aspect with regard to labor. In the January 9th, 2018 San Francisco County Transit Authority meeting, where the TDM was passed, Malia Cohen says this: I believe that Avalon Bay will create a lot of problems for us.

Yeah. Those of us that have relationships in labor, many times they have come here, our labor partners have come here raising concerns that they haven't hired union labor to do the job. Any project built in San Francisco, and especially one on public land, should be mandated to use local union labor. Thank you."

*(Wynd Kaufmyn, CPC Hearing, September 12, 2019 [*I-KAUFMYN1-4*])*

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## Response GC-3: Opinions Related to the Project

These comments generally represent the opinions of the commenters regarding various aspects of the proposed project. None of the comments raise significant environmental points or identify issues related to the adequacy or accuracy of the SEIR. The opinions of the commenters will be

provided to the decision-makers for their consideration prior to taking an approval action on the project.

## *Comment GC-4: Scope of Project*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-EVANS2-2 | I-HEGGIE2-21 | I-PEDERSON2-10 |
| I-FREY1-3 | I-OSAWA-10 | I-T.RANDOLPH-2 |
| I-FREY2-3 | I-PEDERSON2-6 | I-WEIBEL-1 |
| I-GOODMAN-3 | I-PEDERSON2-8 | |

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"**SHUTTLE—WHERE IS THE SHUTTLE???**

Members of the public participating in the public input process for the Balboa Reservoir development have consistently, repeatedly, and loudly requested that a developer-funded shuttle be part of the solution to the traffic and transportation problems created by the project. The shuttle would run between the Balboa Reservoir site and the Balboa Park Station and would also serve students, faculty and staff at City College of San Francisco.

We believe that a free shuttle with frequent service is an absolutely necessity if the residents of the BR project are actually expected to use public transit. Since this expectation of public transit use is an essential component of a successful project, every reasonable measure to promote the use of transit must be used. In a city saturated with shuttle buses, this a logical part of the solution. The shuttle idea has been brought in public meetings, in meetings with the developer, in meetings with city representatives, and at neighborhood association meetings.

Despite this consistent, loud call for a shuttle, there is no mention of any shuttle in the SEIR. It does not appear to have even been discussed as part of the effort to manage transportation demand. This is a huge deficiency that must be corrected before the SEIR is approved."

*(Rita Evans, Letter, September 23, 2019 [*I-EVANS2-2*])*

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"I've gone to all the BRCAC meetings and the Planning Department kept assuring us that the parameters of the BRCAC would have a strong bearing on the final plan. The density of this project far exceeds the density that would have been built if the parameters had been followed.

In the urban design parameters it stated that the height would be 28 feet on the west and then gradually go to 65 on the east. Now, it starts out, I think, at 30, 35, something like that, and then it jumps real quick, and then it goes real high to 78 or 88 feet."

*(Laura Frey, CPC Hearing, September 12, 2019 [*I-FREY1-3*])*

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"I have gone to all of the BRCAC meetings, and the Planning Department often assured us that the parameters developed at the BRCAC meetings would have a strong bearing on the final plan. This plan far exceeds the density that would be built if the BRCAC parameters were followed. In the URBAN DESIGN parameters, it is stated that the height would be 28' to the west and GRADUALLY increasing to 65' to the east. In the current proposed plan the height quickly jumps to 48'-58' on the west and goes up to 78'-88' on the east."

*(Laura Frey, Email, September 22, 2019 [*I-FREY2-3*])*

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"The prior proposals for the Balboa Park Station included concepts for platforming over the freeway. My interest is in indicating the direct linkage that can occur from a more robust transit/parking and pedestrian "green-way" linkage from Frida Kahlo Way corner of Ocean down towards the BART station, on or along the southern edge of CCSF with a more gradual walkway that crosses the freeway and brings people directly into an intermodal station at Balboa Park that would treat the station as an intermodal hub that links the T-Geneva Harney, M-Line and J and K lines with significant bus and other systems in the district.

The increase in housing over near Alemany, and at the opposite end of Ocean Ave at the El-Ray theater, means that more congestion will be impacting an already heavily trafficked and gridlocked area."

*(Aaron Goodman, Letter, September 12, 2019 [*I-GOODMAN-3*])*

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"18. Use of Natural Gas:

Per the EIR, efforts will be made to move away from fossil fuels toward renewable energy sources in accordance with the 2017 Clean Air Plan. As of 2017, electricity supplied to San Franciscans was 82% emissions-free, with 64% of electricity generated from renewable sources that include wind, solar and existing large hydropower. (DOE's Focus 2030: A Pathway to Net Zero Emissions report of July 2019, p. 7.) "Should the city fail to meet its renewable electricity goal by 2030, and continues to use natural gas and other fossil fuels, San Francisco could see up to five times more cumulative emissions by 2050." (Focus 2030 report, page 8.)

It is in the interest of San Francisco that all new buildings are powered by electricity and not natural gas. In the interest of meeting San Francisco's Net Zero Emissions plan, please identify only electrical infrastructure and appliances in all structures built on the Balboa Reservoir."

*(Jennifer Heggie, Email, September 23, 2019 [*I-HEGGIE2-21*])*

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"And we should also use the site as a -- you know, goes to reduce car travel. If people -- when I went to City College, I biked to school every day. And if the students are having to drive there that means our region is not investing enough in public transit. We need to be building more bus lanes.

But that's not -- we should have an express bus from the outer Richmond to City College. But that's not part of the EIR for this project. All right, thank you."

*(Theodore Randolph, CPC Hearing, September 12, 2019 [*I-T.RANDOLPH-2*])*

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I saw in the Balboa Reservoir Project Draft Environmental Impact Report that natural gas will be installed in the development for space heating, cooking, and gas fireplaces.

In light of the climate crisis, I would like to request that no natural gas be installed in the development.

Supervisor Yee, I was impressed by Berkeley's ordinance that bans natural gas in new developments, and I hope you will lead a similar resolution here in San Francisco -- not just for city buildings, as Supervisors Brown and Mandelman have proposed, but for all new construction and major renovation. What a show of leadership it would be to have an 1100+ unit development on all renewable resources, and what a step in the right direction it would be."

*(Christine Weibel, Email, September 19, 2019 [*I-WEIBEL-1*])*

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## Response GC-4: Scope of the Project

The comments request that the scope of the project should include additional features such as a shuttle service, a pedestrian "green-way" linking Frida Kahlo Way with Balboa Park Station, and no natural gas in the project buildings. Comments also state that the proposed buildings are taller than endorsed by the Balboa Reservoir Citizens Advisory Committee.

Neither a shuttle service nor a pedestrian "green-way" is proposed as part of the project, and the transportation analysis in SEIR Section 3.B does not identify either of these features, or comparable features, as necessary mitigation measures. Also refer to Response TR-4, Transit Impacts, on RTC p. 4.C-33 regarding transit effects of the proposed project. These comments do not raise specific environmental issues with respect to the adequacy or accuracy of the SEIR's analysis of the proposed features of the project, and no further response is required.

Regarding building heights, the Proposed Development Principles & Parameters for the Balboa Reservoir[79], developed by the Balboa Reservoir Community Advisory Committee, endorsed 25- to 65-foot-tall development for the project site. As described in SEIR Chapter 2, Project Description, under the Developer's Proposed Option, building heights would range from 25 feet closest to Westwood Park to a maximum of 78 feet closest to Frida Kahlo Way. Thus, heights in the western portion of the project site, nearest Westwood Park, would be the same as set forth in the Proposed Development Principles & Parameters, while buildings to the east side of the site would be up to one to two stories taller than called for in the Proposed Development Principles & Parameters. SEIR

[79] Balboa Reservoir Community Advisory Committee, *Balboa Reservoir Development Printiples & Parameters,* March 9, 2017, *https://sfwater.org/modules/showdocument.aspx?documentid=10644*, accessed February 20, 2020.

Appendix B, Section E.10, Wind, and Section E.11, Shadow (pp. B-41 to B-51), Therefore, the draft SEIR adequately analyzes wind and shadow impacts associated with the height of proposed buildings in both options. This comment does not raise specific environmental issues with respect to the adequacy or accuracy of the draft SEIR, and no further response is necessary.

Regarding the use of natural gas as part of the project, Section E.9, Greenhouse Gas Emissions (draft SEIR Appendix B), evaluates project impacts related to greenhouse gas emissions and concludes that no mitigation measures are necessary. These comments do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's coverage of physical environmental impacts.

All of the foregoing comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to their deliberations of the proposed project. These considerations would be carried out independent of the environmental review process.

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## *Comment GC-5: Market-Rate Units*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-BARISH3-34
I-LEGION-2
I-TARQUINO-10
I-WORLEY-3

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"***The DSEIR must consider the impact of market-rate units in working-class neighborhoods***

The Draft SEIR also does not consider or compare the potential for gentrification impacts to the residents of the Ingleside, the neighborhood located across Ocean Avenue from the proposed development. A development solely devoted to affordable housing would better blend with the residents of this working class neighborhood. The proposed development of mostly market rate units leaves these residents vulnerable to displacement due to gentrification. The adjacent neighborhood, Excelsior, is also a working class neighborhood vulnerable to displacement due to gentrification."

*(Jean Barish, Letter, September 23, 2019 [*I-BARISH3-34*])*

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"The Draft SEIR does not consider the established pattern of market-rate housing driving up the cost of housing in nearby areas, and its impact on OMI and nearby Excelsior, two of the last remaining affordable neighborhoods on SF."

*(Vicki Legion, Email, September 22, 2019 [*I-LEGION-2*])*

"* The DRAFT SEIR must consider the impact of market-rate units in working-class neighborhood"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-10*])*

"***The DRAFT SEIR is inadequate because it fails to consider the impact of market-rate units in working-class neighborhoods***

The Draft SEIR does not consider the impacts of the project on the nearby working-class neighborhoods of Ingleside and The Excelsior. The development of mostly market rate units puts the residents at risk of displacement due to gentrification. A development solely devoted to affordable housing would better blend with these working class neighborhoods."

*(Jennifer Worley, Email, September 23, 2019 [*I-WORLEY-3*])*

## Response GC-5: Market-Rate Units

The comments state that the SEIR should analyze the potential for the project's market-rate housing units to result in increasing the cost of housing nearby, gentrification and potential displacement of residents in nearby neighborhoods. The comments do not identify any potential physical effects on the environment and therefore no detailed response is required.

In response to one comment that a 100 percent affordable housing project "would better blend" with the project vicinity, refer to Response AL-1, Range of Alternatives, on RTC p. 4.F-12. Social and economic impacts are not the subject of CEQA analysis except insofar as a chain of cause and effect may be established between such effects and physical changes in the environment. The focus of CEQA is whether and how a proposed project could alter the physical environment in an adverse manner. CEQA Guidelines section 15360 defines "environment" as "the *physical* conditions which exist within the area which will be affected by the proposed project…" (emphasis added). As stated in CEQA Guidelines section 15131(a):

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

# 4.J Merits of the Project

The comments and corresponding responses in this section cover topics generally related to the merits of the proposed project, as described in draft SEIR Chapter 2, Project Description. These include topics related to:

- Comment ME-1: Support for the Proposed Project
- Comment ME-2: Opposition to the Proposed Project

## *Comment ME-1: Support for the Proposed Project*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

| | | |
|---|---|---|
| I-ANDERSON1-1 | I-HONG-6 | I-SCHNEIDER2-3 |
| I-ANDERSON2-1 | I-HONG-7 | I-SUBIN-1 |
| I-BARNARD-1 | I-HONG-8 | I-T.RANDOLPH |
| I-BARZ-1 | I-JOHNSON-1 | I-TASSE-1 |
| I-BUTTON-1 | I-MAURO-1 | I-TRIPATHI-1 |
| I-CIABATTONI-1 | I-OSAWA-8 | I-ZONTA-1 |
| I-CRONE-1 | I-PEDERSON1-1 | I-ZONTA-2 |
| I-CROSBY-1 | I-SCHNEIDER1-1 | O-MHDC-1 |
| I-GONZALEZ-1 | I-SCHNEIDER1-2 | O-SFHAC-1 |
| I-HONG-1 | I-SMITH-1 | O-YIMBY-1 |
| I-HONG-2 | I-SCHNEIDER2-1 | |

"Hello. I'm Theodore Randolph, resident of the Excelsior. And I think if there's inadequacy in the EIR it's that it plans for the impacts of too few people. So, the previous attempts to build housing at the Balboa Reservoir were planning for like 100, or 500 units of housing and now the developer's option is 1,100. I think that's too small.

When we started this process that was five years ago. It looks like it's going to take up to another ten years, if this goes ahead, to finish all those new buildings. And in the subsequent years, our needs could increase even more. So, we should be open to -- Malia Cohen mentioned a number, like 5,000 units in the reservoir.

So, just because you say what would be the impact of so many people doesn't mean you are going to build up to that amount. So, we should preserve the option of having more units."

*(Theodore Randolph, CPC Hearing, September 12, 2019 [*I-T.RANDOLPH-1*])*

"Hello, my name is Lisa Anderson. I'm here on behalf of myself, my husband, and my son. We live in Monterey Heights and we're supporters of this project. Looking at the Environmental Impact Report, we don't see any reason that this project should not go through.

Housing is such an issue in San Francisco and this project has already been reduced in scope, so we would urge you to support this.

As a former high school administrator, it broke my heart to see all of the students who could not afford to live here. And I've just had to say goodbye to my son's best friend, who grew up on Wildwood, just blocks from this project.

So, please, approve this project."

*(Lisa Anderson, CPC Hearing, September 12, 2019 [*I-ANDERSON1-1*])*

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"We need housing. There should be 5000 units on this lot."

*(Lisa Anderson, Email, September 12, 2019 [*I-ANDERSON2-1*])*

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"I urge you to build SF's fair share of market rate housing and specifically affordable housing. Even providing allowing market rate housing will alleviate pressure on displacement, evictions and rent escalations for those who cant afford to live in SF. Further, this is an opportunity to increase the number of BMR units (either as inclusionary housing or as stand alone buildings).

San Francisco does a great job of providing space for new job creation and should really be approving and providing equal numbers of new units!"

*(Julie Barnard, Email, September 11, 2019 [*I-BARNARD-1*])*

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"I am a District 11 resident and neighbor of Balboa Reservoir, and I strongly support adding 1,100 units of housing in place of the parking lot at Balboa Reservoir.

This is absolutely the right choice for our city to make. New residents will help support our local retail and hopefully bring much needed foot traffic to Ocean Ave and Mission. We absolutely need to build more housing to address the housing crisis, and that housing should ideally be built within walking distance from transit stations like Balboa Park BART and corridors with good Muni access like Ocean Ave. Finally the 50/50 affordability split is an incredible opportunity to bring in affordable homes for people at risk of displacement in Ingleside and the Excelsior.

We absolutely need this parking lot to turn into housing. Please support this project."

*(Sara Barz, Email, September 11, 2019 [*I-BARZ-1*])*

"My name is Gary and I live in the 94112 area code in Balboa Park. I wanted to let you know that I am pro the building at Balboa Reservoir because I think that San Francisco needs more housing. There are people that will always disagree with how things are done but we need to be urgent about the housing shortage and this project seems like a good step."

*(Gary Button, Email, September 12, 2019 [*I-BUTTON-1*])*

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"Please support mixed affordable and market rate housing at the BALBOA RESERVOIR site.

My husband and I live in Zip Code 94127 and as such we are very aware of the neighborhood near the Balboa Reservoir. It is a perfect area for the planned 50/50 new market rate and new subsidized affordable housing plan. It is near public transit as well as stores and services on Ocean Avenue. The neighborhood already has new apartment development that is merging successfully into the community. It is perfect for this development.

We feel it is important to build mixed income housing. We do not need more large public housing development in SF. Both low income, working people and middle income working people need housing.

Please approve this project for 50/50 income housing. And move the project along as speedily as possible.

Thank you for your willingness to plan appropriately for housing in our wonderful city."

*(Kathleen and Alger Ciabattoni, Email, September 12, 2019 [*I-CIABATTONI-1*])*

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"I am writing to urge you to support the Balboa Reservoir Project, which would create 1,100 new units of housing, 50% of which would be subsidized affordable units. The entire Bay Area must do more to build housing, both market rate and below market rate, in order to address our chronic housing crisis. I live in the vicinity of the project (zip code 94112), and I welcome the prospect of having new housing occupy what is currently a 17-acre surface parking lot."

*(Phil Crone, Email, September 12, 2019 [*I-CRONE-1*])*

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"I'm a homeowner in San Francisco and I enthusiastically support the Balboa Reservoir building project. There is strong evidence to support the fact that the more housing we build, the more it will bring down the cost of housing for all. And with 50 percent of it being set aside for affordable housing, I'm confident that this will be a good thing for the neighborhood, and for the city.

Those that oppose the project use the 100% affordable or nothing as a tactic to get nothing built, to maintain the status quo and keep the parking spots for their vehicles, which for some reason they feel they have a right to park on public land. We need to make this city a livable one with great

public transportation, fewer cars, and more housing for those who cannot afford the market rate housing.

Please approve this project so we can develop housing for those that need it most. Homelessness or the threat of it is the most critical issue facing our city today, and this is a very important step toward its resolution."

*(Lisa M. Crosby, Email, September 11, 2019 [*I-CROSBY-1*])*

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"I am writing in full support of building the maximum number of 50/50 new market rate and new subsidized affordable units of housing at this site.

This project will bring much needed housing to our community which drastically needs it, and is a substantially better use of the space than parking."

*(Daniel Gonzales, Email, September 12, 2019 [*I-GONZALEZ-1*])*

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"Please use this as my continued support for this project."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-1*])*

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"1. We desperately need housing. The city can not afford to do this work. The sponsors and the community have worked hard on this project. This project fits the bill as it address' our housing issues."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-2*])*

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"5. I would like your comments good or bad so that the sponsor and the community can continue to work together to get this project moving without further delays. In my opinion by working together and solving these issues before the DEIR is certified only makes sense so there aren't any road blocks before it is certified. As I see it, these road blocks all too often hold up the progress and sometimes we lose the project completely.

6. I'm not too sure how the current SB's and other bills will impact this wonderful project."

*(Dennis Hong, Email, September 12, 2019 [*I-HONG-6*])*

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"7. I like the open space. Since this project focus on family, I would like to see a few four bedroom units."

*(Dennis Hong, Email, September 11, 2019 [*I-HONG-7*])*

"8. Finally, we must move quickly before we loose another project like this. I will be submitting additional comments for the RTC."

*(Dennis Hong, Email, September 12, 2019 [*I-HONG-8*])*

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"I know these opposition groups are now asking for 100% BMR units. But that request does not align with the arguments they originally put forth against this project. They are just shifting the goal posts to prevent this vital, humanitarian housing at any cost. The Planning Commission must see through these tactics. Look at what happened to the proposed affordable senior housing in Forest Hills. It's absolutely barbaric and self-interested. Please give San Francisco a chance, and support this housing."

*(Eric Johnson, Email, September 11, 2019 [*I-JOHNSON-1*])*

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"Hi, I'm a local resident and I want to express my support for the balboa reservoir project. 50/50 affordable and market rate seems like a great balance. Thank you!"

*(Jacqueline Mauro, Email, September 11, 2019 [*I-MAURO-1*])*

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"Thank you very much. My name is Christopher Pederson, a resident of the Ingleside. I strongly support the additional housing option version of this project. It is environmentally superior to options and alternatives that provide less transit-oriented affordable housing and/or more public parking."

*(Christopher Pederson, CPC Hearing, September 12, 2019 [*I-PEDERSON1-1*])*

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"As a resident of Ingleside Terraces in District 7, and a frequent patron of the Ocean Avenue corridor, I'm writing to ask that you support the Balboa Reservoir plan at tomorrow's meeting. The 50-50 affordable and market rate housing mix is an excellent ratio, similar to what is seen in many other countries with more enlightened housing policies. The neighborhood will greatly benefit from more foot traffic, and more people to advocate for better transit and bike infrastructure."

*(Benjamin Schneider, Email, September 11, 2019 [*I-SCHNEIDER1-1*])*

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"My only reservation is that there are not more units planned for this site. We should not be afraid to go up to 10 or more stories. Please do not let the naysayers "preserve" this parking lot."

*(Benjamin Schneider, Email, September 11, 2019 [*I-SCHNEIDER1-2*])*

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"Everyone in SF is shouldering the burden of an extreme lack of housing supply. This state of affairs puts enormous strain on those among us with the least means, and drives people to blame any number of important but ultimately tertiary reasons for the strain. I am writing this note to make clear that as a member of the community I wholeheartedly support attempts like this one to increase housing density while supplying (50%!! amazing) subsidized units. Unfortunately, I am afraid the folks in the community who speak the loudest will be the ones who oppose all development, not understanding that by restricting development of new housing they will only increase our peril.

Please do the right thing by your community and your city and forward this beneficial project."

*(Aaron Smith, Email, September 12, 2019 [*I-SMITH-1*])*

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"Hi there. My name is Benjamin Schneider. I'm a resident of District 7, in Ingleside Terraces, and I'm speaking on behalf of myself and my parents, with whom I live as a 24-year-old college grad, largely because of the dearth of the affordable housing options in San Francisco. And, specifically, the dearth of affordable, reasonably-sized housing options in my own neighborhood, in the OMI, off Ocean Avenue.

So, I'm thrilled to see that this project is making its way through the process with all of these more reasonably sized units, that are still transit accessible, and in this great location.

And it appears to me, with my untrained eye, that the Environmental Impact Report is in order and it should proceed to the next rounds of approval."

*(Benjamin Schneider, CPC Hearing, September 12, 2019 [*I-SCHNEIDER2-1*])*

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"I want to also reiterate what the previous speaker said. That I hope that the Commission approves the more housing-rich option and thinks very seriously about these parking garages, and increasing transit service sooner, rather than later. Thank you."

*(Benjamin Schneider, CPC Hearing, September 12, 2019 [*I-SCHNEIDER2-3*])*

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"Under these conditions, building new housing on a vast surface parking lot near a college and the biggest transit hub in the western half of the city, with 50% dedicated affordable housing, should be an absolute no-brainer. I would love to have seen more units than the 1,500 units considered, but we should absolutely have 1,500 rather than 1,100: we need homes for people, not cars! Reserving large amounts of off-street parking does not effectively reduce congestion and parking scarcity but rather facilitates continued car-dependence-- which is in direct contradiction to the city's recently published "Focus 2030" report that set a strong goal for getting people out of cars into healthier, more sustainable modes of transportation. I hope that the draft EIR appropriately considered this: the reductions in greenhouse gas emissions associated with allowing more dense

urban infill in a transit-rich neighborhood, rather than seeing those same people housed in distant sprawl, have been well-documented and should be noted.

Finally, these new homes would be a great improvement to the neighborhood—I would get access to new green space, new bike routes, and have more people on the street to make for safe, vibrant conditions on Ocean Ave. that will help local businesses thrive."

*(Zack Subin, Email, September 11, 2019 [*I-SUBIN-1*])*

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"Hello. I'm Theodore Randolph, resident of the Excelsior. And I think if there's inadequacy in the EIR it's that it plans for the impacts of too few people. So, the previous attempts to build housing at the Balboa Reservoir were planning for like 100, or 500 units of housing and now the developer's option is 1,100. I think that's too small.

When we started this process that was five years ago. It looks like it's going to take up to another ten years, if this goes ahead, to finish all those new buildings. And in the subsequent years, our needs could increase even more. So, we should be open to -- Malia Cohen mentioned a number, like 5,000 units in the reservoir.

So, just because you say what would be the impact of so many people doesn't mean you are going to build up to that amount. So, we should preserve the option of having more units."

*(Theodore Randolph, CPC Hearing, September 12, 2019 [*I-T.RANDOLPH-1*])*

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"I live in Noe Valley, pretty close to the planned Balboa reservoir project. Please build it! 1100 units of housing would be a huge help, and 50% of that being affordable is even better. And if it's on the site of a parking lot, we don't even lose much of anything.

I know some people are concerned that it's not *more* affordable. Well, I'd much rather see 550 units of affordable housing plus 550 market rate, than nothing. And I'd much rather see these 1100 units now than anything delayed. As they say, "justice delayed is justice denied" – the same is true for housing. Any units we build will eventually make all of our housing more affordable."

*(Dan Tasse, Email, September 11, 2019 [*I-TASSE-1*])*

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"I am writing to urge you to approve the market rate and subsidized affordable housing project that has been proposed on the Balboa Reservoir.

We are in desperate need for both types of housing and this project will add may needed units. Without additional housing our city can not grow. Please approve this project immediately."

*(Priti Tripathi, Email, September 11, 2019 [*I-TRIPATHI-1*])*

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"Let's get moving on this."

*(Mike Zonta, Email, August 8, 2019 [*I-ZONTA1-1*])*

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"I think we ought to get on with this. As long as there are affordable units included, I'm good to go."

*(Mike Zonta, Email, September 3, 2019 [*I-ZONTA2-1*])*

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"My name is Sam Moss. I'm the Executive Director of Mission Housing Development Corporation. We're a 48-year-old nonprofit, affordable housing developer that is one of three affordable housing developers on this team.

Really want to reiterate that, that when developers are being disparaged, it is disparaging three nonprofits who have provided over a century, and thousands upon thousands of one hundred percent low-income affordable housing to San Francisco.

And to be frank, Avalon is an incredible market rate developer that knows and understands the community. This project has taken everything into account and then some. And, you know, Mission Housing has over a thousand children that live in our buildings. We take their health and safety very seriously. We do occupied rehab projects in their buildings all the time.

So, not to say that those concerns aren't valid, but I am personally saying that as one of the co-developers of this project that the community and its safety are top of our list.

But I do hope that you see fit to keep this going forward today and thank you for your time."

*(Sam Moss, Executive Director, Missions Housing Development, CPC Hearing, September 12, 2019 [*O-MHDC-1*])*

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"Good afternoon Commission. My name's Nicholas Nagle. I'm representing the San Francisco Housing Action Coalition. We've been going to these meetings for years, so I'll keep it short. I assume you know our position on it.

We've been advocating for this project because of our City's housing shortage. And while no one project can solve the housing shortage, this is a bit step towards it.

In terms of the EIR, we do find it to be adequate and complete. And that's all from me, today. Thank you."

*(Nicholas Nagle, San Francisco Housing Action Coalition, CPC Hearing, September 12, 2019 [*O-SFHAC-1*])*

"Hi, Laura Foote, YIMBY Action. I have been speaking in favor of Balboa Reservoir for a couple years, now. And if we can't have an Environmental Impact Report tell us that it's better to have dense, vibrant, walkable housing instead of a giant parking lot, then I don't know what to say about the future of San Francisco's ability to deal with climate change.

It's obvious that we should be turning parking into housing. It is obvious that it will be for the benefit of literally thousands of people who will have the ability to live in this 50-percent affordable housing project.

Another great thing, planners have worked really hard to do these cross-subsidized projects in a world where we don't have enough funding for subsidized affordable housing. We're working on things like the bond. We're working on other sources of stable funding. These 50-percent affordable projects, where we get to cross-subsidize with market rate housing in order to get more low-income housing, we need to be celebrating those projects.

This is exactly the kind of thing that allows the city to get a lot more units of subsidized affordable housing.

It's tragic to be speaking for this project over and over again. It's been since 2008 and this is the fourth time they have tried to build housing here. And if San Francisco cannot get its act together and turn a 17-acre parking lot into walkable housing, then we are not going to solve any of our other problems. Thank you."

*(Laura Foote, YIMBY Action, CPC Hearing, September 12, 2019 [*O-YIMBY-1*])*

## Response ME-1: Support for the Proposed Project

Comments express support for particular aspects of the proposed project based on its merits, support for the proposed project options, and housing mix. Comments also include general statements about the adequacy of the draft SEIR.

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. Although general support of the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft SEIR under CEQA, such comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

## *Comment ME-2: Opposition to the Proposed Project*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

I-AISSA-2
I-ALI-1
I-BARISH1-1
I-BARISH2-1
I-BARISH2-3
I-BARISH2-9
I-COLLINS2-1
I-EVBUOMA-4
I-FISHER-1
I-FRAKNOI-3
I-HALFORD1-3
I-HALFORD2-1
I-HOUWER-1
I-HOUWER-5
I-HOUWER-7
I-JA1-1
I-KOPP-1
I-KOWALSKI-4
I-MUHLHEIM-8
I-OSAWA-9
I-OSTEN-1
I-SCHNEIDER2-3
I-T.RANDOLPH-1
I-TARQUINO-1
I-TIMA-5
I-WEYER-1
I-ZELTZER-1
I-ZELTZER-3

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"Keep the height limit and density as originally proposed."

*(Sharon Aissa, Letter, September 13, 2019 [*I-AISSA-2*])*

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"I am a librarian at City College of San Francisco and am deeply opposed to the use being proposed for the Balboa Reservoir land owned by SFPUC but leased to City College for many years. City College will be negatively impacted by this development, the brunt being borne by students from whom parking would be taken away and disruption caused due to construction activities. San Francisco is already suffering at the hands of construction of luxury housing masquerading as affordable housing, disrupting our lives and taking away resources utilized by needy San Franciscans. Please do not add to skyrocketing costs of living in the city and the fact that so called affordable housing is completely out of the reach of so many families and students in particular. Why are private developers given so much room to decide what belongs in our city?"

*(Amna Ali, Email, September 18, 2019 [*I-ALI-1*])*

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"Good afternoon. My name is Jean Barish. Thank you very much for giving me the opportunity to speak this afternoon.

I'm a former CCSF faculty member and have also practiced law for over 20 years, including working on a number of cases involving CEQA. I'm here to state my opposition to the project in general and to highlight the many flaws in the draft EIR."

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH1-1*])*

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"My name is Jean Barish. I'm a former CCSF Faculty Member, teaching Anatomy, Physiology, and Health Education. I have also practiced law for over 20 years. I am here to state my opposition to the Project"

*(Jean Barish, CPC Hearing, September 12, 2019 [*I-BARISH2-1*])*

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"Coalition of San Francisco Neighborhoods, Westwood Park Neighborhood Association, and other groups have signed Resolutions opposing this project. Hundreds of people have signed petitions and letters. I hope you will pay attention to their concerns."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-3*])*

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"In conclusion, I hope you agree this Field of Dreams should be replaced with a scaled-down, environmentally sound, 100% affordable project with no significant environmental impacts."

*(Jean Barish, Letter, September 12, 2019 [*I-BARISH2-9*])*

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"Everyone I know has a different set of reasons for opposing the Balboa Reservoir Project under the nose of City College. Many focus on the effects to health for young ones, not only the children at CCSF day care, but CCSF students, exposed to carcinogens and other calamitous health threats, when young and having decades ahead to become ill and suffer. Riordan High School is across the street- the students are all teenagers. Others are concerned with already horrible traffic on one-lane Frida Kahlo Way, on which the college is situated and on which the proposed large project is to be located, with thousands of new residents.

Many are upset at the terrible damage that will result to the civic gem that is City College. Still others observe that there is little about this enormous, for profit development that will alleviate the housing crisis in a 7 x 7 square mile city or the zooming rents and mortgages. This push for more for profit development, with a little actually affordable housing as a sidebar, is also advancing gentrification on steroids. We're becoming a city of wealthy professionals with a few token elders or poor people remaining and losing our working and middle classes and our families. People of color are not benefiting from this- few can afford to remain in the city. For profit development is DRIVING housing inflation. I cannot help but be appalled by the problems arising from all of these effects of this huge, horribly situated project.

What brought us to the point that developer money from for profit corporations is all that matters? When car shaming, wishing away cars, and using Orwellian terms like "transit rich" stands in for planning, budgeting and spending? When was the last time the people making these decisions had to punch a clock? Had to worry about being late to work or school? There are many vacant lots in San Francisco for so many years, no one can remember what stood on these fenced sites. And even more in Daly City, a few minutes from the county line. Some are now offered for sale. Besides those, what tax policies drive the hoarding of fallow land like this? This is a society. We can't do

whatever we want with our property. Can't burn down our house to build a tent on the site to be one with nature. Can't have public nuisances and hazards on the property. Can't have a cross burning out front. We are governed by laws intended to protect the commonweal.

If the state can tell us we have no right to limit enormous developments in quiet residential neighborhoods, the state can manage tax policy to help the housing crisis. This project would be disastrous for struggling students, for working class residents, for many people of color and families just squeaking by. In the 1960's our city saw the shameful bulldozing and development of the Fillmore, now gentrified into the Western Addition. Countless happy black homeowners saw their beloved Victorian houses bulldozed or run out of town on rails- literally, and were virtually deported, never to return. Ethnic cleansing. Bleaching, if you will. Are we doing same to Ocean/ Merced/ Ingleside using public policy instead of a bulldozer?

As to traffic policy, if we can dignify it with the term "policy", it's not policy deliberately to ignore traffic prolems or to create worse ones. This is not benign neglect. Car shaming feels good to the virtuous, I am sure and the effects have been disastrous. There are no provisions to get people out of their cars (in order to wait for packed buses to pass them by, one after another. To watch panicked drivers fill intersections hoping the green light will stay green, only to block the intersections when the light turns red, endangering pedestrians, cyclists, enraging cross traffic drivers and those waiting. Please keep in mind that bus riders, who are absolutely above reproach, also pay the price, getting stuck in traffic snarls on Frida Kahlo, Ocean (these are both horrible already, btw) or nearby. "Forget you" is not traffic planning. Coming after cars (and who likes the internal combustion engine? NO ONE!) OK, now what are you going to do to help the situation?

I worked for CCSF for decades. I've seen countless people with little hope get their degrees, go on to university/ careers/ vocations, to leave welfare and become happy taxpayers. Often this is their last chance at success. It's why public education is an investment, why CCSF is a lifeline for so many, and has been for generations. Boost the school, don't attack or undermine it. The day any of us concerned here have to live in an adjoining town, far from transit, and drop off a pre schooler in one spot and a 7 year old student in another, have to have two jobs to manage, or to struggle to pay the bills on public assistance, to follow an academic or vocational course of study as a commuting working parent, by all means, let's talk! You can help these people or you can doom their dreams with callous and short sighted disregard for their situation, and for the well being of the school, the neighborhood, and our beloved city. Please do your jobs and say no to this horribly misbegotten, for-profit calamity. There are lots of other and better sites to develop, and there is the money for subsidized housing in the city budget from the ubiquitous projects we see all over. It's a matter of priorities. Don't poor mouth people who need your help because they aren't developers brandishing big bucks. Some things are about more than just short sighted things like this mistake of a development. Please excuse poor editing- it's hard to edit when you are dealing with countless points like we enumerate against this ill thought out, misbegotten development!"

*(Monica Collins, Email, September 11, 2019 [*I-COLLINS2-1*])*

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"I urge you to stop this project, for our collective future."

*(Marria Evbuoma, Email, September 19, 2019 [*I-EVBUOMA-4*])*

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"I strongly oppose the massive housing project that is being planned for the Balboa Reservoir."

*(Allan Fisher, Email, September 12, 2019 [*I-FISHER-1*])*

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"The developer should be required to build a parking facility which replaces most of the lost parking spaces and makes them available for students. I'd rather see a taller building with more parking underneath or fewer buildings and a parking structure."

*(Andrew Fraknoi, Email, September 21, 2019 [*I-FRAKNOI-3*])*

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"We all know that our city needs more affordable housing, but affordable for whom? The private developers define affordable as $139,000 a year, single income! But building market-rate luxury housing on land that City College clearly needs, a need affirmed by the voters three times already, is more than immoral. It's just crazy."

*(Daniel T. Halford, Email, September 9, 2019 [*I-HALFORD1-3*])*

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"The proposed housing would cost City College over a thousand parking spaces, thus denying access to education to thousands of CCSF students who cannot attend classes unless they drive. The typical CCSF student is a part-time student, meaning that s/he needs to drive in order to be able to juggle a job (or two jobs), family responsibilities and classes. Therefore eliminating parking spaces seriously limits access to education. City College is still recovering from the massive loss of students caused by the accreditation crisis; we simply cannot afford to lose more students."

*(Daniel T. Halford, Email, September 16, 2019 [*I-HALFORD2-1*])*

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"I am writing in opposition to this proposal. I live in the neighborhood and feel that this project especially with the amount of proposed units that you wish to develop would produce a negative impact on both the college and the surrounding community."

*(Michell Houwer, Email, September 12, 2019 [*I-HOUWER-1*])*

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"It is not necessary to place a huge amount of units in a small place which critically impacts both the students of CCSF and the outlaying community. CCSF has a huge student population and this land should be provided for further development of the college which will provide a better education for our own local residents and not be concerned about techies from other regions. Often times these techies get their housing subsidized by their companies. When are the supervisors

going to consider the fact that we need to be more concerned about our local tax payers than these techies from other areas."

*(Michell Houwer, Email, September 12, 2019 [*I-HOUWER-5*])*

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"If the rents are similar to the sister properties this proposal is a joke and further how long is this developer required to support a portion of lower income housing? It is bad enough that the supervisors are putting a homeless triage center to be replaced by units at Balboa Park Bart. Please add this to the record in opposition of this proposal."

*(Michell Houwer, Email, September 12, 2019 [*I-HOUWER-7*])*

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"I'm wearing this shirt that says "No War on Iraq". That's because I don't have a shirt that says no invasion of luxury housing onto the Balboa Reservoir. And I am in favor of affordable housing, but not luxury housing.

Yeah, I'll just talk about two inadequacies out of all the things that I've written so far, and there will be more written comments forthcoming. But I'll talk about two.

This is a weapon of mass destruction in terms of what the Balboa Reservoir project is doing. You know, similar to the Iraq war where they were looking for weapons of mass destruction, we have one right here with the reservoir project.

And how do I mean? During the Iraq war, the British Intelligence Agency, M16, wrote what was called the Downing Street Memo. And what the Downing Street memo said that the facts -- excuse me. The evidence and the facts or the intelligence and the facts were fixed around the policy.

And that's what we have right here. You have the Planning Department that has set this whole -- which is sponsoring the reservoir project. And the policy and the SEIR is being fixed around that policy."

*(Alvin Ja, CPC Hearing, September 12, 2019 [*I-JA1-1*])*

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"Please deliver to Jeanie Poling, Senior Planner in the Planning Department, my heartfelt objection to the Balboa Reservoir Draft Subsequent Environmental Impact Report."

*(Judge Quentin L. Kopp, Email, September 23, 2019 [*I-KOPP-1*])*

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"Please reject this EIR. If you want one in reality and not the stylized façade this one is, then have all the stakeholders participate in creating one to see the truth of what's going on in this neighborhood. Thank you for your time."

*(Ken Kowalski, Member, Westwood Park Homeowners Association, CPC Hearing, September 12, 2019 [*I-KOWALSKI-4*])*

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"This monster sized project is inappropriate for this site."

*(Fred Muhlheim, Email, September 23, 2019 [*I-MUHLHEIM-8*])*

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"By no means should the higher density option be considered."

*(Ed Osawa, Email, September 22, 2019 [*I-OSAWA-9*])*

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"As the homeowners at 1222 Plymouth Avenue, we are opposed to any proposal for more than the least amount of density, number of units possible and the highest percentage of parking spaces."

*(G. Scott Osten & Ralph J. Torrez, Email, September 19, 2019 [*I-OSTEN-1*])*

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"I'm frankly terrified at the idea of having the reservoir sold to a Private developer. PLEASE don't.

**I live in Westwood Park. I'm a student and a former instructor of CCSF. As a former coordinator of a CCSF academic program, it is now very difficult to find instructors as there aren't affordable housing and many of the positions are part time. Even full time instructors find it difficult to live in S.F.**"

*(Eve Tarquino, Email, September 12, 2019 [*I-TARQUINO-1*])*

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"I'm against building any 1,200 units."

*(Hedda Tima, CPC Hearing, September 12, 2019 [*I-TIMA-5*])*

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"I have read about the Balboa Reservoir DSEIR and feel that I must formally express my opposition to the current draft."

*(Andy Weyer, Email, September 20, 2019 [*I-WEYER-1*])*

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"Steve Zeltzer, United Public Workers for Action. I think we see today, already, the results of your disastrous Planning Commission decisions. Warrior Stadium is a good example of that. You approved that without proper transit. A violation of your rules, but you did it because you're basically a kept commission, which represents the developers. That's why all today you've been

going along with whatever the developers want. You're saying to hell with the people of San Francisco, it's okay to have more gridlock.

Now, this project, at Ocean, the Balboa Reservoir, is a project that will destroy City College of San Francisco. That's not in your plans, although that will be the result. To have construction, massive construction and 1,500 condos next to the college prevents the college from developing. It will create chaos. But you don't really give a damn about City College or the people of San Francisco because you represent the developers.

That's what I think more and more people understand who come here; they see you as shills for the developers. The fact of the matter is this is a corrupt operation and the City of San Francisco has spent millions of dollars for Avalon for these meetings, staged meetings to really grease the way for this development. These homes, these condos are not for the people of San Francisco, working people, students, professors; they're for people who have a lot of money, who can afford million-dollar condos. That's not the kind of construction we need. We need working class construction."

*(Steve Zeltzer, United Public Workers for Action, CPC Hearing, September 12, 2019 [*I-ZELTZER-1*])*

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"Avalon and the developers are interested in one thing, profit, profiteering off the land of San Francisco. We need working class housing in San Francisco, not more million-dollar condos. But that's, apparently, what you are driven to do by the developers who appointed you and who you represent."

*(Steve Zeltzer, United Public Workers for Action, CPC Hearing, September 12, 2019 [*I-ZELTZER-3*])*

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## Response ME-2: Opposition to the Proposed Project

Comments express opposition to the project generally or to particular aspects of the proposed project options based on its merits. Comments also include general statements about the adequacy of the draft SEIR.

Comments include general statements that the proposed project would worsen traffic in the area, disrupt City College students, remove parking used by City College students, prevent City College expansion, and cause health impacts. The draft SEIR evaluates transportation and air quality health risk impacts of the proposed project in Sections 3.B, Transportation and Circulation, and 3.D, Air Quality, respectively. Responses to comments related to transportation and air quality are addressed in Sections 4.C, Transportation and Circulation, and 4.E, Air Quality, in this RTC.

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft SEIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. Although general opposition of the proposed project do not raise specific issues concerning the adequacy or accuracy of the draft EIR under CEQA, such comments, including recommendations for modifications to

the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

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# CHAPTER 5
# Draft SEIR Revisions

This chapter presents text changes for the Balboa Reservoir Project draft SEIR. The revisions reflect changes identified in RTC Chapter 2, Revisions and Clarifications to the Project Description, RTC Chapter 4, Comments and Responses, or staff-initiated text changes, all of which clarify, expand, or update information and/or graphics presented in the draft SEIR. Staff-initiated changes to clarify information presented in the draft SEIR are highlighted with an asterisk (*) in the margin to distinguish them from text changes in response to comments. For each change, new language is double underlined, while deleted text is shown in ~~strikethrough~~. The changes are organized in the order of the draft SEIR and initial study table of contents.

These revisions do not result in any changes in the draft SEIR conclusions prepared pursuant to CEQA, and thus do not constitute "new information of substantial importance" within the meaning of CEQA Guidelines section 15162(a)(3). Therefore, recirculation of the draft SEIR is not required.

## 5.A Revisions to the Table of Contents, Summary, and Introduction Chapter

* **To be consistent with the revisions made under the applicable resource topics in response to comments, p. viii of the SEIR Table of Contents is revised as follows:**

Table 3.B-8 ~~Existing Transit Delay~~Existing Transit Travel Times ..... 3.B-22

* **To reflect the addition of Appendix C4, Transit Delay Analysis and Capital Improvements Memorandum and Appendix I, Updated Health Risk Assessment Memorandum, p. vi of the SEIR Table of Contents has been revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**Appendices**
A Notice of Preparation
B Initial Study
C Transportation Supporting Information
C1 Travel Demand Memorandum
C2 Transit Assessment Memorandum
C3 Freight Loading Data
C4 Transit Delay Analysis and Capital Improvements Memorandum
D Noise Supporting Information
D1 Construction Noise Model Output

D2 Traffic Noise Model Output
D3 Calculations of Long-Term Noise Metrics
D4 Sound Level Meter Reports
E Air Quality Technical Memorandum
F Water Supply Assessment
G Biological Resources Supporting Information
H Balboa Park Station Area Plan PEIR Mitigation Measures
I Updated Health Risk Assessment Memorandum

The new Appendix C4 and Appendix I are provided at the end of this RTC chapter.

To be consistent with the revisions made under the applicable resource topics in response to comments, the following revisions are made to Table S-2, Summary of Impacts of the Proposed Project—Disclosed in this Draft SEIR including the Initial Study.

* **The third paragraph on draft SEIR p. S-5 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> Construction phasing is shown in **Figure 2-18, Proposed Developer's Option Construction Phasing**, p. 2-40, and **Figure 2-19, Additional Housing Option Construction Phasing**, p. 2-41. The project characteristics presented above (including the total number of residential units, square footage of commercial use, acres of open space, bicycle and automobile spaces) are totals based on full buildout and completion of all phases of the proposed project. Construction would generally occur between the hours of 7 a.m. and 8 p.m., up to seven days a week, consistent with San Francisco Police Code section 2908. Certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, and could include one concrete pour per building, which could occur a total of 12 times throughout the project construction period. Such ~~C~~construction activities ~~that extend beyond normal hours~~ would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

* **In Table S-2, Mitigation Measure M-C-TR-4 on draft SEIR p. S-13 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**(REVISED) TABLE S-2**
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| **SEIR Section 3.B,Transportation and Circulation [EXCERPT]** | | | |
| **Impact C-TR-4:** The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. | S | **Mitigation Measure M-C-TR-4: ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay.** The project sponsor, under either project option, shall ~~monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall~~ implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay~~ and meet the transit travel time performance standard~~ for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.<br>**~~Transit Travel Time Performance Standard~~Routes and Study Segments**. ~~Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4.~~ The following routes and study segments ~~shown in Table M-C-TR-4 represent routes and study segments~~would most likely ~~to have a~~experience cumulative transit delay impact to which the project would have a considerable cumulative contribution.<br>• K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)<br>• K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue<br>• 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue<br>• 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue<br>• 43 Masonic (outbound): Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street<br>• 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard | SUM |

## (REVISED) TABLE S-2
## SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|

~~TABLE M-C-TR-4~~
~~TRANSIT TRAVEL TIME PERFORMANCE STANDARD~~

| ~~Transit Line~~ | ~~Study Segment~~ | ~~Existing Transit Travel Time[a]~~ | | ~~Performance Standard[b]~~ | |
|---|---|---|---|---|---|
| | | ~~A.M. Peak Period~~ | ~~P.M. Peak Period~~ | ~~A.M. Peak Period~~ | ~~P.M. Peak Period~~ |
| ~~K/T~~ | ~~Jules Ave/Ocean Ave to Balboa Park BART~~ | ~~3:30~~ | ~~8:42~~ | ~~7:30~~ | ~~12:42~~ |
| | ~~San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave~~ | ~~3:28~~ | ~~10:03~~ | ~~7:28~~ | ~~11:28~~ |
| ~~29~~ | ~~Plymouth Ave/Ocean Ave to Mission St/Persia Ave~~ | ~~8:01~~ | ~~12:09~~ | ~~12:01~~ | ~~16:01~~ |
| | ~~Mission St/Persia Ave to Plymouth Ave/Ocean Ave~~ | ~~7:10~~ | ~~9:55~~ | ~~11:10~~ | ~~15:10~~ |
| ~~43~~ | ~~Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd~~ | ~~4:20~~ | ~~4:37~~ | ~~8:20~~ | ~~8:37~~ |
| | ~~Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance~~ | ~~4:16~~ | ~~4:23~~ | ~~8:16~~ | ~~8:23~~ |
| ~~49~~ | ~~Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave~~ | ~~5:22~~ | ~~10:04~~ | ~~9:22~~ | ~~14:04~~ |
| | ~~Mission St/Ocean Ave to Frida Kahlo Way/CCSF South Entrance~~ | ~~7:18~~ | ~~11:25~~ | ~~11:18~~ | ~~15:25~~ |

~~SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.~~

~~NOTES:~~

~~a Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.~~

~~b The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.~~

## (REVISED) TABLE S-2
## SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| | | ~~**Monitoring and Reporting.** The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.~~<br><br>~~*Timing.* The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building[80] at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.~~<br><br>~~The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets it terms for this measure.~~<br><br>~~*Collection and Reporting Details.* For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non-holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.~~<br><br>~~For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).~~<br><br>**Implement ~~Fair Share of~~ Capital Improvement Measures.** ~~If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the~~ The project sponsor shall ~~implement~~ contribute funds for the following capital | |

[80] A new major building is City College of San Francisco Ocean Avenue campus construction post-2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.

**(REVISED) TABLE S-2**
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| | | improvement measures that reduce transit travel times. ~~These measures are subject to agency approval and could include:~~<br><br>1. **Signal Timing Modifications at Ocean Avenue/Brighton Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.<br><br>2. **Signal Timing Modifications at Ocean Avenue/Plymouth Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.<br><br>3. **Bus Boarding Island on Southbound Frida Kahlo Way.** The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.<br><br>The cost of these capital improvement measures is $200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment), and shall be considered the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA[81], shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay $110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and $90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2.<br><br>If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA.<br><br>The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.<br><br>~~1. Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.~~<br><br>~~2. Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.~~<br><br>~~3. Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may include off-site capital~~ | |

[81] Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

**(REVISED) TABLE S-2**
**SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| | | ~~improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.~~<br>~~**Term Condition A:** The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.~~<br>~~**Term Condition B:** The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.~~ | |

* **In Table S-2, the sixth bullet point of Mitigation Measure M-NO-1 on draft SEIR p. S-18 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**(REVISED) TABLE S-2: SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| **SEIR Section 3.C, Noise [EXCERPT]** | | | |
| **Impact NO-1:** Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project. | S | **Mitigation Measure M-NO-1: Construction Noise Control Measures.**<br>…<br>• Undertake the noisiest activities (e.g., demolition using hoe rams) during ~~times of least disturbance to surrounding residents and occupants~~ the hours of (9 a.m. to 4 p.m.); and select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street.<br>… | SUM |

* **In Table S-2, Mitigation Measures M-AQ-2a (Construction Emissions Minimization) and M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) on SEIR pp. S-21, and S-23 to S-24 are revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**(REVISED) TABLE S-2: SUMMARY OF IMPACTS OF THE PROPOSED PROJECT–DISCLOSED IN THIS SEIR INCLUDING THE INITIAL STUDY [EXCERPT]**

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| **SEIR Section 3.D, Air Quality [EXCERPT]** | | | |
| … | | | |
| **Impact AQ-2a:** During construction, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. | S | **Mitigation Measure M-AQ-2a: Construction Emissions Minimization.** ~~In the case of the Developer's Proposed Option under the compressed three-year construction schedule or in the case of the Additional Housing Option under either the six-year construction schedule or the compressed three-year construction schedule, t~~The project sponsor or the project sponsor's contractor shall comply with the following:<br>…<br>**Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule.** Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building associated with Phase 1, the project sponsor, with the oversight of the Environmental Review Officer (ERO), shall either:<br>1. *Directly fund or implement a specific offset project within San Francisco if available* to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or<br>2. *Pay mitigation offset fees* to the Bay Area Air Quality Management District Bay Area Clean Air Foundation or other governmental entity or third party. The mitigation offset fee~~, currently estimated at approximately $30,000 per weighted ton, plus an administrative fee of no more than 5 percent of the total offset,~~ shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the ~~planning department~~ERO, the project sponsor, and the ~~air district~~ governmental entity or third party responsible for administering the funds, and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions | SUM |

| Environmental Impact | Level of Significance prior to Mitigation | Improvement/Mitigation Measures | Level of Significance after Mitigation |
|---|---|---|---|
| | | below significance levels after implementation of other identified mitigation measures as currently calculated.<br><br>The agreement that specifies fees and timing of payment shall be signed by the project sponsor, the ~~air district~~ governmental entity or third party responsible for administering the funds, and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c.<br><br>The total emission offset amount ~~is~~ presented above was calculated by summing the maximum daily construction of ROG and NOx (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated operational and construction-related ROG and NOx emissions offsets required. No reductions are needed for operations or overlapping construction and operations. | |

* **The text on SEIR p. 1-14 is revised as follows to include Appendix C3 and to reflect the addition of Appendix C4, Transit Delay Analysis and Capital Improvements Memorandum and Appendix I, Updated Health Risk Assessment Memorandum (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

- Appendix C: Transportation Supporting Information
  - Appendix C1: Travel Demand Memorandum
  - Appendix C2: Transit Assessment Memorandum
  - Appendix C3: Freight Loading Data
  - Appendix C4: Transit Delay Analysis and Capital Improvements Memorandum
- Appendix D: Noise Supporting Information
  - Appendix D1: Construction Noise Model Output
  - Appendix D2: Traffic Noise Model Output
  - Appendix D3: Calculations of Long-Term Noise Metrics
  - Appendix D4: Sound Level Meter Reports
- Appendix E: Air Quality Technical Memorandum
- Appendix F: Water Supply Assessment
- Appendix G: Biological Resources Supporting Information
- Appendix H: Balboa Park Station Area Plan PEIR Mitigation Measures
- Appendix I: Updated Health Risk Assessment Memorandum

# 5.B Revisions to Chapter 2, Project Description

**The following figure has been revised to show the revised street ownership; the revised figure is provided at the end of this chapter.**

- Figure 2-12 on draft SEIR p. 2-27

**The last paragraph on SEIR p. 2-7 is revised as follows:**

> The site does not contain any permanent structures and currently contains 1,007 surface vehicular parking spaces. The lot provides overflow vehicular parking for City College students, faculty, and staff.[26] The San Francisco Municipal Transportation Agency (SFMTA) is also temporarily using a portion of the project site for SFMTA employee parking, under an agreement with SFPUC. The SFMTA started temporarily using on October 1, 2019, an approximate 29,100-square-foot area of the project site. This temporary use will expire September 2020.

**The paragraph under Section 2.E.1, Developer's Proposed Option on SEIR p. 2-13 is revised as follows:**

The Developer's Proposed Option would include up to 1.64 million gsf in new construction on 10 Blocks (**Figure 2-4, Developer's Proposed Option Site Plan and Height Ranges**). Construction under this option would provide 1,100 residential units totaling about 1.3 million gsf. Housing would be provided on each block. A total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income, depending on market surveys, funding source restrictions and other stakeholder input on the affordable housing plan. Affordable housing would be distributed throughout the site. For purposes of this SEIR, the unit mix is assumed to be 40 percent studio/one bedroom units and 60 percent two-or-more-bedroom units. The project proposes to provide approximately 150 moderate-income dwelling units (as a component of the project's 50 percent affordable housing element) that would be deed-restricted to occupancy by educator households with an average income of 100 percent of the area median income. Households with at least one full-time employee of the City College of San Francisco or San Francisco Unified School District would have preferential priority for all educator dwelling units, with City College households having first priority and San Francisco Unified School District households having second priority.

**Figure 2-5, Ground Floor Use Plan for Developer's Proposed Option**, presents the proposed ground floor use plan at the project site. With the exception of the townhome blocks (Blocks TH1 and TH2), the ground floor areas on all blocks could include common spaces, building lobbies, residential units, as well as utility and parking access. As shown in Figure 2-5, the ground floor of Block B would contain approximately 10,000 gsf of childcare and community space. Approximately 7,500 gsf of retail space, including a café, could be provided on the ground level of Block A, C, D, E, or F.

**The first bullet under Section 2.E.6, Vehicle Parking and Loading, on SEIR p. 2-23 is revised as follows:**

- **Developer's Proposed Option:** The Developer's Proposed Option would provide a total of up to 1,300 off-street vehicle parking spaces. **Figure 2-10, Developer's Proposed Option Parking Facilities and Street Parking Plan**, illustrates the proposed off-street parking locations. Up to 550 off-street parking spaces for project residents may be located in parking garages below grade at Blocks A, B, C, D, F, and G and in the townhomes. In addition to resident parking, the Developer's Proposed Option would include a below-grade multilevel public garage of up to 750 spaces located under Blocks A and B and accessed from South Street. Alternatively, the public parking could be located in several of the residential garages. The Developer's Proposed Option would include a minimum of seven car-share parking spaces located on streets and in buildings. In addition, the Developer's Proposed Option would include approximately six on-street freight loading areas and approximately eight passenger loading areas along the internal streets.

**The text on SEIR p. 2-39 is revised as follows to clarify the compressed schedule:**

As stated in the footnote to Table 2-2, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 under a compressed schedule or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time of three years, thereby increasing the typical daily construction activity. Phase 0 would occur in 2021, followed by Phases 1 and 2 occurring simultaneously for approximately 24 months from 2022 to 2023, and completed by early 2024. The construction analysis in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, is generally based on conservative assumptions where appropriate and described in the "Approach to Analysis" section of the resource topic area.

**Section 2.I.1, State and Regional Agencies on SEIR p. 2-50 is revised as follows:**

**California Department of Transportation**

- Transportation permit for oversized or excessive load vehicles

* **Section 2.I.2, Local Agencies on SEIR pp. 2-50 to 2-51 is revised as follows to update or correct local agency approval actions:**

## 2.I.2 Local Agencies

**San Francisco Board of Supervisors**

- Adoption of CEQA findings
- Approval of general plan amendments
- Approval of planning code amendments (SUD) and associated zoning map and height map amendments
- Approval of a development agreement
- Approval of final subdivision map(s)
- Approval of dedications and easements for public improvements, and acceptance of public improvements, as necessary
- Approval of an amended easement and access agreement with ~~City College of~~the San Francisco Community College District for roadway access and any joint development of streets, if applicable
- Approval of a resolution(s) authorizing the sale of property under SFPUC jurisdiction and various license agreements for use, construction, and open space on SFPUC property
- Approval of a resolution acknowledging City's intention to fund affordable housing in the project

**San Francisco Planning Commission**

- Certification of the final SEIR
- Adoption of CEQA findings
- Approval of special use district design standards and guidelines
- Initiation and recommendation to the San Francisco Board of Supervisors to approve amendments to the general plan
- Initiation and recommendation to the San Francisco Board of Supervisors to approve planning code amendments adopting an SUD and associated zoning map amendments
- Approval of Design Standards and Guidelines
- Recommendation to the San Francisco Board of Supervisors to approve a development agreement

**San Francisco Public Utilities Commission or General Manager**

- Adoption of CEQA findings
- Actions and approvals related to a development agreement and ~~purchase and sale~~ an agreement for the sale of property under SFPUC jurisdiction, and various license agreements for use, construction, and open space on SFPUC property and other actions and approvals related to its jurisdictional authority
- Approval of an amended easement and access agreement with the San Francisco Community College District for roadway access and any joint development of streets, if applicable

**San Francisco Department of Public Works**

- Actions and approvals related to its jurisdictional authority

**San Francisco Municipal Transportation Agency**

- Actions and approvals related to a development agreement and approval of transit improvements, public improvements and infrastructure, including certain roadway improvements, stop controls, bicycle infrastructure and loading zones, to the extent included in the project

**San Francisco Fire Department**

- Actions and approvals related to its jurisdictional authority

**San Francisco Department of Building Inspection**

- Approval and issuance of demolition, grading, and site construction permits
- Nighttime construction permit, if required

**San Francisco Department of Public Health**

- Actions and approvals related to its jurisdictional authority

**~~City College of~~ San Francisco Community College District**

- Act as responsible agency under CEQA
- Approval of an amended easement and access agreement

# 5.C Revisions to Section 3.A.6, Approach to Cumulative Impact Analysis

* **To update the status of the potential City College east basin parking garage project and passage of San Francisco Proposition A bond measure on March 3, 2020, the SEIR text is revised on pp. 3.A-13 to 3.A-14 as follows:**

At subsequent 2019 Board of Trustees meetings, City College staff presented a facilities planning update on a potential bond measure that would be anticipated to fund construction of the facilities master plan projects, shown under the "Bond Measure" column in Table 3.A-2. In that update, a number of the facilities master plan projects were included in the list of potential bond-funded improvements. However, the East Basin Parking Garage was no longer included, the Performing Arts and Education Center was replaced by a new Diego Rivera Theater and a smaller STEAM building (both on the east basin), and a Student Development Building was proposed at the location of the existing Creative Arts Extension Building. The bond measure passed on March 3, 2020. The bond measure identified the types of projects the measure would fund, but generally didn't identify specific projects like those shown in the table. The various types of projects that could be funded through the bond are subject to approval by the City College Board of Trustees.

To support the college's projected increase in enrollment, the Balboa Reservoir project sponsor may fund a portion of a study addressing a potential City College garage on the east basin, if the college decides to consider pursuing such a project. A parking garage on the east basin would have independent utility from the Balboa Reservoir project—in other words, the east basin parking garage could move forward regardless of whether the Balboa Reservoir project on the west basin occurs. Consequently, this SEIR analysis need not address an east basin parking lot as part of the Balboa Reservoir project other than accounting for it as part of the cumulative analysis.

# 5.D Revisions to Section 3.B, Transportation and Circulation

* **Table 3.B-2 on draft SEIR p. 3.B-10 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**TABLE 3.B-2**
**VEHICULAR COUNTS AT STUDY INTERSECTIONS**

| Number | Intersection | Number of Vehicles[a,b] | |
|---|---|---|---|
| | | A.M. Peak Hour | P.M. Peak Hour |
| 1 | Ocean Avenue/Miramar Avenue | 1,833 | 1,876 |
| 2 | Ocean Avenue/Lee Avenue | 1,898 | 2,021 |
| 3 | Ocean Avenue/Frida Kahlo Way/Geneva Avenue | 2,090 | 2,293 |
| 4 | Ocean Avenue/San Jose Avenue | 1,376 | 1,413 |
| 5 | Ocean Avenue/Plymouth Avenue | 1,841 | 1,866 |
| 6 | San Ramon Way/Southwood Drive/Plymouth Avenue | ~~422~~268 | ~~409~~226 |
| 7 | Greenwood Avenue/Plymouth Avenue | 430 | 397 |
| 8 | Geneva Avenue/San Jose Avenue | 2,590 | 2,485 |
| 9 | Judson Avenue/Frida Kahlo Way | 1,030 | 1,040 |
| 10 | Judson Avenue/Hazelwood Avenue | 437 | 341 |
| 11 | Judson Avenue/Gennessee Street | 851 | 780 |
| 12 | Monterey Boulevard/Gennessee Street | 1,684 | 1,636 |
| 13 | Cloud Circle (N)/Frida Kahlo Way | 750 | 923 |
| 14 | Cloud Circle (S)/Frida Kahlo Way | 1,074 | 1,210 |
| 15 | City College Upper Reservoir Lot (N)/Frida Kahlo Way | 750 | 923 |
| 16 | City College Upper Reservoir Lot (S)/Frida Kahlo Way | 1,074 | 1,210 |
| 17 | I-280 SB Off Ramp/Ocean Avenue | 1,505 | 1,509 |
| 18 | I-280 SB Ramps/Geneva Avenue | 2,463 | 2,590 |
| 19 | I-280 NB Ramps/Geneva Avenue | 2,653 | 2,642 |
| 20 | I-280 NB Ramps/Ocean Avenue | 1,101 | 1,207 |
| 21 | Ocean Avenue/Brighton Avenue | 1,708 | 1,846 |
| 22 | Ocean Avenue/Harold Avenue | 1,905 | 1,981 |
| 23 | Holloway Avenue/Lee Avenue | 440 | 378 |

SOURCE: Quality Counts, 2018.

NOTES:

[a] Vehicle volume (number of vehicles) reflects the sum of all turning movements at the intersection.

[b] The weekday a.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 7 a.m. and 9 a.m. The weekday p.m. peak hour is the peak one hour (four consecutive 15-minute intervals) of vehicle traffic occurring between 4 p.m. and 6 p.m.

* **The text on draft SEIR pp. 3.B-22 to 3.B-23 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

Muni transit operations in the study area were evaluated using transit delay analysis. The transit delay analysis presents the delay associated with traffic congestion, transit reentry, and passenger boarding along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
- K/T Third/Ingleside:
  - Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (inbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (outbound)

The results of the transit delay analysis are summarized in **Table 3.B-8, ~~Existing Transit Delay~~ Existing Transit Travel Times**, and provided in Attachment C, Corridor Delay Analysis Synchro Worksheets, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations, of SEIR Appendix C2, Transit Assessment Memorandum. Transit ridership and capacity analysis are provided in Attachment F (transit ridership and capacity analysis) of SEIR Appendix C2 for informational purposes. Table 3.B-8 presents the estimated ~~seconds of delay a~~ transit vehicle ~~encounters~~ travel times during the a.m. and p.m. peak hours ~~along each of the study corridors~~.

~~**TABLE 3.B-8**~~
~~**EXISTING TRANSIT DELAY**~~

| ~~Corridor~~ | ~~Weekday a.m. Peak Hour (seconds of delay)~~ | | ~~Weekday p.m. Peak Hour (seconds of delay)~~ | |
|---|---|---|---|---|
| | ~~Northbound/ Eastbound~~ | ~~Southbound/ Westbound~~ | ~~Northbound/ Eastbound~~ | ~~Southbound/ Westbound~~ |
| ~~Frida Kahlo Way~~ | ~~3~~ | ~~12~~ | ~~3~~ | ~~25~~ |
| ~~Ocean Avenue~~ | ~~110~~ | ~~132~~ | ~~113~~ | ~~133~~ |
| ~~Geneva Avenue~~ | ~~70~~ | ~~48~~ | ~~66~~ | ~~41~~ |

~~SOURCE: Kittelson & Associates Inc., 2018.~~

~~NOTES:~~

~~Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.~~

**TABLE 3.B-8**
**EXISTING TRANSIT TRAVEL TIMES**

| Transit Line | Study Segment | Existing Transit Travel Time[a] | |
|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period |
| K/T | Jules Ave/Ocean Ave to Balboa Park BART (outbound) | 3:30 | 8:42 |
| | San Jose Ave/Geneva Ave to Dorado Terr/Ocean Ave (inbound) | 3:28 | 10:03 |
| 29 | Plymouth Ave/Ocean Ave to Mission St/Persia Ave (outbound) | 8:01 | 12:09 |
| | Mission St/Persia Ave to Plymouth Ave/Ocean Ave (inbound) | 7:10 | 9:55 |
| 43 | Geneva Avenue/Howth Street to Foerster St/Monterey Blvd (inbound) | 4:20 | 4:37 |
| | Gennessee St/Monterey Blvd to Geneva Avenue/Howth Street (outbound) | 4:16 | 4:23 |
| 49 | Frida Kahlo Way/City College South Entrance to Mission St/Persia Ave (outbound) | 5:39 | 10:04 |
| | Mission St/Ocean Ave to Frida Kahlo Way/City College South Entrance (inbound) | 7:18 | 11:25 |

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

As shown in Table 3.B-8, the ~~highest transit delays~~ most variability in transit travel times are experienced along Ocean Avenue ~~between Plymouth Avenue and Judson Avenue~~ in the westbound direction where there is a difference in travel times of over 6.5 minutes between the weekday a.m. and p.m. peak hours. This is primarily caused by the vehicular traffic at the Ocean Avenue/San Jose Avenue intersection during the weekday p.m. peak hour, which operates with an average intersection delay above 100 seconds. Additionally, as a result of the high volume of vehicle traffic ~~volumes~~ in the curbside travel lane on

westbound Ocean Avenue (between 900 and 930 vehicles per hour) transit vehicles ~~in this corridor~~ typically experience transit reentry delays of around 11 seconds.

* **Footnote 96 on draft SEIR p. 3.B-52 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

[96] The threshold uses the adopted the Transit First Policy, City Charter section 8A.103(c)1, 85~~,~~ percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.

* **The text on draft SEIR pp. 3.B-73 to 3.B-74 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

The impact of the proposed project on transit delay (traffic congestion, transit reentry delay, and passenger boarding delay) was evaluated along the following ~~corridors and~~ Muni lines for the weekday a.m. and p.m. peak hours:

- ~~Frida Kahlo Way from Judson Avenue to Ocean Avenue (Line 43)~~
- ~~Ocean Avenue from Plymouth Avenue to San Jose Avenue (Lines K, 29, 49)~~
- ~~Geneva Avenue from City College Terminal to San Jose Avenue (Lines 8, 8BX, 43, 54)~~
- K/T Third/Ingleside:
- Jules Avenue/Ocean Avenue to Balboa Park BART Station (outbound)
  - San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (inbound)
- 29 Sunset
  - Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (outbound)
  - Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (inbound)
- 43 Masonic
  - Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard (inbound)
  - Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street (outbound)
- 49 Van Ness/Mission
  - Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (outbound)
  - Mission Street/Ocean Avenue to Frida Kahlo Way/City College South Entrance (inbound)

The results of the transit delay analysis are summarized in **Table 3.B-18, Transit Delay Analysis~~, and~~**. Synchro travel time calculation worksheets presenting transit delay along the corridors are provided in Attachment C, Corridor Delay Analysis Synchro Worksheets~~, and Attachment D, Transit Reentry and Passenger Boarding Delay Analysis Calculations,~~ of SEIR Appendix C2, Transit Assessment Memorandum and supplementary transit

analysis is provided in the SEIR Appendix C4, Transit Delay Analysis and Capital Improvement Memorandum.

**~~TABLE 3.B-18~~**
**~~TRANSIT DELAY ANALYSIS~~**

| ~~Corridor~~ | ~~Weekday a.m. Peak Hour (seconds of delay)~~ | | ~~Weekday p.m. Peak Hour (seconds of delay)~~ | |
|---|---|---|---|---|
| | ~~Northbound/ Eastbound~~ | ~~Southbound/ Westbound~~ | ~~Northbound/ Eastbound~~ | ~~Southbound/ Westbound~~ |
| ~~Transit Delay~~ | | | | |
| ~~Existing Conditions~~ | | | | |
| ~~Frida Kahlo Way~~ | ~~5~~ | ~~15~~ | ~~5~~ | ~~28~~ |
| ~~Ocean Avenue~~ | ~~121~~ | ~~143~~ | ~~124~~ | ~~144~~ |
| ~~Geneva Avenue~~ | ~~79~~ | ~~53~~ | ~~75~~ | ~~46~~ |
| ~~Existing plus Developer's Proposed Option~~ | | | | |
| ~~Frida Kahlo Way~~ | ~~18~~ | ~~74~~ | ~~29~~ | ~~101~~ |
| ~~Ocean Avenue~~ | ~~187~~ | ~~182~~ | ~~182~~ | ~~244~~ |
| ~~Geneva Avenue~~ | ~~99~~ | ~~127~~ | ~~117~~ | ~~127~~ |
| ~~Existing plus Additional Housing Option~~ | | | | |
| ~~Frida Kahlo Way~~ | ~~21~~ | ~~87~~ | ~~46~~ | ~~111~~ |
| ~~Ocean Avenue~~ | ~~183~~ | ~~207~~ | ~~208~~ | ~~272~~ |
| ~~Geneva Avenue~~ | ~~109~~ | ~~137~~ | ~~133~~ | ~~137~~ |
| ~~Project-Related Increase in Delay~~ | | | | |
| ~~Developer's Proposed Option~~ | | | | |
| ~~Frida Kahlo Way~~ | ~~13~~ | ~~59~~ | ~~24~~ | ~~73~~ |
| ~~Ocean Avenue~~ | ~~66~~ | ~~39~~ | ~~58~~ | ~~100~~ |
| ~~Geneva Avenue~~ | ~~20~~ | ~~74~~ | ~~42~~ | ~~81~~ |
| ~~Additional Housing Option~~ | | | | |
| ~~Frida Kahlo Way~~ | ~~16~~ | ~~72~~ | ~~41~~ | ~~83~~ |
| ~~Ocean Avenue~~ | ~~62~~ | ~~64~~ | ~~84~~ | ~~128~~ |
| ~~Geneva Avenue~~ | ~~30~~ | ~~84~~ | ~~58~~ | ~~91~~ |

~~SOURCE: Kittelson & Associates, Inc. 2018.~~

~~NOTES:~~

~~Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.~~

**TABLE 3.B-18**
**TRANSIT DELAY ANALYSIS**

| Transit Line | Study Segment | Transit Travel Time | | Project-Related Change | | Exceeds Four-Minute Threshold?[a] | |
|---|---|---|---|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period |
| **Existing Conditions[b]** | | | | | | | |
| K/T | Jules/Ocean to Balboa Park BART (outbound) | 3:30 | 8:42 | = | = | = | = |
| | San Jose/Geneva to Dorado/Ocean (inbound) | 3:28 | 10:03 | = | = | = | = |
| 29 | Plymouth/Ocean to Mission/Persia (outbound) | 8:01 | 12:09 | = | = | = | = |
| | Mission/Persia to Plymouth/Ocean (inbound) | 7:10 | 9:55 | = | = | = | = |
| 43 | Geneva/Howth to Monterey/Foerster[C] (inbound) | 4:50[C] | 5:07[C] | = | = | = | = |
| | Gennessee/Monterey to Geneva/Howth[C] (outbound) | 4:27[C] | 4:46[C] | = | = | = | = |
| 49 | Frida Kahlo/City College South to Mission/Persia (outbound) | 5:39 | 10:04 | = | = | = | = |
| | Mission/Ocean to Frida Kahlo/City College South (inbound) | 7:18 | 11:25 | = | = | = | = |
| **Existing Conditions + Developer's Proposed Option** | | | | | | | |
| K/T | Jules/Ocean to Balboa Park BART (outbound) | 4:36 | 9:40 | 1:06 | 0:58 | No | No |
| | San Jose/Geneva to Dorado/Ocean (inbound) | 4:07 | 11:43 | 0:39 | 1:40 | No | No |
| 29 | Plymouth/Ocean to Mission/Persia (outbound) | 9:07 | 13:07 | 1:06 | 0:58 | No | No |
| | Mission/Persia to Plymouth/Ocean (inbound) | 7:49 | 11:35 | 0:39 | 1:40 | No | No |
| 43 | Geneva/Howth to Monterey/Foerster[C] (inbound) | 5:04[C] | 5:33[C] | 0:14 | 0:26 | No | No |
| | Gennessee/Monterey to Geneva/Howth[C] (outbound) | 5:37[C] | 5:50[C] | 1:10 | 1:04 | No | No |
| 49 | Frida Kahlo/City College South to Mission/Persia (outbound) | 6:45 | 11:02 | 1:06 | 0:58 | No | No |
| | Mission/Ocean to Frida Kahlo/City College South (inbound) | 7:57 | 13:05 | 0:39 | 1:40 | No | No |
| **Existing Conditions + Additional Housing Option** | | | | | | | |
| K/T | Jules/Ocean to Balboa Park BART (outbound) | 4:32 | 10:06 | 1:02 | 1:24 | No | No |
| | San Jose/Geneva to Dorado/Ocean (inbound) | 4:32 | 12:11 | 1:04 | 2:08 | No | No |
| 29 | Plymouth/Ocean to Mission/Persia (outbound) | 9:03 | 13:33 | 1:02 | 1:24 | No | No |
| | Mission/Persia to Plymouth/Ocean (inbound) | 8:14 | 12:03 | 1:04 | 2:08 | No | No |

| Transit Line | Study Segment | Transit Travel Time | | Project-Related Change | | Exceeds Four-Minute Threshold?[a] | |
|---|---|---|---|---|---|---|---|
| | | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period | A.M. Peak Period | P.M. Peak Period |
| 43 | Geneva/Howth to Monterey/Foerster[C] (inbound) | 5:07[C] | 6:07[C] | 0:17 | 1:00 | No | No |
| | Gennessee/Monterey to Geneva/Howth[C] (outbound) | 5:39[C] | 6:07[C] | 1:12 | 1:21 | No | No |
| 49 | Frida Kahlo/City College South to Mission/Persia (outbound) | 6:41 | 11:28 | 1:02 | 1:24 | No | No |
| | Mission/Ocean to Frida Kahlo/City College South (inbound) | 8:22 | 13:33 | 1:04 | 2:08 | No | No |

SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.

NOTES:

[a] The threshold is calculated as the existing transit travel time plus four minutes.

[b] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA.

[c] The Transit Travel Time column for existing conditions represents the 43 line between Geneva Avenue/Howth Street and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), with collected transit travel time data along the route segment between Frida Kahlo Way/Geneva Avenue/Ocean Avenue and Foerster Street/Monterey Boulevard (inbound) or Gennessee Avenue/Monterey Boulevard (outbound), plus the Synchro estimated delay at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The Project-Related Change columns in Table 3.B-18 represent Synchro-estimated increase for the 43 line between Foerster Street/Monterey Boulevard and Geneva Avenue/Howth Street.

### *Developer's Proposed Option*

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of ~~73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 1 minute and 40 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 6 seconds along Ocean Avenue i to the 29, 49, and K/T n the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, t~~T~~he majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, t~~T~~he Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, based on the established thresholds of significance, the Developer's Proposed Option would result in a ***less-than-significant*** impact related to transit delay.

*Additional Housing Option*

As shown in Table 3.B-18, vehicle and transit generated by the Additional Housing Option would increase transit delay by a maximum of ~~83 seconds along Frida Kahlo Way, (southbound direction, weekday p.m. peak hour), a maximum of 128 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 91 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour).~~ 2 minutes and 8 seconds along Ocean Avenue to the 29, 49, and K/T in the westbound direction during the weekday p.m. peak hour and a maximum of 1 minute and 2 seconds along Ocean Avenue to the 29, 49, and K/T in the eastbound direction during the weekday a.m. peak hour.

Based on an analysis of the project-related change in delay attributable to traffic congestion, transit reentry, and passenger boardings/alightings, t~~T~~he majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Additional Housing Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.

As shown in Table 3.B-18, t~~T~~he Additional Housing Option would not result in transit delay greater than or equal to four minutes.~~123~~ Therefore, based on the established thresholds of significance, the Additional Housing Option would result in a ***less-than-significant*** impact related to transit delay.

~~123 Ibid~~

* **The last sentence on draft SEIR p. 3.B-79 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

The Developer's Proposed Option would construct an up to 750~~650~~-space public parking garage to partially replace the existing 1,007-space surface parking lot on the project site.

* **The following edits update draft SEIR pp. 3.B-95 to 3.B-98, including Mitigation Measure M-C-TR-4, Implement Measures to Reduce Transit Delay, to reflect the impact conclusion updates regarding the 49 Van Ness/Mission and transit capital improvements (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**Mitigation Measure M-C-TR-4: ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay.** The project sponsor, under either project option, shall ~~monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall~~ implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay ~~and meet the transit travel time performance standard~~ for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic.

~~**Transit Travel Time Performance Standard**~~**Routes and Study Segments.** ~~Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods, are shown in Table M-C-TR-4.~~ The following routes and

study segments ~~shown in Table M-C-TR-4 represent routes and study segments~~would most likely ~~to have a~~ experience cumulative transit delay impact to which the project would have a considerable cumulative contribution.

- K/T Third/Ingleside (outbound): Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART)
- K/T Third/Ingleside (inbound): San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue
- 29 Sunset (outbound): Plymouth Avenue/Ocean Avenue to Mission St/Persia Avenue
- 29 Sunset (inbound): Mission St/Persia Avenue to Plymouth Avenue/Ocean Avenue
- 43 Masonic (outbound): Gennessee Street/Monterey Boulevard to Geneva Avenue/Howth Street
- 43 Masonic (inbound): Geneva Avenue/Howth Street to Foerster Street/Monterey Boulevard

**~~TABLE M-C-TR-4~~**
**~~TRANSIT TRAVEL TIME PERFORMANCE STANDARD~~**

| ~~Transit Line~~ | ~~Study Segment~~ | ~~Existing Transit Travel Time[a]~~ | | ~~Performance Standard[b]~~ | |
|---|---|---|---|---|---|
| | | ~~A.M. Peak Period~~ | ~~P.M. Peak Period~~ | ~~A.M. Peak Period~~ | ~~P.M. Peak Period~~ |
| ~~K/T~~ | ~~Jules Ave/Ocean Ave to Balboa Park BART~~ | ~~3:30~~ | ~~8:42~~ | ~~7:30~~ | ~~12:42~~ |
| | ~~San Jose Ave/Geneva Ave to Dorado Terr/ Ocean Ave~~ | ~~3:28~~ | ~~10:03~~ | ~~7:28~~ | ~~11:28~~ |
| ~~29~~ | ~~Plymouth Ave/Ocean Ave to Mission St/ Persia Ave~~ | ~~8:01~~ | ~~12:09~~ | ~~12:01~~ | ~~16:01~~ |
| | ~~Mission St/Persia Ave to Plymouth Ave/ Ocean Ave~~ | ~~7:10~~ | ~~9:55~~ | ~~11:10~~ | ~~15:10~~ |
| ~~43~~ | ~~Frida Kahlo Way/CCSF South Entrance to Foerster St/Monterey Blvd~~ | ~~4:20~~ | ~~4:37~~ | ~~8:20~~ | ~~8:37~~ |
| | ~~Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance~~ | ~~4:16~~ | ~~4:23~~ | ~~8:16~~ | ~~8:23~~ |
| ~~49~~ | ~~Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave~~ | ~~5:22~~ | ~~10:04~~ | ~~9:22~~ | ~~14:04~~ |
| | ~~Mission St/Ocean Ave to Frida Kahlo Way/ CCSF South Entrance~~ | ~~7:18~~ | ~~11:25~~ | ~~11:18~~ | ~~15:25~~ |

~~SOURCE: Kittelson & Associates, Inc. 2019; SFMTA Automatic Vehicle Location Data, 2019.~~

~~NOTES:~~

~~[a] Kittelson staff collected transit travel time data along route segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Staff boarded a transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Onboard survey data was used to supplement and verify automatic vehicle location data provided by SFMTA. Agencies may determine to update the existing baseline transit travel times closer to commencement of construction.~~

~~[b] The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.~~

~~**Monitoring and Reporting.** The project sponsor shall retain a transportation consultant to monitor and report cumulative transit travel times to determine if a route exceeds its performance standard and the project's fair share contribution to such exceedance, if applicable. The transportation consultant shall be on a list of qualified consultants at the SFMTA or San Francisco Planning Department (agencies). The monitoring plan is subject to agencies' review and approval. All reporting documents are also subject to review and approval by the agencies. The agencies may modify the monitoring and reporting program to account for transit route or transportation network changes, or major changes to the project's development program.~~

~~*Timing*. The project sponsor shall retain a transportation consultant within one year of occupancy of one new major building[82] at the City College of San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site.~~

~~The transportation consultant shall submit its first transit travel time reporting document to the agencies within 18 months of occupancy of one new major building at the City College San Francisco Ocean Avenue campus (City College) and at least 750 units are occupied at the project site. Thereafter, the transportation consultant shall submit annual reporting documents until the project sponsor meets it terms for this measure.~~

~~*Collection and Reporting Details*. For each reporting document, the transportation consultant shall collect transit travel time data during the a.m. peak (7 to 9 a.m.) and p.m. peak (4 to 6 p.m.) periods during three consecutive, non-holiday weekdays (Tuesday, Wednesday or Thursday) when City College is in typical (i.e., non-finals or spring break week) session. The transportation consultant may use automatic vehicle location on the routes to average the transit travel time data for the peak hour within the peak period of each route in both the inbound and outbound directions along the study segment. Transit travel time surveys shall be conducted within the same month for each reporting period.~~

~~For the first reporting document, the transportation consultant shall collect and report additional data during the peak periods to determine the project sponsor's fair-share impacts of the cumulative transit delay. The transportation consultant may use methodologies such as cordons, intersection counts, or video cameras to determine traffic congestion and reentry delay attributable to the project and intercept surveys to determine passenger boarding/alighting delay attributable to the project. Agencies will determine if the collecting and reporting of this subsequent data is required for subsequent reporting documents (e.g., if a route exceeds or is close to exceeding the performance standard in a prior reporting document).~~

**Implement ~~Fair-Share of~~ Capital Improvement Measures.** ~~If the agencies determine a route does not meet its performance standard and the project contributes greater than or equal to two minutes' delay to that route, the~~ The project sponsor shall ~~implement~~

~~[82] A new major building is City College of San Francisco Ocean Avenue campus construction post-2019 that results in a cumulative net addition of more than 50,000 square feet to an existing building(s) or a new building(s), or a new or expanded parking facility of more than a 50,000 square feet.~~

contribute funds for the following capital improvement measures that reduce transit travel times. ~~These measures are subject to agency approval and could include:~~

1. **Signal Timing Modifications at Ocean Avenue/Brighton Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Brighton Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
2. **Signal Timing Modifications at Ocean Avenue/Plymouth Avenue.** The project sponsor shall fund the design and construction of signal timing modifications and restriping, as needed, at the Ocean Avenue/Plymouth Avenue intersection. The existing traffic signal shall be modified to prohibit eastbound left turns and provide a protected green arrow signal phase for westbound left turns.
3. **Bus Boarding Island on Southbound Frida Kahlo Way.** The project sponsor shall fund the design and construction of a bus boarding island on southbound Frida Kahlo Way, north of the Frida Kahlo Way/Geneva Avenue/Ocean Avenue intersection, and restriping, as needed.

The cost of these capital improvement measures is $200,000 (in 2020 dollars; cost shall be escalated using consumer price index (CPI) to year of payment) and shall be considered the project's fair share toward mitigating this significant cumulative impact. The fair share contribution, as documented by SFMTA[83], shall not exceed this amount (with CPI escalation) across both payment phases. The project sponsor shall pay $110,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 1, and $90,000 (plus CPI escalation) to SFMTA prior to issuance of the first construction document for the first project building in phase 2.

If SFMTA adopts a strategy to reduce transit travel times to the K/T Third/Ingleside, 29 Sunset, and 43 Masonic that does not involve signal timing modifications or bus boarding islands, the project's total contribution shall remain the same, and may be used for other transit travel time saving strategies on these routes, as deemed appropriate by the SFMTA.

The schedule for implementing capital improvement measures shall be at the discretion of SFMTA, as designated in the SFMTA's capital improvements plan.

~~1. Expansion of measures already included in the project's transportation demand management (TDM) Plan (e.g., increases in tailored transportation marketing services, additional bicycle parking, etc.). The project sponsor shall pay the full cost of implementation.~~

~~2. Measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's TDM Plan. The project sponsor shall pay the full cost of implementation.~~

~~3. Other measures not included in the City's TDM Program Standards Appendix A that the agencies agree are likely to reduce transit travel times. These other measures may~~

[83] Henderson, Tony, SFMTA, e-mail communication to Elizabeth White, San Francisco Planning Department, and Leigh Lutenski, Office of Economic and Workforce Development on March 30, 2020.

~~include off-site capital improvements such as, turn pockets, bus bulbs, queue jumps, turn restrictions, boarding islands, and/or transit signal priority projects. The project sponsor shall pay their fair share, calculated as the project's percent contribution to the increase in transit travel time between baseline and cumulative conditions, of the selected measures.~~

~~**Term Condition A:** The project sponsor shall monitor, submit reporting documents, and implement their fair share portion of measures for each route until the agencies determine that three consecutive reporting documents demonstrate: (1) the route does not exceed its performance standard or (2) the project does not contribute greater than or equal to two minutes' delay to a route that exceeds its performance standard.~~

~~**Term Condition B:** The project sponsor shall be subject to the term condition A for every new major building at City College or for every additional 250 occupied dwelling units at the project site. The agencies may waive term Condition B if past reporting documents demonstrate the project has no potential to contribute to greater than or equal to two minutes' delay to a route that exceeds or may exceed its performance standard.~~

~~In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and~~ Implementation of these capital improvement measures would reduce transit delay for the identified segments of the K/T Third/Ingleside, 29 Sunset, and 43 Masonic. Payment of the fair share contribution levels would mitigate the project's contribution to the cumulative impacts of the estimated transit delay added by full development of the proposed project options, City College facilities master plan, and other cumulative projects. However, given the uncertainty of SFMTA approval ~~of other measures under their jurisdiction,~~ of these capital improvement measures, the impact of the proposed project options would remain ***significant and unavoidable with mitigation,*** even with implementation of Mitigation Measure M-C-TR-4**.**

**Significance after Mitigation:** Significant and Unavoidable.

# 5.E Revisions to Section 3.C, Noise

**The text on draft SEIR p. 3.C-23 is revised as follows to clarify nighttime noise-generating activity (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

Construction activities would generally occur between the hours of 7 a.m. and 8 p.m., up to seven days a week. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity ~~and would not occur during nighttime hours~~. Consequently, construction activities would be consistent with San Francisco Police Code section 2908.

### Construction-Related Noise Sources

Project implementation would result in operation of heavy equipment on the project site for the demolition of the west side berm, and north and east embankments, construction of new structures and associated infrastructure, and open space improvements. Construction activities would occur intermittently on the project site over the six-year construction duration and could expose nearby existing and future sensitive receptors to temporary increases in noise levels substantially in excess of ambient levels. The project sponsor does not anticipate frequent or regular nighttime noise-generating construction activity. ~~Construction activity is only proposed to occur during daytime hours and nighttime construction noise impacts would not occur and are not assessed herein. While c~~Certain construction activities such as large concrete pours, may require earlier start or later finish times to accommodate such time-specific activities, and could include one concrete pour per building, which could occur a total of 12 times throughout the project construction period. Such construction activities ~~that extend beyond normal hours have not been specifically identified by the applicant and~~ would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

**The text on draft SEIR p. 3.C-25 is revised as follows to correct the location of this receptor (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

Archbishop Riordan High School would be the receptor nearest to the ~~eastern~~ northern property line. Archbishop Riordan High School would be located approximately 80 feet from Phase 0 demolition activities which would last approximately two months.

**The text on draft SEIR p. 3.C-29 is revised as follows to clarify the noise analysis under the compressed construction schedule (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

As stated in the footnote to Table 2-2, p. 2-38, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Consequently, construction could be complete as early as 2024 or extend beyond 2027. If construction occurs over a shorter period than shown in Table 2-2 (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity.

Compression of the construction schedule from six to three years would increase the intensity of construction and may result in more individual pieces of equipment operating simultaneously than under the proposed six-year construction period of the project. Under the compressed scenario, Phase 0 would occur over a 12-month period, as under the six-year construction scenario; therefore, the construction noise impacts for Phase 0 would be the same.

Under the compressed scenario, Phases 1 and 2 would be constructed simultaneously after Phase 0 and would involve more equipment operation but not at the same location, as Phase 1 and Phase 2 are in separate geographic areas of the project site. Consequently, construction noise impacts at Archbishop Riordan High School as assessed in Table 3.C-8 would increase by 3 dBA and only if development of Blocks G and TH2 would occur simultaneously (see Figure 2-18). All other Phase 1 development would be over 300 feet away, such that construction noise would be attenuated by distance so as not to contribute considerably to construction noise from concurrent development of Phase 2 area under the compressed schedule. Additionally, because construction noise analysis involves consideration of the simultaneous operation of the two noisiest pieces of equipment, the compressed construction scenario would not appreciably result in a change in the character of the significant and unavoidable construction noise impact identified. Therefore, due to the distances involved, the compressed construction scenario would only have a potential for a modest increase in noise levels over those predicted for the proposed schedule.

The peak volume of truck trips under the compressed schedule would also occur over four months in 2022 and would be 1.2 times greater than the six-year schedule due to the simultaneous construction of Phase 1 and 2. As indicated in Table 3.C-8 on SEIR p. 3.C-27, the noise contribution of truck trips would be much less than that of off-road construction equipment. There would not be a substantial increase in the severity of construction noise impacts under the compressed schedule compared to that of the proposed project. ~~The same pieces of equipment would be operating under a compressed construction schedule. Therefore, the maximum noise level would not change based on the methodology above combining the operation of the noisiest pieces of equipment with each phase.~~ Under the compressed construction schedule, the construction noise impact from off-road equipment would be *significant*.

**The sixth bullet point of Mitigation Measure M-NO-1 on draft SEIR p. 3.C-30 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

- Undertake the noisiest activities (e.g., demolition using hoe rams) during ~~times of least disturbance to surrounding residents and occupants~~ the hours of ~~(~~9 a.m. to 4 p.m.~~)~~; and select or construct haul routes that avoid the North Access Road and the adjacent Archbishop Riordan High School and residential uses along Plymouth Avenue and Lee Avenue, such as the temporary or permanent relocation of North Street.

**The second full paragraph on draft SEIR p. 3.C-31 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**Significance after Mitigation:** Significant and Unavoidable. Implementation of construction-related noise control measures in Mitigation Measure M-NO-1 would reduce the project's temporary or periodic increases in ambient noise levels. However, given that there would still be periods of peak construction activity exceeding the "Ambient + 10 dBA" standard at the nearest sensitive receptor locations for occasional periods when

activity would be conducted at the property lines nearest to receptors, these occurrences would occur in all three phases of construction over an extended period of up to six years.

Plywood barriers or moveable sound barrier curtains can provide, at best, 10 to 15 dBA of sound attenuation but would not be effective for elevated receptors in the 1100–1150 Ocean Avenue residences. The feasibility of implementing either a temporary or permanent North Street extension is unknown at this time, as it would require development of an agreement on timing and right-of-way acquisition with City College.

If construction were to be conducted under the compressed schedule and be complete as early as 2024, a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity. Therefore, in either case the construction noise impacts would be significant and unavoidable with mitigation.

**The second paragraph of draft SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

This analysis evaluates the significance of construction-related vibration on structures and people (receptors), specifically cosmetic damage effects on structures and sleep disturbance and associated health effects on people. For building damage, the threshold limit depends on the architectural characteristics of the potentially affected structure (see Table 3.C-6, p. 3.C-14)~~, but.~~ ~~f~~For modern residential, industrial and commercial buildings, a standard of 0.5 in/sec PPV is applied, while for older residential structures, a standard of 0.3 in/sec PPV is applied. Potential nighttime concrete pours would not involve the use of vibration-generating equipment. The potential for sleep disturbance vibration effects are evaluated only when construction activities are proposed during the nighttime hours, which would not occur under the proposed project, therefore, there would be no sleep disturbance vibration impacts.

**The fourth paragraph of SEIR p. 3.C-32 is revised as follows to correct the vibration standard for older residential structures (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

As shown in Table 3.C-6, p. 3.C-14, depending on the type of vibration (transient versus continuous), groundborne vibration generated by project-related demolition and construction activities above ~~0.5~~ 0.3 in/sec PPV could cause cosmetic damage to new or older nearby structures. As shown Table 3.C-9, estimated vibration levels of PPV's would be ~~well~~ below the ~~0.5~~ 0.3 in/sec threshold and this impact would be ***less than significant***.

# 5.F Revisions to Section 3.D, Air Quality

The background existing cancer risk and $PM_{2.5}$ concentrations presented in the draft SEIR were based on the most recent San Francisco Citywide Health Risk Assessment database available at the time the notice of preparation (NOP) and draft SEIR were released. This assessment was conducted

in 2012 and indicates that the project site is not located within an air pollutant exposure zone (APEZ). In February 2020, the city, in collaboration with the regional air district, completed a draft update to the Citywide Health Risk Assessment database in order to update the APEZ map, as required by Health Code article 38. The draft 2020 Citywide Health Risk Assessment database includes the following updates compared to the prior Citywide Health Risk Assessment database:

- Vehicle activity is based on an updated San Francisco Chained Activity Modeling Process (SF-CHAMP) model run for year 2020
- Vehicle emissions are updated for year 2020
- Vehicle emissions include re-suspended road dust, which was not included in the prior citywide health risk assessment
- Maritime emissions now also account for ferry emissions (emissions that were not included in the prior Citywide Health Risk Assessment database due to lack of available information at that time)
- Caltrain emissions have been updated
- Stationary source emissions permitted by the air district have been updated
- Updated citywide air dispersion modeling was conducted
- Cancer risk estimates have been updated based on updated methodologies from the Office of Environmental Health Hazard Assessment

Based on this draft updated database, the San Francisco Department of Public Health issued a draft updated APEZ map, issued a draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, and initiated a 30-day public review period.[84] The updated final APEZ map shows that the project site is not located within an APEZ, consistent with the draft SEIR.

Based on the updated final APEZ map[85] and the draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, the proposed project would result in a significant health risk impact to on- and off-site sensitive receptors during the project's construction activities without mitigation, consistent with what was presented in the draft SEIR. However, with implementation of Mitigation Measure M-AQ-2a (Construction Emissions Minimization) and M-AQ-4a (Install MERV 13 Filters at the Daycare Facility), this impact would be reduced to a less-than-significant level, also consistent with what was presented in the draft SEIR. Also consistent with the draft SEIR, the health risks to existing offsite sensitive receptors may exceed the cancer risk thresholds under the worst-case three-year construction phasing scenario, and therefore this impact would be significant and unavoidable with mitigation. Specifically:

- For excess cancer risk from construction and operation emissions for both offsite and onsite receptors not in APEZ under existing conditions, the project's contribution is either less than the threshold of 10.0 cancers per 1 million and/or the project's contribution would not place any offsite or onsite receptor into a new APEZ.

[84] San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020

[85] San Francisco Planning Department, San Francisco Property Information Map, *https://sfplanninggis.org/PIM/*.

- For excess cancer risk from construction and operation emissions for both offsite and onsite receptors in the APEZ under existing conditions, the project's contribution is less than the threshold of 7.0 cancers per 1 million.
- For excess cancer risk from construction and operation emissions under the compressed construction scenario for offsite receptors in the APEZ under existing conditions, this impact would be conservatively considered significant and unavoidable with mitigation.
- For PM2.5 concentrations from construction and operation emissions for both offsite and onsite receptors not in APEZ under existing conditions, the project's contribution is either less than the threshold of 0.3 $\mu/m^3$ and/or the project's contribution would not place any offsite or onsite receptor into a new APEZ.
- For PM2.5 concentrations from construction and operation emissions for both offsite and onsite receptors in the APEZ under existing conditions, the project's contribution is less than the threshold of 0.2 $\mu/m^3$.
- For PM2.5 concentrations from construction and operation emissions under the compressed construction scenario for offsite receptors in the APEZ under existing conditions, this impact would be conservatively considered significant and unavoidable with mitigation.

Therefore, the following text in the draft SEIR has been revised to update references to, and data from, the updated citywide health risk modeling database. The revised text does not provide new information that would result in any new significant impact not already identified in the draft SEIR or a substantial increase in the severity of an impact identified in the draft SEIR that cannot be mitigated to less than significant level with implementation of mitigation measure(s) agreed to by the project sponsor. Therefore, recirculation pursuant to CEQA guidelines section 15088.5 is not required.

* **To reflect the updated health risk analysis, the last sentence in the first paragraph on draft SEIR p. 3.D-1 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> Supplemental air quality information supporting the analysis in this section is provided in SEIR Appendix E, Air Quality Technical Memorandum, and Appendix I, Updated Health Risk Assessment Memorandum.

* **To reflect the updated APEZ map and the draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, draft SEIR pp. 3.D-16 to 3.D-17, and footnote 239, is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> In an effort to identify areas of San Francisco most adversely affected by sources of TACs and elevated concentrations of particulate matter, the City and County of San Francisco partnered with BAAQMD to inventory and assess air pollution exposure from vehicles, stationary sources, and area sources within San Francisco. Citywide dispersion modeling was conducted using AERMOD[238] to assess the emissions from the following primary sources: vehicles on local roadways, permitted stationary sources, port and maritime sources, and diesel emissions from Caltrain. Emissions of $PM_{10}$ (DPM is assumed equivalent to $PM_{10}$), $PM_{2.5}$, and total organic gases (TOGs) were modeled on a 20 by 20–

meter receptor grid covering the entire city. The citywide modeling results represent a comprehensive assessment of existing cumulative exposures to air pollution throughout the city. The methodology and technical documentation for modeling citywide air pollution are available in the document entitled, ~~*The San Francisco Community Risk Reduction Plan: Technical Support Documentation*~~ *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*.[239]

Model results were used to identify areas in the city with poor air quality, which are designated as the *Air Pollutant Exposure Zone* (APEZ), based on the following health-protective criteria: (1) cumulative $PM_{2.5}$ concentrations greater than 10 $\mu g/m^3$ and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million persons exposed. See below for evidence supporting these standards.

An additional health vulnerability layer was incorporated in the APEZ for those San Francisco ZIP codes in the worst quintile of Bay Area Health Vulnerability scores (ZIP Codes 94102, 94103, ~~94105~~94110, 94124, and ~~94130~~94134). In these areas, the standard for identifying areas as being within the zone were lowered to: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 90 per one million persons exposed and/or (2) cumulative $PM_{2.5}$ concentrations greater than 9 $\mu g/m^3$.

Lastly, all parcels within 500 feet of a major freeway were also included in the APEZ, consistent with findings in CARB's Air Quality and Land Use Handbook: A Community Health Perspective, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.[240]

Citywide modeling results identified that the project site is not located within the APEZ, including it is not located within a health vulnerable zip code. The closest parcels to the project site within the APEZ are those within 500 feet of I-280 bounded by Howth Street, Ocean Avenue, and Geneva Avenue, located approximately 1,300 feet to the southeast of the project site.

[239] ~~BAAQMD,~~ San Francisco Department of Public Health, ~~and~~ San Francisco Planning Department, and Ramboll, ~~*The San Francisco Community Risk Reduction Plan: Technical Support Documentation,*~~ *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation,* ~~December 2012~~February 2020.

*** To reflect the updated health risk analysis background values, draft SEIR p. 3.D-20 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

The project site is not located within an area with risk factors that meet the updated APEZ criteria. Background cancer risk values on the project site range from 8 to 22 in one million, with background values ranging from ~~1~~3 to ~~139~~549 in one million within 3,280 feet (1,000 meters) of the site. Background $PM_{2.5}$ concentrations range from 8.3 to 8.6 $\mu g/m^3$ on the project site, with background values varying between ~~8.1~~7.8 and ~~11.3~~18.2 $\mu g/m^3$ within

3,280 feet (1,000 meters) of the site. The nearest offsite receptors within an APEZ are located approximately 1,100 feet to the southeast and are so designated due to the proximity of I-280. Receptors within 3,280 feet (1,000 meters) of the project boundary are located both within and outside of the APEZ and impacts are assessed accordingly as discussed below in the "Approach to Analysis" section.

* **The last paragraph on draft SEIR p. 3.D-36 and first two lines on p. 3.D-37 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

As part of this project, a health risk assessment was conducted for the proposed project to estimate health risks from exposures to TACs. The assessment examined sensitive receptors within 3,280 feet (1,000 meters) of the project boundary, used the ~~citywide Community Risk Reduction Plan (CRRP) model~~ draft 2020 San Francisco Citywide Health Risk Assessment database to identify existing background risk, included updated locations and emission rates of existing stationary sources provided by the BAAQMD, and updated cancer risk values based on the latest (2015) guidance by OEHHA.

* **The third full paragraph and footnote 282 on draft SEIR p. 3.D-37 is revised as follows to update the new draft Citywide Health Risk Assessment references (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

The threshold of significance used to evaluate health risks from new sources of TACs associated with the project is based on the potential for the proposed project to substantially affect the extent and severity of the APEZ at sensitive receptor locations. The health protective standards used for determining the APEZ and evidence supporting these standards are discussed in the Setting section above and were developed in consultation with BAAQMD staff as part of the preparation of a ~~Community Risk Reduction Plan~~ draft 2020 San Francisco Citywide Health Risk Assessment.[282] The project site is not within an identified health vulnerable ZIP code; therefore, the APEZ criterion for this location is based on: (1) cumulative $PM_{2.5}$ concentrations greater than 10 $\mu g/m^3$, and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population.

[282] San Francisco has prepared a ~~Community Risk Reduction Plan~~ Citywide Health Risk Assessment. Extensive modeling has been conducted and is documented in ~~*The San Francisco Community Risk Reduction Plan: Technical Support Documentation*~~ the *draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*. This modeling provides the technical basis for development of the ~~Community Risk Reduction Plan~~ Citywide Health Risk Assessment.

*** The text on draft SEIR p. 3.D-39 and footnote 289 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**TAC Concentrations**

Consistent with the ~~Community Risk Reduction Plan Health Risk Assessment (CRRP HRA)~~ draft 2020 San Francisco Citywide Health Risk Assessment, the air toxics analysis evaluated health risks and $PM_{2.5}$ concentrations resulting from the proposed project upon the surrounding community. For the proposed project, this would include construction emissions over the course of buildout, operational traffic (which was assessed using the ~~CRRP HRA~~ draft 2020 San Francisco Citywide Health Risk Assessment modeling), operational heavy-duty delivery truck travel and idling, and stationary sources (the emergency generators). The methods used to evaluate emissions for the proposed project and cumulative health risk assessment are based on the most recent air district CEQA Guidelines and the most recent Air Toxics Hot Spots Program Risk Assessment Guidelines.[287]

The cancer risk analysis in the health risk assessment for the project is based on DPM concentrations from on- and off-road construction equipment, as well as the operational DPM concentrations from the emergency generators and delivery trucks. Concentrations of TACs from the proposed project construction emissions were estimated using the U.S. EPA's preferred atmospheric dispersion modeling system (AERMOD), as were project-related operational mobile sources (vehicle traffic and delivery vehicles) and stationary sources (emergency generators and delivery trucks). The most-recent version of the American Meteorological Society/U.S. EPA regulatory air dispersion model (AERMOD version 9.6.5) was used to evaluate ambient air concentrations of DPM and $PM_{2.5}$ at on- and offsite receptors.[288]

AERMOD requires a number of inputs including meteorological data. For this project's health risk assessment, BAAQMD's Mission Bay meteorological data for 2008 were used, which aligns with the San Francisco ~~CRRP HRA Methodology~~ draft 2020 San Francisco Citywide Health Risk Assessment.[289] For detail with regard to terrain and land use considerations, emission rates, source parameters, and risk characterization methods applied in the assessment, please refer to Appendix E, Air Quality Technical Memorandum.

**Sensitive Receptors**

In order to evaluate health impacts to onsite and offsite receptors, receptors were placed at locations co-located with the receptors used in the ~~CRRP HRA~~ draft 2020 San Francisco Citywide Health Risk Assessment and within 3,280 feet (1,000 meters) of the project site. Sensitive receptors were modeled at a height of 6 feet (1.8 meters), above terrain height, a default breathing height for ground-floor receptors, consistent with the ~~CRRP HRA analysis~~ draft 2020 San Francisco Citywide Health Risk Assessment.

[289] ~~BAAQMD,~~ San Francisco Department of Public Health, ~~and~~ San Francisco Planning Department, and Ramboll, ~~*The San Francisco Community Risk Reduction Plan: Technical Support Documentation,*~~ *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation,* ~~December 2012~~February 2020.

* **The beginning of Mitigation Measure M-AQ-2a (Construction Emissions Minimization) on draft SEIR p. 3.D-49 is revised as follows because it applies under all scenarios for Impact AQ-2b and Impact AQ-4 (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> **Mitigation Measure M-AQ-2a: Construction Emissions Minimization.** ~~In the case of the Developer's Proposed Option under the compressed three-year construction schedule or in the case of the Additional Housing Option under either the six-year construction schedule or the compressed three-year construction schedule, t~~The project sponsor or the project sponsor's contractor shall comply with the following:

* **The scenario descriptions are revised as follows to clarify the scenarios with overlapping construction and operation on draft SEIR p. 3.D-40 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> **Scenario 3.** *Construction Plus Operation:* offsite receptors (residents, daycare, and school) evaluated starting when construction commences and exposed to all construction emissions and 27 years of operational emissions.
>
> **Scenario 4.** *Construction Plus Operation:* onsite receptors (residents and daycare) present at the project site once Phase 1 is complete evaluated starting when construction for Phase 1 concludes and exposed to all Phase 2 construction emissions and 30 years of operational emissions.

* **The last paragraph on draft SEIR p. 3.D-45 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> With regard to construction schedule and phasing, the analysis assumed that Phase 0 (site preparation and grading) would require a full year, followed by Phase 1 construction for 30 months, followed by Phase 2 construction for 30 months, for a full construction duration of six years. ~~This is the longest feasible timeline as anticipated by the project sponsor.~~

**In response to the air district's request, acknowledging that the air district's emissions reduction grant program is evolving, and because individual emission reduction projects needed to support the ozone precursor offsets required by Mitigation Measure M-AQ-2d (Offset Construction Emissions for the Compressed Schedule) have not yet been identified, Mitigation Measure M-AQ-2d is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

> **Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule.** Under the compressed three-year construction schedule for either the Developer's Proposed Option or the Additional Housing Option, the project sponsor shall implement this measure. Prior to issuance of the final certificate of occupancy for the final building

associated with Phase 1, the project sponsor, with the oversight of the Environmental Review Officer (ERO), shall either:

1. *Directly fund or implement a specific offset project within San Francisco if available* to achieve the equivalent to a one-time reduction of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option. To qualify under this mitigation measure, the specific emissions offset project must result in emission reductions within the San Francisco Bay Area Air Basin that would not otherwise be achieved through compliance with existing regulatory requirements. A preferred offset project would be one implemented locally within the City and County of San Francisco. Prior to implementing the offset project, it must be approved by the ERO. The project sponsor shall notify the ERO within six months of completion of the offset project for verification; or

2. *Pay mitigation offset fees* to the Bay Area Air Quality Management District Bay Area Clean Air Foundation or other governmental entity or third party. The mitigation offset fee~~, currently estimated at approximately $30,000 per weighted ton, plus an administrative fee of no more than 5 percent of the total offset,~~ shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the ~~planning department~~ERO, the project sponsor, and the~~ air district~~ governmental entity or third party responsible for administering the funds, and be based on the type of projects available at the time of the payment. This fee is intended to fund emissions reduction projects to achieve reductions of 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option, which is the amount required to reduce emissions below significance levels after implementation of other identified mitigation measures as currently calculated.

   The agreement that specifies fees and timing of payment shall be signed by the project sponsor, the~~ air district~~ governmental entity or third party responsible for administering the funds, and the ERO prior to issuance of the first site permit. This offset payment shall total the predicted 2.0 tons per year of ozone precursors for the Developer's Proposed Option or 3.2 tons per year of ozone precursors for the Additional Housing Option above the 10-ton-per-year threshold after implementation of Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c.

   The total emission offset amount ~~is~~ presented above was calculated by summing the maximum daily construction emissions of ROG and NOx (pounds/day), multiplying by 260 work days per year, and converting to tons. The amount represents the total estimated construction-related ROG and NOx emissions offsets required. No reductions are needed for operations or overlapping construction and operations.

**The second paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:**

Mitigation Measure M-AQ-2d would offset emissions of ROG and NOx that would exceed the respective thresholds of significance for these pollutants. Thus, these offsets, if implemented, would reduce impacts to less-than-significant levels. The measure allows the project sponsor to directly fund or implement an offset project; however, no such project has yet been identified. Additionally, implementation of the emissions reduction

project could be conducted by the ~~air district~~ governmental entity or third party responsible for administering the funds and is outside the jurisdiction and control of the City and not fully within the control of the project sponsor. Therefore, the residual impact of project emissions during construction is conservatively considered ***significant and unavoidable with mitigation***, due to some limited uncertainty in its implementation. This finding does assume that the project sponsor would implement Mitigation Measures M-AQ-2a, M-AQ-2b, and M-AQ-2c, in addition to Mitigation Measure M-AQ-2d. Although the specific offset projects are not known, it is anticipated that implementation of this mitigation measure would not result in any adverse environmental effects.

**The last paragraph on draft SEIR p. 3.D-54 is revised as follows to reflect changes in Mitigation Measure M-AQ-2d:**

The Developer's Proposed Option would be ***less than significant*** under the assumed six-year construction schedule. The Additional Housing Option under the assumed six-year schedule would be reduced to ***less than significant with mitigation*** through the implementation of Mitigation Measure M-AQ-2a and M-AQ-2b. Given the potential that the project could be developed under an accelerated construction schedule of three years' duration, the potential exists that construction emissions of NOx would exceed the daily and annual significance thresholds even with mitigation, which would be a ***significant impact*** (see Table 3.D-8b). Therefore, in the case of the Developer's Proposed Option or the Additional Housing Option under the compressed three-year construction schedule, the project sponsor would also be required to implement Mitigation Measure M-AQ-2c, which requires that all heavy-duty trucks greater than 19,500 pounds must have model year 2014 or newer engines, and Mitigation Measure M-AQ-2d, which requires the project sponsor to implement emission offsets. However, because implementation of the emissions offset project would be conducted by the ~~air district~~ governmental entity or third party responsible for administering the funds and would be outside the jurisdiction and control of the City and not fully within the control of the project sponsor, because no specific emission reduction project has been identified, and because the project may be constructed over a much shorter timeframe resulting in higher NOx emissions than presented above, the impact with respect to criteria air pollutants is conservatively considered ***significant and unavoidable with mitigation***. These conclusions are summarized in **Table 3.D-9, Summary of Construction Criteria Pollutant Impacts (Impact AQ-2)**.

* **To reflect the updated health risk analysis, the text on draft SEIR pp. 3.D-66 to 3.D-68 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

The maximum estimated excess lifetime cancer risk for each exposure scenario (see "Health Risk Assessment Methods," p. 3.D-38) for all sensitive receptor locations[306] for receptors not in the APEZ under existing conditions is presented in **Table 3.D-13a, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Developer's Proposed Option, and Table 3.D-13b, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Additional Housing Option**.

**TABLE 3.D-13A**
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – DEVELOPER'S PROPOSED OPTION**

| Scenario / Receptor Type | Lifetime Excess Cancer Risk (in One Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | | Unmitigated | | Mitigated[c] | |
| | Bkgd. | Project | Total | Project | Total |
| **Significance Threshold** | — | **10.0**[d] | **100.0** | **10.0**[d] | **100.0** |
| **Construction** | | | | | |
| Resident (offsite)[e f] | 78.115.7 | **36.167.1** | **114.282.8** | 4.77.7 | 82.823.4 |
| Resident (onsite)[f] | 64.823.7 | **108.69** | **173.3132.6** | 9.5 | 74.233.2 |
| Daycare (offsite)[f] | 62.021.9 | **87.5** | **149.6109.4** | 11.6 | 73.633.5 |
| Daycare (onsite)[f] | 59.321.8 | **238.4** | **297.6260.2** | 20.9 | 80.142.7 |
| School (offsite)[e] | 28.017.5 | 12.9 | 40.830.3 | 1.5 | 29.519.0 |
| **Construction + Operations** | | | | | |
| Resident (offsite)[ef] | 52.915.7 | **61.867.5** | **114.883.3** | 7.98.1 | 60.823.9 |
| Resident (onsite)[f] | 64.823.7 | **110.3110.9** | **175.0134.6** | 11.4 | 75.935.1 |
| Daycare (offsite)[f] | 62.021.9 | **87.7** | **149.7109.6** | 11.8 | 73.833.6 |
| Daycare (onsite)[f] | 59.321.8 | **239.5** | **298.8261.3** | 22.0 | 81.343.8 |
| School (offsite)[e] | 28.017.5 | 13.1 | 41.130.6 | 1.7 | 29.719.2 |
| **Operations[e]** | | | | | |
| Resident (offsite)[fe] | 28.961.7 | 2.65.5 | 31.567.2 | 2.25.4 | 31.267.2 |
| Resident (onsite)[fe] | 45.318.2 | 14.8 | 60.133.0 | 14.7 | 60.032.9 |
| Daycare (offsite)[fe] | 62.041.3 | 0.71.2 | 62.742.5 | 0.70.7 | 62.722.6 |
| Daycare (onsite)[fe] | 50.819.4 | 7.0 | 57.826.4 | 6.9 | 57.726.3 |
| School (offsite)[fe] | 28.935.1 | 0.6 | 29.535.7 | 0.5 | 29.535.6 |

SOURCE: ESA, 2019, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

$PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; $\mu g/m^3$ = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the onsite MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the onsite MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

**TABLE 3.D-13B**
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – ADDITIONAL HOUSING OPTION**

| Scenario / Receptor Type | Lifetime Excess Cancer Risk (in One Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | — | **10.0**[d] | **100.0** | **10.0**[d] | **100.0**[d] |
| **Construction** | | | | | |
| Resident (offsite)[fe] | 49.8~~15.7~~ | **76.3~~80.5~~** | **126.0~~96.3~~** | 8.2~~8.5~~ | 57.9~~24.3~~ |
| Resident (onsite)[f] | 64.8~~23.7~~ | **122.2~~122.6~~** | **186.9~~146.3~~** | 10.7 | 75.4~~34.4~~ |
| Daycare (offsite)[f] | 62.0~~21.9~~ | **101.7** | **163.7~~123.6~~** | 12.6 | 74.6~~34.5~~ |
| Daycare (onsite)[f] | 59.3~~21.8~~ | **267.7** | **326.9~~289.5~~** | 23.4 | 82.7~~45.3~~ |
| School (offsite)[e] | 28.0~~17.5~~ | 14.4 | 42.4~~31.9~~ | 1.6 | 29.6~~19.1~~ |
| **Construction + Operations** | | | | | |
| Resident (offsite)[fe] | 49.8~~15.7~~ | **77.5~~81.2~~** | **127.3~~97.0~~** | 9.4~~9.2~~ | 59.1~~25.0~~ |
| Resident (onsite)[f] | 63.9~~23.7~~ | **125.6** | **189.5~~149.3~~** | 13.4 | 77.3~~37.1~~ |
| Daycare (offsite)[f] | 62.0~~21.9~~ | **102.0** | **164.0~~123.8~~** | 12.8 | 74.8~~34.7~~ |
| Daycare (onsite)[f] | 59.3~~21.8~~ | **269.6** | **328.8~~291.4~~** | 25.3 | 84.5~~47.1~~ |
| School (offsite)[e] | 28.0~~17.5~~ | 14.8 | 42.8~~32.3~~ | 1.9 | 29.9~~19.4~~ |
| **Operations[e]** | | | | | |
| Resident (offsite)[f] | 28.9~~61.7~~ | 4.2~~7.8~~ | 33.2~~69.5~~ | 3.26~~7.6~~ | 32.2~~69.4~~ |
| Resident (onsite)[ef] | 45.3~~18.2~~ | 25.1 | 70.4~~43.2~~ | 24.9 | 70.2~~43.1~~ |
| Daycare (offsite)[ef] | 62.0~~41.3~~ | 1.2~~1.8~~ | 63.2~~43.0~~ | 1.1 | 63.1~~23.0~~ |
| Daycare (onsite)[ef] | 50.8~~19.4~~ | 11.8 | 62.6~~31.2~~ | 11.7 | 62.5~~31.1~~ |
| School (offsite)[ef] | 29.0~~35.1~~ | 1.0 | 29.9~~36.1~~ | 0.7 | 29.7~~25.4~~ |

SOURCE: ESA, ~~2019,~~ 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

~~$PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; µg/$m^3$ = micrograms per cubic meter;~~ APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the ~~onsite~~ MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the ~~onsite~~ MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

* **To reflect the updated health risk analysis, the third paragraph on draft SEIR p. 3.D-69 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

For the offsite MEISR (daycare receptor), the mitigated lifetime excess cancer risk under proposed project conditions for the Developer's Proposed Option of 11.8 combined with the background cancer risk of ~~21.9~~62.0 would equal ~~33.5~~73.8, which is less than 100; the mitigated lifetime excess cancer risk under proposed project conditions for the Additional Housing Option of 12.8 combined with the background cancer risk of ~~21.9~~62.0 would equal ~~34.7~~74.8, which is also less than 100; therefore, under mitigated conditions, the offsite MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of 10.0 per 1 million would not apply. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and the excess cancer risk impact on offsite receptors not located in the APEZ would be less than significant with mitigation.

* **To reflect the updated health risk analysis, the third paragraph on draft SEIR p. 3.D-70 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

Table 3.D-13a, p. 3.D-67, and Table 3.D-12b, p. 3.D-68, also show the cancer risk under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. For the onsite MEISR (daycare receptor), the mitigated lifetime excess cancer risk under proposed project conditions for the Developer's Proposed Option of 22.0 combined with the background cancer risk of ~~21.8~~59.3 would equal ~~43.8~~81.3, which is less than 100; the mitigated lifetime excess cancer risk under proposed project conditions for the Additional Housing Option of 25.3 combined with the background cancer risk of ~~21.8~~59.3 would equal ~~47.1~~84.5, which is also less than 100; therefore, under mitigated conditions, the onsite daycare MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of 10.0 per 1 million would not apply. As shown in Table 3.D-13a and Table 3.D-12b, implementation of these mitigation measures would be sufficient to reduce this impact to a less-than-significant level, and the excess cancer risk impact on onsite receptors not located in the APEZ would be less than significant with mitigation.

* **To reflect the updated health risk analysis, draft SEIR pp. 3.D-73 to 3.D-78 is revised as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double underline):**

**TABLE 3.D-14A**
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – DEVELOPER'S PROPOSED OPTION**

| Scenario / Receptor Type[d] | Lifetime Excess Cancer Risk (in one Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | — | **7.0** | — | **7.0** | — |
| **Construction** | | | | | |
| Resident (offsite) | 80.9~~74.0~~ | **43.4**~~4.2~~ | 124.3~~78.2~~ | 6.0~~0.5~~ | 86.9~~74.5~~ |
| Daycare (offsite) | 104.8 | **37.3** | 142.0 | 5.1 | 109.8 |
| School (offsite) | 145.5~~36.6~~ | 1.1 | 146.7~~37.7~~ | 0.1 | 145.7~~36.7~~ |
| **Construction + Operations** | | | | | |
| Resident (offsite) | 80.9~~74.0~~ | **44.1**~~4.4~~ | 125.0~~78.4~~ | 6.7~~1.4~~ | 87.6~~58.0~~ |
| Daycare (offsite) | 104.8 | **37.4** | 142.1 | 5.2 | 109.9 |
| School (offsite) | 145.5~~36.6~~ | 1.3 | 146.8~~37.8~~ | 0.3 | 145.8~~36.8~~ |
| **Operations** | | | | | |
| Resident (offsite) | 187.0~~56.6~~ | 5.0~~2.4~~ | 192.0~~59.0~~ | 4.9~~2.4~~ | 191.9~~59.0~~ |
| Daycare (offsite) | 124.2 | 1.2 | 125.4 | 1.2 | 125.4 |
| School (offsite) | 145.5~~36.6~~ | 0.2 | 145.8~~36.8~~ | 0.2 | 145.7~~36.8~~ |

SOURCE: ESA, ~~2019,~~ 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

~~$PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; $\mu g/m^3$ = micrograms per cubic meter;~~ APEZ = Air Pollutant Exposure Zone; Bkgd. = background value; n/a = Not applicable; i.e., for this receptor type, there are no receptors that are currently located in the APEZ.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents~~, offsite daycare, and~~ or onsite daycare receptors in the modeling domain that are already located in the APEZ.

Offsite receptors considered in the health risk assessment include existing offsite receptors currently located in the APEZ due to their proximity to I-280 (within 500 feet) and Ocean Avenue. These tables do not show receptors types that are not already in the APEZ, including onsite residents, offsite daycare, and onsite daycare; risks to these receptors are discussed above. The majority of project-generated excess cancer risk at the MEISR would be attributable to construction emissions. For these receptor locations, the project would contribute cancer risks of up to ~~4.4~~37.4 per million and ~~5.44~~3.1 per million at offsite ~~resident~~daycare locations for the Developer's Proposed Option and the Additional Housing Option, respectively. The project's excess cancer risk contribution would ~~not~~

exceed the significance threshold of 7.0 in a million. Therefore, without mitigation, the impact with regard to increased cancer risk would be ~~less than~~ significant for offsite receptors located in the APEZ.

**TABLE 3.D-14B**
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – ADDITIONAL HOUSING OPTION**

| Scenario / Receptor Type[d] | Lifetime Excess Cancer Risk (in one Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | — | **7.0** | — | **7.0** | —~~7~~ |
| **Construction** | | | | | |
| Resident (offsite) | 80.9~~74.0~~ | **48.5**~~4.9~~ | 129.4~~78.9~~ | 6.3~~0.6~~ | 87.3~~74.6~~ |
| Daycare (offsite) | 104.8 | **43.0** | 147.7 | 5.5 | 110.2 |
| School (offsite) | 145.5~~36.6~~ | 1.3 | 146.8~~37.8~~ | 0.1 | 145.7~~36.7~~ |
| **Construction + Operations** | | | | | |
| Resident (offsite)[e] | 80.9/83.9~~74.0~~ | **49.6**~~5.4~~ | 130.5~~79.4~~ | e~~1.8~~[f] | 91.2~~58.5~~ |
| Daycare (offsite) | 104.8 | **43.1** | 147.8 | 5.6 | 110.4 |
| School (offsite) | 145.5~~36.6~~ | 1.5 | 147.0~~38.0~~ | 0.3 | 145.9~~36.9~~ |
| **Operations** | | | | | |
| Resident (offsite) | 187.0~~56.6~~ | 7.0~~3.4~~ | 194.0~~60.0~~ | 6.9~~3.4~~ | 193.9~~60.0~~ |
| Daycare (offsite) | 124.2 | 1.8 | 126.0 | 1.7 | 125.9 |
| School (offsite) | 145.5~~36.6~~ | 0.3 | 145.9~~36.9~~ | 0.3 | 145.8~~36.9~~ |

SOURCE: ESA, ~~2019,~~ 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020. See Appendix E, Air Quality Technical Memorandum and Appendix I, Updated Health Risk Assessment Memorandum.

NOTES:

~~$PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; µg/m³ = micrograms per cubic meter;~~ APEZ = Air Pollutant Exposure Zone; Bkgd. = background value; n/a = Not applicable; i.e., for this receptor type, there are no receptors that are currently located in the APEZ.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents~~, offsite daycare, and~~ or onsite daycare receptors in the modeling domain that are already located in the APEZ.

e Under mitigated conditions, the offsite residential MEISR is a different receptor location than under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated offsite residential MEISR occurs during the project operations phase.

f Although the cancer risk for the Additional Housing Option of 7.4 per million exceeds the significance threshold for the project's contribution of 7.0 per million, the project's contribution does not increase the severity of the cancer risk for this receptor, nor does the project expand the geography of the APEZ. The total background plus project value does not exceed the APEZ criterion of 100 per million. Therefore, this receptor does not technically meet the criteria for the APEZ.

~~Although~~ Because mitigation measures are ~~not~~ required to reduce the impact to offsite sensitive receptors located in the APEZ, Table 3.D-14a and Table 3.D-14b also show the cancer risk under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71, which are required to

reduce impacts to receptors not in the APEZ under existing conditions and to reduce construction-generated emissions of criteria pollutants.

Construction emissions contribute over 90 percent of the unmitigated project's health risk at the MEISR (see Appendix E, Air Quality Technical Memorandum, for additional detail). Implementation of Mitigation Measure M-AQ-2a would reduce cancer risk at the offsite receptor locations currently located in the APEZ further below the significance thresholds. As shown in Table 3.D-14a and Table 3.D-14b, under mitigated conditions, the project would contribute cancer risks at the unmitigated MEISR of up to ~~1.4~~5.2 per million and ~~1.9~~5.6 per million at offsite ~~resident~~ daycare locations for the Developer's Proposed Option and the Additional Housing Option, respectively. It is worth noting that under mitigated conditions, the offsite MEISR is a different receptor location than under unmitigated conditions; in other words, the greatest cancer risk for mitigated emissions occurs at a different location than greatest cancer risk under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated MEISR occurs during the project operations phase. The project would contribute cancer risks at the mitigated MEISR of up to ~~2.4~~6.7 per million and ~~3.4~~7.4 per million at offsite resident locations for the Developer's Proposed Option and the Additional Housing Option, respectively.

Under the Additional Housing Option, the unmitigated cancer risk at the offsite resident MEISR is about 50 per million. When combined with the background cancer risk of 83.9, the total cancer risk is approximately 130 per million, which exceeds the APEZ criteria of 100 cancers per million. Without mitigation, the project's cancer risk contribution would be significant because it would exceed a cancer risk of 7 per million. However, with mitigation, the Additional Housing Option would contribute a cancer risk of 7.4 per million, resulting in a total cancer risk of 91.2. This total cancer risk is below the APEZ cancer risk criteria of 100 per million. Therefore, with mitigation, this receptor does not technically meet the criteria for the APEZ and the project would not substantially increase the severity of the cancer risk for this receptor, nor does the project expand the geography of the APEZ.

The reason this receptor is located in the APEZ is because the APEZ is defined at the parcel level, and there are one or more receptor points within 20 meters of the parcel where this receptor is located that exceed the APEZ criterion of 100 per million. In other words, if one receptor point within a given parcel meets the APEZ criteria, all receptor points within this parcel are also categorized as within the APEZ. However, because neither the background cancer risk value of 83.9 nor the combined total cancer risk value of 91.2 (background of 83.9 plus the project's contribution of 7.4) at the offsite resident MEISR exceeds the APEZ criterion of 100 per million, the project would not increase the severity of the cancer risk for this receptor or expand the geography of the APEZ. In addition, the cancer risk values presented above are the result of many conservative assumptions and do not consider the effect of the building shell on outdoor TAC concentrations to the resulting indoor concentrations and the associated sensitive receptor exposure. Therefore, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level.

All of the other cancer risk values for both the Developer's Proposed Option and the Additional Housing Option are less than the significance threshold for the project's contribution of 7.0 per million. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and the excess cancer risk impact on offsite receptors located in the APEZ would be less than significant with mitigation.

As discussed above, the project may be constructed over a total of three years instead of six years. If this were to occur, the excess lifetime cancer risk at offsite sensitive receptor locations would increase. While the total exposure to TACs remains the same in this compressed construction scenario, more exposure would occur when sensitive receptors are younger and, thus, more susceptible to TAC exposure. It is estimated that cancer risks could increase at least 30 percent for the offsite MEISR currently located in the APEZ under the three-year construction schedule, leading to mitigated cancer risks of ~~7~~9 to ~~8~~10 per million for the Developer's Proposed Option and ~~10~~11 to ~~11~~12 per million for the Additional Housing Option. Although the mitigated cancer risk for both the Developer's Proposed Option and the Additional Housing Option under the anticipated construction schedule would be less than ~~the threshold of 7.0 in a million~~ significant with mitigation as discussed above, because the construction schedule is subject to change, this impact would be conservatively considered significant. Therefore, the excess cancer risk impact on offsite receptors would be significant and unavoidable with mitigation.

Onsite Receptors

There are currently no onsite receptors located in the APEZ under existing conditions. Therefore, no analysis was conducted.

$PM_{2.5}$ Concentrations from Construction and Operation Emissions for Receptors Not in APEZ under Existing Conditions

Offsite Receptors

The maximum estimated annual average $PM_{2.5}$ concentrations from all project sources at offsite receptor locations not in the APEZ under existing conditions are presented in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Assessment Memorandum, Tables ~~3~~15 and ~~3~~36. The project's emissions would combine with existing background concentrations and would exceed the APEZ criteria of either an annual average $PM_{2.5}$ concentration of 10.0 $\mu g/m^3$, or a total lifetime excess cancer risk of 100.0 per million,[86] with the project contributing $PM_{2.5}$ concentrations of up to 0.38 $\mu g/m^3$ and 0.43 $\mu g/m^3$ at offsite daycare locations for the Developer's Proposed Option and the Additional Housing Option, respectively. The project's annual average $PM_{2.5}$ concentrations would exceed the significance threshold of 0.3 $\mu g/m^3$. Therefore, without

[86] The APEZ is defined for receptor locations that meet the criteria for *either* lifetime excess cancer risk *or* annual average $PM_{2.5}$ concentrations. For example, if the lifetime excess cancer risk is 105 per million and the annual average $PM_{2.5}$ concentration is 9.5 $\mu g/m^3$, and the receptor would be in the APEZ even though the annual average $PM_{2.5}$ concentration does not exceed the APEZ criteria of 10.0 $\mu g/m^3$.

mitigation, the impact with regard to $PM_{2.5}$ concentrations would be significant for offsite receptors not located in the APEZ.

Tables ~~31~~5 and ~~33~~6 in ~~Appendix E, Air Quality Technical Memorandum~~ new SEIR Appendix I, Updated Health Risk Assessment Memorandum, also show the annual average $PM_{2.5}$ concentrations under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. Mitigation Measure M-AQ-2a would reduce off-road $PM_{2.5}$ exhaust emissions by 80 to 85 percent, and Mitigation Measure M-AQ-4a would reduce generator $PM_{2.5}$ exhaust emissions by 93 percent. Construction emissions contribute over 90 percent of the unmitigated project's $PM_{2.5}$ concentrations (see SEIR Appendix ~~E~~I for additional detail).

For the offsite MEISR (daycare), the maximum mitigated annual average $PM_{2.5}$ concentrations under the Developer's Proposed Option of 0.04 $\mu g/m^3$ combined with background annual average $PM_{2.5}$ concentrations of ~~8.49~~8.92 would equal ~~8.53~~8.95, which is less than 10.0; and the maximum mitigated annual average $PM_{2.5}$ concentrations under proposed project conditions for the Additional Housing Option of 0.04 $\mu g/m^3$ combined with background annual average $PM_{2.5}$ concentrations of ~~8.49~~8.92 would equal ~~8.53~~8.95, which is less than 10.0. Therefore, under mitigated conditions, the offsite MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of an annual average $PM_{2.5}$ concentration of 0.3 $\mu g/m^3$ would not apply. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and the annual average $PM_{2.5}$ concentration impact on offsite receptors not located in the APEZ would be less than significant with mitigation.

As noted above, the project may be constructed over a total of three years instead of six years. If this were to occur, the annual average $PM_{2.5}$ concentrations at offsite sensitive receptor locations would increase. While the total $PM_{2.5}$ emissions remain the same in this compressed construction scenario, annual average $PM_{2.5}$ concentrations would increase because the construction duration would be shorter. It is estimated that annual average $PM_{2.5}$ concentrations could increase at least 50 percent for the offsite MEISR currently located in the APEZ under the three-year construction schedule, leading to mitigated annual average $PM_{2.5}$ concentrations of approximately 0.05 $\mu g/m^3$ for the Developer's Proposed Option and approximately 0.06 $\mu g/m^3$ for the Additional Housing Option. Therefore, the annual average $PM_{2.5}$ concentration impact on offsite receptors not located in the APEZ would be less than significant with mitigation.

Onsite Receptors

The maximum estimated annual average $PM_{2.5}$ concentrations from all project sources at onsite receptor locations are also presented in Tables ~~31~~5 and ~~33~~6 in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Assessment Memorandum. The project's emissions would combine with existing background concentrations and would exceed the APEZ criteria of an annual average $PM_{2.5}$ concentration of 10 $\mu g/m^3$, or a total lifetime excess cancer risk of 100 per million,[12] with the project

contributing $PM_{2.5}$ concentrations up to ~~1.33~~1.32 µg/m³ for onsite residential receptors and 1.33 µg/m³ for onsite daycare receptors for the Developer's Proposed Option and 1.49 µg/m³ for onsite residential receptors and 1.50 µg/m³ for onsite daycare receptors for the Additional Housing Option. The project's annual average $PM_{2.5}$ concentrations would exceed the significance threshold of 0.3 µg/m³. Therefore, without mitigation, the impact with regard to $PM_{2.5}$ concentrations would be significant for onsite receptors not located in the APEZ.

As noted above, this analysis conservatively assumes that the daycare would be fully operational and occupied as part of Phase 1 and exposed to all Phase 2 construction TAC emissions. However, the daycare would be part of Block B in Phase 2 and will likely not be operational and occupied until the proposed projects is fully built-out in 2027 with the completion of Phase 2. This was assumed to provide a worst-case analysis of health risks to the onsite daycare receptor in the event that the daycare would be occupied in Phase 1 and exposed to all of Phase 2 construction TAC emissions. Likely, the daycare receptors would not be exposed to any construction emissions at the project site.

Tables ~~3~~15 and ~~3~~36 in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Memorandum, also shows the annual average $PM_{2.5}$ concentrations under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. For the onsite resident MEISRs, the maximum modeled mitigated annual average $PM_{2.5}$ concentrations under proposed project conditions for the Developer's Proposed Option of 0.12 µg/m³ combined with background annual average $PM_{2.5}$ concentrations of ~~8.48~~8.90 would equal ~~8.60~~9.02, which is less than 10.0; and the maximum mitigated annual average $PM_{2.5}$ concentrations under proposed project conditions for the Additional Housing Option of ~~0.14~~0.13 µg/m³ combined with background annual average $PM_{2.5}$ concentrations of ~~8.48~~8.90 would equal ~~8.62~~9.04, which is less than 10.0. Therefore, under mitigated conditions, the onsite MEISR would not be placed in a new APEZ under either project option, and the significance threshold for the project contribution of an annual average $PM_{2.5}$ concentration of 0.3 µg/m³ would not apply. Consequently, implementation of these mitigation measures would be sufficient to reduce this impact to a less-than-significant level, and the annual average $PM_{2.5}$ concentration impact on onsite receptors not located in the APEZ would be less than significant with mitigation.

It should be noted that if construction durations and phases are spread out over a longer period of time, this could result in increased $PM_{2.5}$ concentrations to onsite receptors compared to what has been modeled. Under an extended construction schedule, onsite receptors could be exposed to construction for longer periods of time, which could result in a significant and unavoidable impact. However, it should also be noted that ~~by the time the project buildings are constructed, it is likely that~~ MERV 13 filtration ~~would be~~ is required by the Building Code for all new residential development.~~13~~ This would presumably result in less than significant health risk impacts to new onsite sensitive receptors.

**$PM_{2.5}$ Concentrations from Construction and Operation Emissions for Receptors in APEZ under Existing Conditions**

Offsite Receptors

The maximum estimated annual average $PM_{2.5}$ concentrations from all project sources at offsite receptor locations in the APEZ under existing conditions are presented in Tables ~~35~~7 and ~~37~~8 in ~~Appendix E, Air Quality Technical Memorandum~~ SEIR Appendix I, Updated Health Risk Assessment Memorandum. For these receptor locations, the project would contribute $PM_{2.5}$ concentrations of ~~0.02~~0.64 µg/m$^3$ and ~~0.03~~0.72 µg/m$^3$ at offsite resident locations for the Developer's Proposed Option and the Additional Housing Option, respectively. These values would ~~not~~ exceed the significance threshold of 0.2 µg/m$^3$. Therefore, without mitigation, the impact with regard to $PM_{2.5}$ concentrations would be ~~less than~~ significant for offsite receptors located in the APEZ.

~~However,~~ Tables ~~35~~7 and ~~37~~8 in SEIR Appendix ~~E~~I also show the annual average $PM_{2.5}$ concentrations under the mitigated condition, which includes emission reductions quantified for Mitigation Measures M-AQ-2a, p. 3.D-48, and M-AQ-4a, p. 3.D-71. ~~These mitigation measures are required to reduce the excess cancer risk impact.~~ The annual average $PM_{2.5}$ concentrations from the proposed project would be reduced as a result of these mitigation measures, as shown in Table 3.D-14a, p. 3.D-73, and Table 3.D-14b, p. 3.D-74. For these receptor locations, the project would contribute $PM_{2.5}$ concentrations of 0.06 µg/m$^3$ and 0.07 µg/m$^3$ at offsite resident locations for the Developer's Proposed Option and the Additional Housing Option, respectively. These values would not exceed the significance threshold of 0.2 µg/m$^3$. Consequently, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce this impact to a less-than-significant level, and ~~Therefore,~~ the $PM_{2.5}$ concentration impact on offsite receptors located in the APEZ would be less than significant.

As noted above, the project may be constructed over a total of three years instead of six years. If this were to occur, the annual average $PM_{2.5}$ concentrations at offsite sensitive receptor locations would increase, contributing further to the impact. While the total $PM_{2.5}$ emissions remain the same in this compressed construction scenario, annual average $PM_{2.5}$ concentrations would increase because the construction duration would be shorter. It is estimated that annual average $PM_{2.5}$ concentrations could increase at least 50 percent for the offsite MEISR currently located in the APEZ under the three-year construction schedule, leading to mitigated annual average $PM_{2.5}$ concentrations of approximately ~~0.05~~0.09 µg/m$^3$ for the Developer's Proposed Option and approximately ~~0.06~~0.10 µg/m$^3$ for the Additional Housing Option. Therefore, the annual average $PM_{2.5}$ concentration impact on offsite receptors located in the APEZ would be less than significant with mitigation.

~~[313] Currently being confirmed.~~

# 5.G Revisions to Chapter 5, Variants

* **The text in the second paragraph on SEIR p. 5-6 is revised as follows to update the mitigation measure title:**

Thus, the operational-related mitigation measure identified for the Developer's Proposed Option would be applicable to Variant 1 (Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay [under Impact C-TR-4], p. 3.B-96).

**The first paragraph on SEIR p. 5-9 for Variant 2: South Street Alignment and Aboveground Public Parking at North End of Site is revised as follows:**

Variant 2 would have the same mix of land uses, square footages, and construction and operational characteristics as the Developer's Proposed Option, except the 750-space multilevel public parking garage would be constructed aboveground on Block G towards the north end of the site and would be wrapped by housing, or in dedicated public parking areas within several of the residential garages. South Street would be shifted south and occupy SFPUC's 80-foot-wide strip of land located along the southern edge of the site and south of Blocks A and B. As a result of this change in configuration, Blocks A, C, and D would have slightly different footprints. The maximum height (seven stories) would not change between the Developer's Proposed Option and Variant 2.

# 5.H Revisions to Chapter 6, Alternatives

* **The text in the last bullet on SEIR p. 6-3 is revised as follows to reflect changes to the mitigation measure:**

Mitigation would require the project sponsor to ~~monitor transit travel times and~~ implement measures to meet the transit travel time performance standard; however, given the uncertainty regarding the effectiveness of TDM measures and if SFMTA would approve other measures under their jurisdiction, even with implementation of Mitigation Measure M-C-TR-4, this impact is conservatively considered to remain significant and unavoidable with mitigation. (Impact C-TR-4)

* **The text in the second paragraph under "Alternative Strategy to Address Transit Delay" on SEIR p. 6-6 is revised as follows to update the mitigation measure title:**

As discussed under Impact C-TR-4, p. 3.B-94, given the uncertainty regarding the effectiveness of TDM measures and if SFMTA would approve other measures under their jurisdiction, even with implementation of Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay, p. 3.B-96, the proposed project options and variants would result in a significant and unavoidable with mitigation cumulative impact with respect to transit delay.

* **The text in the first paragraph on SEIR p. 6-13 is revised as follows to update the mitigation measure title:**

Therefore, the mitigation measure identified for the proposed project options and variants (Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay, p. 3.B-96) would not be applicable.

* **The text at the top of SEIR p. 6-21 is revised as follows to update the mitigation measure title:**

~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay, p. 3.B-96, as with the proposed project options and variants, Alternative B would result in a ***significant and unavoidable with mitigation*** cumulative impact with respect to transit delay.

* **The text at the top of SEIR p. 6-39 is revised as follows to update the mitigation measure title:**

approve other measures under their jurisdiction, even with implementation of Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay, p. 3.B-96, as with the proposed project options and variants, Alternative C would result in a ***significant and unavoidable with mitigation*** cumulative impact with respect to transit delay.

* **The text under "Transportation and Circulation" on SEIR p. 6-45 is revised as follows to update the mitigation measure title:**

Project- and cumulative-level construction and operational transportation and circulation impacts would be the same as under the proposed project options. Cumulative operational-related mitigation measures identified for the proposed project options and variants would be applicable to Alternative D (i.e., Mitigation Measure M-C-TR-4, ~~Monitor Cumulative Transit Travel Times and~~ Implement Measures to Reduce Transit Delay, p. 3.B-96). Alternative D impacts for cumulative transit delay would be ***significant and unavoidable with mitigation*** (Impact C-TR-4, p. 3.B-94).

# 5.I Revisions to Appendix D2, Noise Supporting Information

## Pages 1 and 2 of draft SEIR Appendix D2 are revised as follows:

**Existing**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1179 | 97 | 1143.6 | 2 | 23.58 | 1 | 11.79 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 55.5 | 60.1 | 64.1 | 40 | 59.8 | 12.1 | 39.7 |
| F. Kahlo | C. Coll N. | Judson | 914 | 97 | 886.58 | 2 | 18.28 | 1 | 9.14 | 25 | 40 | 25 | 40 | 25 | 40 | 59.6 | 54.4 | 59.0 | 63.0 | 40 | 58.7 | 9.4 | 30.8 |
| Lee | Ocean | Site | 167 | 97 | 161.99 | 2 | 3.34 | 1 | 1.67 | 25 | 40 | 25 | 40 | 25 | 40 | 52.2 | 47.0 | 51.6 | 55.6 | 40 | 51.3 | 1.7 | 5.6 |
| Lee | Ocean | Holoway | 166 | 97 | 161.02 | 2 | 3.32 | 1 | 1.66 | 25 | 40 | 25 | 40 | 25 | 40 | 52.2 | 47.0 | 51.6 | 55.6 | 40 | 51.3 | 1.7 | 5.6 |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| City Coll N | F. Kahlo | Site | 323 | 97 | 313.31 | 2 | 6.46 | 1 | 3.23 | 25 | 40 | 25 | 40 | 25 | 40 | 55.1 | 49.9 | 54.5 | 58.4 | 40 | 54.2 | 3.3 | 10.9 |
| Judson | F. Kahlo | Genesee | 670 | 97 | 649.9 | 2 | 13.4 | 1 | 6.7 | 25 | 40 | 25 | 40 | 25 | 40 | 58.2 | 53.0 | 57.7 | 61.6 | 40 | 57.4 | 6.9 | 22.6 |
| ~~Ocean~~ | ~~Plymouth~~ | ~~Miramar~~ | ~~1589~~ | ~~97~~ | ~~1926.9~~ | ~~2~~ | ~~38.6~~ | ~~1~~ | ~~19.8~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.2~~ | ~~57.0~~ | ~~61.7~~ | ~~65.6~~ | | | ~~17.9~~ | ~~58.9~~ |
| ~~Ocean~~ | ~~F. Kahlo~~ | ~~I 280~~ | ~~1079~~ | ~~97~~ | ~~1049.7~~ | ~~2~~ | ~~67.4~~ | ~~1~~ | ~~10.7~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.7~~ | ~~57.5~~ | ~~62.1~~ | ~~66.1~~ | | | ~~15.8~~ | ~~52.0~~ |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Developer's Project**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1179 | 97 | 1143.6 | 2 | 23.58 | 1 | 11.79 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 55.5 | 60.1 | 64.1 | 40 | 59.8 | 12.1 | 39.7 |
| F. Kahlo | C. Coll N. | Judson | 997 | 97 | 967.09 | 2 | 19.94 | 1 | 9.97 | 25 | 40 | 25 | 40 | 25 | 40 | 60.0 | 54.8 | 59.4 | 63.3 | 40 | 59.1 | 10.2 | 33.6 |
| Lee | Ocean | Site | 387 | 97 | 375.39 | 2 | 7.74 | 1 | 3.87 | 25 | 40 | 25 | 40 | 25 | 40 | 55.8 | 50.6 | 55.3 | 59.2 | 40 | 55.0 | 4.0 | 13.0 |
| Lee | Ocean | Holoway | 209 | 97 | 202.73 | 2 | 4.18 | 1 | 2.09 | 25 | 40 | 25 | 40 | 25 | 40 | 53.2 | 48.0 | 52.6 | 56.6 | 40 | 52.3 | 2.1 | 7.0 |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| City Coll N | F. Kahlo | Site | 368 | 97 | 356.96 | 2 | 7.36 | 1 | 3.68 | 25 | 40 | 25 | 40 | 25 | 40 | 55.6 | 50.4 | 55.1 | 59.0 | 40 | 54.7 | 3.8 | 12.4 |
| Judson | F. Kahlo | Genesee | 700 | 97 | 679 | 2 | 14 | 1 | 7 | 25 | 40 | 25 | 40 | 25 | 40 | 58.4 | 53.2 | 57.9 | 61.8 | 40 | 57.5 | 7.2 | 23.6 |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Additional Housing Scenario**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1179 | 97 | 1143.6 | 2 | 23.58 | 1 | 11.79 | 25 | 40 | 25 | 40 | 25 | 40 | 60.7 | 55.5 | 60.1 | 64.1 | 40 | 59.8 | 12.1 | 39.7 |
| F. Kahlo | C. Coll N. | Judson | 1063 | 97 | 1031.1 | 2 | 21.26 | 1 | 10.63 | 25 | 40 | 25 | 40 | 25 | 40 | 60.2 | 55.0 | 59.7 | 63.6 | 40 | 59.4 | 10.9 | 35.8 |
| Lee | Ocean | Site | 434 | 97 | 420.98 | 2 | 8.68 | 1 | 4.34 | 25 | 40 | 25 | 40 | 25 | 40 | 56.3 | 51.1 | 55.8 | 59.7 | 40 | 55.5 | 4.5 | 14.6 |
| Lee | Ocean | Holoway | 226 | 97 | 219.22 | 2 | 4.52 | 1 | 2.26 | 25 | 40 | 25 | 40 | 25 | 40 | 53.5 | 48.3 | 52.9 | 56.9 | 40 | 52.6 | 2.3 | 7.6 |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 | 40 | 25 | 40 | 25 | 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| City Coll N | F. Kahlo | Site | 479 | 97 | 464.63 | 2 | 9.58 | 1 | 4.79 | 25 | 40 | 25 | 40 | 25 | 40 | 56.8 | 51.6 | 56.2 | 60.2 | 40 | 55.9 | 4.9 | 16.1 |
| Judson | F. Kahlo | Genesee | 733 | 97 | 711.01 | 2 | 14.66 | 1 | 7.33 | 25 | 40 | 25 | 40 | 25 | 40 | 58.6 | 53.4 | 58.1 | 62.0 | 40 | 57.7 | 7.5 | 24.7 |

Assumptions: PM peak hour traffic data from Kittleson

**~~Cumulative + Developer's Project~~**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | | MT k/h | | HT k/h | | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ~~Calveno Peak~~ | | | | | | | | | | | | | | | | | | | | | | | |
| | ~~from:~~ | ~~to:~~ | | % | Auto | % | MT | % | HT | | | | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| ~~F. Kahlo~~ | ~~Ocean~~ | ~~Cloud~~ | ~~1644~~ | ~~97~~ | ~~1564.8~~ | ~~2~~ | ~~32.88~~ | ~~1~~ | ~~16.44~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.1~~ | ~~56.9~~ | ~~61.6~~ | ~~65.5~~ | ~~40~~ | ~~54.2~~ | ~~16.5~~ | ~~55.0~~ |
| ~~F. Kahlo~~ | ~~C. Coll N.~~ | ~~Judson~~ | ~~1759~~ | ~~97~~ | ~~1706.1~~ | ~~2~~ | ~~35.44~~ | ~~1~~ | ~~17.59~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.4~~ | ~~57.2~~ | ~~61.9~~ | ~~65.9~~ | ~~40~~ | ~~54.5~~ | ~~18.0~~ | ~~59.1~~ |
| ~~Lee~~ | ~~Ocean~~ | ~~Site~~ | ~~359~~ | ~~97~~ | ~~348.41~~ | ~~2~~ | ~~7.184~~ | ~~1~~ | ~~3.592~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~55.5~~ | ~~50.3~~ | ~~55.0~~ | ~~58.9~~ | ~~40~~ | ~~54.6~~ | ~~3.7~~ | ~~12.1~~ |
| ~~Lee~~ | ~~Ocean~~ | ~~Holoway~~ | ~~429~~ | ~~97~~ | ~~427.58~~ | ~~2~~ | ~~8.851~~ | ~~1~~ | ~~4.946~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~54.3~~ | ~~49.0~~ | ~~53.6~~ | ~~57.6~~ | ~~40~~ | ~~53.3~~ | ~~1.9~~ | ~~4.4~~ |
| ~~Plymouth~~ | ~~Ocean~~ | ~~S.Wood~~ | ~~452~~ | ~~97~~ | ~~449.66~~ | ~~2~~ | ~~9.691~~ | ~~1~~ | ~~4.845~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~54.8~~ | ~~49.6~~ | ~~54.3~~ | ~~58.2~~ | ~~40~~ | ~~53.9~~ | ~~1.9~~ | ~~5.4~~ |
| ~~City Coll N~~ | ~~F. Kahlo~~ | ~~Site~~ | ~~506~~ | ~~97~~ | ~~493.48~~ | ~~2~~ | ~~10.17~~ | ~~1~~ | ~~5.087~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~57.0~~ | ~~51.8~~ | ~~56.5~~ | ~~60.4~~ | ~~40~~ | ~~55.2~~ | ~~5.2~~ | ~~17.1~~ |
| ~~Judson~~ | ~~F. Kahlo~~ | ~~Genesee~~ | ~~879~~ | ~~97~~ | ~~845.44~~ | ~~2~~ | ~~17.49~~ | ~~1~~ | ~~8.749~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~59.4~~ | ~~54.2~~ | ~~59.0~~ | ~~62.9~~ | ~~40~~ | ~~56.5~~ | ~~8.9~~ | ~~29.2~~ |
| ~~Ocean~~ | ~~Plymouth~~ | ~~Miramar~~ | ~~1644~~ | ~~97~~ | ~~1588.6~~ | ~~2~~ | ~~32.88~~ | ~~1~~ | ~~16.44~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~64.3~~ | ~~59.0~~ | ~~63.7~~ | ~~67.6~~ | ~~40~~ | ~~56.4~~ | ~~13.9~~ | ~~45.8~~ |
| ~~Ocean~~ | ~~F. Kahlo~~ | ~~I 280~~ | ~~1079~~ | ~~97~~ | ~~1049.7~~ | ~~2~~ | ~~67.4~~ | ~~1~~ | ~~10.7~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~25~~ | ~~40~~ | ~~62.7~~ | ~~57.5~~ | ~~62.1~~ | ~~66.1~~ | ~~40~~ | ~~54.9~~ | ~~15.8~~ | ~~52.0~~ |

~~Assumptions: PM peak hour traffic data from Kittleson~~

Page 1 of 2

~~**Cumulative + Additional Housing Scenario**~~

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1644 | 97 | 1594.8 | 2 | 32.89 | 1 | 16.44 | 25 40 | 25 40 | 25 40 | 62.1 | 56.9 | 61.9 | 65.5 | 40 | 61.2 | 19.5 | 65.0 |
| F. Kahlo | C. Coll N. | Judson | 1795 | 97 | 1740.9 | 2 | 35.89 | 1 | 17.95 | 25 40 | 25 40 | 25 40 | 62.5 | 57.3 | 61.9 | 65.9 | 40 | 61.9 | 19.4 | 63.4 |
| Lee | Ocean | Site | 426 | 97 | 412.49 | 2 | 8.564 | 1 | 4.282 | 25 40 | 25 40 | 25 40 | 58.8 | 51.8 | 56.7 | 60.9 | 40 | 56.4 | 4.4 | 14.6 |
| Lee | Ocean | Holaway | 149 | 97 | 143.1 | 2 | 2.951 | 1 | 1.475 | 25 40 | 25 40 | 25 40 | 51.7 | 45.5 | 51.1 | 55.9 | 40 | 50.8 | 1.5 | 5.0 |
| Plymouth | Ocean | S.Wood | 152 | 97 | 146.99 | 2 | 3.031 | 1 | 1.515 | 25 40 | 25 40 | 25 40 | 51.8 | 45.6 | 51.2 | 55.9 | 40 | 50.9 | 1.6 | 5.1 |
| City Coll N | F. Kahlo | Site | 540 | 97 | 524.34 | 2 | 10.95 | 1 | 5.477 | 25 40 | 25 40 | 25 40 | 57.4 | 50.1 | 55.0 | 59.7 | 40 | 55.5 | 3.9 | 10.4 |
| Judson | F. Kahlo | Genesee | 999 | 97 | 969.99 | 2 | 17.75 | 1 | 9.878 | 25 40 | 25 40 | 25 40 | 59.5 | 54.2 | 58.5 | 62.9 | 40 | 58.0 | 9.4 | 29.5 |
| Ocean | Plymouth | Miramar | 1345 | 97 | 1305.1 | 2 | 26.92 | 1 | 13.46 | 25 40 | 25 40 | 25 40 | 61.3 | 55.1 | 60.7 | 64.6 | 40 | 60.4 | 13.8 | 45.3 |
| Ocean | F. Kahlo | I-280 | 1999 | 97 | 1940.7 | 2 | 39.99 | 1 | 19.99 | 25 40 | 25 40 | 25 40 | 62.9 | 57.6 | 62.2 | 66.4 | 40 | 61.9 | 19.5 | 64.1 |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Construction Trucks**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| F. Kahlo | Ocean | Cloud | 1201 | 96 | 1153 | 1 | 12.01 | 3 | 36.03 | 25 40 | 25 40 | 25 40 | 60.7 | 52.5 | 65.0 | 66.5 | 40 | 62.3 | 21.3 | 70.0 |
| City Coll N | F. Kahlo | Site | 345 | 92 | 317.4 | 1 | 3.45 | 7 | 24.15 | 25 40 | 25 40 | 25 40 | 55.1 | 47.1 | 63.2 | 63.9 | 40 | 59.7 | 11.8 | 38.6 |
| Trucks Alone | | | 22 | 0.1 | 0.022 | 0 | 0.022 | 100 | 21.96 | 25 40 | 25 40 | 25 40 | 13.5 | 25.2 | 62.8 | 62.8 | 30 | 59.8 | 9.1 | 29.8 |

Assumptions: PM peak hour traffic data from Kittleson

**Existing**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| Plymouth | Ocean | S.Wood | 177 | 97 | 171.69 | 2 | 3.54 | 1 | 1.77 | 25 40 | 25 40 | 25 40 | 52.4 | 47.2 | 51.9 | 55.8 | 40 | 51.6 | 1.8 | 6.0 |
| Plymouth | San Ram | Wild wd | | | | | | | | | | | | | | | | | | |

Assumptions: PM p

**Existing + Developer's Project Alternative C**

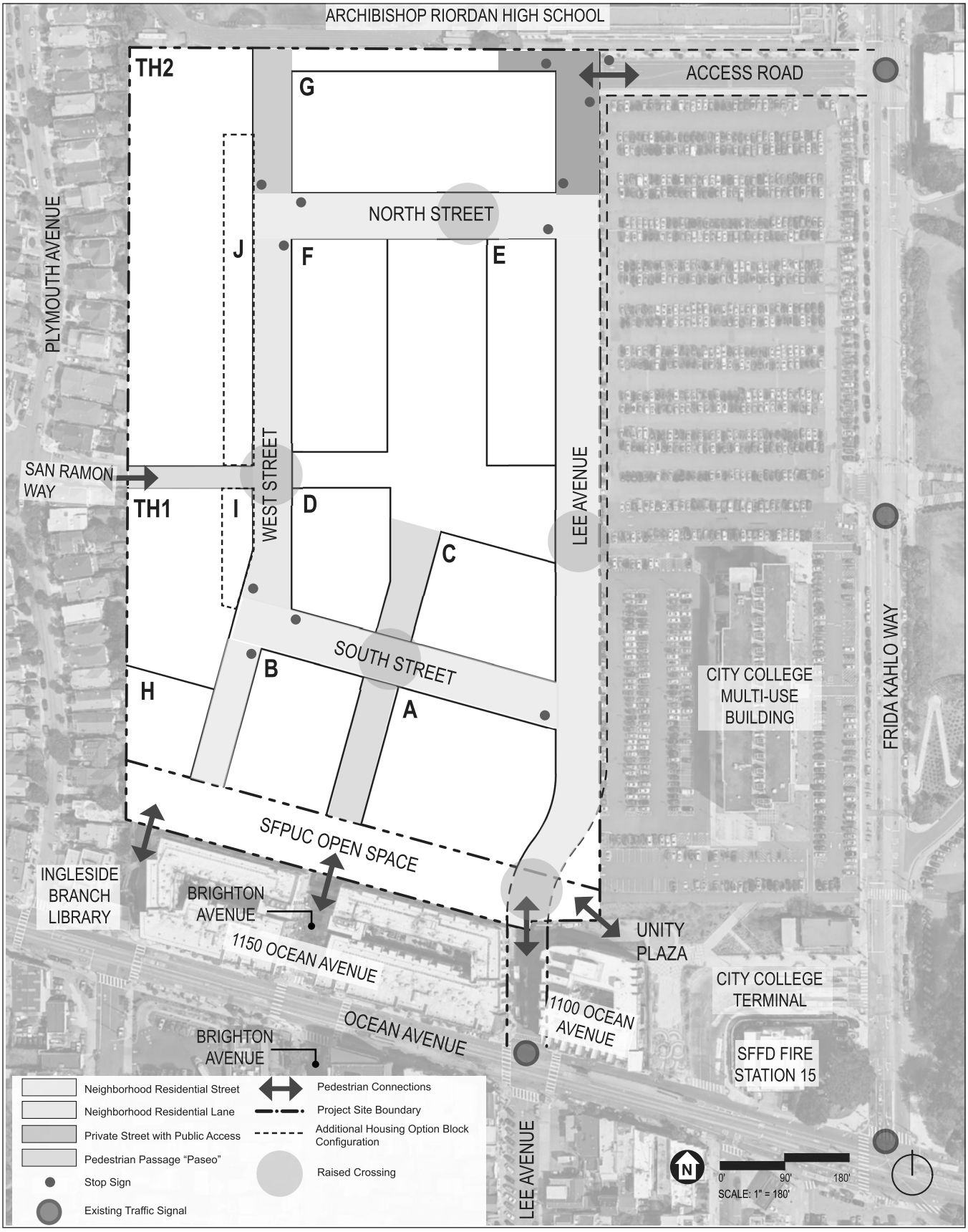
| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| Plymouth | San Ram | Wild wd | 222 | 97 | 215.34 | 2 | 4.44 | 1 | 2.22 | 25 40 | 25 40 | 25 40 | 53.4 | 48.2 | 52.9 | 56.8 | 40 | 52.6 | 2.3 | 7.5 |
| | | | | | | | | | | | | | | | | | | | | |

Assumptions: PM peak hour traffic data from Kittleson

**Existing + Additional Housing Alternative C**

| ROAD SEGMENT | | | TOTAL # VEHICLES | VEHICLE TYPE % Auto | | MT | | HT | | VEHICLE SPEED Auto k/h | MT k/h | HT k/h | NOISE LEVEL (dBA) Auto | MT | HT | CALCULATED NOISE LEVEL 15 meters from | Receptor Dist. from Roadway | Adjusted Noise Level | Distance from Roadway to 65 dBA | Distance from Roadway to 65 dBA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calveno Peak | | | | | | | | | | | | | | | | | | | | |
| | from: | to: | | % | Auto | % | MT | % | HT | | | | | | | roadway center) | Center (m.) | (dBA) | (m.) | (ft) |
| Plymouth | San Ram | Wild wd | 236 | 97 | 228.92 | 2 | 4.72 | 1 | 2.36 | 25 40 | 25 40 | 25 40 | 53.7 | 48.5 | 53.1 | 57.1 | 40 | 52.8 | 2.4 | 7.9 |
| | | | | | | | | | | | | | | | | | | | | |

Assumptions: PM peak hour traffic data from Kittleson




SOURCE: : Van Meter Williams Pollack LLP, 2020

Case No. 2018-007883ENV: Balboa Reservoir Project

**(Revised) Figure 2-12**
Proposed Street Type Plan

# Appendix C
## Transportation Supporting Information

C1 Travel Demand Memorandum
C2 Transit Assessment Memorandum
C3 Freight Loading Data
C4 Transit Delay Analysis and Capital Improvements Memorandum

# C4 Transit Delay Analysis and Capital Improvements Memorandum

KITTELSON & ASSOCIATES

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# TECHNICAL MEMORANDUM

**Balboa Reservoir Subsequent EIR**

Responses to Comments Supplementary Memorandum

Transit Delay Analysis and Capital Improvements

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Date: April 17, 2020
To: Wade Wietgrefe, Liz White
From: Mike Alston, RSP & Amanda Leahy, AICP
cc: Jeanie Poling

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## PURPOSE OF MEMORANDUM

This technical memorandum (memo) identifies and analyzes existing sources of transit delay to the 29 Sunset, K/T Third/Ingleside, and 43 Masonic Muni lines in the Balboa Reservoir project study area, and then recommends offsite capital improvements to reduce transit travel times. The results of this analysis further refine and inform Balboa Reservoir Draft Subsequent Environmental Impact Report (draft SEIR)'s **Mitigation Measure M-C-TR-4. Monitor Cumulative Transit Travel Times and Implement Measures To Reduce Transit Delay**.

This memo is organized as follows:

- Background
- Analysis Approach
- Findings
- Recommended Improvements
- Secondary Effects of Implementing Improvements

## BACKGROUND

The draft SEIR presented an analysis of transit delay under existing plus project conditions and under 2040 cumulative conditions. The impacts were determined to be less than significant under existing plus project conditions and significant and unavoidable under 2040 cumulative conditions, with the proposed project contributing considerably. The project would make a considerable contribution, defined as two

or more minutes, to cumulative transit delay to the K/T Third/Ingleside; 29 Sunset; and the 43 Masonic Muni lines.[1,2]

## ANALYSIS APPROACH

This analysis consists of both quantitative and qualitative approaches to identify and analyze sources of transit delay and quantify how implementation of capital improvements would reduce transit travel times. **Figure 1** presents the study area as it relates to these approaches.

### Analysis Approach for K/T Third/Ingleside and 29 Sunset

The analysis approach compares transit travel times during the peak period and nighttime off-peak period. Transit travel times are typically slowest during the p.m. peak period as travel times are greatly influenced by vehicle congestion. Off-peak nighttime travel times represent conditions in which transit vehicles do not experience the typical delays related to vehicle congestion in the p.m. peak period. As a result, the off-peak nighttime travel times are compared to the p.m. peak period travel times to calculate the differences between individual segments of delay within the study area, and to identify the delay sources for those segments.

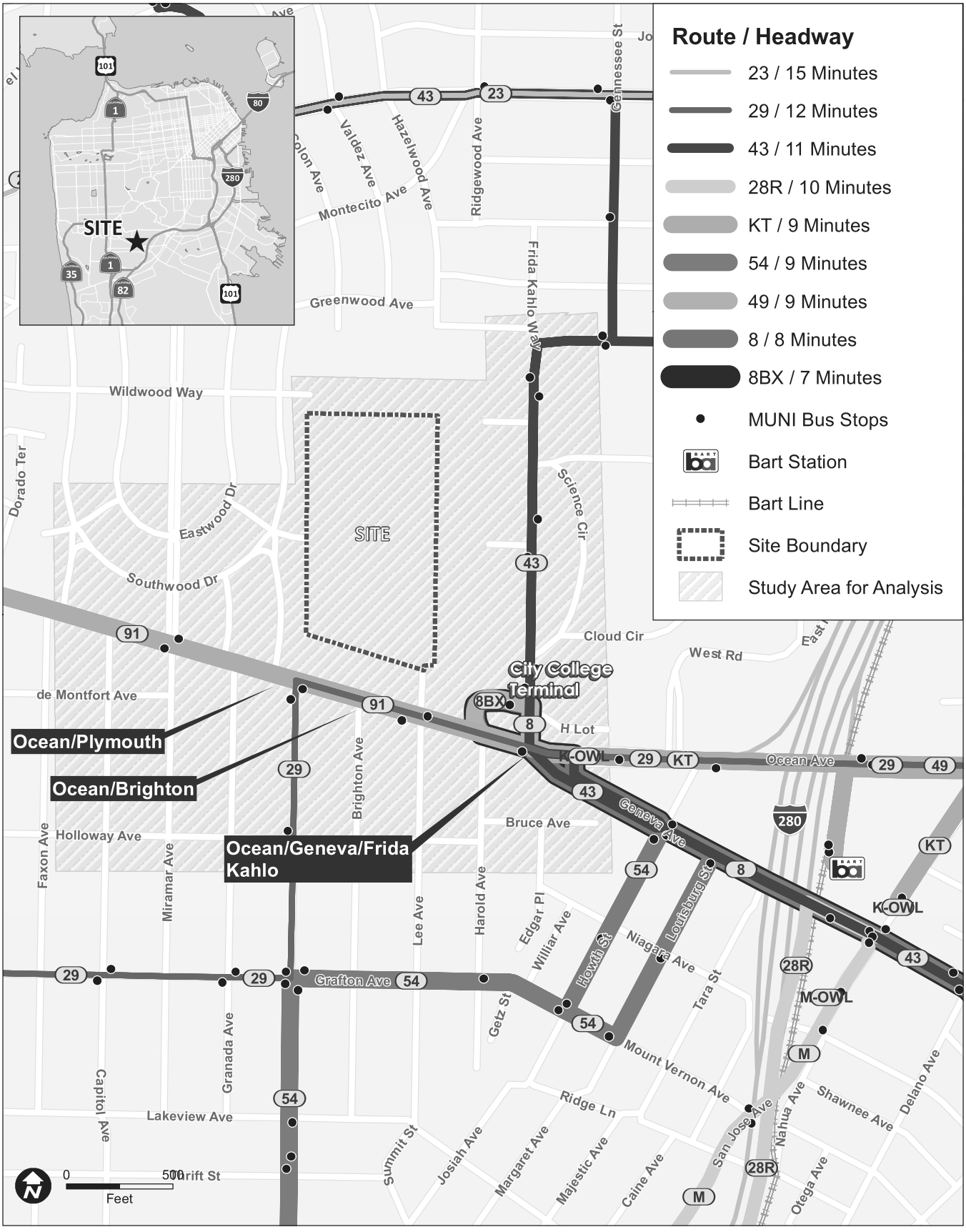
Identifying the specific locations, causes, and amount of delay along a transit route provides the ability to estimate delay reductions from capital improvements. In contrast, the data collected for the draft SEIR analysis includes existing K/T travel times for the full segment along Ocean Avenue between Jules Avenue and Balboa Park BART, but not for points and subdivided segments along the corridor.

The analysis was conducted for the routes along the following segments:

- K/T Third/Ingleside: Jules Avenue/Ocean Avenue to Balboa Park Bay Area Rapid Transit (BART);
- K/T Third/Ingleside: San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue;
- 29 Sunset: Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue; and
- 29 Sunset: Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue.

[1] The 8 Bayshore and 8BX Bayshore B Express series buses also travel through the study area; however, as identified in the draft SEIR, the proposed project would not considerably contribute to cumulative transit delay on these routes. The 91 Third Street/19th Avenue Owl and K Owl also travels through the corridor but is an overnight only route and is not included in the analysis.

[2] The Responses to Comments (RTC) document revised the draft SEIR analysis and Mitigation Measure M-C-TR-4, which incorrectly identified that the proposed project would have a considerable contribution to cumulative transit delay on the 49 Van Ness/Mission line.




H:\22122188 - SF Balboa Reservoir TIS\gis\transit analysis RTC memo gis\Fig 1 Project Study Area_rev1.mxd - malston - 1:02 PM 3/26/2020

Source: Kittelson & Associates, Inc., 2020

Case No.2018-007883ENV: Balboa Reservoir Project

**Figure 1**

**Transit Delay Analysis and Capital Improvements Study Area**
**Existing Transit Service and Weekday P.M. Peak Headways**

Field data collection was collected to identify the following:

- Sources of transit delay along the corridor (location and descriptive cause);
- Delay values associated with given locations and bus actions (corridor delay, transit reentry delay, or passenger boarding delay); and
- Qualitative observations of conditions at potential improvement locations.

Based on these data and observations, capital improvements are then recommended to improve transit operations at a fixed point along a service segment (i.e., an intersection and approach direction), with benefits accruing to the segment's travel time.

### Analysis Approach for 43 Masonic

The analysis for the 43 Masonic supplements the Synchro corridor analysis from the draft SEIR and utilizes the traffic counts and future traffic volumes from the draft SEIR to calculate delay to the line at the Ocean Avenue/Frida Kahlo Way/Geneva Avenue intersection.[3] The delay associated with the inbound 43 Masonic (i.e., going towards Balboa Park BART station) primarily comes from the signal at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The delay experienced at this intersection is primarily associated with vehicle congestion. This is different than the delay on Ocean Avenue, which can be attributed to other factors, such as left or right turning vehicles.

As a result, no additional data collection was needed to calculate transit delay because the supplemental Synchro analysis allows the disaggregation of corridor travel time to identify the amount of delay attributable to the specific transit movement at the intersection versus along the segment as a whole.

## DATA COLLECTION

The field data collection occurred in two phases to achieve a disaggregate analysis of travel times and delays. The p.m. peak period data collection and observations yielded travel times along and through fixed segments of the transit routes, along with descriptions of operational events at each location. The p.m. peak period data collection was conducted from 5-7 p.m. on Tuesday, December 17, 2019; Wednesday, December 18, 2019; and Thursday, January 16, 2020. The off-peak travel time runs provided a baseline travel time along the lines as well as times along and through the same fixed segments

[3] As part of the draft SEIR analysis, transit corridor delay was quantified using Trafficware's Synchro modeling software arterial/corridor delay reports to calculate traffic congestion delays along corridors served by transit. Intersection operations analysis was performed using Synchro software and conducted using the SF Planning Department's *Guidelines for Synchro Intersection LOS Analysis*. Intersection operations were analyzed for Existing Conditions, Existing plus Developer's Proposed Option (which includes reassigned parking trips), and Existing plus Additional Housing Option (does not include reassigned parking trips) for the weekday a.m. and p.m. peak hours.

observed in the p.m. peak period collection. The off-peak travel time runs occurred between 8 p.m. and 11:59 p.m. on Thursday, January 9, 2020, and Thursday, January 23, 2020.[4,5]

## P.M. Peak Period Delay Collection and Observation

Travel time data were collected and qualitative observations recorded at the following locations from a fixed vantage point[6]:

- Ocean Avenue and Brighton Avenue (eastbound and westbound)[7];
- Ocean Avenue and Plymouth Avenue (eastbound and westbound)[8]; and
- Ocean Avenue and Frida Kahlo Avenue (eastbound and westbound)[9].

At each intersection, both segment travel time and intersection travel time were calculated, both of which are defined below. The number of observations used to establish the averages is provided in each table with the discussion of findings.

Segment travel time is defined as the time required for the transit vehicle to travel from the previous intersection to the subject intersection. The recorded time began when the front of the vehicle cleared the previous intersection and ended when:

- The vehicle stopped at a red light or entered the back of a queue at the light; or
- The front of the vehicle entered the intersection during a green light; or
- The vehicle was within a car length of the back of a queue at the intersection.

Intersection travel time is defined as the time required for the transit vehicle to pass through an intersection. The recorded time began when:

- The vehicle stopped at a red light or entered the back of a queue at the light; or
- The front of the vehicle entered the intersection during a green light; or

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[4] City College was in regular session during all p.m. peak period data collection (December 17, 2019, December 18, 2019, and January 16, 2020). City College was in regular session during January 23, 2020, off-peak (8-11 p.m.) data collection but not during January 9, 2020 off-peak data collection. As explained, off-peak travel time runs were compared to historical data to check that they were representative.

[5] Field data were collected during typical conditions (i.e., no events, disruptions, or inclement weather).

[6] These data collection locations were identified in coordination with the SFMTA.

[7] This intersection was observed from public space in front of the McDonald's on the south side of Ocean Avenue between Plymouth and Brighton avenues.

[8] Ibid.

[9] This intersection was observed from an elevated vantage point on the Ocean Avenue pedestrian bridge.

- The recorded time ended when the front of the transit vehicle cleared the intersection.

### Off-Peak Travel Nighttime Time Runs

Kittelson conducted onboard travel time runs (as compared to the fixed vantage point data collection during the p.m. period) on the studied segments to establish baseline times in calculating p.m. peak period delay.[10] These segments included:

- K/T Third/Ingleside
  - Eastbound, Ocean Avenue/Miramar Avenue to Balboa Park BART
  - Westbound, Balboa Park BART to Ocean Avenue/Miramar Avenue
- 29 Sunset
  - Eastbound, Plymouth Avenue/Ocean Avenue to Ocean Avenue/Howth Street
  - Westbound, Ocean Avenue/I-280 onramp to Plymouth Avenue/ Ocean Avenue

## FINDINGS

### Ocean Avenue/Brighton Avenue

#### *Eastbound*

**Table 1** provides average observed travel times at Ocean and Brighton avenues in the eastbound direction for the K/T Third/Ingleside and the 29 Sunset.

[10] To ensure these travel times were representative of typical off-peak nighttime conditions, Kittelson compared the stop-to-stop travel times to historical SFMTA travel time data as a cross-check. The SFMTA maintains an internal database of historical travel times; those data points are aggregated as historical travel time between stops. SFMTA provided historical weeknight travel times as a point of reference. The SFMTA data provided includes median and 90th percentile historical travel times between stops. The historical travel time data is included in Appendix D.

**Table 1:Transit Travel Time Delays Eastbound at Ocean Avenue/Brighton Avenue**

| Route/Location | Off-Peak Nighttime Average Travel Time, Seconds (number of observations) | Peak Average Travel Time, Seconds (number of observations) | Difference in seconds |
|---|---|---|---|
| K/T Third/Ingleside | | | |
| Segment travel time: Plymouth to Brighton | 14 | 14 | 0 |
| Intersection travel time: through Brighton | 4 | 29 | 26 |
| 29 Sunset | | | |
| Segment travel time: Plymouth to Brighton | 13 | 17 | 4 |
| Intersection travel time: through Brighton | 12 | 28 | 16 |

Note: Averages based on four K/T off-peak period observations, three 29 Sunset off-peak period observations, 16 peak period K/T observations, and 10 peak period 29 Sunset observations.
Source: Kittelson, 2020.

Most differences in delay at this location were associated with the intersection: an average of 26 and 16 seconds for the K/T Third/Ingleside and 29 Sunset, respectively. The following observations provide context for peak period travel times at this location in the eastbound direction:

- The segment travel times were relatively similar between peak and off-peak periods, indicating that delay is mostly related to signal timing and intersection queueing rather than conditions along the corridor that would slow transit along the segment.
- The K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles. The train was frequently observed to be stuck behind left-turning vehicles, at times resulting in missing a green light and incurring additional delay from the red signal.
- The K/T routinely stopped at red lights in the p.m. peak period. In the off-peak period, the line was not observed to experience any travel time delay due to red lights.
- The 29 has the flexibility to operate in either lane and was generally observed in the right travel lane and does not wait directly behind left-turning vehicles (it must be in the right lane traveling through the intersection to be aligned to serve the next passenger stop). However, one observation noted that queuing from a left-turning vehicle affected both lanes and contributed to delay for the 29.
- The 29 was frequently stopped at red lights during the peak period.
- With the center-running track lane serving left-turning vehicles, the right lane serves the 29, a majority of through vehicles, and right-turning vehicles. Drivers turning right must yield to pedestrian movements at the parallel crosswalk, delaying through vehicles behind right-turning vehicles.

In the eastbound direction, much of the delay to the K/T Line and a portion of the delay to the 29 can be attributed to left-turning vehicle delay. This includes frequently waiting behind left-turning vehicles searching for a gap in oncoming traffic.

### *Westbound*

**Table 2** provides average observed travel times on Ocean Avenue approaching and through Brighton Avenue in the westbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 2:Transit Travel Time Delays Westbound at Ocean Avenue/Brighton Avenue**

| Route/Location | Off-Peak Nighttime Average Travel Time (seconds) | Peak Average Travel Time (seconds) | Difference in seconds |
|---|---|---|---|
| K/T Third/Ingleside | | | |
| Segment travel time: Lee to Brighton | 8 | 15 | 7 |
| Intersection travel time: through Brighton | 3 | 23 | 20 |
| 29 Sunset | | | |
| Segment travel time: Lee to Brighton | 8 | 19 | 11 |
| Intersection travel time: through Brighton | 2 | 32 | 30 |

Note: Averages based on two K/T off-peak period observations, two 29 Sunset off-peak period observations, five peak period K/T observations, and seven peak period 29 Sunset observations.
Source: Kittelson, 2020.

Most differences in delay were associated with the intersection: an average of 20 and 30 seconds for the K/T Third/Ingleside and 29 Sunset, respectively. The following observations provide context for the peak period travel times at this location in the westbound direction:

- The segment travel times almost doubled for the K/T and more than doubled for the 29 but represent a small portion of each line's travel time compared to the time through the intersection. The differences indicate that p.m. peak period congestion levels affect operating speed through the corridor in the westbound direction.
- The K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles. The train was not observed to be stuck behind left-turning vehicles such that the train would miss a green light and incur additional delay from the red signal, as was observed in the eastbound direction. However, left turns do contribute to approach delay in this direction, and the K/T was frequently observed to experience delay at red lights in this direction. The p.m. peak hour turning movement counts collected for the project show 122 left-turning vehicles in the p.m. peak hour (see Appendix A); observations indicate that most left-turning drivers must wait until the end of the permissive green phase to turn left.

- The 29 operates in the right travel lane and does not wait directly behind left-turning vehicles. The left-turning delay has less direct influence on 29 operations.
- The 29 was frequently stopped at red lights during the peak period.
- With the center-running track lane serving left-turning vehicles, the right lane serves the 29, and right-turning vehicles, as well as observed to serve the majority of through vehicles. Drivers turning right must yield to pedestrian movements at the parallel crosswalk, potentially delaying through vehicles behind right-turning vehicles.

## Ocean Avenue/Plymouth Avenue

### *Eastbound*

**Table 3** provides average observed travel times at Ocean and Plymouth avenues in the eastbound direction for the K/T Third/Ingleside.

**Table 3:Transit Travel Time Delays Eastbound at Ocean Avenue/Plymouth Avenue**

| Location | Off-Peak Nighttime Average Travel Time (seconds) | Peak Average Travel Time (seconds) | Difference in seconds |
|---|---|---|---|
| K/T Third/Ingleside | | | |
| Segment travel time: Miramar to Plymouth | 16 | *Not recorded*[1] | - |
| Intersection travel time: through Plymouth | 13 | 27 | 14 |

[1] Because of limitations from a fixed vantage point, observed p.m. peak period segment travel time was noted between Granada and Plymouth avenues, whereas off-peak period observations noted time between Miramar and Plymouth avenues. Comparison of the two entries would not be commensurate.

Note: Averages based on four K/T off-peak period observations and seven peak period K/T observations.
Source: Kittelson, 2020.

The average p.m. peak hour travel time delay through the intersection was 14 seconds compared to off-peak nighttime conditions. The following observations provide context for peak period travel times:

- The K/T was observed to sit at a red light in almost all p.m. peak hour observations, including as a result of waiting behind a left-turning vehicle and subsequently missing a green phase. Similar to the Brighton location, the K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles.
- The 29 turns right from Plymouth Avenue onto Ocean Avenue at this intersection and does not travel eastbound through the intersection.

### *Westbound*

**Table 4** provides average observed travel times at Ocean and Plymouth avenues in the westbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 4: Transit Travel Time Delays Westbound at Ocean Avenue/Plymouth Avenue**

| Location | Off-Peak Nighttime Average Travel Time (seconds) | Peak Average Travel Time (seconds) | Difference in seconds |
|---|---|---|---|
| K/T Third/Ingleside | | | |
| Segment travel time: Brighton to Plymouth | 7 | 11 | 4 |
| Intersection travel time: through Plymouth | 4 | 29 | 25 |
| 29 Sunset | | | |
| Segment travel time: Brighton to Plymouth | 5 | 9 | 4 |
| Intersection travel time: through Plymouth | 3 | 33 | 30 |

Note: Averages based on two K/T off-peak period observations, three off-peak period 29 Sunset observations, six peak period K/T observations, and 12 peak period 29 Sunset observations.
Source: Kittelson, 2020.

The average p.m. peak hour travel time delay through the intersection was 14 seconds compared to off-peak nighttime conditions. The following observations provide context for peak period travel times:

- The travel time difference in segment travel times for each line indicates that the sources of delay are at the intersection rather than due to overall travel speeds on the segment.
- The K/T was observed to sit at a red light in most all p.m. peak hour observations, including as a result of waiting behind a left-turning vehicle and subsequently missing a green phase on multiple occasions. The average delay experienced is largely a result of delay behind left-turning vehicles and subsequent red-light delay. Although the p.m. peak hour average among observations is 30 seconds, the maximum observed intersection travel time was 57 seconds, indicating wide variability. Like at the Brighton location, the K/T travels in the center-running track lane and is sometimes delayed by left-turning vehicles.
- The 29 turns left onto Plymouth Avenue at this intersection, so it is subject to the same operational delay and issues as the K/T. During the p.m. peak hour, the 29 was observed to miss its green phase multiple times, with a maximum intersection travel time of 99 seconds attributed to left-turning drivers (sitting through two red phases).

## Ocean Avenue and Geneva Avenue/Frida Kahlo Way

### *Eastbound*

**Table 5** provides average observed travel times in the eastbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 5: Transit Travel Time Delays Eastbound at Ocean Avenue/Frida Kahlo Way/Geneva Avenue**

| Location | Off-Peak Nighttime Average Travel Time (seconds) | Peak Average Travel Time (seconds) | Difference in seconds |
|---|---|---|---|
| K/T Third/Ingleside | | | |
| Segment travel time: Lee to Frida Kahlo | 19 | 18 | - |
| Intersection travel time: through Frida Kahlo[1] | 39 | 53 | 14 |
| 29 Sunset | | | |
| Segment travel time: Lee to Frida Kahlo | 10 | 15 | 5 |
| Intersection travel time: through Frida Kahlo | 57 | 54 | - |

[1] Includes dwell time

Note: Averages based on four K/T off-peak period observations, three off-peak period 29 Sunset observations, four peak period K/T observations, and eight peak period 29 Sunset observations.

Source: Kittelson, 2020.

As **Table 5** indicates, the p.m. peak period travel time delays were relatively small based on the observations and data collection. The following observations provide context for travel times:

- During peak and off-peak periods, the K/T showed consistent travel times between Lee Avenue and the intersection (or back of queue).
- The 29 includes a near side bus stop between Harold and Geneva avenues. Following this stop, the bus driver must reenter the traffic stream to continue along Ocean Avenue. A combination of red lights, associated re-entry delay (with a green or red indication), and slow operating speeds through the intersection resulted in similar peak hour and off-peak average travel times for the 29.
- Observed p.m. peak hour intersection travel times were widely variable, ranging from 21 seconds to 82 seconds.
- The K/T line shares a travel lane with left-turning vehicles in a left-turn lane with a protected left-turn phase. Although drivers do not share a conflicting phase with crossing pedestrians and do not need to yield to oncoming traffic, the K/T (which continues straight) must wait behind left-turning

vehicles at a red light. In contrast, adjacent through traffic has a green indication, delaying the line relative to if it was in an exclusive lane or a through lane.

### *Westbound*

**Table 6** provides average observed travel times in the westbound direction for the K/T Third/Ingleside and the 29 Sunset.

**Table 6: Transit Travel Time Delays Westbound at Ocean Avenue/Frida Kahlo Way/Geneva Avenue**

| Location | Off-Peak Nighttime Average Travel Time (seconds) | Peak Average Travel Time (seconds) | Difference in seconds |
|---|---|---|---|
| K/T Third/Ingleside | | | |
| Segment travel time: Howth to Frida Kahlo | 12 | 17 | 5 |
| Intersection travel time: through Frida Kahlo | 11 | 49 | 38 |
| 29 Sunset | | | |
| Segment travel time: Howth to Frida Kahlo | 15 | 20 | 5 |
| Intersection travel time: through Frida Kahlo | 8 | 66 | 58 |

Note: Averages based on two K/T off-peak period observations, two off-peak period 29 Sunset observations, six peak period K/T observations, and 10 peak period 29 Sunset observations.
Source: Kittelson, 2020.

The following observations provide context for travel times:

- In the p.m. peak hour, the K/T experienced an average of 38 seconds of travel time delay compared to off-peak conditions. This delay was mostly a result of red-light delay and of queuing once the K/T left the separated track lane to the east of the intersection. No left turns are allowed from the center-running track lane, so the K/T was not observed to be waiting behind turning vehicles. Rather, the limited green time and the queuing present contributed to higher p.m. peak hour travel times.
- The 29 experienced 58 seconds of relative delay to travel through the intersection in p.m. peak hour conditions compared to in off-peak conditions. Observations noted that the 29 frequently queued in advance of the intersection, in some cases back to Howth Street. As a result of queueing, buses missed green signal phases and waited for an extra signal cycle; the maximum intersection travel time observed in the p.m. peak observations was 213 seconds.
- The 29 was observed to use the center-running track lane to bypass queuing on at least one occasion.

- This intersection is uniquely constrained compared to the other study intersections:
  - It serves multiple approaches with higher volumes than the Brighton and Plymouth intersections. This includes cross-street volumes and through and turning movement volumes along Ocean Avenue. Much of the delay recorded was observed to be a result of queuing, likely as a result of the allocation of green time to competing intersection approaches.
  - The intersection includes longer pedestrian crossings across Ocean Avenue (in excess of 80 feet) than the other intersections, requiring longer side-street pedestrian crossings phases and a longer signal cycle than the other locations.

These constraints reduce the ability to provide capital improvement solutions compared to the other locations in the study area.

### *Southbound*

The 43 Masonic outbound travels south from one of two shared left-through lanes on Frida Kahlo Way, across Ocean Avenue, and on to Geneva Avenue; this movement is signal protected and does not include conflicting pedestrian or vehicle movements. Project-related increase in vehicle traffic and passenger boarding/alighting activity would be associated with 82 seconds of travel time delay during the p.m. peak hour.[11] Travel time delay is attributable to passenger boarding activity, transit reentry time, and the level of vehicular traffic at the intersection and surrounding the Muni stop approximately 250 feet north of the intersection. The 2000 *Highway Capacity Manual* shows average bus re-entry delay into adjacent traffic streams to increase as a function of the adjacent lane hourly volumes, from an average of zero seconds with 100 vehicles to an average between four and six seconds at volumes between 400 and 600 vehicles per hour.[12] Data collected for this project show a southbound p.m. peak hour volume of 508 vehicles, which corresponds with an estimate of between four and six seconds of reentry delay in addition to delay at the intersection. As explained in the preceding section, this intersection is constrained by vehicle demand and pedestrian crossing lengths that limit possible signal timing solutions.

## Combined Delay

**Table 7** provides the recorded travel time delays presented above by line, direction, and location.

11

12 2000 *Highway Capacity Manual*, Chapter 27, Exhibit 27-10. Reproduced in the "Public Transit" appendix of the *2019 San Francisco Transportation Impact Analysis Guidelines* and available at https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines

**Table 7: P.M. Peak Hour Transit Travel Time Delays by Line**

| Location | Eastbound | Westbound |
|---|---|---|
| K/T Third/Ingleside | | |
| Intersection travel time: through Plymouth Avenue | 14 | 25 |
| Intersection travel time: through Brighton Avenue | 26 | 20 |
| Intersection travel time: through Frida Kahlo Way | 14 | 38 |
| **Total Combined Delay** | **54** | **83** |
| 29 Sunset | | |
| Segment Travel Time: Lee to Brighton | n/a | 11 |
| Intersection travel time: through Brighton Avenue | 16 | 30 |
| Intersection travel time: through Plymouth | - | 30 |
| Intersection travel time: through Frida Kahlo Way | - | 58 |
| **Total Combined Delay** | **16** | **129** |

Source: Kittelson, 2020.

## RECOMMENDED IMPROVEMENTS

The following improvements are recommended to reduce transit travel times in the study area and are displayed in Figure 2. These proposed improvements require approval by the SFMTA and are subject to review by relevant rail oversight authorities.

- Providing a protected green arrow signal phase for westbound left turns at Ocean Avenue/Brighton Avenue;
- Prohibit eastbound left turns at Ocean Avenue/Brighton Avenue;
- Providing a protected green arrow signal phase for westbound left turns at Ocean Avenue/Plymouth Avenue;
- Prohibit eastbound left turns at Ocean Avenue/Plymouth Avenue; and
- Construct a bus boarding island on southbound Frida Kahlo Way.

**Figure 2: Recommended Improvements to Reduce Transit Travel Times**

Source: Google Earth.

## Ocean Avenue/Brighton Avenue

### *Eastbound: Prohibit Left Turns*

At Ocean and Brighton avenues, prohibiting eastbound left turns would provide dual benefit to transit operations. It would eliminate transit delay for the K/T associated with waiting behind left-turning vehicles, which was observed to result in missing green phases. A left turn prohibition would also provide more through volume capacity and would give through drivers the ability to choose a lane rather than to proceed in the right lane. This would benefit the 29 as well, whose drivers would either travel in a right lane with fewer vehicles or could also use the left lane to travel through the intersection if right-turning vehicles are yielding to crossing pedestrians.

Implementing this improvement would improve reliability for the K/T and 29 and could reduce p.m. peak hour travel time delay compared to off-peak travel times by up to 26 and 16 seconds, respectively. There is no guarantee that the improvement would reduce delay by the full amounts observed, given there are other sources of transit delay, although it is a reasonable approximation of travel time savings.

### *Westbound: Provide Protected/Permissive Left Turn Phasing*

At Ocean and Brighton avenues, providing a protected green arrow left turn phase would allow left-turning vehicles a dedicated portion of the signal phase and would reduce delay for the K/T associated with waiting behind those left-turning vehicles. This improvement would improve reliability for the K/T and could reduce delay by up to 20 seconds. There is no guarantee that the improvement would reduce delay by the full amounts observed, as the K/T line would need to wait for a turning vehicle to clear even though the movement would be more reliable with a protected/permissive phase, although it is a reasonable approximation of travel time savings.

## Ocean Avenue/Plymouth Avenue

### *Eastbound: Prohibit Left Turns*

At Ocean and Plymouth avenues, prohibiting eastbound left turns would provide dual benefit to transit operations. It would eliminate transit delay for the K/T associated with waiting behind left-turning vehicles, which was observed to result in missing green phases. A left turn prohibition would also provide more through volume capacity and would give through drivers the ability to choose a lane rather than to proceed in the right lane. This improvement would improve reliability for both lines and could reduce delay for the K/T by up to 14 seconds. There is no guarantee that the improvement would reduce delay by the full amounts observed, given there are other sources of transit delay, although it is a reasonable approximation of travel time savings.

### *Westbound: Provide Protected/Permissive Left Turn Phasing*

At Ocean and Brighton avenues, providing a protected/permissive left turn phase would allow left-turning vehicles a dedicated portion of the signal phase and would reduce delay for the K/T associated with waiting behind those left-turning vehicles. This improvement would improve reliability for the K/T. This benefit would also accrue to the 29, which turns left at the intersection and is subject to the same travel delays. This improvement would improve reliability for both lines and could reduce delay for the K/T by up to 25 seconds and for the 29 by up to 30 seconds. There is no guarantee that the improvement would reduce delay by the full amounts observed, as the K/T and 29 lines would need to wait for a turning vehicle to clear even though the movement would be more reliable with a protected/permissive phase, although it is a reasonable approximation of travel time savings.

## Frida Kahlo Way/ Ocean Avenue/Geneva Avenue

### *Southbound: Transit Boarding Island*

The improvement identified to improve transit operations at this intersection is the addition of a along the southbound approach of Frida Kahlo Way. A transit boarding island would reduce passenger boarding and re-entry delay associated with accessing the bus stop. The SFMTA Transportation Engineering *Transit*

*Preferential Toolkit* identifies that transit boarding islands typically reduce passenger boarding/alighting delay by an average of five seconds and reduce re-entry delay by an average of five seconds. This location may be associated with more passenger boarding/alighting delay than five seconds. The would reduce transit reentry delay, which is estimated to be up to be about ten seconds under existing conditions, which would in turn allow Muni buses better access to the signal, potentially reducing delay at the intersection by proceeding through on more green signals or getting better position in a queue.

### Conclusion

The recommended improvements further refine the capital measures identified as part of SEIR's **Project Mitigation Measure M-C-TR-4: Implement Measures to Reduce Transit Delay[13].**

## SECONDARY EFFECTS OF IMPLEMENTING IMPROVEMENTS

The following describes the secondary construction and operational effects of implementing the improvements identified above.

### Construction

Construction of the identified capital improvements would include the installation of signage for the prohibited left turns at both Brighton and Plymouth avenues and the installation of additional signal heads, possibly including a new mast arm, to provide protected/permissive phasing in the eastbound direction at Plymouth and Brighton avenues.

These construction activities would cause temporary disruption to existing conditions and may include temporary sidewalk and lane closures. Construction activities would be similar to those evaluated as part of the DEIR and require compliance with the public works code, public works department orders, and the blue book, as applicable, so that potentially hazardous conditions or substantial public transit delay would not occur.

### General Effect to Vehicle Traffic

The reliability and delay reduction benefits described for transit vehicles along Ocean Avenue as a result of the proposed changes would also accrue to general traffic along Ocean Avenue. Anticipated effects are discussed below:

[13] Originally entitled Project Mitigation Measure M-C-TR-4: **Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay** in the DEIR**,** the title of the mitigation measure was amended as part of the Responses to Comments document.

- For westbound left-turning drivers at Plymouth and Brighton avenues, a protected/permissive phase provides dedicated time to make the left turn separated from oncoming traffic or pedestrians. This would also reduce the number of conflicts between people driving and walking through the provision of the protected movement.
- The westbound protected left-turn phase would occupy a share of green time and would result in a decrease in green time of a few seconds to other phases.
- For eastbound through drivers along Ocean Avenue, the prohibition of left turns at Plymouth and Brighton avenues would improve travel times and reliability, eliminating instances of delay from waiting behind a left-turning vehicle.

Effects on left-turning drivers at Plymouth or Brighton avenues are discussed in the General Effect on Circulation section below.

## General Effect to Pedestrians

The Ocean Avenue/Plymouth Avenue intersection serves many pedestrians in the p.m. peak hour. These pedestrians share a signal phase with the parallel Ocean Avenue movements, including right-turn and left-turn movements. The shared vehicle turning movements and pedestrian crossings create a conflict between road users and contribute travel time delay for turning drivers yielding to pedestrians. The two intersections with recommended improvements serve the following number of pedestrians:

- **Ocean Avenue/Brighton Avenue:** 442 pedestrians across north leg, 278 pedestrians across south leg in the weekday p.m. peak hour (5-7 p.m.; see Appendix A)
- **Ocean Avenue/Plymouth Avenue:** 349 pedestrians across north leg, 152 pedestrians across south leg in the weekday p.m. peak hour (5-7 p.m.; see Appendix A)

For pedestrians crossing the north legs of these intersections, conflicting left-turning vehicles would be eliminated. For pedestrians crossing the south legs of these intersections, conflicts with left-turning drivers would be reduced.

## General Effect on Circulation

The prohibition of eastbound left turns at Ocean and Plymouth avenues would redistribute the 11 left-turning drivers currently making this movement in the p.m. peak hour. These drivers would have the following options (see Figure 2):

- Turn left at Faxon, Miramar, or Granada avenues in advance of the Plymouth Avenue intersection; or
- Turn right at Granada Avenue, left to Holloway Avenue, and then left at Plymouth Avenue, left at Ocean Avenue, and right at Plymouth Avenue, adding approximately 1,700 feet of diversion to their trip.

The prohibition of eastbound left turns at Ocean and Brighton avenues would redistribute the 39 left turning drivers currently making this movement in the p.m. peak hour. These drivers would have the

following options (see Figure 2):

- Turn right at Plymouth, Granada, or Miramar avenues, left at Brighton Avenue, and through at Ocean Avenue, adding approximately 1,700 feet of diversion to their trip. Transit travel time and reliability benefits accrue to general traffic.

Note that Brighton Avenue provides vehicular access to the Whole Foods parking deck and to Avalon Ocean Avenue residential parking.

Both prohibitions would redistribute approximately the number of left-turning trips presented above and would increase the traffic on the relevant local streets by an amount commensurate to the existing eastbound left-turn volumes.

The redistribution of vehicles trips would be anticipated to occur on Plymouth, Granada, Miramar, Brighton, and Holloway avenues, which are low-speed local roads. The capital improvements and potential diversions discussed above would not be expected to introduce new conflicts or delays to existing transit operations and would not create potentially hazardous conditions for people walking, biking, driving, or public transit operations.

# APPENDIX A: MULTIMODAL TURNING MOVEMENT COUNTS

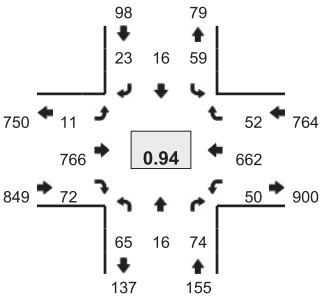
Type of peak hour being reported: Intersection Peak

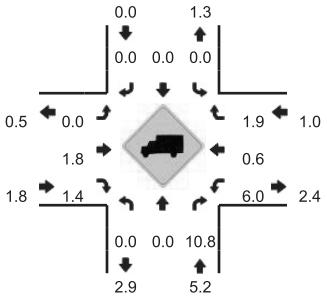
Method for determining peak hour: Total Entering Volume

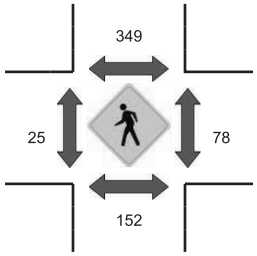
**LOCATION:** Plymouth Ave -- Ocean Ave
**CITY/STATE:** San Francisco, CA

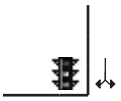
**QC JOB #:** 14612226
**DATE:** Wed, Jan 31 2018

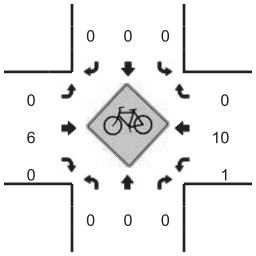
**Peak-Hour: 5:00 PM -- 6:00 PM**
**Peak 15-Min: 5:00 PM -- 5:15 PM**

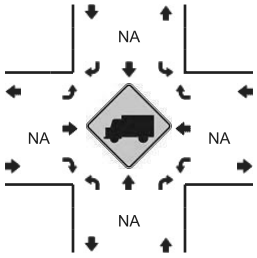


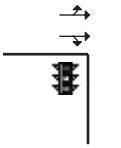



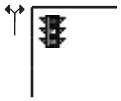



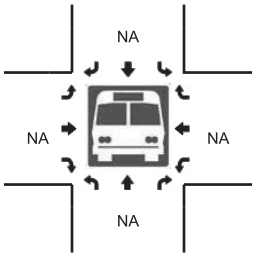










| 5-Min Count Period Beginning At | Plymouth Ave (Northbound) | | | | Plymouth Ave (Southbound) | | | | Ocean Ave (Eastbound) | | | | Ocean Ave (Westbound) | | | | Total | Hourly Totals |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | | |
| 4:00 PM | 5 | 0 | 7 | 0 | 1 | 1 | 2 | 0 | 0 | 63 | 6 | 0 | 3 | 48 | 4 | 0 | 140 | |
| 4:05 PM | 3 | 0 | 2 | 0 | 3 | 3 | 1 | 0 | 1 | 74 | 1 | 0 | 5 | 61 | 2 | 0 | 156 | |
| 4:10 PM | 4 | 5 | 5 | 0 | 1 | 1 | 0 | 0 | 2 | 51 | 4 | 0 | 5 | 49 | 4 | 0 | 131 | |
| 4:15 PM | 2 | 0 | 1 | 0 | 5 | 2 | 2 | 0 | 0 | 58 | 5 | 0 | 3 | 53 | 4 | 0 | 135 | |
| 4:20 PM | 3 | 1 | 6 | 0 | 0 | 1 | 1 | 0 | 1 | 60 | 11 | 0 | 4 | 56 | 3 | 0 | 147 | |
| 4:25 PM | 2 | 2 | 8 | 0 | 0 | 2 | 1 | 0 | 0 | 58 | 10 | 0 | 7 | 52 | 6 | 0 | 148 | |
| 4:30 PM | 4 | 1 | 4 | 0 | 3 | 4 | 1 | 0 | 0 | 49 | 9 | 0 | 7 | 37 | 1 | 0 | 120 | |
| 4:35 PM | 3 | 3 | 4 | 0 | 6 | 1 | 0 | 0 | 1 | 59 | 4 | 0 | 4 | 52 | 4 | 0 | 141 | |
| 4:40 PM | 4 | 2 | 4 | 0 | 2 | 0 | 2 | 0 | 2 | 69 | 6 | 0 | 6 | 65 | 4 | 0 | 166 | |
| 4:45 PM | 3 | 5 | 6 | 0 | 2 | 2 | 0 | 0 | 2 | 59 | 7 | 0 | 1 | 68 | 2 | 0 | 157 | |
| 4:50 PM | 4 | 4 | 2 | 0 | 8 | 3 | 2 | 0 | 1 | 52 | 5 | 0 | 3 | 53 | 6 | 0 | 143 | |
| 4:55 PM | 1 | 0 | 6 | 0 | 4 | 2 | 3 | 0 | 0 | 51 | 7 | 0 | 4 | 38 | 5 | 0 | 121 | 1705 |
| 5:00 PM | 3 | 0 | 5 | 0 | 5 | 2 | 2 | 0 | 1 | 68 | 8 | 0 | 5 | 63 | 1 | 0 | 163 | 1728 |
| 5:05 PM | 5 | 1 | 5 | 0 | 9 | 1 | 2 | 0 | 0 | 68 | 6 | 0 | 5 | 56 | 7 | 0 | 165 | 1737 |
| 5:10 PM | 6 | 1 | 6 | 0 | 8 | 1 | 2 | 0 | 1 | 64 | 10 | 0 | 2 | 63 | 4 | 0 | 168 | 1774 |
| 5:15 PM | 6 | 2 | 6 | 0 | 5 | 3 | 3 | 0 | 2 | 57 | 8 | 0 | 4 | 48 | 3 | 0 | 147 | 1786 |
| 5:20 PM | 5 | 0 | 3 | 0 | 4 | 1 | 1 | 0 | 0 | 58 | 4 | 0 | 2 | 54 | 4 | 0 | 136 | 1775 |
| 5:25 PM | 10 | 0 | 7 | 0 | 5 | 3 | 4 | 0 | 0 | 73 | 7 | 0 | 5 | 64 | 4 | 0 | 182 | 1809 |
| 5:30 PM | 6 | 1 | 8 | 0 | 2 | 3 | 0 | 0 | 0 | 63 | 2 | 0 | 3 | 48 | 4 | 0 | 140 | 1829 |
| 5:35 PM | 4 | 2 | 10 | 0 | 7 | 0 | 2 | 0 | 1 | 56 | 6 | 0 | 10 | 58 | 4 | 0 | 160 | 1848 |
| 5:40 PM | 7 | 3 | 7 | 0 | 2 | 1 | 3 | 0 | 1 | 63 | 5 | 0 | 6 | 63 | 4 | 0 | 165 | 1847 |
| 5:45 PM | 6 | 0 | 4 | 0 | 5 | 0 | 2 | 0 | 2 | 69 | 2 | 0 | 1 | 48 | 6 | 0 | 145 | 1835 |
| 5:50 PM | 6 | 4 | 7 | 0 | 4 | 0 | 1 | 0 | 3 | 66 | 7 | 0 | 3 | 51 | 4 | 0 | 156 | 1848 |
| 5:55 PM | 1 | 2 | 6 | 0 | 3 | 1 | 1 | 0 | 0 | 61 | 7 | 0 | 3 | 46 | 7 | 1 | 139 | 1866 |

| Peak 15-Min Flowrates | Northbound | | | | Southbound | | | | Eastbound | | | | Westbound | | | | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | |
| All Vehicles | 56 | 8 | 64 | 0 | 88 | 16 | 24 | 0 | 8 | 800 | 96 | 0 | 48 | 728 | 48 | 0 | 1984 |
| Heavy Trucks | 0 | 0 | 8 | | 0 | 0 | 0 | | 0 | 8 | 0 | | 4 | 8 | 0 | | 28 |
| Pedestrians | | 104 | | | | 464 | | | | 56 | | | | 40 | | | 664 |
| Bicycles | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 | 1 | 0 | | 1 |
| Railroad Stopped Buses | | | | | | | | | | | | | | | | | |

*Comments:*

Report generated on 2/13/2018 3:04 PM

SOURCE: Quality Counts, LLC (http://www.qualitycounts.net) 1-877-580-2212

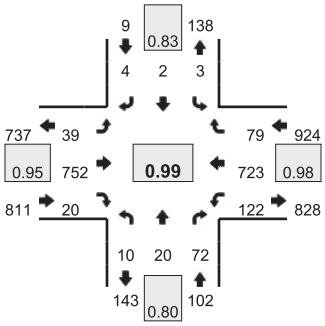
Type of peak hour being reported: Intersection Peak

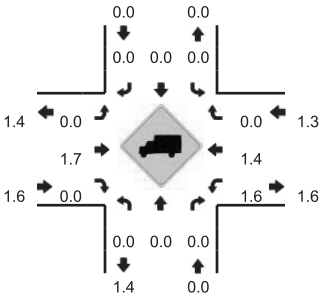
Method for determining peak hour: Total Entering Volume

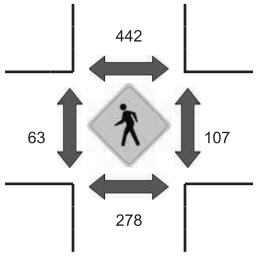
**LOCATION:** Brighton Ave -- Ocean Ave
**CITY/STATE:** San Francisco, CA

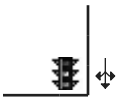
**QC JOB #:** 14777402
**DATE:** Tue, Aug 28 2018

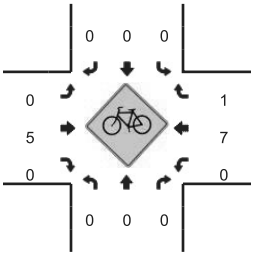
**Peak-Hour: 5:00 PM -- 6:00 PM**
**Peak 15-Min: 5:15 PM -- 5:30 PM**

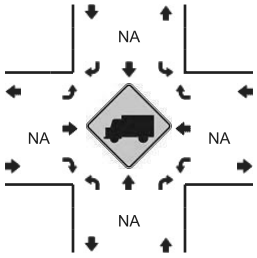


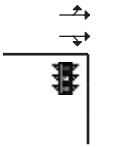



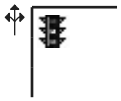



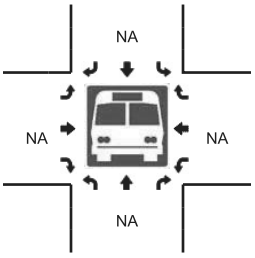










| 15-Min Count Period Beginning At | Brighton Ave (Northbound) | | | | Brighton Ave (Southbound) | | | | Ocean Ave (Eastbound) | | | | Ocean Ave (Westbound) | | | | Total | Hourly Totals |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | | |
| 4:00 PM | 5 | 4 | 12 | 0 | 3 | 0 | 0 | 0 | 10 | 186 | 10 | 0 | 22 | 173 | 20 | 0 | 445 | |
| 4:15 PM | 5 | 6 | 10 | 0 | 2 | 0 | 1 | 0 | 8 | 174 | 10 | 0 | 20 | 192 | 25 | 0 | 453 | |
| 4:30 PM | 6 | 5 | 23 | 0 | 0 | 1 | 1 | 0 | 9 | 152 | 4 | 0 | 23 | 187 | 20 | 0 | 431 | |
| 4:45 PM | 3 | 5 | 15 | 0 | 1 | 0 | 1 | 0 | 11 | 177 | 6 | 1 | 28 | 178 | 15 | 0 | 441 | 1770 |
| 5:00 PM | 3 | 7 | 16 | 0 | 0 | 0 | 1 | 0 | 9 | 186 | 7 | 0 | 30 | 188 | 17 | 0 | 464 | 1789 |
| 5:15 PM | 0 | 7 | 19 | 0 | 2 | 1 | 0 | 0 | 13 | 187 | 7 | 0 | 27 | 182 | 22 | 1 | 468 | 1804 |
| 5:30 PM | 4 | 4 | 19 | 0 | 0 | 0 | 2 | 0 | 11 | 176 | 2 | 0 | 39 | 173 | 24 | 0 | 454 | 1827 |
| 5:45 PM | 3 | 2 | 18 | 0 | 1 | 1 | 1 | 0 | 6 | 203 | 4 | 0 | 25 | 180 | 16 | 0 | 460 | 1846 |

| Peak 15-Min Flowrates | Northbound | | | | Southbound | | | | Eastbound | | | | Westbound | | | | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | Left | Thru | Right | U | |
| All Vehicles | 0 | 28 | 76 | 0 | 8 | 4 | 0 | 0 | 52 | 748 | 28 | 0 | 108 | 728 | 88 | 4 | 1872 |
| Heavy Trucks | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 | 12 | 0 | | 4 | 20 | 0 | | 36 |
| Pedestrians | | 280 | | | | 392 | | | | 44 | | | | 108 | | | 824 |
| Bicycles | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 | 3 | 0 | | 0 | 0 | 0 | | 3 |
| Railroad | | | | | | | | | | | | | | | | | |
| Stopped Buses | | | | | | | | | | | | | | | | | |

*Comments:*

Report generated on 9/7/2018 3:43 PM

SOURCE: Quality Counts, LLC (http://www.qualitycounts.net) 1-877-580-2212

# APPENDIX B: PEAK HOUR DATA COLLECTION

**Location** Ocean Avenue/Brighton Avenue
**Direction** Westbound
EBH - 12/18/2019
**Route** **K / T Third**

| Observation | | Time | Ocean/Lee doors open | Ocean/Lee initial boarding end | Ocean/Lee arrival stop | Ocean/Lee departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|---|
| 2 | Time | 5:21pm | Start | 30 | N/A | 35 | 57 | 80 | 11 | |
| 2 | Delay Note | | | | | | RL (57) | GL (68) | | |
| 3 | Time | 5:34pm | Start | 25 | N/A | 70 | 83 | 83 | 32 | |
| 3 | Delay Note | | | | RL (32) | GL (64) | | | | |
| 4 | Time | 6:00pm | Start | 27 | N/A | 75 | N/A | 92 | 23 | Slowed, but did not stop, by Ocean/Brighton due to car trying to parallel park |
| 4 | Delay Note | | | | RL (32) | GL (58) | | | | |
| 5 | Time | 6:10pm | Start | 13 | N/A | 18 | 30 | 57 | 20 | |
| 5 | Delay Note | | | | | | RL (30) | GL (50) | | |
| 6 | Time | 6:22pm | Start | 16 | N/A | 59 | 73 | 113 | 64 | |
| 6 | Delay Note | | | | RL (25) | GL (56) | RL (75) | GL (108) | | |
| | | | | | | | | | | average |
| | | | | | | | | | | count |

**Route** **29**

| Observation | | Time | Ocean/Lee doors open | Ocean/Lee initial boarding end | Ocean/Lee arrival stop | Ocean/Lee departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:10pm | Start | 11 | N/A | 12 | 27 | 60 | 22 | |
| 1 | Delay Note | | | | | | RL (27) | GL (45) | | |
| 2 | Time | 5:19pm | Start | 12 | N/A | 55 | 71 | N/A | 34 | |
| 2 | Delay Note | | | | RL (20) | GL (54) | | | | |
| 3 | Time | 5:35pm | Start | 20 | N/A | 20 | 41 | 80 | 32 | |
| 3 | Delay Note | | | | | | RL (41) | GL (73) | | |
| 4 | Time | 5:48pm | Start | 21 | N/A | 55 | 80 | 124 | 68 | |
| 4 | Delay Note | | | | RL (23) | GL (54) | RL (83) | GL (120) | | |
| 5 | Time | 5:55pm | Start | 19 | N/A | 45 | N/A | 75 | 25 | |
| 5 | Delay Note | | | | RL (20) | GL (45) | | | | |
| 6 | Time | 6:15pm | Start | 15 | N/A | 40 | 59 | 97 | 57 | |
| 6 | Delay Note | | | | RL (16) | GL (39) | RL (59) | GL (99) | | |
| 7 | Time | 6:18pm | Start | 12 | N/A | 13 | 30 | 48 | 9 | |
| 7 | Delay Note | | | | | | RL (30) | GL (39) | | |
| 8 | Time | 6:31pm | Start | 20 | N/A | 23 | 40 | 57 | | |
| 8 | Delay Note | | | | | | There is no RL or queue. | | | |
| 9 | Time | 6:50pm | Start | 28 | N/A | 59 | N/A | 75 | 31 | |
| 9 | Delay Note | | | | RL (27) | GL (58) | | | | |

**Location** Ocean Avenue/Plymouth Avenue
**Direction** Westbound
DAY 1 12/18 - ASG
**Route** **K / T Third**

| Observation | Info | Time | Ocean/Lee departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | Ocean/Plymouth S arrival stop | Ocean/Plymouth S departure | Ocean/Plymouth N arrival stop | Ocean/Plymouth N departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 6:01 PM | Start | 9 | 76 | 88 | 118 | 122 | 124 | 43 | |
| 1 | Delay Note | | | | RL (13) + LT | | RL (28) | | | | |
| 2 | Time | 6:06 PM | Start | 5 | 69 | 79 | . | 118 | 122 | 69 | LT resulted in RL delay |
| 2 | Delay Note | | | | RL (32) + LT (x2) | | RL (37) | | | | |
| 3 | Time | 6:29 PM | Start | 7 | 55 | 64 | 75 | 76 | 77 | 31 | LT resulted in RL delay |
| 3 | Delay Note | | | | RL (31) + LT | | LT (slowed never stop) | | | | |
| 4 | Time | 6:42 PM | Start | 5 | 6 | 21 | 47 | 49 | 51 | | Clear run with no LTs at Brighton or Plymouth |
| 4 | Delay Note | | | | RL (24) | | | | | | |
| 5 | Time | 6:48 PM | Start | 4 | 40 | 49 | 59 | 68 | 96 | 42 | Almost entirely RL related |
| 5 | Delay Note | | | | RL only (24) | | LT (slowed never stop) | | RL (18) | | |
| 6 | Time | 6:49 PM | Start | 5 | 55 | 65 | 66 | 67 | 68 | 29 | RL delay due to LT blocking vehicle |
| 6 | Delay Note | | | | LT + RL (29) | | | | | | |

**Route** **29**

| Observation | Info | Time | Ocean/Lee departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | Ocean/Plymouth S arrival stop | Ocean/Plymouth S departure (completes left turn) | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:55 PM | Start | 3 | 60 | 78 | 98 | 32 | |
| 1 | Delay Note | | | | RL + LT | | Gap Finding | | |
| 2 | Time | 6:18 PM | Start | 1 | 195 | 205 | 218 | 99 | Worst case scenario - Missed multiple cycles at Brighton |
| 2 | Delay Note | | | | RL (x3) + LT (x2) | | Gap Finding | | |
| 3 | Time | 6:40 PM | Start | 9 | 10 | 25 | 90 | 18 | Red Light **not** result of GF |
| 3 | Delay Note | | | | | | RL (18) + GF | | |
| 4 | Time | 6:46 PM | Start | 10 | 30 | 37 | 62 | | Complete turn during yellow phase |
| 4 | Delay Note | | | | RL (23) | | GF | | |
| 5 | Time | | Start | | | | | | |
| 5 | Delay Note | | | | | | | | |
| 6 | Time | | Start | | | | | | |
| 6 | Delay Note | | | | | | | | |

**29**

| Info | Time | Ocean/Lee departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | McDonalds | Ocean/Plymouth S arrival stop | Ocean/Plymouth S departure (completes left turn) | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|
| Time | 5:20 AM | | | | Start | 8 | 82 | 24 | Red light then finding gap |
| Delay Note | | | | | | | RL (24) + Gap (45) | | |
| Time | 5:36 AM | | | | Start | 7 | 19 | | Quick to find gap |
| Delay Note | | | | | | | Gap (7) | | |
| Time | 5:51 AM | | | | Start | 6 | 16 | | quick to find gap |
| Delay Note | | | | | | | Gap (5) | | |
| Time | 5:56 AM | | | | Start | 5 | 72 | 28 | red light then finding gap |
| Delay Note | | | | | | | RL (28) + Gap (34) | | |
| Time | 6:17 PM | | | | Start | 6 | 30 | | |
| Delay Note | | | | | | | Gap (21) | | |
| Time | 6:20 PM | | | | Start | 7 | 21 | | slowed down because signal had just turned green ahead |
| Delay Note | | | | | | | | | |
| Time | 6:33 PM | | | | Start | 14 | 20 | | cars moving slowly because of signal change |
| Delay Note | | | | | | | Gap (1) | | |
| Time | 6:52 AM | | | | Start | 7 | 70 | 24 | red light then car ahead turning left |
| Delay Note | | | | | | | RL (24) + LT (32) | | |

**Location** Ocean Avenue/Frida Kahlo/Geneva
**Direction** Eastbound
EBH 12/17/19

**Route** **29**

| Observation | Info | Time | Ocean/Lee departure | Ocean/Harold/Frida arrival | Ocean/Harold/Frida doors open | Ocean/Harold/Frida initial boarding end | Ocean/Frida departure (this should account for intersection footprint) | Total Red Time |
|---|---|---|---|---|---|---|---|---|
| 1 | Time | 6:06pm | Start | 18 | 30 | 49 | 62 | |
| 1 | Delay Note | | | RL | | | | |
| 2 | Time | 6:12pm | Start | 13 | 24 | 55 | 69 | |
| 2 | Delay Note | | | RL | | | No queuing involved; just slow | |
| 3 | Time | 6:20pm | Start | 15 | 35 | 50 | 56 | |
| 3 | Delay Note | | | RL | GL (21) | | | |
| 4 | Time | 6:27pm | Start | N/A | 13 | 25 | 79 | |
| 4 | Delay Note | | | | | RL | GL (63) | |
| 5 | Time | 6:32pm | Start | N/A | 15 | 40 | 66 | 23 |
| 5 | Delay Note | | | | RL (40) | GL (63) | | |
| 6 | Time | 6:43pm | Start | N/A | 19 | 25 | 63 | |
| 6 | Delay Note | | | | RL | GL (61) | | |
| 7 | Time | 6:48pm | Start | N/A | 12 | 19 | 30 | |
| 7 | Delay Note | | | | | | | |
| 8 | Time | 6:54pm | Start | N/A | 14 | 95 | 129 | |
| 8 | Delay Note | | | | RL (14) | GL | | |

**Route** 49

| Observation | Info | Time | Ocean/Frida arrival stop | Ocean/Harold departure | Ocean/Frida departure (this should account for intersection footprint) | Total Red Time |
|---|---|---|---|---|---|---|
| 1 | Time | 6:32pm | Start | 15 | 67 | 25 |
| 1 | Delay Note | | | RL (40) | GL (65) | |
| 2 | Time | 6:40pm | Start | 13 | 19 | |
| 2 | Delay Note | | | RL | GL (14) | |
| 3 | Time | 6:49pm | Start | 14 | 20 | 0 |
| 3 | Delay Note | | | | | |
| 4 | Time | | Start | | | |
| 4 | Delay Note | | | | | |
| 5 | Time | | Start | | | |
| 5 | Delay Note | | | | | |
| 6 | Time | | Start | | | |
| 6 | Delay Note | | | | | |

**Route** **K/ T Third**

| Observation | Info | Time | Ocean/Lee departure | Ocean/Frida Kahlo arrival stop | Ocean/Frida Kahlo departure (this should account for intersection footprint) | Ocean/ped bridge doors open | Ocean/ped bridge initial boarding end | Total Red Time |
|---|---|---|---|---|---|---|---|---|
| 1 | Time | 6:22pm | Start | 13 | 18 | N/A | 46 | |
| 1 | Delay Note | | | RL | GL (18) | | | |
| 2 | Time | 6:31pm | Start | N/A | N/A | 51 | 63 | |
| 2 | Delay Note | | | Kept going | | | | |
| 3 | Time | 6:42pm | Start | N/A | 43 | 100 | 128 | |
| 3 | Delay Note | | | Slow to move (nc | RL | GL (79) | | |
| 4 | Time | 6:46pm | Start | 40 | 60 | N/A | 114 | |
| 4 | Delay Note | | RL | GL (18) *Bus remained stopped. The | | RL (60) | GL (91) | |
| 5 | Time | 6:54pm | Start | 11 | 18 | 39 | 90 | |
| 5 | Delay Note | | | RL | | | | |
| 6 | Time | 6:58pm | Start | 9 | 69 | N/A | 90 | |
| 6 | Delay Note | | | RL | | | | |

**Location** Ocean Avenue/Frida Kahlo/Geneva
**Direction** Westbound
QGW, EBH 12/17/2019
**Route** **29**

| Observation | Info | Time | Howth Street departure | Howth Street door open | Howth Street initial boarding end | Ocean/Harold/Frida arrival stop | Ocean/Frida departure (this should account for intersection footprint) | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:00 | Start | 8 | 18 | 32 | 135 | 50 | (Alex's observations) |
| 1 | Delay Note | | | | merging delay to get to center | | | | |
| 2 | Time | 5:20 | Start | 13 | 23 | 24 | 50 | | |
| 2 | Delay Note | | | | | | RL; merging to get to center lane | | |
| 3 | Time | 5:35 | Start | 8 | 19 | 36 | 76 | | |
| 3 | Delay Note | | | | | queue | | | |
| 4 | Time | 5:45 | Start | 9 | 33 | 94 | 110 | | |
| 4 | Delay Note | | | | RL (58) | queue | | | |
| 5 | Time | 5:53 | Start | n/a | n/a | 32 | 53 | | |
| 5 | Delay Note | | | | | queue | | | |
| 6 | Time | 6:10 | Start | 4 | 12 | 15 | 228 | | major queueing in both lights while bus trying to change lanes |
| 6 | Delay Note | | | | | queue | queue, red light | | |
| 7 | Time | 6:15 | Start | n/a | n/a | 25 | 61 | | traveled on tracks with 49 bus from Howth |
| 7 | Delay Note | | | skip stop | | red light | | | |
| 8 | Time | 6:38 | Start | 10 | 24 | 45 | 55 | | no delay |
| 8 | Delay Note | | | | | | | | |
| 9 | Time | 6:42 | Start | n/a | n/a | 13 | 140 | | bus sat for 1 extra cycle |
| 9 | Delay Note | | | skip stop | | queue, red light | | | |
| 10 | Time | 6:56 | Start | n/a | n/a | 31 | 98 | | all delay was at second light |
| 10 | Delay Note | | | skip stop | | red light | | | |

**Route** **K/ T Third**

| Observation | Info | Time | Howth Street departure | Ocean/Frida Kahlo door open | Ocean/Frida Kahlo initial boarding end | Ocean/Frida Kahlo departure (this should account for intersection footprint) | | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:15 | Start | 26 | 35 | 112 | | 43 | |
| 1 | Delay Note | | | | | RL (43) | | | |
| 2 | Time | 5:25 | Start | 15 | 45 | 118 | | 48 | hit both red lights |
| 2 | Delay Note | | | | | RL #1 (37) + RL #2 (11) | | | |
| 3 | Time | 5:42 | Start | 16 | 28 | 99 | | 42 | slowed at second intersection due to recent light change |
| 3 | Delay Note | | | | | RL #1 (42) slowed at intersection 2 | | | |
| 4 | Time | 6:00 | Start | 15 | 22 | 50 | | | no delay |
| 4 | Delay Note | | | | | | | | |
| 5 | Time | 6:10 | Start | n/a | n/a | 95 | | | |
| 5 | Delay Note | | | skip stop | | queueing | | | |
| 6 | Time | 6:39 | Start | 16 | 38 | 64 | | | no delay |
| 6 | Delay Note | | | | | | | | |
| 7 | Time | 6:45 | Start | n/a | n/a | 123 | | | |
| 7 | Delay Note | | | skip stop | | 2 red lights, 1 queue | | | |
| 8 | Time | 6:48 | Start | 16 | 26 | 47 | | | |
| 8 | Delay Note | | | | | red light | | | |

**Location** Ocean Avenue/Plymouth Avenue
**Direction** Eastbound

**Route** **K / T Third**

| Observation | Info | Time | Ocean/Granada departure | Ocean/Plymouth N arrival stop | Ocean/Plymouth N departure | Ocean/Plymouth S arrival stop | Ocean/Plymouth S departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:03 | Start | 3 | 23 | n/a | 27 | 12 | |
| 1 | Delay Note | | | | RL (12) | | | | |
| 2 | Time | 5:40 | Start | 6 | 26 | n/a | 33 | 14 | |
| 2 | Delay Note | | | | RL (14) | | | | |
| 3 | Time | 5:42 | Start | 6 | 29 | n/a | 33 | 19 | |
| 3 | Delay Note | | | | RL (19) | | | | |
| 4 | Time | 5:47 | Start | 6 | 26 | n/a | 32 | 14 | |
| 4 | Delay Note | | | | RL (14) | | | | |
| 5 | Time | 6:03 | Start | 5 | 24 | n/a | 31 | 13 | |
| 5 | Delay Note | | | | RL (13) | | | | |
| 6 | Time | 6:35 | Start | 6 | 23 | n/a | 30 | 8 | |
| 6 | Delay Note | | | | RL (8) | | | | |
| 7 | Time | 6:37 | Start | 3 | 31 | n/a | 38 | 2 | |
| 7 | Delay Note | | | | RL (2) + LT (20) | | | | |
| 8 | Time | 6:39 | Start | n/a | 9 | n/a | 14 | | some slight slowing at the first intersection |
| 8 | Delay Note | | | | | | | | |

**Location** Ocean Avenue/Brighton Avenue
**Direction** Eastbound
ASG 1/16/2020
**Route** **K / T Third**

| Observation | | Time | Plymouth/Ocean N arrival stop | Plymouth/Ocean N departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:20:00 PM | Start | 6 | 24 | 26 | 0 | Slow at Plymouth do to clearing from previous red. |
| 1 | Delay Note | | | | | No vehicles turned left before vehicle | | |
| 2 | Time | 5:23:00 AM | Start | 33 | 44 | 46 | 30 | |
| 2 | Delay Note | | | RL (30) | | No vehicles turned left before vehicle | | |
| 3 | Time | 5:36:00 PM | Start | 29 | 38 | 69 | 29 | Made light at Brighton on Yellow due to active effort by K/T driver |
| 3 | Delay Note | | | RL (29) - Front of Queue | | LT (38) - All due to single LT vehicle | | K/T driver encourage left-turning driver with bell |
| 4 | Time | 5:45:00 PM | Start | 7 | 14 | 74 | 35 | Arrive at Brighton at green, missed light after waiting in queue for LT |
| 4 | Delay Note | | | Slow from previous red, no stop | | LT (18) + RL (35) | | 53 seconds all due to LT queue |
| 5 | Time | 5:53:00 PM | Start | Missed Timing | Missed Timing | Missed Timing | 0 | Was able to record that No LT delay or RL delay at Brighton |
| 5 | Delay Note | | | | | | | |
| 6 | Time | 6:07:00 PM | Start | 3 | 4 | 100 | 35 | Example of multiple LTs from Ocean to Plymouth |
| 6 | Delay Note | | | | | LT (14) + RL (35) + LT (25) | | Almost entirely attributable to LT delay |
| 7 | Time | 6:20:00 PM | Start | 1 | 10 | 12 | 0 | Clean run |
| 7 | Delay Note | | | | | | | No LT or RL delay |
| 8 | Time | | Start | | | | | |
| 8 | Delay Note | | | | | | | |
| 9 | Time | | Start | | | | | |
| 9 | Delay Note | | | | | | | |
| 10 | Time | | Start | | | | | |
| 10 | Delay Note | | | | | | | |
| 11 | Time | | Start | | | | | |
| 11 | Delay Note | | | | | | | |
| 12 | Time | | Start | | | | | |
| 12 | Delay Note | | | | | | | |

**Route** **K / T Third**

| Observation | | Time | Plymouth/Ocean N arrival stop | Plymouth/Ocean N departure | Ocean/Brighton arrival stop | Ocean/Brighton departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:08 | Start | 0 | 86 | 96 | | was stuck behind vehicle turning left then stuck at light |
| 1 | Delay Note | | | I missed the bus at arrival stop; started counting at departure | | | | |
| 2 | Time | 5:15 | Start | 0 | 28 | 100 | | waited at station for 1 light cycle |
| 2 | Delay Note | | | I missed at arrival stop; started counting at departure | | | | |
| 3 | Time | 5:20 | Start | 8 | 32 | 76 | | |
| 3 | Delay Note | | | | | red light | | |
| 4 | Time | 5:38 | Start | 20 | 32 | 38 | | |
| 4 | Delay Note | | | red light | | | | |
| 5 | Time | 5:41 | Start | 24 | 37 | 51 | | |
| 5 | Delay Note | | | | paused at intersection but no red light - unclear why | | | |
| 6 | Time | 5:48 | Start | 21 | 31 | 34 | | |
| 6 | Delay Note | | | red light | | | | |
| 7 | Time | 6:03 | Start | 17 | 30 | 35 | | |
| 7 | Delay Note | | | red light | | | | |
| 8 | Time | 6:37 | Start | - | - | 0 | 12 | |
| 8 | Delay Note | | | I missed tram at this stage; started counting at Ocean/Brighton | | | | |
| 9 | Time | 6:38 | Start | 54 | 68 | 109 | | |
| 9 | Delay Note | | | paused at both ints but no red light - unclear why | | | | |
| 10 | Time | 6:41 | Start | 10 | 24 | 28 | | no delay |
| 10 | Delay Note | | | | | | | |
| 11 | Time | 6:54 | Start | 8 | 31 | 44 | | |
| 11 | Delay Note | | | red light | | green light but left-turning car | | |
| 12 | Time | 6:58 | Start | 6 | 17 | 29 | | |
| 12 | Delay Note | | | | stuck behind a left-turning car onto Brighton that was in the tracks (and shouldn't have been) | | | |

**averages**

**Route** **29**

| Observation | | Time | Plymouth/Ocean doors open | Plymouth/Ocean initial boarding end | Plymouth/Ocean departure (right turn) | Ocean/Brighton arrival stop | Ocean/Brighton departure | Total Red Time | Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Time | 5:02 | Start | - | 0 | 20 | 91 | | |
| 1 | Delay Note | | | I missed bus at this stage; started counting at Ocean/Brighton | | | | | |
| 2 | Time | 5:04 | Start | - | 0 | 55 | 118 | | |
| 2 | Delay Note | | | I missed bus at this stage; started counting at Ocean/Brighton | | | | | |
| 3 | Time | 5:13 | Start | - | 0 | 37 | 56 | | |
| 3 | Delay Note | | | I missed the bus at arrival stop; started counting at departure | | | | | |
| 4 | Time | 5:20 | Start | 12 | 67 | 100 | - | | |
| 4 | Delay Note | | | | long wait due to passing K | | did not get this info (K blocking sight) | | |
| 5 | Time | 5:44 | Start | 12 | 27 | 34 | 38 | | no delay |
| 5 | Delay Note | | | | | | | | |
| 6 | Time | 5:48 | Start | 10 | 46 | 53 | 75 | | |
| 6 | Delay Note | | | red light and queue | | | | | |
| 7 | Time | 6:06 | Start | 14 | 56 | 68 | 81 | | |
| 7 | Delay Note | | | | red light | | | | |
| 8 | Time | 6:10 | Start | 9 | 59 | 67 | 104 | | |
| 8 | Delay Note | | | | red light | | red light | | |
| 9 | Time | 6:15 | Start | n/a | n/a | 8 | 15 | | no delay, no stop |
| 9 | Delay Note | | | skip stop | | | | | |
| 10 | Time | 6:41 | Start | 11 | 38 | 46 | 77 | | |
| 10 | Delay Note | | | | red light | | red light | | |
| 11 | Time | 6:41 | Start | 0 | 14 | 20 | 57 | | |
| 11 | Delay Note | | | missed start of boarding - started at boarding end | | | | | |
| 12 | Time | 6:54 | Start | 9 | 41 | 53 | 58 | | |
| 12 | Delay Note | | | red light | | | | | |

# APPENDIX C: OFF-PEAK (NIGHTTIME) DATA COLLECTION

## Travel Time Summaries

| K/T | | | | |
|---|---|---|---|---|
| Westbound | | | | Ea |
| **Segment** | **Off-Peak** | **Peak** | **Delta** | **Segment** |
| link travel time: Howth to Frida Kahlo | 12 | 17 | 5 | Link travel time: Miramar to Plymouth |
| node travel time: through Frida Kahlo (including dwell) | 20 | 64 | 44 | Node travel time: through Plymouth |
| node travel time: through Frida Kahlo (excluding dwell) | 11 | 49 | 38 | link travel time: plymouth to Brighton |
| link travel time: Lee to Brighton | 8 | 15 | 7 | node travel time: through Brighton |
| node travel time: through Brighton | 3 | 23 | 20 | link travel time: Lee to Frida Kahlo |
| link travel time: Brighton to plymouth | 7 | 11 | 4 | node travel time: through Frida Kahlo |
| node travel time: through plymouth | 4 | 29 | 25 | |

| 29 | | | | |
|---|---|---|---|---|
| Westbound | | | | Ea |
| **Segment** | **Off-Peak** | **Peak** | **Delta** | **Segment** |
| link travel time: Howth to Frida Kahlo | 15 | 20 | 5 | link travel time: plymouth to Brighton |
| node travel time: through Frida Kahlo | 8 | 66 | 58 | node travel time: through Brighton |
| link travel time: Lee to Brighton | 8 | 19 | 11 | link travel time: Lee to Frida Kahlo |
| node travel time: through Brighton | 2 | 32 | 30 | node travel time: through Frida Kahlo (including |
| link travel time: Brighton to plymouth | 5 | 9 | 4 | |
| node travel time: through plymouth | 3 | 33 | 30 | |

## K/T Eastbound Travel Time Runs

| | | TRAVEL TIME RUN 1 | | | TRAVEL TIME RUN 2 | | | TRAVEL TIME RUN 3 | | | TRAVEL TIME RUN 4 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Seconds | Delta | comments | Seconds | Delta | comments | Seconds | Delta | comments | Seconds | Delta | comments |
| | Pre-bus stop Arrival time (if queue) | | | | | | | 0 | | | | | |
| | Bus stop door open time | | | | 18 | | | 58 | | | 11 | | |
| | End of active initial boarding | | | | 18 | | | 70 | | | 11 | | |
| | Intx departure time (front of bus clears intx) | 1 | | | 18 | | | 105 | | | 16 | | |
| Ocean/Miramar STOP + SIGNAL | Total red time | | | | 0 | | | 30 | | | 0 | | |
| | N LEG: Pre-bus stop Arrival time (if queue) | 20 | 19 | | 28 | 10 | | 115 | 10 | | 41 | 25 | |
| | N LEG Intx departure time (front of bus clears intx) | 35 | 15 | | 42 | 14 | | 135 | 20 | | 45 | 4 | |
| Plymouth/Ocean signal | Total red time | 15 | 15 | | 10 | 10 | | 20 | 20 | | 0 | 0 | |
| | Arrival stop time (signal control or queue) | 45 | 10 | | 57 | 15 | | 159 | 24 | | 50 | 5 | |
| Ocean/Brighton SIGNAL | Intersection departure (front of bus clears intx) | 48 | 3 | | 62 | 5 | | 162 | 3 | | 53 | 3 | |
| | Pre-bus stop Arrival time (if queue) | | | | | | | | | | 61 | | |
| | Bus stop door open time | 58 | 10 | | 71 | 9 | | 173 | 11 | | 61 | 8 | |
| | End of active initial boarding | 58 | 0 | | 86 | 15 | | 181 | 8 | | 68 | 7 | |
| | Intx departure time (front of bus clears intx) | 105 | 47 | | 106 | 20 | | 213 | 32 | | 105 | 37 | |
| Ocean/Lee STOP + SIGNAL | Total red time | 40 | 40 | | 17 | 17 | | 29 | 29 | | 35 | 35 | |
| | Ocean/Harold/Frida arrival time | 120 | 15 | | 129 | 23 | | 233 | 20 | | 123 | 18 | |
| | Ocean/Frida departure (front of bus clears intx) | 165 | 45 | | 157 | 28 | | 271 | 38 | | 168 | 45 | |
| Ocean/Frida Kahlo/Geneva | Total red time | 0 | 0 | | 21 | 21 | | 27 | 27 | | 35 | 35 | |
| | Door open time | 175 | 10 | | 175 | 18 | | 290 | 19 | | 182 | 14 | |
| | End of active initial boarding / doors close | 180 | 5 | | 175 | | | | | | 182 | | |
| Ocean/CCSF/Ped Bridge Stop | Reentry time (bus moving) | 200 | 20 | | 175 | | | | | | | | |

| | | Historical data | | TRAVEL TIME RUN 1 | | | | TRAVEL TIME RUN 2 | | | | TRAVEL TI | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Calcs: | | incl. dwell (doors open to doors open) | excl. dwell (doors close to doors open) | incl. dwell (doors open to doors open) | % Diff from historical | excl. dwell (doors close to doors open) | % Diff from historical | incl. dwell (doors open to doors open) | % Diff from historical | excl. dwell (doors close to doors open) | % Diff from historical | incl. dwell (doors open to doors open) | % Diff from historical |
| from: | to: | | | | | | | | | | | | |
| Ocean Avenue & Miramar Avenue SW-NS/SI | Ocean Avenue & Lee St SW-NS | 99 | 70 | 57 | -42% | 57 | -19% | 53 | -46% | 53 | -24% | 115 | 16% |
| Ocean Avenue & Miramar Avenue SW-NS/SI | City College Pedestrian Bridge SW | 117 | 80 | 117 | 0% | 117 | 46% | 104 | -11% | 89 | 11% | 117 | 0% |

## 29 Eastbound Travel Time Runs

| | | TRAVEL TIME RUN 1 | | | TRAVEL TIME RUN 2 | | | TRAVEL TIME RUN 3 | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Seconds | Delta | comments | Seconds | Delta | comments | Seconds | Delta | comments |
| Plymouth Ave & Holloway Avenue NS Stop Control + near side bus stop | Pre-bus stop Arrival time (if queue) | | | | 0 | | | | | |
| | Bus stop door open time | | | | | | | | | |
| | End of active initial boarding | | | | | | | | | |
| | Intx departure time (front of bus clears intx) | | | | 8 | | | 0 | | |
| Plymouth & Ocean signal control + near side bus stop | Pre-bus stop Arrival time (if queue) | 0 | | | | | | | | |
| | Bus stop door open time | 21 | | | 41 | | | 9 | | |
| | End of active initial boarding | 29 | | | 56 | | | 25 | | |
| | Intx departure time (front of bus clears intx) | 70 | 41 | | 68 | 12 | | 104 | 79 | |
| | Total red time | 40 | 40 | | 0 | 0 | negligible r | 0 | 0 | negligible red ti |
| Ocean & Brighton signal | Arrival stop time (signal control or queue) | 83 | 13 | | 82 | 14 | | 117 | 13 | |
| | Intersection departure (front of bus clears intx) | 105 | 22 | | 88 | 6 | | 126 | 9 | |
| | Total red time | 22 | | | 6 | | | 138 | | |
| Ocean & Lee signal control + near side bus stop | Pre-bus stop Arrival time (if queue) | | | | | | | 138 | | |
| | Bus stop door open time | 118 | 13 | | 101 | 13 | | 141 | 15 | |
| | End of active initial boarding | 125 | | | 109 | | | 141 | | |
| | Intx departure time (front of bus clears intx) | 132 | 7 | | 145 | 36 | | 141 | 0 | |
| | Total red time | 0 | 0 | | 36 | 36 | | 0 | 0 | |
| Ocean & Frida Kahlo/Geneva | Ocean/Harold/Frida arrival time | 143 | 11 | | 155 | 10 | | 150 | 9 | |
| | Ocean/Harold/Friday doors open | 156 | | | 170 | | | 161 | | |
| | End of active initial boarding | 165 | 9 | | 175 | 5 | | 166 | 5 | |
| | Ocean/Frida departure (front of bus clears intx) | 225 | 82 | | 206 | 51 | | 187 | 37 | |
| | Total red time | 48 | 48 | | 15 | 15 | | 5 | 5 | |
| Ocean & Howth signal control + far side bus stop | Arrival time (queue or signal) | 247 | 22 | | 220 | 14 | | 205 | 18 | |
| | Departure time (front of bus clears intx) | | | | 223 | | | | | |
| | Door open time | 247 | | | 223 | | | 210 | | |
| | End of active initial boarding / doors close | 247 | | | | | | 217 | | |
| | Reentry time (bus moving) | 247 | | | | | | 220 | | |
| | Total Red time | 0 | | | | | | | | |

| Historical data | | TRAVEL TIME RUN 1 | | | | TRAVEL TIME RUN 2 | | | |
|---|---|---|---|---|---|---|---|---|---|
| incl. dwell (doors open to | excl. dwell (doors close to | incl. dwell | % Diff | excl. dwell (doors close to | % Diff | incl. dwell (doors open to | % Diff | excl. dwell (doors close to | % Di |

## 49 Westbound Travel Time Runs

| | | TRAVEL TIME RUN 1 | | | TRAVEL TIME RUN 2 | | |
|---|---|---|---|---|---|---|---|
| | | Seconds | Delta | comments | Seconds | Delta | comments |
| Ocean & I-280 onramp signal control + near side bus stop | Pre-bus stop Arrival time (if queue) | | | | | | |
| | Bus stop door open time | | | | -3 | | |
| | End of active initial boarding | | | | 4 | | |
| | Intx departure time (front of bus clears intx) | | | | 16 | | |
| | Total red time | | | | 0 | | |
| Ocean & Howth signal | Arrival time (queue or signal) | 0 | | | 45 | | |
| | Departure time (front of bus clears intx) | 2 | | | 68 | | |
| | Door open time | 2 | | | 78 | | |
| | End of active initial boarding / doors close | 2 | | | 85 | | |
| | Reentry time (bus moving) | 2 | | | 100 | | |
| | Total Red time | 0 | | | 20 | | |
| Ocean/ Frida Kahlo/Geneva signalized intersection | Arrival time (queue or signal) | 16 | 14 | | 113 | 13 | |
| | Intx departure time (front of bus clears intx) | 24 | 8 | | 138 | 25 | |
| | Total red time | 0 | 0 | | 0 | 0 | no red, but 10 s |
| City College Terminal | Arrival/doors open time | 58 | | | 171 | | |
| | End of active initial boarding | 65 | | | | | |

| | | Historical data | | TRAVEL TIME RUN 1 | | | | |
|---|---|---|---|---|---|---|---|---|
| Calcs: | | incl. dwell (doors open to doors open) | excl. dwell (doors close to doors open) | incl. dwell (doors open to doors open) | % Diff from historical | excl. dwell (doors close to doors open) | % Diff from historical | incl. (doo open door ope |
| from: | to: | | | | | | | |
| Ocean Avenue & Howth Street NW-FS/PS | City College terminal NW-FS/SI | 90 | 81 | 56 | -38% | 56 | -31% | |

## 29 Westbound Travel Time Runs

| | | TRAVEL TIME RUN 1 | | | TRAVEL TIME RUN 2 | | | Average | |
|---|---|---|---|---|---|---|---|---|---|
| | | Seconds | Delta | comments | Seconds | Delta | comments | | |
| Ocean & I-280 onramp signal control + near side bus stop | Pre-bus stop Arrival time (if queue) | | | | | | | | |
| | Bus stop door open time | | | | 3 | | | | |
| | End of active initial boarding | | | | 12 | | | | |
| | Intx departure time (front of bus clears intx) | 5 | | | 20 | | | | |
| | Total red time | | | | 0 | | | | |
| Ocean & Howth signal | Arrival time (queue or signal) | 25 | | | 56 | | | | |
| | Departure time (front of bus clears intx) | 28 | | | 60 | | | | |
| | Door open time | 28 | | | 60 | | | | |
| | End of active initial boarding / doors close | 28 | | | 60 | | | | |
| | Reentry time (bus moving) | 28 | | | 60 | | | 15 | link tra |
| | Total Red time | 0 | | | 0 | | | 7.5 | node t |
| Ocean/ Frida Kahlo/Geneva signalized intersection | Arrival time (queue or signal) | 40 | 12 | | 78 | 18 | | | |
| | Intx departure time (front of bus clears intx) | 48 | 8 | | 85 | 7 | | | |
| | Total red time | 0 | 0 | | 0 | 0 | | | |
| Ocean & Lee signal control + near side transit stop | Pre-bus stop Arrival time (if queue) | | | | | | | 8 | link tra |
| | Bus stop door open time | 70 | | | 109 | | | 2 | node t |
| | End of active initial boarding | 90 | | | 115 | | | | |
| | Intx departure time (front of bus clears intx) | 117 | | | 148 | | | | |
| | Total red time | 21 | | | 30 | | | 5 | link tra |
| Ocean & Brighton signal | S LEG Arrival time (queue or red signal) | 126 | 9 | | 155 | 7 | | 3 | node t |
| | S LEG Departure time (front of bus clears intx) | 128 | 2 | | 157 | 2 | | | |
| | Total red time | 0 | 0 | | 0 | 0 | | | |
| Ocean & Plymouth signal + far side bus stop | S LEG Arrival time (queue or red signal) | 135 | 7 | | 165 | 8 | | | |
| | S LEG Departure time (front of bus clears intx) | 144 | 9 | | 165 | 0 | | | |
| | Total red time | 0 | 0 | | 0 | 0 | | | |
| Ocean & Miramar signal control + near side transit stop | Pre-bus stop Arrival time (if queue) | | | | | | | | |
| | Intx departure time (front of bus clears intx) | | | | | | | | |
| | Total red time | | | | | | | | |
| | Bus stop door open time | | | | | | | | |
| | End of active initial boarding | | | | | | | | |

| | Historical data | | TRAVEL TIME RUN 1 | | TRAV |
|---|---|---|---|---|---|
| | incl. dwell | excl. dwell | | excl. dwell | incl. dwell |

## K/T Westbound Travel Time Runs

| | | TRAVEL TIME RUN 1 | | | TRAVEL TIME RUN 2 | | |
|---|---|---|---|---|---|---|---|
| | | Seconds | Delta | comments | Seconds | Delta | comments |
| Ocean & San Jose signal | Intersection departure time | 5 | | | 10 | | |
| Ocean & Howth signal | Arrival stop time (signal control or queue) | 76 | 71 | | 154 | 144 | |
| | Intersection departure (front of bus clears intx) | 85 | 9 | | 156 | 2 | |
| | Total red time | 5 | 5 | | 0 | 0 | |
| Ocean/CCSF Ped Bridge stop / Frida Kahlo/Geneva intersection | Pre-bus stop Arrival time (if queue) | 97 | 12 | | 168 | 12 | |
| | Bus stop door open time | 102 | | | 168 | | |
| | End of active initial boarding | 120 | 18 | | 168 | 0 | |
| | Intx departure time (front of bus clears intx) | 145 | 25 | | 182 | 14 | |
| | Total red time | 10 | 10 | | 0 | 0 | |
| Ocean & Lee signal control + near side transit stop | Pre-bus stop Arrival time (if queue) | 165 | | | 201 | | |
| | Bus stop door open time | 165 | 20 | | 201 | 19 | |
| | End of active initial boarding | 188 | 23 | | 215 | 14 | |
| | Intx departure time (front of bus clears intx) | 223 | 35 | | 245 | 30 | |
| | Total red time | 32 | 32 | | | 0 | |
| Ocean & Brighton signal | S LEG Arrival time (queue or red signal) | 233 | 10 | | 251 | 6 | |
| | S LEG Departure time (front of bus clears intx) | 236 | 3 | | 253 | 2 | |
| | Total red time | 0 | 0 | | 0 | 0 | |
| Ocean & Plymouth signal | S LEG Arrival time (queue or red signal) | 243 | 7 | | 259 | 6 | |
| | S LEG Departure time (front of bus clears intx) | 248 | 5 | | 261 | 2 | |
| | Total red time | 0 | 0 | | 0 | 0 | |
| Ocean & Miramar signal control + near side transit stop | Pre-bus stop Arrival time (if queue) | 268 | 20 | | 281 | 20 | |
| | Bus stop door open time | 280 | 12 | | 281 | 0 | |
| | End of active initial boarding | | | | 281 | | |
| | Intx departure time (front of bus clears intx) | | | | 285 | | |
| | Total red time | | | | 0 | | |

| | Historical data | | TRAVEL TIME RUN 1 | | | |
|---|---|---|---|---|---|---|
| | incl. dwell (doors open to doors | excl. dwell (doors close to doors | incl. dwell (doors open to doors | % Diff from | excl. dwell (doors close to doors | % Diff from |

# APPENDIX D: HISTORICAL SFMTA MUNI TRAVEL TIMES

29 westbound/inbound, including dwell

## Stop to Stop Travel Time - Before/After

Based on APC data
Contact: Tal Green

| From | To | Before: Median Travel Time (sec) | Before: Variability (90% - 50%) | Before: Number of Records | Difference in Travel Time (sec) |
|---|---|---|---|---|---|
| Persia Ave&Paris St E-NS/SB | Persia Ave&Mission St E-N.. | 39 | 13.0 | 305 | |
| Persia Ave&Mission St E-NS/BZ | Ocean Ave&Cayuga Ave N.. | 92 | 36.5 | 368 | |
| Ocean Ave&Cayuga Ave NE-NS/BZ | Ocean Ave&Otsego Ave N.. | 30 | 10.0 | 257 | |
| Ocean Ave&Otsego Ave NE-NS/BZ | Ocean Ave&San Jose Ave .. | 55 | 26.0 | 277 | |
| Ocean Ave&San Jose Ave NW-FS/BZ | Ocean Ave & I-280 on-ram.. | 37 | 14.5 | 458 | |
| Ocean Ave & I-280 on-ramp NE-NS/SB | Ocean Ave&Howth St NW-.. | 75 | 49.7 | 404 | |
| Ocean Ave&Howth St NW-FS/PS | Ocean Ave&Lee St NE-NS/SI | 74 | 37.0 | 408 | |
| Ocean Ave&Lee St NE-NS/SI | Plymouth Ave&Ocean Ave .. | 87 | 26.0 | 639 | |
| Plymouth Ave&Ocean Ave SW-FS/BZ | Plymouth Ave&Holloway A.. | 42 | 13.0 | 399 | |
| Plymouth Ave&Holloway Ave NW-NS/PS | Plymouth Ave&Grafton Av.. | 36 | 9.0 | 365 | |
| Plymouth Ave&Grafton Ave NW-NS/PS | Grafton Ave&Granada Ave.. | 33 | 11.0 | 329 | |
| Grafton Ave&Granada Ave NE-NS/SB | Grafton Ave&Capitol Ave .. | 30 | 12.0 | 314 | |
| Grafton Ave&Capitol Ave NE-NS/PS | Grafton Ave&Jules Ave NE-.. | 36 | 8.0 | 416 | |
| Grafton Ave&Jules Ave NE-NS/SB | Garfield St&Bright St NE-N.. | 39 | 10.0 | 441 | |
| Garfield St&Bright St NE-NS/SB | Garfield St&Victoria St NE-.. | 36 | 6.0 | 408 | |
| Garfield St&Victoria St NE-NS/SB | Garfield St&Vernon St NE-.. | 42 | 10.0 | 408 | |
| Garfield St&Vernon St NE-NS/SB | Garfield St&Byxbee St NE-.. | 35 | 7.0 | 385 | |
| Garfield St&Byxbee St NE-NS/SB | Garfield St&Beverly St NE-.. | 29 | 10.0 | 287 | |
| Garfield St&Beverly St NE-NS/PS | Holloway Ave&Junipero Se.. | 98 | 42.4 | 257 | |
| Holloway Ave&Junipero Serra NW-FS | 19th Ave&Holloway Ave N.. | 41 | 41.5 | 308 | |
| 19th Ave&Holloway Ave NE-FS/BZ | Winston Dr&20th Ave NE-.. | 117 | 80.1 | 690 | |
| Winston Dr&20th Ave NE-NS/BZ | Winston Dr&Buckingham .. | 74 | 12.0 | 459 | |
| Winston Dr&Buckingham Way E-NS/BZ | Winston Dr&Lake Merced .. | 62 | 11.5 | 366 | |
| Winston Dr&Lake Merced Blvd NE-NS | Lake Merced&Middlefield .. | 50 | 21.0 | 318 | |
| Lake Merced&Middlefield Dr NE-NS | Sunset Blvd&Lake Merced .. | 67 | 24.0 | 246 | |
| Sunset Blvd&Lake Merced Blvd NE-FS | Sunset Blvd&Ocean Ave S.. | 16 | 15.0 | 250 | |
| Sunset Blvd&Ocean Ave SE-NS/SB | Sunset Blvd&Yorba St SE-N.. | 45 | 24.0 | 375 | |
| Sunset Blvd&Yorba St SE-NS/PS | Sunset Blvd&Wawona St S.. | 33 | 15.0 | 347 | |
| Sunset Blvd&Wawona St SE-NS/SB | Sunset Blvd&Vicente St SE-.. | 34 | 13.5 | 330 | |
| Sunset Blvd&Vicente St SE-NS/SB | Sunset Blvd&Ulloa St SE-N.. | 38 | 18.0 | 357 | |
| Sunset Blvd&Ulloa St SE-NS/SB | Sunset Blvd&Taraval St SE-.. | 38 | 30.0 | 417 | |

### Route Information

Route: 29

Direction: (•) INBOUND ( ) OUTBOUND

### Date and Time

BEFORE - Start Date: 3/1/2019
BEFORE - End Date: 12/13/2019
AFTER - Start Date: 3/1/2019
AFTER - End Date: 6/30/2019
Days of Week: (Multiple values)
Hours: (Multiple values)

### Additional Options

Include Dwell Times: (•) Include (Door Open to Door Open) ( ) Exclude (Door Close to Door Open)
Pattern: Full
Segments to Include (Starting Stop): (All)

29 westbound/inbound, excluding dwell

## Stop to Stop Travel Time - Before/After

Based on APC data
Contact: Tal Green

| From | To | Before: Median Travel Time (sec) | Before: Variability (90% - 50%) | Before: Number of Records | Difference in Travel Time (sec) |
|---|---|---|---|---|---|
| Persia Ave&Paris St E-NS/SB | Persia Ave&Mission St E-N.. | 36 | 9 | 304 | |
| Persia Ave&Mission St E-NS/BZ | Ocean Ave&Cayuga Ave N.. | 73 | 32 | 370 | |
| Ocean Ave&Cayuga Ave NE-NS/BZ | Ocean Ave&Otsego Ave N.. | 30 | 2 | 257 | |
| Ocean Ave&Otsego Ave NE-NS/BZ | Ocean Ave&San Jose Ave .. | 51 | 26 | 277 | |
| Ocean Ave&San Jose Ave NW-FS/BZ | Ocean Ave & I-280 on-ram.. | 29 | 9 | 458 | |
| Ocean Ave & I-280 on-ramp NE-NS/SB | Ocean Ave&Howth St NW-.. | 60 | 39 | 404 | |
| Ocean Ave&Howth St NW-FS/PS | Ocean Ave&Lee St NE-NS/SI | 66 | 36 | 408 | |
| Ocean Ave&Lee St NE-NS/SI | Plymouth Ave&Ocean Ave .. | 68 | 21 | 641 | |
| Plymouth Ave&Ocean Ave SW-FS/BZ | Plymouth Ave&Holloway A.. | 30 | 6 | 398 | |
| Plymouth Ave&Holloway Ave NW-NS/PS | Plymouth Ave&Grafton Av.. | 30 | 7 | 364 | |
| Plymouth Ave&Grafton Ave NW-NS/PS | Grafton Ave&Granada Ave.. | 24 | 7 | 329 | |
| Grafton Ave&Granada Ave NE-NS/SB | Grafton Ave&Capitol Ave .. | 28 | 6 | 314 | |
| Grafton Ave&Capitol Ave NE-NS/PS | Grafton Ave&Jules Ave NE-.. | 29 | 5 | 414 | |
| Grafton Ave&Jules Ave NE-NS/SB | Garfield St&Bright St NE-N.. | 31 | 7 | 441 | |
| Garfield St&Bright St NE-NS/SB | Garfield St&Victoria St NE-.. | 29 | 3 | 412 | |
| Garfield St&Victoria St NE-NS/SB | Garfield St&Vernon St NE-.. | 34 | 8 | 409 | |
| Garfield St&Vernon St NE-NS/SB | Garfield St&Byxbee St NE-.. | 27 | 6 | 386 | |
| Garfield St&Byxbee St NE-NS/SB | Garfield St&Beverly St NE-.. | 25 | 5 | 285 | |
| Garfield St&Beverly St NE-NS/PS | Holloway Ave&Junipero Se.. | 96 | 40 | 257 | |
| Holloway Ave&Junipero Serra NW-FS | 19th Ave&Holloway Ave N.. | 38 | 40 | 307 | |
| 19th Ave&Holloway Ave NE-FS/BZ | Winston Dr&20th Ave NE-.. | 101 | 70 | 690 | |
| Winston Dr&20th Ave NE-NS/BZ | Winston Dr&Buckingham .. | 48 | 13 | 461 | |
| Winston Dr&Buckingham Way E-NS/BZ | Winston Dr&Lake Merced .. | 56 | 8 | 366 | |
| Winston Dr&Lake Merced Blvd NE-NS | Lake Merced&Middlefield .. | 43 | 18 | 318 | |
| Lake Merced&Middlefield Dr NE-NS | Sunset Blvd&Lake Merced .. | 64 | 17 | 244 | |
| Sunset Blvd&Lake Merced Blvd NE-FS | Sunset Blvd&Ocean Ave S.. | 16 | 9 | 250 | |
| Sunset Blvd&Ocean Ave SE-NS/SB | Sunset Blvd&Yorba St SE-N.. | 37 | 21 | 375 | |
| Sunset Blvd&Yorba St SE-NS/PS | Sunset Blvd&Wawona St S.. | 26 | 11 | 346 | |
| Sunset Blvd&Wawona St SE-NS/SB | Sunset Blvd&Vicente St SE-.. | 28 | 12 | 331 | |
| Sunset Blvd&Vicente St SE-NS/SB | Sunset Blvd&Ulloa St SE-N.. | 30 | 16 | 353 | |
| Sunset Blvd&Ulloa St SE-NS/SB | Sunset Blvd&Taraval St SE-.. | 31 | 29 | 418 | |

### Route Information

Route: 29

Direction: (•) INBOUND ( ) OUTBOUND

### Date and Time

BEFORE - Start Date: 3/1/2019
BEFORE - End Date: 12/13/2019
AFTER - Start Date: 3/1/2019
AFTER - End Date: 6/30/2019
Days of Week: (Multiple values)
Hours: (Multiple values)

### Additional Options

Include Dwell Times: ( ) Include (Door Open to Door Open) (•) Exclude (Door Close to Door Open)
Pattern: Full
Segments to Include (Starting Stop): (All)

29 eastbound/outbound, including dwell

29 eastbound/outbound, excluding dwell

# Appendix I

## Updated Health Risk Assessment Memorandum

ESA 50 YEARS 1969-2019

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San Francisco, CA 94108
415.896.5900 phone
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esassoc.com

# memorandum

| | |
|---|---|
| date | April 17, 2020 |
| to | Jeanie Poling, San Francisco Environmental Planning |
| cc | Susan Yogi, Environmental Science Associates<br>Jessica Range, San Francisco Environmental Planning |
| from | Brian Schuster, Environmental Science Associates |
| subject | Updated Health Risk Assessment Memorandum for the Balboa Reservoir Project |

## Introduction

Environmental Science Associates (ESA) evaluated the health risks associated with construction and operation of the Balboa Reservoir Project on the 17.6-acre site in the West of Twin Peaks area of south central San Francisco known as the Balboa Reservoir (the "project") for the draft Subsequent Environmental Impact Report (draft SEIR). This analysis was described in draft SEIR Appendix E, *Balboa Reservoir Project Air Quality Technical Memorandum*.

In February 2020, after the release of the draft SEIR, the City and County of San Francisco, in collaboration with the Bay Area Air Quality Management District (air district), updated the Community Risk Reduction Plan (CRRP) database of health impacts throughout the City. This database is now referred to as the draft 2020 Citywide Health Risk Assessment, or Citywide HRA. This action was initiated to update the APEZ map, as required by San Francisco Health Code article 38.[1]

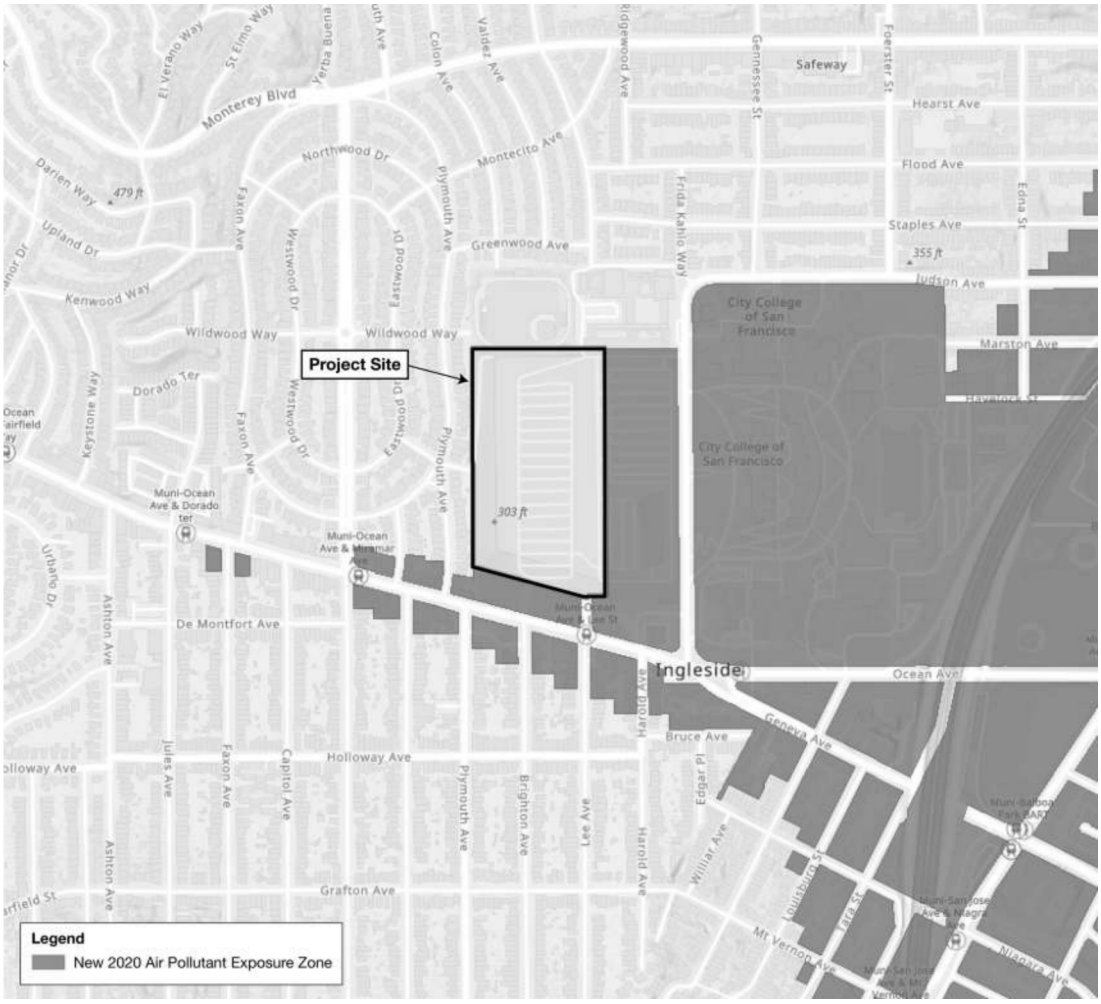
Using the new Citywide HRA database for the background health impacts in the City, the project remains outside of the Air Pollution Exposure Zone (APEZ); see **Figure 1, Balboa Reservoir Project Site and New 2020 Air Pollutant Exposure Zone**. However, sensitive receptors in the immediately surrounding areas to the south and west would meet the APEZ criteria. This includes four daycares that previously were outside of the APEZ, residential receptors to the south of the project site along Ocean Avenue, and the City College campus and Multi-Use Building to the east of the project site. In addition, the background health risk values, including excess lifetime cancer risk due to exposure to emissions of diesel particulate matter (DPM), and annual average concentrations of particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$), have been updated in the new Citywide HRA database. The majority of these background health risk values have increased compared to the 2012 CRRP database included in the draft SEIR and draft SEIR Appendix E. This is the primary reason for

1 For more information, see: https://www.sfdph.org/dph/EH/Air/Article38.asp

why the APEZ has expanded. For more information on the Citywide HRA, please refer to the City's technical documentation for the analysis.[2]

ESA prepared an updated HRA for the project to account for the cumulative background health risk values from the updated Citywide HRA database. The health risk values from the updated Citywide HRA were provided by the City and County of San Francisco Planning Department. The analysis of the project is unchanged from the draft SEIR. The unmitigated and mitigated emissions associated with the project were used to estimate excess lifetime cancer risk and annual average $PM_{2.5}$ concentrations using the same methodologies described under Impact AQ-4 (draft SEIR p. 3.D-67) and in draft SEIR Appendix E, *Air Quality Technical Memorandum*.

**FIGURE 1**
**BALBOA RESERVOIR PROJECT SITE AND NEW 2020 AIR POLLUTANT EXPOSURE ZONE**




[2] San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020, https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf, accessed March 2020.

# HRA Methods

As discussed above, ESA updated the HRA to incorporate the new Citywide HRA database and APEZ map. The Citywide HRA database presents the existing health risk impacts on the project site and in the project vicinity. Because construction and operational activities for the project have not changed, ESA did not update construction or operational emissions. In addition, ESA did not update the project's health risk impact calculations for onsite and offsite sensitive receptors. Only the background cumulative health risk values and the Maximum Exposed Individual Sensitive Receptor (MEISR) locations were updated to reflect the new Citywide HRA database.

This updated HRA was prepared using technical information and HRA protocol from the air district, California Air Pollution Control Officer's Association, California Air Resources Board, Office of Environmental Health Hazard Assessment, and the U.S. Environmental Protection Agency. The HRA evaluates the estimated incremental increase in lifetime cancer risks from exposure to emissions of toxic air contaminants (TACs), which include DPM and total organic gases from gasoline vehicle exhaust, and annual average $PM_{2.5}$ concentrations associated with combustion (i.e., exhaust) that would be emitted by project-related construction sources and project-related operational sources. Concentrations were estimated using the U.S. Environmental Protection Agency's American Meteorological Society/Environmental Protection Agency regulatory air dispersion model (AERMOD version 9.6.5).

ESA calculated health risks for the following exposure scenarios. TAC exposure and resulting health risks were quantified for both the Developer's Proposed Option (1,100 dwelling units) and the Additional Housing Option (1,550 dwelling units).

**Scenario 1.** *Construction:* offsite receptors (residents, daycare, and school) evaluated starting when construction commences for Phase 0 and exposed to all construction emissions for Phase 1 and Phase 2.

**Scenario 2.** *Construction:* onsite receptors (residents and daycare[3]) present at the project site once Phase 1 is complete evaluated starting when construction for Phase 1 concludes and exposed to all Phase 2 construction emissions.

**Scenario 3.** *Construction plus Operation:* offsite receptors (residents, daycare, and school) evaluated starting when construction commences and exposed to all construction emissions and 27 years of operational emissions.

**Scenario 4.** *Construction plus Operation:* onsite receptors (residents and daycare) present at the project site once Phase 1 is complete evaluated starting when construction for Phase 1 concludes and exposed to all Phase 2 construction emissions and 30 years of operational emissions.

[3] It was assumed that daycare receptors would be present at the site when Phase 1 construction is complete and exposed to all Phase 2 construction emissions. Although the project phasing plan indicates that the daycare is part of Phase 2 and would not be occupied until Phase 2 construction is complete (and therefore daycare receptors would not be exposed to any construction emissions), the health risk assessment assumes that daycare receptors would be present when Phase 1 is complete. This results in a highly conservative assessment of daycare risk.

**Scenario 5.** *Operation:* offsite (residents, daycare, and school) and onsite receptors (residents and daycare) evaluated starting when full buildout operation commences and exposed to 30 years of operational emissions.

For each exposure scenario, health risks were evaluated for the following receptor locations based on the APEZ:

1. the maximum lifetime excess cancer risks and annual average $PM_{2.5}$ exhaust concentrations contribution from the proposed project for those off-site receptors not located in the APEZ during existing conditions, but which would be placed in the APEZ during existing plus proposed project conditions; and

2. the maximum lifetime excess cancer risks and annual average $PM_{2.5}$ exhaust concentrations contribution from the proposed project for those off-site receptors located in the APEZ during existing conditions, and which would continue to be located in the APEZ during existing plus proposed project conditions.

For more information on exposure scenarios, emission calculation methods, health risk analysis methods, and sensitive receptor types, please see "Health Risk Assessment Methods," draft SEIR p. 3.D-38, and draft SEIR Appendix E, *Air Quality Technical Memorandum*, pp. 12-24.

# Results of the Updated HRA

## Excess Cancer Risk from Construction and Operation Emissions for Receptors Not in APEZ under Existing Conditions

The cancer risk analysis in the health risk assessment for the project is based on DPM concentrations from construction on- and off-road equipment, as well as the operational DPM concentrations from the emergency generators and project-generated vehicle emissions. The assessment evaluated excess cancer risk and $PM_{2.5}$ concentrations as a result of exposure to both construction and operational emissions.

The maximum estimated excess lifetime cancer risk for each exposure scenario (see "Health Risk Assessment Methods," draft SIER p. 3.D-38) for all sensitive receptor locations for receptors not in the APEZ under existing conditions is presented in **Table 1, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Developer's Proposed Option**, and **Table 2, Lifetime Cancer Risk for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Additional Housing Option.** These tables can be compared to the results in draft SEIR Table 3.D-13a (p. 3.D-67) and 3.D-13b (p. 3.D-68) in Impact AQ-4 of the draft SEIR, respectively.

**TABLE 1**
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – DEVELOPER'S PROPOSED OPTION**

| | Lifetime Excess Cancer Risk (in One Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | | Unmitigated | | Mitigated[c] | |
| Scenario / Receptor Type | Bkgd. | Project | Total | Project | Total |
| **Significance Threshold** | — | **10.0**[d] | **100.0** | **10.0**[d] | **100.0** |
| **Construction** | | | | | |
| Resident (offsite)[f] | 78.1 | **36.1** | **114.2** | 4.7 | 82.8 |
| Resident (onsite)[f] | 64.8 | **108.6** | **173.3** | 9.5 | 74.2 |
| Daycare (offsite)[f] | 62.0 | **87.5** | **149.6** | 11.6 | 73.6 |
| Daycare (onsite)[f] | 59.3 | **238.4** | **297.6** | 20.9 | 80.1 |
| School (offsite)[e] | 28.0 | 12.9 | 40.8 | 1.5 | 29.5 |
| **Construction + Operations** | | | | | |
| Resident (offsite)[f] | 52.9 | **61.8** | **114.8** | 7.9 | 60.8 |
| Resident (onsite)[f] | 64.8 | **110.3** | **175.0** | 11.4 | 75.9 |
| Daycare (offsite)[f] | 62.0 | **87.7** | **149.7** | 11.8 | 73.8 |
| Daycare (onsite)[f] | 59.3 | **239.5** | **298.8** | 22.0 | 81.3 |
| School (offsite)[e] | 28.0 | 13.1 | 41.1 | 1.7 | 29.7 |
| **Operations[e]** | | | | | |
| Resident (offsite)[f] | 28.9 | 2.6 | 31.5 | 2.2 | 31.2 |
| Resident (onsite)[e] | 45.3 | 14.8 | 60.1 | 14.7 | 60.0 |
| Daycare (offsite)[e] | 62.0 | 0.7 | 62.7 | 0.7 | 62.7 |
| Daycare (onsite)[e] | 50.8 | 7.0 | 57.8 | 6.9 | 57.7 |
| School (offsite)[e] | 29.0 | 0.6 | 29.6 | 0.5 | 29.5 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

**TABLE 1**
**LIFETIME CANCER RISK FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – ADDITIONAL HOUSING OPTION**

| Scenario / Receptor Type | Lifetime Excess Cancer Risk (in One Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | – | **10.0**[d] | **100.0** | **10.0**[d] | **100.0** |
| **Construction** | | | | | |
| Resident (offsite)[f] | 49.8 | **76.3** | 126.0 | 8.2 | 57.9 |
| Resident (onsite)[f] | 64.8 | **122.2** | **186.9** | 10.7 | 75.4 |
| Daycare (offsite)[f] | 62.0 | **101.7** | **163.7** | 12.6 | 74.6 |
| Daycare (onsite)[f] | 59.3 | **267.7** | **326.9** | 23.4 | 82.7 |
| School (offsite)[e] | 28.0 | **14.4** | 42.4 | 1.6 | 29.6 |
| **Construction + Operations** | | | | | |
| Resident (offsite)[f] | 49.8 | **77.5** | **127.3** | 9.4 | 59.1 |
| Resident (onsite)[f] | 63.9 | **125.6** | **189.5** | 13.4 | 77.3 |
| Daycare (offsite)[f] | 62.0 | **102.0** | **164.0** | 12.8 | 74.8 |
| Daycare (onsite)[f] | 59.3 | **269.6** | **328.8** | 25.3 | 84.5 |
| School (offsite)[e] | 28.0 | 14.8 | 42.8 | 1.9 | 29.9 |
| **Operations** | | | | | |
| Resident (offsite)[f] | 28.9 | 4.2 | 33.2 | 3.26 | 32.2 |
| Resident (onsite)[e] | 45.3 | 25.1 | 70.4 | 24.9 | 70.2 |
| Daycare (offsite)[e] | 62.0 | 1.2 | 63.2 | 1.1 | 63.1 |
| Daycare (onsite)[e] | 50.8 | 11.8 | 62.6 | 11.7 | 62.5 |
| School (offsite)[e] | 29.0 | 1.0 | 29.9 | 0.7 | 29.7 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d The project-level threshold only applies when the background risk plus the project risk exceeds 100; otherwise, the threshold does not apply.

e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 100; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 10.0 per 1 million would not apply.

# Excess Cancer Risk from Construction and Operation Emissions for Receptors in APEZ under Existing Conditions

The maximum estimated excess lifetime cancer risk for each exposure scenario (see "Health Risk Assessment Methods," draft SEIR p. 3.D-38) for all sensitive receptors in the APEZ under existing conditions is presented in **Table 3**, **Lifetime Cancer Risk for Receptors Located in the APEZ – Developer's Proposed Option**, and **Table 4**, **Lifetime Cancer Risk for Receptors Located in the APEZ – Additional Housing Option**. These tables can be compared to the results in draft SEIR Table 3.D-14a (p. 3.D-73) and 3.D-14b (p. 3.D-74) in Impact AQ-4 of the draft SEIR, respectively.

**TABLE 3**
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – DEVELOPER'S PROPOSED OPTION**

| Scenario / Receptor Type[d] | Lifetime Excess Cancer Risk (in one Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | — | **7.0** | — | **7.0** | — |
| **Construction** | | | | | |
| Resident (offsite) | 80.9 | **43.4** | 124.3 | 6.0 | 86.9 |
| Daycare (offsite) | 104.8 | **37.3** | 142.0 | 5.1 | 109.8 |
| School (offsite) | 145.5 | 1.1 | 146.7 | 0.1 | 145.7 |
| **Construction + Operations** | | | | | |
| Resident (offsite) | 80.9 | **44.1** | 125.0 | 6.7 | 87.6 |
| Daycare (offsite) | 104.8 | **37.4** | 142.1 | 5.2 | 109.9 |
| School (offsite) | 145.5 | 1.3 | 146.8 | 0.3 | 145.8 |
| **Operations** | | | | | |
| Resident (offsite) | 187.0 | 5.0 | 192.0 | 4.9 | 191.9 |
| Daycare (offsite) | 124.2 | 1.2 | 125.4 | 1.2 | 125.4 |
| School (offsite) | 145.5 | 0.2 | 145.8 | 0.2 | 145.7 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.

**TABLE 4**
**LIFETIME CANCER RISK FOR RECEPTORS LOCATED IN THE APEZ – ADDITIONAL HOUSING OPTION**

| Scenario / Receptor Type[d] | Lifetime Excess Cancer Risk (in one Million)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | — | **7.0** | — | **7.0** | — |
| **Construction** | | | | | |
| Resident (offsite) | 80.9 | **48.5** | 129.4 | 6.3 | 87.3 |
| Daycare (offsite) | 104.8 | **43.0** | 147.7 | 5.5 | 110.2 |
| School (offsite) | 145.5 | 1.3 | 146.8 | 0.1 | 145.7 |
| **Construction + Operations** | | | | | |
| Resident (offsite)[e] | 80.9/83.9 | **49.6** | 130.5 | 7.4[f] | 91.2 |
| Daycare (offsite) | 104.8 | **43.1** | 147.8 | 5.6 | 110.4 |
| School (offsite) | 145.5 | 1.5 | 147.0 | 0.3 | 145.9 |
| **Operations** | | | | | |
| Resident (offsite) | 187.0 | 7.0 | 194.0 | 6.9 | 193.9 |
| Daycare (offsite) | 124.2 | 1.8 | 126.0 | 1.7 | 125.9 |
| School (offsite) | 145.5 | 0.3 | 145.9 | 0.3 | 145.8 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; Bkgd. = background value.

a **Bold values** = threshold exceedance
b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 100 per million. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.
c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.
d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.
e Under mitigated conditions, the offsite residential MEISR is a different receptor location than under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated offsite residential MEISR occurs during the project operations phase.
f Although the cancer risk for the Additional Housing Option of 7.4 per million exceeds the significance threshold for the project's contribution of 7.0 per million, the project's contribution does not increase the severity of the cancer risk for this receptor, nor does the project expand the geography of the APEZ. The total background plus project value does not exceed the APEZ criterion of 100 per million. Therefore, this receptor does not technically meet the criteria for the APEZ.

## $PM_{2.5}$ Concentrations from Construction and Operation Emissions for Receptors Not in APEZ under Existing Conditions

The maximum estimated annual average $PM_{2.5}$ concentrations from all project sources at offsite receptor locations not in the APEZ under existing conditions are presented in **Table 5**, **Annual Average $PM_{2.5}$ Concentrations for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Developer's Proposed Option**, and **Table 6**, **Annual Average $PM_{2.5}$ Concentrations for Receptors Not Located in the APEZ but Would Be Located in the APEZ with the Proposed Project – Additional Housing**

**Option**. These tables can be compared to the results in draft SEIR Appendix E, Table 32 (p. 57) and 34 (p. 61), respectively.

**TABLE 5**
**ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – DEVELOPER'S PROPOSED OPTION**

| | Annual Average $PM_{2.5}$ Concentrations ($\mu g/m^3$)[a,b] | | | | |
|---|---|---|---|---|---|
| | | Unmitigated | | Mitigated[c] | |
| Scenario / Receptor Type | Bkgd. | Project | Total | Project | Total |
| **Significance Threshold** | — | **0.3**[d] | **10.0** | **0.3**[d] | **10.0** |
| **Construction** | | | | | |
| Resident (offsite)[e] | 9.60 | <0.01 | 9.61 | <0.01 | 9.60 |
| Resident (onsite)[f] | 8.90 | **1.32** | **10.22** | 0.12 | 9.02 |
| Daycare (offsite)[e] | 8.92 | 0.38 | 9.29 | 0.03 | 8.95 |
| Daycare (onsite)[f] | 8.82 | **1.33** | **10.14** | 0.12 | 8.93 |
| School (offsite)[e] | 8.29 | 0.25 | 8.54 | 0.02 | 8.31 |
| **Construction + Operations** | | | | | |
| Resident (offsite)[e] | 9.60 | <0.01 | 9.61 | <0.01 | 9.60 |
| Resident (onsite)[f] | 8.90 | **1.32** | **10.23** | 0.12 | 9.02 |
| Daycare (offsite)[e] | 8.92 | 0.38 | 9.30 | 0.04 | 8.95 |
| Daycare (onsite)[f] | 8.82 | **1.33** | **10.15** | 0.12 | 8.94 |
| School (offsite)[e] | 8.29 | 0.25 | 8.55 | 0.02 | 8.32 |
| **Operations** | | | | | |
| Resident (offsite)[e] | 9.87 | 0.01 | 9.88 | 0.01 | 9.88 |
| Resident (onsite)[e] | 8.59 | 0.04 | 8.62 | 0.04 | 8.62 |
| Daycare (offsite)[e] | 8.92 | <0.01 | 8.92 | <0.01 | 8.92 |
| Daycare (onsite)[e] | 8.68 | 0.03 | 8.71 | 0.03 | 8.71 |
| School (offsite)[e] | 8.30 | <0.01 | 8.31 | <0.01 | 8.31 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; $\mu g/m^3$ = micrograms per cubic meter; Bkgd. = background value

a **Bold values** = threshold exceedance
b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their $PM_{2.5}$ concentrations risk value, which may be below the APEZ criteria of 10 $\mu g/m^3$. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.
c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.
d The project-level threshold only applies when the background risk plus the project risk exceeds 10 $\mu g/m^3$; otherwise, the threshold does not apply.
e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 $\mu g/m^3$; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 $\mu g/m^3$ would not apply.
f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 $\mu g/m^3$; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 $\mu g/m^3$ would not apply.

**TABLE 6**
**ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS FOR RECEPTORS NOT LOCATED IN THE APEZ BUT WOULD BE LOCATED IN THE APEZ WITH THE PROPOSED PROJECT – ADDITIONAL HOUSING OPTION**

| | Annual Average $PM_{2.5}$ Concentrations ($\mu g/m^3$)[a,b] | | | | |
|---|---|---|---|---|---|
| | | Unmitigated | | Mitigated[c] | |
| Scenario / Receptor Type | Bkgd. | Project | Total | Project | Total |
| **Significance Threshold** | — | **0.3**[d] | **10.0** | **0.3**[d] | **10.0** |
| **Construction** | | | | | |
| Resident (offsite)[e] | 9.19 | **0.46** | 9.65 | 0.04 | 9.23 |
| Resident (onsite)[f] | 8.90 | **1.48** | **10.38** | 0.13 | 9.03 |
| Daycare (offsite)[e] | 8.92 | 0.42 | 9.34 | 0.04 | 8.95 |
| Daycare (onsite)[f] | 8.82 | **1.49** | **10.30** | 0.13 | 8.95 |
| School (offsite)[e] | 8.29 | 0.28 | 8.57 | 0.02 | 8.32 |
| **Construction + Operations** | | | | | |
| Resident (offsite)[e] | 9.19 | **0.46** | 9.65 | 0.04 | 9.23 |
| Resident (onsite)[f] | 8.90 | **1.49** | **10.39** | 0.13 | 9.04 |
| Daycare (offsite)[e] | 8.92 | 0.43 | 9.34 | 0.04 | 8.96 |
| Daycare (onsite)[f] | 8.82 | **1.50** | **10.31** | 0.14 | 8.95 |
| School (offsite)[e] | 8.29 | 0.28 | 8.58 | 0.03 | 8.32 |
| **Operations** | | | | | |
| Resident (offsite)[e] | 9.87 | 0.01 | 9.88 | 0.01 | 9.88 |
| Resident (onsite)[e] | 8.59 | 0.05 | 8.64 | 0.05 | 8.64 |
| Daycare (offsite)[e] | 8.92 | <0.01 | 8.92 | <0.01 | 8.92 |
| Daycare (onsite)[e] | 8.68 | 0.05 | 8.73 | 0.05 | 8.73 |
| School (offsite)[e] | 8.30 | 0.01 | 8.31 | 0.01 | 8.31 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; $\mu g/m^3$ = micrograms per cubic meter; Bkgd. = background value

a **Bold values** = threshold exceedance
b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their $PM_{2.5}$ concentrations risk value, which may be below the APEZ criteria of 10 $\mu g/m^3$. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.
c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.
d The project-level threshold only applies when the background risk plus the project risk exceeds 10 $\mu g/m^3$; otherwise, the threshold does not apply.
e Note that for these receptors, the unmitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 $\mu g/m^3$; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 $\mu g/m^3$ would not apply.
f Note that for these receptors, the mitigated cancer risk from the proposed project combined with the background cancer risk would be less than 10 $\mu g/m^3$; therefore, the MEISR would not be placed in a new APEZ, and the significance threshold for the project contribution of 0.3 $\mu g/m^3$ would not apply.

# $PM_{2.5}$ Concentrations from Construction and Operation Emissions for Receptors in APEZ under Existing Conditions

The maximum estimated annual average $PM_{2.5}$ concentrations from all project sources at offsite receptor locations not in the APEZ under existing conditions are presented in **Table 7**, **Annual Average $PM_{2.5}$ Concentrations for Receptors Located in the APEZ – Developer's Proposed Option**, and **Table 8**, **Annual Average $PM_{2.5}$ Concentrations for Receptors Located in the APEZ – Additional Housing Option**. These tables can be compared to the results in draft SEIR Appendix E, Table 36 (p. 66) and 38 (p. 70), respectively.

**TABLE 7**
**ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS FOR RECEPTORS LOCATED IN THE APEZ – DEVELOPER'S PROPOSED OPTION**

| Scenario / Receptor Type[d] | Annual Average $PM_{2.5}$ Concentrations ($\mu g/m^3$)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | **—** | **0.2** | **—** | **0.2** | **—** |
| **Construction** | | | | | |
| Resident (offsite) | 9.18 | **0.64** | 9.82 | 0.06 | 9.23 |
| Daycare (offsite) | 9.68 | 0.17 | 9.85 | 0.02 | 9.69 |
| School (offsite) | 10.26 | 0.02 | 10.28 | <0.01 | 10.26 |
| **Construction + Operations** | | | | | |
| Resident (offsite) | 9.18 | **0.64** | 9.82 | 0.06 | 9.24 |
| Daycare (offsite) | 9.68 | 0.18 | 9.85 | 0.02 | 9.70 |
| School (offsite) | 10.26 | 0.02 | 10.28 | <0.01 | 10.27 |
| **Operations** | | | | | |
| Resident (offsite) | 11.12 | <0.01 | 11.13 | <0.01 | 11.1 |
| Daycare (offsite) | 9.72 | <0.01 | 9.72 | <0.01 | 9.7 |
| School (offsite) | 10.26 | <0.01 | 10.26 | <0.01 | 10.3 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; $\mu g/m^3$ = micrograms per cubic meter; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 10 $\mu g/m^3$. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.

**TABLE 8**
**ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS FOR RECEPTORS LOCATED IN THE APEZ – ADDITIONAL HOUSING OPTION**

| Scenario / Receptor Type[d] | Annual Average $PM_{2.5}$ Concentrations ($\mu g/m^3$)[a,b] | | | | |
|---|---|---|---|---|---|
| | Bkgd. | Unmitigated | | Mitigated[c] | |
| | | Project | Total | Project | Total |
| **Significance Threshold** | — | **0.2** | — | **0.2** | — |
| **Construction** | | | | | |
| Resident (offsite) | 9.18 | **0.72** | 9.89 | 0.06 | 9.24 |
| Daycare (offsite) | 9.68 | 0.19 | 9.87 | 0.02 | 9.70 |
| School (offsite) | 10.26 | 0.02 | 10.28 | <0.01 | 10.26 |
| **Construction + Operations** | | | | | |
| Resident (offsite) | 9.18 | **0.72** | 9.90 | 0.07 | 9.25 |
| Daycare (offsite)[e] | 9.68/9.72 | 0.20 | 9.88 | 0.02 | 9.74 |
| School (offsite) | 10.26 | 0.02 | 10.29 | <0.01 | 10.27 |
| **Operations** | | | | | |
| Resident (offsite) | 11.12 | 0.01 | 11.14 | 0.01 | 11.1 |
| Daycare (offsite) | 9.72 | <0.01 | 9.73 | <0.01 | 9.7 |
| School (offsite) | 10.26 | <0.01 | 10.27 | <0.01 | 10.3 |

SOURCE: ESA, 2020; San Francisco Planning Department, *Citywide Health Risk Assessment*, 2020.

NOTES:

APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter; $\mu g/m^3$ = micrograms per cubic meter; Bkgd. = background value.

a **Bold values** = threshold exceedance

b All receptors within 500 feet of I-280 also included in the APEZ, regardless of their cancer risk value, which may be below the APEZ criteria of 10 $\mu g/m^3$. This is consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.

c Mitigation measures include: (1) M-AQ-2a: all off-road construction equipment was modeled with Tier 4 Final engine emission standards; and (2) M-AQ-4a: all emergency generators were modeled with Tier 4 engine emission standards.

d Only receptor types that are already in the APEZ are shown in the table; there are no onsite residents or onsite daycare receptors in the modeling domain that are already located in the APEZ.

e Under mitigated conditions, the offsite residential MEISR is a different receptor location than under unmitigated conditions. This is because the reduction in construction emissions from mitigation results in operational emissions being a relatively larger share of total emissions, and thus the mitigated offsite residential MEISR occurs during the project operations phase.

# RESPONSES TO COMMENTS ON THE DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT Volume 2 (Attachments 1–5)

# Balboa Reservoir Project

SAN FRANCISCO PLANNING DEPARTMENT
CASE NO. 2018-007883ENV
STATE CLEARINGHOUSE NO. 2018102028

| | |
|---|---|
| Draft EIR Publication Date: | AUGUST 7, 2019 |
| Draft EIR Public Hearing Date: | SEPTEMBER 12, 2019 |
| Draft EIR Public Comment Period: | AUGUST 8, 2019 – SEPTEMBER 23, 2019 |
| Responses to Comments Publication Date: | APRIL 29, 2020 |
| Final EIR Certification Hearing Date: | MAY 28, 2020 |

*NOTE: Because of the COVID-19 shelter-in-place order, the planning commission may have to hold the certification hearing remotely. Members of the public are encouraged to participate. Additional information may be found on the department's website at www.sfplanning.org and on the planning commission agenda.*

SAN FRANCISCO
PLANNING
DEPARTMENT

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# Attachment 1

## Planning Commission Hearing Transcript

SAN FRANCISCO PLANNING COMMISSION

In the Matter of:

Regular Meeting )
)
_____)

ITEM 12: BALBOA RESERVOIR PROJECT

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

2018-007883ENV

PUBLIC COMMENT

BOARD OF SUPERVISORS CHAMBERS, ROOM 250

CITY HALL, 1 DR. CARLTON B. GOODLETT PLACE

SAN FRANCISCO, CALIFORNIA

THURSDAY, SEPTEMBER 12, 2019

4:21 P.M.

Reported by:

Bridgette Rast

APPEARANCES

SAN FRANCISCO PLANNING COMMISSION

Joel Koppel, Vice President

Frank Fung, Commissioner

Rich Hillis, Commissioner

Milicent Johnson, Commissioner

Kathrin Moore, Commissioner

Jonas P. Ionin, Secretary

SAN FRANCISCO PLANNING DEPARTMENT

Jeanie Poling, Senior Environmental Planner

PUBLIC COMMENT

Lisa Anderson, Resident, Monterey Heights

Alvin Ja, Resident

Steve Zeltzer, United Public Workers for Action

Andrew Currier, PhD, Archbishop Riordan High School

Christopher Pederson, Resident, Ingleside

Benjamin Schneider, Resident, Ingleside

Sam Moss, Executive Director, Mission Housing Development

Laura Foote, YIMBY Action

Brad, CCSF Student

Jess Nguyen, CCSF Student

Michael Adams, CCSF Student

Vicky, CCSF Student

Sophie Sapphire, CCSF Student

Wynd Kaufmyn, CCSF Faculty

Monica Collins, Resident, Sunnyside

PUBLIC COMMENT

Theodore Randolph, Resident, Excelsior

Jean Barish, former CCSF Faculty Member

Amy O'Hare, Sunnyside Representative, Balboa Reservoir Community Advisory Committee, Board Member, Sunnyside Neighborhood Association

Gary Barringer, Resident

Jennifer Heggie, Resident Sunnyside, Balboa Reservoir Community Advisory Committee Representative

Christine Hanson, Resident

Marcie Rhine, Resident

Hedda Tima, Resident

Michael Ahrens, President, Westwood Park Homeowners Association

Ken Kowalski, Member, Westwood Park Homeowners Association

Laura Fry, Resident, Westwood Park

Anita Theoharis, Board Member, Westwood Park Association

Harry Bernstein, CCSF Faculty Member

Nicholas Nagle, San Francisco Housing Action Coalition

Jon Winston, Chair, Balboa Reservoir Community Advisory Committee

Rita Evans, Sunnyside Neighborhood Association

P R O C E E D I N G S

4:21 P.M.

SAN FRANCISCO, CALIFORNIA,

THURSDAY, SEPTEMBER 12, 2019

SECRETARY IONIN: Okay, the court reporter is ready.

Commissioners, we left off on Item 12, for Case No. 2018-007883ENV, for the Balboa Reservoir Project. This is the draft Environmental Impact Report.

Please note that written comments will be accepted at the Planning Department until 5:00 p.m., on September 23, 2019.

And I would like to just stress and remind members of the public your testimony should be on the accuracy and adequacy of the final Environmental Impact Report, not your opinion of the project itself.

MS. POLING: Good afternoon Vice President Koppel and members of the Commission. I'm Jeanie Poling, Planning Department staff and Environmental Coordinator for the Balboa Reservoir Project.

Can I have the screen? Thank you. The

item before you is the review and comment on the Balboa Reservoir Project draft Subsequent Environmental Impact Report, or EIR. The purpose of today's hearing is to take public comments on the adequacy, accuracy and completeness of the draft Subsequent EIR pursuant to the California Environmental Quality Act, or CEQA, and San Francisco's local procedures for implementing CEQA. No approval action on this document is requested at this time.

The public review period for the project's draft Subsequent EIR began on August 8 and will continue until 5:00 p.m., on September 23.

I'll briefly explain why we're preparing a Subsequent EIR and then summarize the project description and analysis before opening up the meeting to public comment.

The 17-acre project site is the western portion of the Balboa Reservoir, which is within the Balboa Park Station Plan Area. The programmatic EIR for the area plan was certified in 2008 and it assumed 500 dwelling units would be developed at the reservoir project site.

A Subsequent EIR is a whole new EIR that

focuses on the conditions that need new analysis. The current project proposes more density than was assumed in the Area Plan EIR, so it's a revision to the project and it identifies new, significant environmental impacts, and substantially more severe impacts than those identified in the 2008 Area Plan EIR.

Thus, the CEQA document we are preparing is a Subsequent EIR and it uses as a base the analysis that was done for the 2008 Area Plan EIR.

The draft Subsequent EIR analyzes two different sets of options for the site's residential density to capture a range of possible development on the project site. The developer's proposed option is proposed by Reservoir Community Partners and the additional housing option has been developed by the City to maximize affordable housing.

Development under each of the two options would entail the same land uses, street configurations, and site plans. The additional housing option adds one story to each of the buildings and includes smaller units to increase the number or residences.

The developer's proposed option includes 1,100 dwelling units and a public parking garage. The additional housing option includes 1,550 units and no public parking garage.

The draft Subsequent EIR also analyzes four project variants. These variants are located at the same project site and they all relate to the parking garage location and transportation access.

Before I discuss the findings, I'd like to point out that in February 2019 the Planning Department updated its Transportation Impact Analysis guidelines. These guidelines provide methodologies and criteria for undertaking transportation review in San Francisco. They include updated travel demand rates that account for vehicles operating as Transportation Network Companies, or TNCs.

The Balboa Reservoir Project's transportation analysis is based on these rates and, therefore, analyzes the impacts of TNCs.

I'll now summarize the draft Subsequent EIR's significant and unavoidable impact findings. The draft Subsequent EIR identifies three significant and unavoidable impacts during

project construction. These involve construction noise, regional air quality during the three-year construction schedule, and localized air quality during the three-year construction schedule.

All three of these impacts would be significant under both project options and all project areas.

The draft Subsequent EIR identifies two transportation-related impacts during project operation. One involves potential conflicts related to loading along the Lee Avenue extension, which is currently a dead end, but would become a through street when the project becomes operational.

The other impact involves transit delay under cumulative conditions due to growth at the project site combined with growth at City College.

Both of these impacts would be significant under both project options and all project variants.

The draft Subsequent EIR identifies four project alternatives. A no project alternative, which is required by CEQA law, a reduced density alternative, an alternative that allows passenger

vehicle access from Westwood Park via San Ramon Way, and a six-year construction alternative.

The only build alternative that would reduce significant and unavoidable impacts is the six-year construction schedule, which would reduce the two significant construction air quality impacts to less than significant with mitigation.

Significant transportation impacts during project operation would occur under both options and all variants.

While the San Ramon Way vehicle access alternative and the reduced density alternative would reduce transportation-related impacts, they wouldn't reduce them to less-than-significant levels.

Today, the Planning Department is seeking comments on the adequacy and accuracy of the information contained in the draft Subsequent EIR. For members of the public who wish to speak, please fill out a speaker card and state your name for the record. Please speak slowly and clearly so that the court reporter can make an accurate transcript of today's proceedings.

Staff is not here to respond to comments

today. Instead, we will transcribe all verbal and written comments received today, and during the public comment period, and we will respond to these comments that raise significant environmental issues in a responses to comment document.

SECRETARY IONIN: I'm sorry, there are no speaker cards.

MS. POLING: Sorry. Okay, no speaker cards, but you can line up. Correct? Okay, sorry about that.

So, we will respond to written and oral comments in a responses to comments document, which we anticipate publishing in the spring of 2020.

Those who are interested in submitting written comments on the draft Subsequent EIR may do so by email or by hardcopy. All comments must be received by 5:00 p.m., on Monday, September 23.

Unless the Commissioners have procedural questions, I respectfully suggest that the public hearing on this item be opened. Thank you.

SECRETARY IONIN: Okay, members of the public, please line up on our left, your right

side of the room, and come on up.

MS. ANDERSON: Hello, my name is Lisa Anderson. I'm here on behalf of myself, my husband, and my son. We live in Monterey Heights and we're supporters of this project. Looking at the Environmental Impact Report, we don't see any reason that this project should not go through.

Housing is such an issue in San Francisco and this project has already been reduced in scope, so we would urge you to support this.

As a former high school administrator, it broke my heart to see all of the students who could not afford to live here. And I've just had to say goodbye to my son's best friend, who grew up on Wildwood, just blocks from this project.

So, please, approve this project.

I-Anderson-1

SECRETARY IONIN: Thank you. Next speaker please.

MR. JA: My name's Alvin Ja. I've already submitted quite a number of written comments to you. Hopefully, you've been able to read some of them. And I have pointed out a whole lot of inadequacies in the SEIR.

I'm wearing this shirt that says "No War on Iraq". That's because I don't have a shirt

I-JA1-1

I-JA1-1 (cont.)

that says no invasion of luxury housing onto the Balboa Reservoir. And I am in favor of affordable housing, but not luxury housing.

Yeah, I'll just talk about two inadequacies out of all the things that I've written so far, and there will be more written comments forthcoming. But I'll talk about two.

This is a weapon of mass destruction in terms of what the Balboa Reservoir project is doing. You know, similar to the Iraq war where they were looking for weapons of mass destruction, we have one right here with the reservoir project.

And how do I mean? During the Iraq war, the British Intelligence Agency, M16, wrote what was called the Downing Street Memo. And what the Downing Street memo said that the facts -- excuse me. The evidence and the facts or the intelligence and the facts were fixed around the policy.

And that's what we have right here. You have the Planning Department that has set this whole -- which is sponsoring the reservoir project. And the policy and the SEIR is being fixed around that policy.

Okay, so I'll go to two specifics. One is the environmental setting. Okay, that's critical for CEQA, setting up the environmental baseline setting. The description that's given in the SEIR basically just talks about the plot itself. But CEQA, in terms of the Code of California Regulations, says you have to talk about the vicinity, not just the plot, itself. So, that, already, right there is in violation of CCR 15125. You can look it up, okay. I-JA1-2

The second one is regarding transit delay. Okay, transit delay is defined in this SEIR with a threshold of significance. And it's an invented threshold of significance. And what does the SEIR say: The threshold of significance is four minutes. What does that mean in terms of the reservoir? It means that, oh, the reservoir project can contribute four minutes of delay on MUNI without it being considered to be significant. So, it's BS. Okay, read it carefully before you certify it. I-JA1-3

SECRETARY IONIN: Thank you, sir. Next speaker please.

MR. ZELTZER: Steve Zeltzer, United Public Workers for Action. I think we see today, I-Zeltzer-1

I-Zeltzer-1 (cont.)

already, the results of your disastrous Planning Commission decisions. Warrior Stadium is a good example of that. You approved that without proper transit. A violation of your rules, but you did it because you're basically a kept commission, which represents the developers. That's why all today you've been going along with whatever the developers want. You're saying to hell with the people of San Francisco, it's okay to have more gridlock.

Now, this project, at Ocean, the Balboa Reservoir, is a project that will destroy City College of San Francisco. That's not in your plans, although that will be the result. To have construction, massive construction and 1,500 condos next to the college prevents the college from developing. It will create chaos. But you don't really give a damn about City College or the people of San Francisco because you represent the developers.

That's what I think more and more people understand who come here; they see you as shills for the developers. The fact of the matter is this is a corrupt operation and the City of San Francisco has spent millions of dollars for

Avalon for these meetings, staged meetings to really grease the way for this development. These homes, these condos are not for the people of San Francisco, working people, students, professors; they're for people who have a lot of money, who can afford million-dollar condos. That's not the kind of construction we need. We need working class construction.

I-Zeltzer-1 (cont.)

Now, the San Francisco Labor Council has said, along with the Union, AFP 21, the PUC should transfer that property to City College for development. That's what we support. It shouldn't be privatized, as you're supporting these developers to do.

I-Zeltzer-2

Avalon and the developers are interested in one thing, profit, profiteering off the land of San Francisco. We need working class housing in San Francisco, not more million-dollar condos. But that's, apparently, what you are driven to do by the developers who appointed you and who you represent.

I-Zeltzer-3

The students at San Francisco City College need that parking. There's no plans for parking for them. These are working class students who work at jobs. Where are they going

I-Zeltzer-4

to go? They're going to be driven out of City College because they won't have parking. They have to go to their jobs. They won't be able to. They'll go to other colleges. That's part of the privatization and the destruction of City College, which is being pushed, really, by the developers and the mayor of San Francisco. And if the supervisors approve that, they're part of this actual development process. I-Zetzer-4 (cont.)

So, we say to the public of San Francisco, stop this corrupt, rotten development, the more gridlock on Ocean Avenue. There's no way of getting mass transportation out there. The MTA has said they can't provide the extension of the Ocean Avenue, which means there will be gridlock. There is gridlock now, and you want to encourage more gridlock for the people of San Francisco. I-Zeltzer-5

You have to be held accountable for the terrible situation of the Warriors, with two stadiums, now. A hospital, two hospitals, or a hospital and Kaiser, and people can't go to their own facilities.

VICE PRESIDENT KOPPEL: Thank you, sir. Next speaker please.

SECRETARY IONIN: I will remind members of the public that the purpose of today's hearing is to accept testimony on the accuracy, adequacy, and completeness of the Environmental Impact Report.

DR. CURRIER: Good afternoon. That's a tough one to follow, but I've got a few concerns. My name's Dr. Andrew Currier. I'm representing Archbishop Riordan High School, as its President. O-ARHS-1

There's a multitude of concerns. But as it relates to this report, we serve 680 boys, 9 to 12, and a quarter of them, 170 of them, have diagnosed learning needs. And if you see, if I could pull this up, this circle RSP; that represents the learning area. It's a specialized designed learning area for students with diagnosed learning needs that they can't -- we can't move them elsewhere in the building.

So, we're worried that there's not enough information about the noise, the dust, the disruption to their learning growth, their academic growth. Again, we don't have any option to move them elsewhere in the building, so we really want more detail on that. We want some sensitivity to that. These are young men that

cannot be served by San Francisco public schools. These are specialized programs.

We also have 50 students in residence at Archbishop Riordan High School who, also, some of them have significant learning needs. They can't go elsewhere to receive this help.

So, we need more information about the noise impact. How is this all -- how is the hammering, the excavation, the drilling, all of that noise, all of that disruption, the trucks when they're beeping to back up, the backhoes, all that noise, how is that going to impact -- is that going to be two years lost on 170 students' education, who are trying despite learning needs and differences, to prepare themselves for college.

They're paying, in some cases, $60,000 a year to attend Riordan for this specialized care. That's all going to be disrupted for two plus years? That's unacceptable to us. So, we need more detail on this.

The other thing is we're worried that fire trucks aren't going to be able to get to our school in case of a fire. There's not been enough detail or clarity about transportation.

O-ARHS-1 (cont.)

O-ARHS-2

O-ARHS-3

They've delayed that meeting. That was supposed to take place this week. That has not occurred. It's been delayed until September 30th. I need more clarity on the impact of transportation on our school. O-ARHS-3 (cont.)

The other thing is there's not nearly enough detail about the blockage of light into our building. It was designed to have natural light coming in to warm the building, to enhance the culture of learning for our students in the classrooms. That's all going to be blocked. O-ARHS-4

So, thank you for listening.

VICE PRESIDENT KOPPEL: Thank you. Next speaker please.

MR. PEDERSON: Thank you very much. My name is Christopher Pederson, a resident of the Ingleside. I strongly support the additional housing option version of this project. It is environmentally superior to options and alternatives that provide less transit-oriented affordable housing and/or more public parking. I-Pederson1-1

To reduce the amount of housing would increase pressure on housing in areas that are more automobile dependent and have more extreme climate. To provide more public parking would I-Pederson1-2

undercut efforts to address climate change by reducing automobile use.

That said, this draft fails to evaluate how the developer's proposed public parking garage would undercut City College's efforts to reduce automobile use. The College's 2019 Transportation Demand Management and Parking Plan concludes that TDM measures would be sufficient to address the loss of parking spaces caused by this project. The only exception will be during a few hours of the first week of each semester. Even then, the shortfall would be less than one-third of the 750 spaces proposed in the public parking garage.

There is, therefore, no need for such a large public parking garage. It would undercut the City's and the College's efforts to respond to the climate crisis by reducing automobile use.

I-Pederson1-2 (cont.)

Finally, the transit improvement mitigation measures identified in the draft should not be deferred until after the project is shown to have an adverse impact on transit service. Congestion when City College is in session and congestion associated with the Whole Foods Grocery Store are already impeding transit

I-Pederson1-3

service. So, the project proponents should be working with MUNI, now, to implement transit improvement measures up front without waiting for proof of additional adverse impacts in the future. Thank you very much.

I-Pederson1-3 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker please.

MR. SCHNEIDER: Hi there. My name is Benjamin Schneider. I'm a resident of District 7, in Ingleside Terraces, and I'm speaking on behalf of myself and my parents, with whom I live as a 24-year-old college grad, largely because of the dearth of the affordable housing options in San Francisco. And, specifically, the dearth of affordable, reasonably-sized housing options in my own neighborhood, in the OMI, off Ocean Avenue.

I-Schneider2-1

So, I'm thrilled to see that this project is making its way through the process with all of these more reasonably sized units, that are still transit accessible, and in this great location.

And it appears to me, with my untrained eye, that the Environmental Impact Report is in order and it should proceed to the next rounds of approval.

And I'd also like to say that the kind of thing that isn't included in the Environmental Impact Report is the number of people who will live in these places in the future, without cars, and who will be taking public transit in San Francisco, rather than that same number of people living out in Modesto and driving into San Francisco every day, for an hour and a half. So, I think those are really important environmental considerations to make as well. I-Schneider2-2

I want to also reiterate what the previous speaker said. That I hope that the Commission approves the more housing-rich option and thinks very seriously about these parking garages, and increasing transit service sooner, rather than later. Thank you. I-Schneider2-3

VICE PRESIDENT KOPPEL: Thank you. Next speaker please.

MR. MOSS: Good evening Commissioners. Thanks for having this lovely meeting. Really appreciate your time.

My name is Sam Moss. I'm the Executive Director of Mission Housing Development Corporation. We're a 48-year-old nonprofit, affordable housing developer that is one of three O-MHDC-1

affordable housing developers on this team.

Really want to reiterate that, that when developers are being disparaged, it is disparaging three nonprofits who have provided over a century, and thousands upon thousands of one hundred percent low-income affordable housing to San Francisco.

And to be frank, Avalon is an incredible market rate developer that knows and understands the community. This project has taken everything into account and then some. And, you know, Mission Housing has over a thousand children that live in our buildings. We take their health and safety very seriously. We do occupied rehab projects in their buildings all the time.

So, not to say that those concerns aren't valid, but I am personally saying that as one of the co-developers of this project that the community and its safety are top of our list.

But I do hope that you see fit to keep this going forward today and thank you for your time.

O-MHDC-1 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. FOOTE: Hi, Laura Foote, YIMBY

O-YIMBY-1

Action. I have been speaking in favor of Balboa Reservoir for a couple years, now. And if we can't have an Environmental Impact Report tell us that it's better to have dense, vibrant, walkable housing instead of a giant parking lot, then I don't know what to say about the future of San Francisco's ability to deal with climate change.

O-YIMBY-1 (cont.)

It's obvious that we should be turning parking into housing. It is obvious that it will be for the benefit of literally thousands of people who will have the ability to live in this 50-percent affordable housing project.

Another great thing, planners have worked really hard to do these cross-subsidized projects in a world where we don't have enough funding for subsidized affordable housing. We're working on things like the bond. We're working on other sources of stable funding. These 50-percent affordable projects, where we get to cross-subsidize with market rate housing in order to get more low-income housing, we need to be celebrating those projects.

This is exactly the kind of thing that allows the city to get a lot more units of subsidized affordable housing.

It's tragic to be speaking for this project over and over again. It's been since 2008 and this is the fourth time they have tried to build housing here. And if San Francisco cannot get its act together and turn a 17-acre parking lot into walkable housing, then we are not going to solve any of our other problems. Thank you. O-YIMBY-1 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

BRAD: Hi. My name's Brad. I've lived here. I grew up here. I was born here. But you have to really think about this location. It's City College. It's the main campus. So, you really have to think about what this use is for and the impact. I-Brad-1

I'm all for, you know, affordable housing. I believe in, you know, biking. But you really have to think about all the people that can't bike here to that location. You know, it's very valuable to be able to have a parking lot and so that it opens it to everybody that wants to be able to park there. And it's frustrating and I'm sure you guys are frustrated, too, that it's dragged on so long. But there's a

reason why it's dragged on so long because people really, you know, that believe in this. I'm glad that we're really taking time to make sure that this is. And also, so I'm also disabled, and so, you have to think about the mobility of the, you know, people that need to be able to get to campus and to get to class on time.

I-Brad-1 (cont.)

Obviously, you know, parking's very limited. So, thanks for your time.

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

I-Nguyen-1

MS. NGUYEN: Hi. Sorry, I'm a little nervous. This is my first time at any of these meetings and watching other people speak, it's incredibly inspiring -- sorry. My name is Jess Nguyen and I have been a student since January 2018 and a proud recipient of free City. I'm incredibly grateful for the opportunity to change my life and my career. And now, you help protect the access for future students.

I would like to echo the student disability advocate, Brad, for his statements on the already lack of available parking for disabled students. The parking lot is not just parking it's a representation of students,

I-Nguyen-1 (cont.)

students carpool. They work two or three jobs just to go to school. Free city is their only option to go and actually get to the next level. They can't afford to even live -- I would -- I've heard the pictures shown in the developer's plan, of the land in question, showing the CCSF parking lot as being under-utilized. The photo was said to be taken on a Sunday. I don't know about you, but we don't offer many Sunday classes at our school or on Ocean campus. The library isn't even open. I don't think it's a fair representation of the current service this public land provides.

Nearby, Riordan uses the parking lot during the school year for band practice. The upper CCSF lot is filled by 10:00 a.m. and the Balboa Reserved Public Land has been essential for students.

Students have been posting videos on Twitter of the Balboa Reservoir being occupied by students, at ccsfstudentsays/#ccsfbottomlaw and ccsfsaid.

Students are going to experience the pain and it's going to affect the success of the community. Neighborhoods are flooded with cars.

I-Nguyen-1 (cont.)

And if students are rushing to find parking in residential, surrounding areas, then you're going to increase the risk of pedestrian fatalities.

SF is known as a premier city. During the transit week, associate students surveyed students on their MUNI commute to school. One tweeted result showed that a large number of students take over an hour to get to school on MUNI. Students commute over an hour just to come here to learn. And it's not a surprise that veteran students come in droves to San Francisco. The education and higher rate of reimbursement encourages them to come all the way from Hollister, Joshua Tree, Stockton and Sacramento just to go. Where will students go?

Pushing the responsibilities -- pushing the burden on neighbors seems irresponsible.

Is this the absolute best use of the land? The school isn't perfect. It had seven to eight chancellors in the last decade. I question its management of money and how the CCSF Transportation Report represented students.

I've sat on the land. I've organized. I've advocated and I've talked to students for hours at a time. Seventy percent of the CCSF

teaching staff are now part-timers. Their salaries won't even cover affordable housing that Avalon claims to build.

I-Nguyen-1 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MR. ADAMS: Hello. My name is Michael Adams. I come to you as a student of City College, a former City Planner, a former Administrator of a major university in this City, and a person who lives in a walkable neighborhood.

I-Adams-1

The access from my walkable neighborhood to City College is accomplished by rapid transit. Rapid transit in San Francisco is getting in a car, driving twice as far in half the time as you can get on MUNI or BART, and getting to your destination and doing your business, and then departing on your next rapid transit journey.

That parking lot is more than a piece of asphalt. It's kind of like folks would call the runways at San Francisco Airport a parking lot. Without any context in terms of the cultural and social and economic value of that property. It's not a parking lot. It's a transit stop for people's shopping and experiencing the

educational opportunity that City College provides.

I-Adams-1 (cont.)

We've heard remarks about zoning. This project's going to require a zoning change. Spot zoning is the substance of federal lawsuits. When a neighborhood is zoned a certain way and people, developers, come in and capture a spot, and create a spot zone exception to the normal asset value of a consistently zoned neighborhood, that's lawsuit material.

I-Adams-2

This group, who are opposing this project, I'd like you to look at the diversity of the group and then compare that with the diversity of this panel, and then compare that with the diversity of the project sponsors, who can't find a person who looks like me to support the project.

There's something about San Francisco that gets preserved when diverse populations join together to try to make their point and presence known.

Justin Herman, who I studied under as a City Planner, destroyed the Western Addition. And that legacy has continued, unfortunately, in major decisions by this City, through this

I-Adams-3

Planning Department, through this City Board of Supervisors. And it would be helpful, since you're going through a transition of administrators, to look carefully, and not repeating the ghost of Justin Herman.

Carlton Goodlett is a better ghost. And he was a friend and neighbor of ours in Omaha, Nebraska. Think about it.

I-Adams-3 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

VICKY: Hi. My name is Vicky. I am a student at City College. And I'm here because -- I'm here to represent a lot of those who couldn't come with me. If you can imagine the 20,000 students who will be impacted by this, who are currently enrolled at City College. Twenty thousand students, yeah.

We already, as is, are a commuter school. We know that when we did a survey in 2016, it showed that over 45 percent of the students have to commute to the college. Right. And so, we already -- we're serving a population where more than 80 percent are either employed or looking for paid jobs. So, they're part-time students. Or, really, they're actually maybe taking a full

I-Vicky-1

course load and just working part-time.

And we know of that, there's 26 percent who work 26 plus hours. That's a survey we did in 2019.

So, if we're thinking about the population that we serve at City College, how they live in the intersections of being marginalized, having disabilities, being of color, being trans, they're probably the ones who are working these jobs.

So, if you're taking away access, physical access to education, where they have to transport themselves to the college, we're probably not going to have the same level of enrollment. These students won't have access to educations. Is that something we're ready to take away from people? From a population that's already marginalized?

I-Vicky-1 (cont.)

And I would say, I am all for affordable housing. I grew up living in Section 8s. And to me this plan is not aggressive enough. I'm sorry, it's public land. A hundred percent of it should go to affordable housing.

I-Vicky-2

We know that the cost of land in San Francisco is incredibly high. Why would we take

public land and privatize it? We should be asking for a more aggressive plan. If anything, to expand access to education, to provide affordable housing to students, to faculty.

I mean, unless we're addressing their ability to access education, then I'm sorry, this plan is just not good enough. Thank you.

I-Vicky-2 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. SAPPHIRE: Hi. My name's Sophie Sapphire. I was born and raised in San Francisco and I've been a City College of San Francisco student since 2012.

I-Sapphire-1

I recently moved near campus, so I can walk to school. But for seven years I had to drive, and that was living in the City. I lived in the outer Richmond. And to take a bus from there to City College takes an hour and a half. That's the time it takes for me to walk out of my house until I'm in my classroom. And that was what it was like for me.

So, like Vicky said, over 40 percent of students who go to City College commute.

And for those seven years that I drove to school, I always had to drive straight down to

the lower lot, the language -- or, excuse me, the location that is in question, because the upper lot is always full. And as the years have progressed, this has only continued to get more and more severe. There is no access to parking on campus and, frankly, it's a necessity for many of these students who do work part and fulltime jobs, like myself, to be able to attend school. I-Sapphire-1 (cont.)

Furthermore, there are not going to be enough units in this building for students to be able to access them. It's public land and it should be only 100 percent affordable. And if that can't be, then the situation that we have currently, with the available parking, is the best situation for the students. That's all, thank you. I-Sapphire-2

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. KAUFMYN: Hi. I'm Wynd Kaufmyn and I've been a teacher at City College for 36 years. You know, San Francisco has always prided itself on its commitment to social justice and equity. To that end, the City's undertaking an effort to train its decision makers to be more sensitive and aware of social justice. I-Kaufmyn-1

In fact, I know that on September 26th you, the Planning Commission, are scheduled to participate in a racial and social equity training.

In light of this, and in light of the fact that the draft Environmental Impact Report states the need to develop the reservoir in a manner that will best benefit the neighborhood, the City, and the region as a whole.

In light of these things, I ask you to consider the social justice aspects of the proposed Balboa Reservoir Project with respect to housing, education, and labor.

I-Kaufmyn-1 (cont.)

Housing. This project is not addressing the real crisis in San Francisco. It's not addressing the affordability crisis of housing. Public land should be kept in public hands for public good, and it should only be used for 100 percent deeply affordable housing on the Balboa Reservoir. It certainly should not be given over to a private developer, whose CEO makes $7 million a year.

I-Kaufmyn-2

With regards to education, this project will limit student access to higher education by allowing the developer to remove their

I-Kaufmyn-3

transportation options before another viable one -- viable ones are put into place.

I want to put this picture here because you see so many pictures of this parking lot that are completely empty. We need to have a counterbalance. Now, of course, it's not always this full, but it's more toward this end of the spectrum than the empty lots that you see in the developer's promotional materials.

I-Kaufmyn-3 (cont.)

Lastly, the social justice aspect with regard to labor. In the January 9th, 2018 San Francisco County Transit Authority meeting, where the TDM was passed, Malia Cohen says this: I believe that Avalon Bay will create a lot of problems for us.

VICE PRESIDENT KOPPEL: Thank you, ma'am, your time -- oh, I apologize, go ahead.

MS. KAUFMYN: Yeah. Those of us that have relationships in labor, many times they have come here, our labor partners have come here raising concerns that they haven't hired union labor to do the job. Any project built in San Francisco, and especially one on public land, should be mandated to use local union labor. Thank you.

I-Kaufmyn-4

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. COLLINS: Hello, Monica Collins, Sunnyside. This is prepared. I-Collins1-1

The SEIR states that transit delay induced by the Balboa Reservoir Project will be insignificant. But this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The meaning on time performance standards allows for a four-minute delay for an entire route. But the 43 Masonic travels from Balboa Reservoir, along Frida Kahlo Way, to Balboa Park in seven minutes. Using the consultant's redefinition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of 19 minutes, 171 percent increase. From any perspective, whether legal, ethical, or engineering, this is wrong.

The SEIR is in error in using this faulty, invalid method of determining transit delay.

So, as for me, I am an electrician, construction electrician. We build things. And I'm not against development. I'm totally in the I-Collins1-2

I-Collins1-2 (cont.)

bag for City College, and for diversity, and for truly, deeply affordable housing.

Also, I'm a small-time landlord. But this is luxury housing. Can we stop pretending that this is L.A.? We can't cram an infinite number of people into a 7-by-7 square mile city, you know, at the expense of a quiet residential neighborhood, and a college that's serving working class and poor people, and many people. And can we stop pretending that gentrification on steroids is helping anyone.

As my friend Michael hinted, what happened in the Fillmore District with a bulldozer is being done, now, with gentrification. Some call it ethnic cleansing. Some call it bleaching. Can we stop pretending that the Orwellian terms we're using are accurate? That up to 50 percent affordable housing is 50 percent. Macy's is having a sale up to 50 percent off. Good luck finding anything that's 50 percent off. Up to means less than, okay.

Now, $140,000 a year is affordable for a single person for housing? Oh, please. $4,000 a month for an Avalon Bay one-bedroom apartment is

affordable? Oh, please. Transit rich is just a substitute for we're not going to plan, budget, or spend for MUNI.

I-Collins1-2 (cont.)

I talked to Carmen Chu. Developer money is rolling in and you can afford to subsidize housing. Thank you.

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

I-T.Randolph-1

MR. RANDOLPH: Hello. I'm Theodore Randolph, resident of the Excelsior. And I think if there's inadequacy in the EIR it's that it plans for the impacts of too few people. So, the previous attempts to build housing at the Balboa Reservoir were planning for like 100, or 500 units of housing and now the developer's option is 1,100. I think that's too small.

When we started this process that was five years ago. It looks like it's going to take up to another ten years, if this goes ahead, to finish all those new buildings. And in the subsequent years, our needs could increase even more. So, we should be open to -- Malia Cohen mentioned a number, like 5,000 units in the reservoir.

So, just because you say what would be

the impact of so many people doesn't mean you are going to build up to that amount. So, we should preserve the option of having more units. I-T.Randolph-1 (cont.)

And we should also use the site as a -- you know, goes to reduce car travel. If people -- when I went to City College, I biked to school every day. And if the students are having to drive there that means our region is not investing enough in public transit. We need to be building more bus lanes. But that's not -- we should have an express bus from the outer Richmond to City College. But that's not part of the EIR for this project. All right, thank you. I-T.Randolph-2

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. BARISH: Good afternoon. My name is Jean Barish. Thank you very much for giving me the opportunity to speak this afternoon. I-Barrish1-1

I'm a former CCSF faculty member and have also practiced law for over 20 years, including working on a number of cases involving CEQA. I'm here to state my opposition to the project in general and to highlight some of the many flaws in the draft EIR. I-Barrish1-2

I'd like to show you a rendering of what

the project will look like if it has 1,550 units. As you can see, this is an oversized project. It would squeeze up to 1,550 units of housing, mostly market rate, onto a parking lot adjoining CCSF, and a quiet neighborhood of single-family homes.

I-Barrish1-2 (cont.)

While it may be a developer's field of dreams, this project is an environmental nightmare to the surrounding neighborhoods and to City College. It will create traffic congestion, transit issues, environmental problems galore, convert public land into private property for profiteering developers, and it will not meet the growing need in San Francisco for affordable housing.

There are numerous flaws in the draft SEIR. I'd like to highlight a few that are just representative of the problem in this document.

I-Barrish1-3

In the initial study, Appendix B, of the draft SEIR, these are just three examples of many problems with the SEIR.

The study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25 percent of the year and there

would be significant shadow on Riordan High School. No significant effect.

I-Barrish1-3 (cont.)

The initial study says there would be a population increase of over 100 percent in the plan area, but then concludes there would be no significant cumulative population impacts because this is just a tiny increase compared to the total population of the City as a whole.

This is a flawed apples and oranges comparison and should not be accepted.

I-Barrish1-4

Finally, another example, the initial study, Appendix B, concludes the project would not result in cumulative impacts on public services, yet it did not analyze the impacts of the project on City College. Again, the draft SEIR review of this impact is inadequate.

I-Barrish1-5

In these and in many other areas the draft SEIR offers no objective criteria to serve as a basis for determining that the impacts aren't less than significant.

Accordingly, it is a flawed document that must be revised before it is submitted for final review. Thank you for your consideration.

I-Barrish1-6

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

O-SNA1-1

MS. O'HARE: Good afternoon Commissioners. My name is Amy O'Hare. I'm the Sunnyside representative on the Balboa Reservoir Community Advisory Committee. I'm also on the Board of Sunnyside Neighborhood Association, and I'm speaking for the Board today.

I want to address a particular aspect of the environmental report and that is Alternative C. That's opening San Ramon Way to vehicular traffic.

I want to urge the Planning Department to support this alternative. As currently planned, there are only two openings for vehicular traffic in and out of the reservoir sites. By opening San Ramon Way, a third access point would be provided, mitigating some of the locked in nature of the site.

When AECOM did the initial transportation analysis, in 2015, they conclude: Extending San Ramon Way would reduce local traffic bottleneck into the neighborhood. The extension would attract a portion of the Reservoir site traffic and it can be accommodated without resulting in substantial negative impacts on the existing neighborhood.

O-SNA1-1 (cont.)

The draft SEIR states that opening San Ramon Way to vehicles would redistribute traffic from Ocean Avenue and Frida Kahlo Way, where it would otherwise contribute to the transit delay. Opening San Ramon Way would provide emergency vehicles better access.

Further, it would reduce project-generated traffic volume at Lee Avenue, which is identified in the draft report as a troublesome intersection with a lot of projected congestion.

In 1917, Westwood Park laid out several stub-ended streets. It was laid out with several stub-end streets, including San Ramon.

In 1986, Westwood Park Association successfully blocked the opening of the one of the east -- the west side of Westwood Park and so that's just a solid wall. And on the other side of that is the El Dorado development, which happened in the 80s.

The original planners fully envisioned that these stubs would be connecting up with new streets as future residential development happened in the surrounding neighborhoods.

Connecting San Ramon Way to the Balboa Reservoir Project would seem like an obvious part

of effectively developing this site. But apparently, the barrier to do so lies far in the past.

I have a conveyance real estate, which was just provided to me by the assessor today, which shows that in 1955 Westwood Park acquired a very tiny slice of San Ramon Way, as a lot. Which a lot was just made up out of public streets. And this is a barrier that's right at the edge of the Balboa Reservoir Project. And I urge the Commission to override this ownership that costs them $1.36.

O-SNA1-1 (cont.)

VICE PRESIDENT KOPPEL: Thank you, ma'am, your time is up.

MS. O'HARE: Yeah, thank you.

VICE PRESIDENT KOPPEL: The next speaker, please.

I-Bieringer1-1

MR. BIERINGER: Good afternoon. Garry Bieringer. I live within three blocks of this proposed project area and have lived there for 40 years. I first found out about this project and this meeting today when I was taking my dog for a walk right where the project is to be built. And I saw on these lamp posts, this kind of public notice wrapped around. So, I tried to read it

and looked a little bit goofy walking around and around, because it really wasn't readable to the public. Finally, I was able to sense it's from the Planning Commission. I got a name and an email. And I wrote Ms. Poling. I told her my problem with this and asked, well, can I get more information?

I-Bieringer1-1 (cont.)

So, she directed me to the website. She was very helpful. And I went down to the Planning Commission and I picked up this book, or this tome, as I call it. And as I read through it, I started calling this the Balboa Housing Boondoggle Project.

I-Bieringer1-2

And I cannot separate the actual project from this SEIR. It's like they borrowed some frumies -- some Sharpies from Donald Trump, drew the lines to make their own reality, and ignored the reality that the neighbors of this project and the students of City College are going to be facing.

One example. The draft SEIR fails to include the City College multi-use building as a sensitive receptor, which I think is a euphemism for young kids, okay.

I-Bieringer1-3

The multi-use building is 150 feet from

the construction site and is used for childcare classes, for children and classes on the site.

The short term measurement location information in the SEIR, which is on page 3, section C.9, notes that, and I quote from the DEIR: The college campuses are generally not considered a noise-sensitive receptor.

The MUB has been used for childcare classes, for children on site for years and will continue to be used that way. Therefore, it qualifies as a noise-sensitive receptor. And the DEIR completely ignores that, as they ignore the impact to City College, and the impact on Riordan College.

I-Bieringer1-3 (cont.)

This is public land. It should be used for the public. I strongly urge you accept alternative A, which is to do nothing and start back at the drawing board to build affordable housing for teachers and students.

I-Bieringer1-4

VICE PRESIDENT KOPPEL: Thank you, sir.

MR. BIERINGER: Thank you.

VICE PRESIDENT KOPPEL: Next speaker, please.

MS. HEGGIE: Hello. My name's Jennifer Heggie. I'm from Sunnyside and representing the

I-Heggie1-1

Balboa Reservoir Committee for the SNA.

First, I want to thank the Planning Department for this SEIR. It identifies many of our concerns that are issues that cannot be mitigated, including noise, transportation, and air quality. My focus today is going to be on noise.

I-Heggie1-1 (cont.)

I-Heggie1-2

Noise effects on residents and childcare centers in adjacent Sunnyside have been ignored, although they are located within the 900-foot zone of the project noise considerations. Two childcare centers and preschools were identified in the EIR, in this east side of the project.

The sensitive receptors are closer to parts of the development than the studied 24-hour LT.3 location in Westwood Park. And Sunnyside sites lie in an area that is typically downwind of the construction site.

Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way -- I've forgotten the name of the mini location. It's for children. Serves as a residence, as well as childcare center and preschool center. It needs a 24-hour noise study.

Additionally, we suggest noise testing at

I-Heggie1-3

the corner of Judson and Frida Kahlo Way, formerly Phelan Avenue, where a replacement City College daycare center is planned for the future.

I-Heggie1-3 (cont.)

The first mitigation measure for noise recommends selecting truck haul routes that, quote: Avoid the north access road and adjacent Riordan High School and residential uses along Lee Avenue.

I-Heggie1-4

But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, the Harmony Family Childcare. A high school, nursery schools and daycare centers are located at or near all of the identified possible entrances and exit site points.

The Lee Avenue alternative is already identified in the Cumulative Transportation Items 4 and 6.B, as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation.

Mitigation measure for Noise Number 1 would only exacerbate another unmitigatable project issue. The first mitigation of the report also recommends undertaking the noisiest activities during times of least disturbance to

surrounding residents and occupants, which are identified as 9:00 a.m. to 4:00 p.m. This coincides with the period when daycare centers and nursery schools are in session. Riordan High School holds classes and afterschool activities. And the majority of City College classes, including child development classes in the multi-use building, are in session.

The times of least disturbance need to be redefined.

I-Heggie1-4 (cont.)

SECRETARY IONIN: Thank you, ma'am. Your time is up.

MS. HEGGIE: Thank you.

VICE PRESIDENT KOPPEL: Next speaker, please.

MS. HANSON: Thank you for your time. My name's Christine Hanson. And I don't know if you can see this, but the cars in this lot -- I don't think you're showing the picture. I'll just do my comment, then.

The administrative record and the draft SEIR has little information about the pressure that City agencies have exerted upon the creation of City College's Facilities Master Plan. The meetings, ongoing today, began during the time of

I-Hanson1-1

I-Hanson1-1 (cont.)

the state takeover of the school. City agencies began meeting then with the state-imposed administration. The administrative record in the draft SEIR makes a very slim mention of those meetings.

A public records search in 2017 showed that by then at least 17 of these private meetings had occurred, mostly at SF Planning. It was news to the board of trustees, and news to Trustee Davila, who sits on the Balboa Reservoir CAC, representing City College.

Kitchell, City College's facility planners, whose work is included in this SEIR, answers to the question: What is the appropriate place for city agencies to address the Facilities Master Plan was; in public comment.

If you take the administrative record presented in the draft SEIR at face value, you would get the impression that this, indeed, has been the behavior of city agencies. But this is not what the collection of emails, agendas, meetings, and notes surrounding these meetings show. The agendas for those meetings are mostly similar, with the top item being the City College Facilities Master Plan.

Your planner, Jeremy Shaw, even attended one of the consultant job interviews on June 8th, 2015, with the blessing of a former state-appointed facilities head at City College. The Facilities Master Plan has been upgraded twice and rebooted once. The intrusion of city agencies into a plan that should have been focused on the school's Education Master Plan and focused on the needs of students has, instead, been formed around a private development that has literally cost the taxpayers millions in bond money.

I-Hanson1-1 (cont.)

The collection will be forwarded to you as written public comment. Thank you.

VICE PRESIDENT KOPPEL: Thank you. The next speaker, please.

MS. RHINE: Hello. My name is Marcie Rhine. And I just wanted to say a couple quick things. I wasn't going to talk, but I was so moved by what the City College students had to offer that I wanted to just underscore that I think there is a very critical flaw in this draft EIR that it does not address City College either as a part of the overall setting, or as a vital public service.

I-Rhine-1

This is a school that has been a part of the life of the City for generations. It's trained people for essential jobs and public services, provided enrichment to countless people through lifelong learning. And to not consider it, consider the impact seems to me a serious flaw that should be reexamined. I-Rhine-2

The second thing I wanted to address is there's a lot of talk about affordable housing. So, I just wanted to put out a couple of figures for your consideration. If you look at the development plan, the request is for 18 percent affordable housing for people who are making 80 percent of the area median income, and that would be $66,500 a year. I-Rhine-3

Then, an additional 17 percent for moderate income. That's 120 percent over the AMI. We're talking $99,500 a year. And then, you get to 50 percent with an additional, optional moderate income housing and that additional housing is -- there's no responsibility for the developer to build it and there's currently no funding in the plan.

So, I know this is about the EIR and not the project itself, but I just wanted you to have

those figures that the actual affordable housing that will be gotten from giving away this public land to a private developer is less than one-fifth. So, and of course, the biggest cost in building housing is the land. If the public land were not given away, it could all be affordable. So, just to think about that. Thank you very much. I-Rhine-3 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker.

MS. TIMA: Thank you for your invitation. My name is Etta Tima. I'm a resident for 48 years and at times old age helps to understand something. I live on Plymouth Avenue. I view the parking lot every morning. It is full. And it is necessary. And it should remain because during Ed Lee's time, he said he wanted to put another 100,000 people into the County of San Francisco. I-Tima-1

Now, I'm asking you, where should they find education? If you reduce the parking space, this at this moment presents 4 percent of the student body. That is not very much.

In regards to the history of this lot, I was really disenchanted that your SEIR was I-Tima-2

showing such a lousy picture to mislead everybody. That's a sales pitch. Can you imagine if you have 1,200 units right at the entrance of freeway 280, and that will not solve apartments for San Francisco. They will all go down to Silicon Valley.

I asked the developer, could he put restrictions on it and he denied my request. He said that would not be possible.

I-Tima-2 (cont.)

If you are building 1,200 units on an earthquake fault, and I'm sure you know because I have expressed this before, the earthquake fault runs right through City College, and Riordan High School, and Wildwood.

I-Tima-3

Then, you need emergency water in case we have an earthquake to kill the fires. There is no emergency water supply for the west and south area of San Francisco. Would you please get busy before you start building and get that done?

I-Tima-4

I'm against building any 1,200 units. And in regards to building, the shaking of the construction element way above the viability demands of construction. And my house is old and I do not want to have cracks in my stucco. Thank you.

I-Tima-5

I-Tima-6

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MR. AHRENS: Good afternoon. My name is Michael Ahrens. I am President of the Westwood Park Association, Homeowners Association. I am also a member of the Balboa Citizens Advisory Committee, sometimes called the CAC. And thank you for hearing our comments. O-WPA1-1

On behalf of the Board of Directors of the Westwood Park Association, the neighborhood that is most affected by this whole development, I'm glad to tell you I will be brief. We will put our comments on the DSEIR in writing.

But I will say this that the DSEIR is severely flawed and we will tell you why in writing.

I will outline, now, only a series of some of the flaws, and you've heard some of the hints of these things from other speakers tonight. First, we will discuss the failure of the DSEIR to accurately address the cumulative secondary parking impacts caused by the loss of existing parking, including the impacts on transit, Lyft and Uber drivers.

Second, we will discuss the failure to O-WPA1-2

properly take into consideration the cumulative transportation impacts of the projected increase in City College enrollment. There's an increase, as the DSEIR correctly notes, by I think 26 to 56 percent over the next few years, and it fails to take that into consideration. O-WPA1-2 (cont.)

Next, the DSEIR fails to mention that City College has an agreement and will undertake to have 500 units of student housing developed on what's called the East Basin. That is not taken into consideration. O-WPA1-3

In addition, the consideration of the building of the PAEC, and the STEAM building, is going to go on simultaneously and the DSEIR does not take into consideration the tremendous environmental problems caused by a simultaneous construction on the East Basin and the West Basin, which will result in virtually no parking remaining.

Next, there is an extreme error in the DSEIR in discussing Reduced Density Alternative B in stating that no financial analysis has been conducted. That's false and we will show why. O-WPA1-4

Next, there is the improper inclusion of Alternative C on San Ramon Way, on Passenger O-WPA1-5

Vehicle Alternative. That should be rejected and we will say why. That has to do with Plymouth Avenue and others. O-WPA1-5 (cont.)

And last, the rejection by the Planning Department of the use of the site for City College as an alternative was not appropriate. Public land should not be used for anything but public good. O-WPA1-6

Parties in the scoping process requested that this alternative of using project land for City College should be an alternative. The Planning Department rejected that and that was inappropriate under the law.

I only had two minutes. I tried to be brief. Thank you very much. We will put the rest of our comments in writing. Or, no, we will put those comments in writing.

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MR. KOWALSKI: Thank you. Kevin Kowalski, a Westwood Park Association resident. I live along Plymouth Avenue with my wife 18 years, between San Ramon and Ocean. I can attest to the situation of the violence level due to the parking and driving situation. I-Kowalski-1

Westwood Park was built for Model T's and Model A's. Cars have to pull over all the time. The violence level goes on all the time, day and night.

I leave for work at 4:00 o'clock in the morning. People are going at 40 miles per hour on that street and they're bypassing the stop signs at San Ramon Way. They're also running the red light at Ocean Avenue and Plymouth Avenue.

I-Kowalski-1 (cont.)

I do not believe that the EIR takes into account the death that will happen to City College. City College needs different types of things. Some of them may be buildings. Some of them may be parking. Some of them may be an on ramp to the freeway. It needs a lot of different things. To not leads to the college animus.

I-Kowalski-2

And, thirdly, the environmental impact to the neighborhood will be overwhelming. When they rebuilt Ocean Avenue, they used right behind our house, which abuts to the reservoir, as a dumping ground for the concrete and asphalt. There were over 70 filed complaints, with payoffs for damages to homes, sewer lines, et cetera, et cetera, et cetera.

I-Kowalski-3

Please reject this EIR. If you want one

I-Kowalski-4

in reality and not the stylized façade this one is, then have all the stakeholders participate in creating one to see the truth of what's going on in this neighborhood. Thank you for your time.

I-Kowalski-4 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. FREY: My name is Laura Frey, Westwood Park. Thanks for your patience with all these people.

I-Frey-1

Three main concerns. My first concern, like a lot of people, is City College. I don't think the impact on City College has been really addressed in this. And I want to remind the Planning Department that the timing of the development, the process began at the same time that the accreditation crisis began. So, City College, like Chris alluded to, was out of the loop and never really caught up.

I-Frey-2

My second issue is density. This is a downtown style project, without the downtown style streets. And has Hedda mentioned, the firefighting infrastructure, water pipes that accommodate the dense housing in the other parts of the City that have dense housing, their water structure is totally different than what we have

in this area. And that lack of firefighting infrastructure would be a hazard to the residents of the development itself, but it would also be a hazard to all of the surrounding neighborhoods. I-Frey-2 (cont.)

I've gone to all the BRCAC meetings and the Planning Department kept assuring us that the parameters of the BRCAC would have a strong bearing on the final plan. The density of this project far exceeds the density that would have been built if the parameters had been followed. I-Frey-3

In the urban design parameters it stated that the height would be 28 feet on the west and then gradually go to 65 on the east. Now, it starts out, I think, at 30, 35, something like that, and then it jumps real quick, and then it goes real high to 78 or 88 feet.

And then, my third concern is opening San Ramon Way. In the DEIR it downplayed and, in fact, it even said it was a positive that on Plymouth, it's basically one lane. The 1200 block of Plymouth, where I live, there's always parking cars on both streets, so it's single lane. So, you have to go into the driveways and let people pass. And this happens all day. And the driveways are small and if the car is big, or I-Frey-4

the driver isn't such a good driver, it can take a long time for people just to move down the street. And sometimes people get upset. Sometimes they get really nasty. Sometimes they scream. Sometimes they just sit.

And the EIR just sort of really downplayed this, that this would slow traffic. Well, as a previous speaker said, that sometimes people still go very fast on Plymouth and people on Plymouth regard this situation as a negative, not as a positive.

And then, just, I think the predictions of the traffic through San Ramon is inaccurately low because the EIR does not address that if that San Ramon Way was opened you'd get other traffic than just the project. Thank you.

I-Frey-4 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MS. THEOHARIS: Good afternoon Commissioners. Anita Theoharis, Westwood Park Association Board Member on behalf of Westwood Park.

I know that comments should be narrowly focused on technical issues, but I do have one nontechnical observation that does have relevance

O-WPA2-1

to one of our -- to one of the technical objections to the sufficiency of the draft.

Our goal is to support a housing project on the reservoir that includes affordable housing for people of modest means. A project that creates a new neighborhood with sufficient open space and a welcoming environment for everyone. A project with a number of units that can be supported by the existing and planned infrastructure. And one that does not damage a crown jewel of the City, City College, or the students who attend in the hopes of a better life for themselves and their families.

O-WPA2-1 (cont.)

It doesn't accomplish these goals. However, there was a proposal, submitted by Related of California, a developer, during the RFP process, a process that Westwood Park was frozen out of by the Balboa Citizens Advisory Committee. A project that could be one we could support.

O-WPA2-2

It brings me to the relevant objection. The draft concludes that the financial feasibility of a reduced option of 800 units referred to as Plan B is unknown. That is factually incorrect.

Related proposed a 680-unit project, with parking to accommodate City College. And in discussions with Related, they said they could reduce the number of units even further and still make a profit.

Yet, this document ignores that real world fact and concludes that the financial feasibility option of 800 units is unknown, even though a well-known and respected developer concluded it could make a profit with far fewer units.

The EIR must conclude that a reduced density option is financially feasible and study the impacts of that option.

We will submit in writing as well. And thank you very much for your time.

O-WPA2-2 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MR. BERNSTEIN: My name is Harry Bernstein. I'm a faculty member at City College. So, I would like to provide some context to the impacts indicated in the Subsequent EIR for the Balboa Reservoir Project.

Noise, air quality and transportation from the project will cause significant and

I-Bernstein1-1

I-Bernstein1-1 (cont.)

unavoidable adverse impact. You hear those words? Significant and unavoidable adverse impact. Impacts on the college students, faculty and staff, students at the adjacent Riordan High School, and students in the childcare program at the adjacent multi-use building.

So, these topics, noise, air quality, and transportation came up before the Planning Commission at their meeting in August. And this was the context I want to mention. The mayor has sought to streamline development, housing development in San Francisco. And so, she is trying to get a -- have several factors that are considered in CEQA to reduce the required mitigation. So, these, besides secondary ones like cultural and paleontological, they include noise, air quality, and transportation.

So, out of this 500-page report, the serious issues are the one that the City is trying to -- I don't know if it's put under the rug, but not have to consider. They've already done that with parking.

Okay, so that's the way we're going, just to save some months, save some dollars, but to give the public and the public health less

opportunity, less consideration. I-Bernstein1-1 (cont.)

A separate topic. The description of the project setting baseline existing condition is inadequate. The primary use of the lower reservoir, since 1946, has been parking. Today, it's spillover student parking. Except for the years 1946 to 1954 and that was the time that the college, itself, occupied the entire Balboa Reservoir site. So, the college really has not -- the impacts on the college, the secondary impacts from parking, not the parking itself because that's an issue that's being considered in other ways, but the impacts on the college, and the access to education, which should have some priority. Thank you. I-Bernstein1-2 I-Bernstein1-3

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MR. NAGLE: Good afternoon Commission. My name's Nicholas Nagle. I'm representing the San Francisco Housing Action Coalition. We've been going to these meetings for years, so I'll keep it short. I assume you know our position on it. O-SFHAC-1

We've been advocating for this project because of our City's housing shortage. And

while no one project can solve the housing shortage, this is a bit step towards it.

In terms of the EIR, we do find it to be adequate and complete. And that's all from me, today. Thank you.

O-SFHAC-1 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Next speaker, please.

MR. WINSTON: Good evening Commissioners. My name's Jon Winston. I have the at large seat on the Balboa Reservoir CAC and I'm also the Chair.

O-BRCAC-1

I'm here this afternoon -- this evening, I should say, to talk about transportation and circulation. The impacts I believe will be significant, but I disagree with the report that they will be unmitigable.

Developer mitigation, including the Transportation Demand Management Plan, including measures like giving out a Fast Pass with rental packages to encourage non-car use will play a part. They will pay impact fees, which I believe should be applied at the point of impact in the neighborhood where the impacts actually occur. That's where they're needed the most.

But also, the City can and must do more.

Recent San Francisco history is full of projects, like the Metreon Center, the San Francisco Center, the ballpark, the Chase Center, all built without parking and they were all predicted to lead to traffic apocalypse.

But with moonshot level planning, by multiple city agencies, we got great civic and cultural amenities that, despite the naysayers, worked.

This, too, is a project that needs to have proactive planning on the neighborhood and City level to accommodate the influx of new residents in the reservoir and the projected increase in CCSF students.

New housing and businesses, like Whole Foods on Ocean Avenue, also add new car, foot and bike traffic.

SFMTA and other agencies need to begin, now, to be ready with increased transit frequency and have more of the share of the roadway to avoid even worse gridlock and in keeping with the City's transit first policy. That's the first time we've heard the words "transit first" tonight.

In addition to my role on this CAC, I

O-BRCAC-1 (cont.)

O-BRCAC-1 (cont.)

also serve as the Pedestrian Safety Advisor Committee for the SFUSD. From that perch, I can see Ocean, Geneva, San Jose Avenue as vision zero high injury corridors. That means there have been enough deaths and injuries, serious injuries, due to the design of these streets that they're due and fundable for complete redesign.

In short, true transit first reimagining of transportation and circulation for the neighborhood is needed and it has to be implemented.

At our September 30th CAC meeting, the CAC will present their plans for their SFMTA Ocean Avenue Safety Project. I hope to hear about a safe, beautiful, and dignified walk to BART, and better pedestrian bicycle access to CCSF, the reservoir and the Ocean Avenue shopping district.

But in future meetings, I really hope to hear more about a comprehensive, proactive plan. The Balboa Reservoir is really a great opportunity to deal with the problems that have accumulated over many, many years and now, we have a chance to make the needed change to get a livable, sustainable community for future

generations. Thank you for your time.

O-BRCAC-1 (cont.)

VICE PRESIDENT KOPPEL: Thank you. Any more speakers for public comment.

MR. BERNSTEIN: I'm sorry there was an oversight for my comments. You have an empty lot on the cover of this SEIR. I'd like to give this, copies of this for the record and for the members. If there a possibility to do that?

I-Bernstein1-4

SECRETARY IONIN: Thank you. You can just leave it right there.

MR. BERNSTEIN: Okay. And one of the record, please.

SECRETARY IONIN: Anyone else for public comment come on up.

UNIDENTIFIED FEMALE SPEAKER: Rita Evans dropped this off. She had to leave.

I-Evans1-1

SECRETARY IONIN: Thank you. Anyone else? Going once, public comment. Seeing none, public comment is closed.

VICE PRESIDENT KOPPEL: We're adjourned.

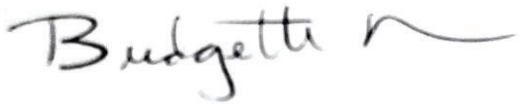
(The meeting concluded at 5:46 p.m.)

**REPORTER'S CERTIFICATE**

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a notary public and certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF,
I have hereunto set my hand this 2nd day of October, 2019.



Bridgette Rast
Electronic Reporter

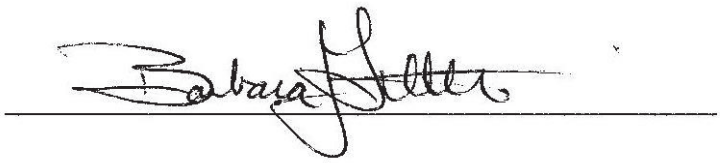
1

**TRANSCRIBER'S CERTIFICATE**

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 26th day of September, 2019.



Barbara Little
Certified Transcriber
AAERT No. CET**D-520

This was also submitted via Email and addressed in response to Comment I-BERNSTEIN3

Received at CPC Hearing 9/12/19

J. Poling

# Balboa Reservoir Project

SAN FRANCISCO PLANNING DEPARTMENT
CASE NO. 2018-007883ENV
STATE CLEARINGHOUSE NO. 2018102028

SAN FRANCISCO
PLANNING
DEPARTMENT

| | |
|---|---|
| Draft EIR Publication Date: | AUGUST 7, 2019 |
| Draft EIR Public Hearing Date: | SEPTEMBER 12, 2019 |
| Draft EIR Public Comment Period: | AUGUST 8, 2019 – SEPTEMBER 23, 2019 |

Written comments should be sent to:
San Francisco Planning Department
Attention: Jeanie Poling, Senior Planner
1650 Mission Street, Suite 400 | San Francisco, CA 94103
or by email to: CPC.BalboaReservoir@sfgov.org

View of far end of Balboa Reservoir parking area at 9:30- out of frame portion is full. Taken Aug 28 2017 by Otto Pippenger.

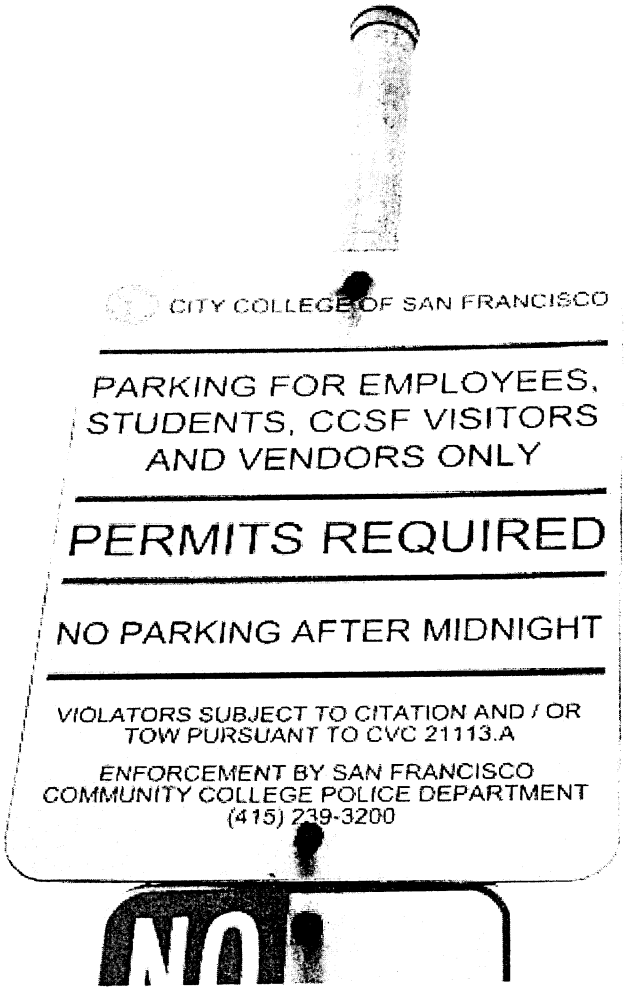
*Reprinted with permission from City College's newspaper, The Guardsman: http://theguardsman.com/parking-crisis/ (http://theguardsman.com/parking-crisis/)*

moves forward over the next several years."

For more information, visit the Balboa Reservoir Community Advisory Committee website. (http://sf-planning.org/balboa-reservoir-cac-meeting-schedule)

View of far end of Balboa Reservoir parking area at 9:30- out of frame portion is full. Taken Aug 28 2017 by Otto Pippenger.

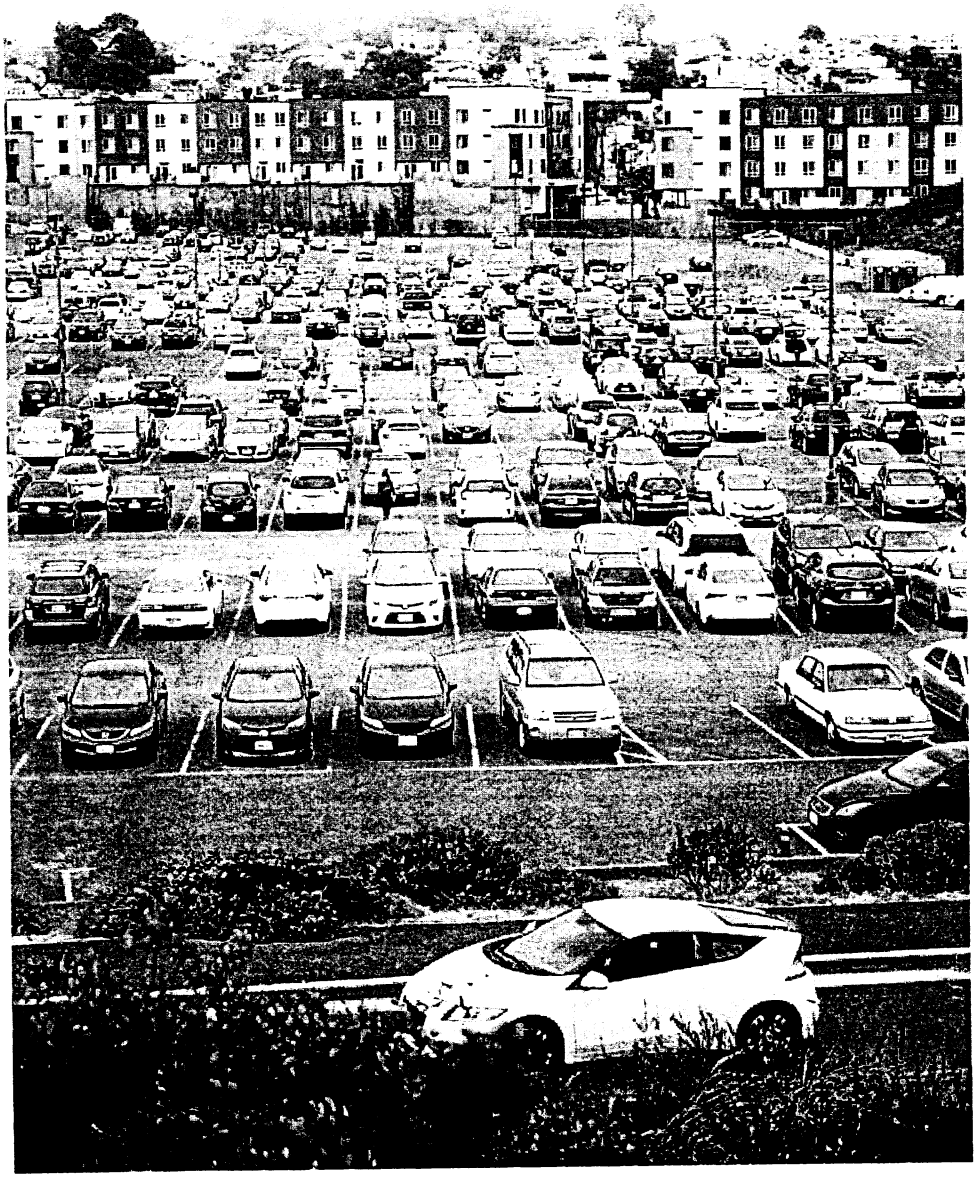
In an email, sent in late August to the Board of Trustees' President Thea Selby, Baum asked Selby to explain "how the housing project, that might be built on the Public Utilities Commission (PUC) section of the reservoir, could possibly serve the needs of CCSF's students?" Additionally, because many students must commute by car and use the controversial section of the reservoir for parking, Baum asked if Selby could "please explain how…any student [would] even be able to afford to live in the housing being contemplated?"




A sign looms over cars in the lower parking lot requiring permits to be purchased. Photo taken Aug 28 2017 by Otto Pippenger.

With inquiries stretching as far as potentially using the land for the voter approved Performing Educational Arts Center, Baum gave voice to what many people from Ocean Campus have already been talking about.

In response, Selby issued an email to the community on Aug. 24, 2017, which said, "City College is a vital partner to this project as it



Lower parking lot (Balboa Reservoir) at 11:30. Taken Aug 28 2017 by Otto Pippenger.

The Guardsman's observation took place over the course of several weeks, and the research provided legitimacy to Professor Rick Baum's fears that the project could "interfere with efforts to increase student enrollment."

Balboa Reservoir parking at 12:30 as classes get out. Taken Aug 28 2017 by Otto Pippenger.

September 13, 2017 The Guardsman
By Bethaney Lee

The Guardsman photographed the usage of the parking lot in contention with the Balboa Reservoir Project (BRP) every hour on Aug. 28, and concluded it was used consistently throughout the day. It was highly impacted at peak class hours and the surrounding neighborhoods and streets cannot support the amount of vehicles displaced by the removal of the lower parking lot.

Tensions first arose after the BRP reported its goal was to repurpose the lot into mixed-income level housing.

In October 2016, Nelson Nygaard released the Balboa Area Transportation Demand Management (TDM) Plan which was used to identify transportation needs for the Balboa Park area. The report identified limited roadway space, transit infrastructure and financial resources as three primary problems.

"Yet despite the obvious fact that the elimination of student parking and the addition of new Reservoir residents will increase demand placed on limited transportation resources, the Balboa Reservoir Project Team proposes no amelioration for adverse impacts other than TDM," Professor William McGuire said in an email sent in early January 2017.

# Sunnyside Neighborhood Association

**Building our community every day.**

# CCSF Guardsman: 'Parking crisis raises Balboa Reservoir Project concerns'

ON SEPTEMBER 26, 2017SEPTEMBER 27, 2017 / BY SUNNYSIDE NEIGHBORHOOD ASSOCIATION / IN BALBOA RESERVOIR PROJECT, CCSF, CITY COLLEGE OF SAN FRANCISCO, PARKING, SF PLANNING DEPT, SFMTA, UNCATEGORIZED

*Reprinted with permission from City College's newspaper, The Guardsman: http://theguardsman.com/parking-crisis/ (http://theguardsman.com/parking-crisis/)*

## Parking crisis raises Balboa Reservoir Project concerns

The cover image of

the Balboa Reservoir site

does not fairly represent

the actual usage of the Lower Reservoir

site when City College is in session.

Consider the following

newspaper story from

August 28, 2017

This was also submitted via Email and addressed in response to Comment I-EVANS2

Received at CPC Hearing 9/12/19

**C1 Travel Demand Memorandum**

This section refers repeatedly to two sources for trip generation data. One is the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th edition and the other is the *San Francisco Planning Trip Generation Workbook (SF Workbook)*. While the ITE *Trip Generation Manual* is indeed a standard source, it also is recognized as a very flawed source of information due to its reliance on datasets with very little input, generally from suburban, not urban, sources. We can't even find the *SF Workbook* and so are unable to determine whether it addresses any of those flaws or simply compounds them. Can the Planning Department provide us with a copy of this workbook?

**C2 Transit Assessment Memorandum**

**TRANSIT ASSESSMENT**

**Transit reentry delay analysis**

Delay calculated based on empirical data from 2010 *Highway Capacity Manual*.

Data at least 15 years old was used instead of using 6th edition of *HCM* published in 2016—why?

"The *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis (HCM)* provides methods for quantifying highway capacity. In its current form, it serves as a fundamental reference on concepts, performance measures, and analysis techniques for evaluating the **multimodal** operation of streets, highways, freeways, and off-street pathways. The Sixth Edition incorporates the latest research on highway capacity, quality of service, and travel time reliability... "

Given the use of an outdated HCM and its related data, we challenge the Kittleson conclusion that, "Based on the findings from this corridor delay analysis, the project would not result in a substantial delay to public transit along Frida Kahlo Way, Ocean Avenue, or Geneva Avenue."

**Passenger boarding delay analysis**

What source was used to assume "two seconds per passenger boarding"? Is it again outdated data? Does it include students and instructors carrying books, supplies, and other material? Does it include students traveling with children? Residents carrying shopping bags or using a wheeled cart? Disabled users?

**City College Loop analysis**

The consultant concludes that despite increases in traffic volume, no additional delay will be generated. Consultant makes repeated reference to "existing signal timing coordination and optimization." As anyone who travels these corridors knows, having actuated signals and having those signals actually work are two different things. Broken and mis-timed signals have plagued traffic on Phelan/Frida Kahlo for years and the city has either ignored the problems or addressed them only after years of complaints. What assurance do we have that any of this will change after the development has been built?

This was also submitted via Email and addressed in response to Comment I-EVANS2

Received at CPC Hearing 9/12/19

J. Poling

**2018-007883ENV**
**BALBOA RESERVOIR PROJECT – (Assessor's Block 3180, Lot 190)**
**Public Hearing on the Draft Environmental Impact Report**

**TRANSIT DELAY**

The SEIR states that transit delay induced by the Balboa Reservoir project will be insignificant but this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The MUNI on-time performance standard allows for a 4-minute delay for an entire route. The SEIR instead allows for a 4-minute delay on any segment of a route (i.e., between two stops), a completely invalid assumption, meaning almost no amount of delay would be considered significant.

EXAMPLE: The 43-Masonic travels from the Balboa Reservoir project site on Frida Kahlo Way to the Balboa Park Station in ***7 minutes***. Using the consultants' re-definition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of ***19 minutes***, a **171% increase**, is somehow deemed "**insignificant**." No one riding that 43 would find the delay to be insignificant. And this utterly faulty reasoning is allowed to be presented in the SEIR as justification for a finding of "insignificant delay," meaning no mitigation is required.

From any perspective, whether legal, ethical or engineering, this is wrong. The SEIR is in error in using this faulty, invalid method of determining transit delay. The transit delays as a result of this project will be significant and appropriate mitigation must be identified before the SEIR is approved.

# Attachment 2

## Comment Letters and Emails on the Draft SEIR

**From:** Areana Flores
**To:** CPC.BalboaReservoir
**Cc:** Henry Hilken
**Subject:** Balboa Reservoir Project Comment Letter
**Date:** Monday, September 23, 2019 3:40:35 PM
**Attachments:** image014.png
image016.png
image017.png
image018.png
image019.png
image020.png
2019-09-23 Balboa Reservoir DSEIR Comment Letter.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good afternoon Ms. Poling,

Attached is a comment letter for the DSEIR for the Balboa Reservoir Project at Balboa Park Station. For any questions regarding this letter, please contact Areana Flores, Environmental Planner, at (415)749-4616 or by email at aflores@baaqmd.gov

Thank you,

AREANA FLORES
**ENVIRONMENTAL PLANNER**
Bay Area Air Quality Management District
375 Beale St. Suite 600 | San Francisco, CA 94105
415-749-4616 | aflores@baaqmd.gov

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

**ALAMEDA COUNTY**
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

**CONTRA COSTA COUNTY**
John Gioia
David Hudson
Karen Mitchoff
Mark Ross

**MARIN COUNTY**
Katie Rice
(Chair)

**NAPA COUNTY**
Brad Wagenknecht

**SAN FRANCISCO COUNTY**
Gordon Mar
Shamann Walton
Tyrone Jue
(SF Mayor's Appointee)

**SAN MATEO COUNTY**
David J. Canepa
Carole Groom
Doug Kim

**SANTA CLARA COUNTY**
Margaret Abe-Koga
Cindy Chavez
(Secretary)
Liz Kniss
Rod G. Sinks
(Vice Chair)

**SOLANO COUNTY**
James Spering
Lori Wilson

**SONOMA COUNTY**
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
**EXECUTIVE OFFICER/APCO**

Connect with the
Bay Area Air District:

September 23, 2019

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

Subject: Balboa Reservoir Draft Subsequent Environmental Impact Report

Dear Ms. Poling,

Bay Area Air Quality Management District (Air District) staff has reviewed the City and County of San Francisco's (City) Draft Subsequent Environmental Impact Report (DSEIR) prepared for the Balboa Reservoir (Project). The Project applicant proposes to develop the site with mixed-income housing, open space, a childcare facility/community room available for public use, retail space, on-and-off street parking, and new streets, utilities, and other infrastructure. There are two potential buildout schedules for the Project: (1) the anticipated estimated 6-year (2021-2027) schedule and (2) the compressed estimated 3-year (2021-2023) schedule.

Air District staff greatly appreciates the opportunity to work with the City to address the potentially significant air quality impacts estimated for this Project. Project design features and the mitigation measures identified in the DSEIR will substantially lessen the local and regional air quality impacts from construction and operation of the Project.

However, even with these Project design features and on-site mitigation measures, the DSEIR finds that air quality impacts from the Project still exceed the City's thresholds of significance for the compressed schedule. Therefore, Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule (M-AQ-2d) proposes that the Project applicant provide funds to achieve additional emission reductions to reduce air emissions below the thresholds of significance. To this end, M-AQ-2d states that the Project applicant would provide funding to the Air District to fund emissions reduction projects in the region in order to offset the remaining criteria pollutant emissions generated by construction during the compressed schedule. 1

Please be aware that the Air District does not currently have a fee program for offsetting emissions. These are occasionally conducted on a case-by-case basis based on available projects. We recommend that M-AQ-2d replace "Air District" with "governmental entity". This will allow the project applicant to seek additional options if the Air District has no available projects at the time.

Air District staff is available to assist the City to address these comments. If you have any questions, please contact Areana Flores, Environmental Planner, at (415) 749-4616 or aflores@baaqmd.gov.

Sincerely,

Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Gordon Mar
BAAQMD Director Shamann Walton
BAAQMD Director Tyrone Jue

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
TTY 711
www.dot.ca.gov

**A-Caltrans**

*Making Conservation a California Way of Life.*

September 10, 2019

SCH #2018102028
GTS # 04-SF-2018-00287
GTS ID: 12934
SF-280-PM 1.75

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

**Balboa Reservoir Project – Draft Subsequent Environmental Impact Report (DSEIR)**

Dear Jeanie Poling:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Balboa Reservoir Project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals our continuing approach to evaluate and mitigate impacts to the State's multimodal transportation network. Caltrans' Strategic Management Plan 2015-2020 aims, in part, to reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas emissions (GHG) in alignment with state goals and policies. Our comments are based on the August 7, 2019 Draft Subsequent Environmental Impact Report (DSEIR).

***Project Understanding***

The proposed project would develop the site with mixed-income housing, open space, a childcare facility/community room available for public use, retail space, on- and off-street parking, and new streets, utilities, and other infrastructure. This DSEIR will analyze two different sets of options for the site's residential density to capture a range of possible development on the project site: The first is the Developer's Proposed Option (1,100 dwelling units), proposed by Reservoir Community Partners LLC. The second is the Additional Housing Option (1,550 dwelling units), developed by the City of San Francisco to fulfill the objectives of the San Francisco General Plan to maximize affordable housing and housing in transit-rich neighborhoods.

Development under each of the two options would entail the same land uses and street configurations, and similar site plans. Overall, the proposed project would construct up to approximately 1.8 million gross square feet (gsf) of uses,

**A-Caltrans**

including between approximately 1.3 and 1.5 million gsf of residential space (1,100 to 1,550 dwelling units plus residential amenities), approximately 10,000 gsf of community space (childcare and a community room for public use), approximately 7,500 gsf of retail, up to 550 residential parking spaces and 750 public parking spaces in the Developer's Proposed Option, and up to 650 residential parking spaces (with no public parking spaces) in the Additional Housing Option. The buildings would range in height from 25 to 78 feet in the Developer's Proposed Option and from 25 to 88 feet in the Additional Housing Option.

Approximately 4 acres would be devoted to publicly accessible open space under each option. Also, under each option, the San Francisco Public Utilities Commission would retain ownership of an 80-foot-wide strip of land located along the southern edge of the site where an underground water transmission pipeline is located. Regional access is provided from the Interstate (I-) 280 and Ocean Avenue interchange approximately 0.35 miles east of the project site.

***Bicycle Considerations***

The Caltrans District 4 Bike Plan identifies a "Top Tier" project at the I-280 and Ocean Avenue/Geneva Avenue interchange that would reconstruct the interchange ramps and stripe Class II buffered bike lanes. Given the anticipated increase in vehicle and bicycle traffic at this location due to the project, the project should evaluate measures to enhance bicycle safety at freeway on- and off-ramps at this location. 1

***Construction-Related Impacts***

Potential impacts to the I-280 from project-related temporary access points should be analyzed. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: https://dot.ca.gov/programs/traffic-operations/transportation-permits. 2

***Coordination***

As the project progress, please keep Caltrans informed of any updates with the project, including but not limited to alternative selection and scope changes. 3

***Lead Agency***

As the Lead Agency, the City of San Francisco is responsible for all project mitigation, including any needed improvements to the State Transportation Network. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. 4

**A-Caltrans**

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Andrew Chan at 510-622-543 or andrew.chan@dot.ca.gov.

Sincerely,

Wahida Rashid
Acting District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION
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OAKLAND, CA 94623-0660

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DEPT. OF CITY PLANNING
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Jeanie Poling
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

94103-248000

A-Caltrans

A-SCH

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

September 23, 2019

Jeanie Poling
San Francisco, City and County of
1650 Mission Street, Suite 400
San Francisco, CA 94103-2749

Subject: Balboa Reservoir Project
SCH#: 2018102028

Dear Jeanie Poling:

The State Clearinghouse submitted the above named SBE to selected state agencies for review. The review period closed on 9/20/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly. 1

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

**Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2018102028/2 .** Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly**.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

*State of California*

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE
P.O. BOX 3044
SACRAMENTO, CALIFORNIA 95812-3044

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RECEPTION

A-SCH

9410382480 C025

I-Aissa

Sept. 13, 2019

To Whom It May Concern: We have owned and resided in our property at 1238 Plymouth Avenue for 40+ years. We are already dealing with tremendous congestion on a daily basis. Our street cannot tolerate the additional traffic that would be created by the plan proposed. Parking is impossible for existing residents now. Please do not allow the proposed opening to Sea Ranch! Keep the height limit and density as originally proposed. 1 2

Sincerely,
Steven Aissa &
David Bess

RECEIVED
SEP 19 2019
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

1238 Plymouth Ave
San Francisco, Ca
94112

RECEIVED
SEP 18 2019
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
RECEPTION

San Francisco Planning Dept
attn Jamie Poling, Sr. Planner
1650 Mission Street, Suite 400
San Francisco, Calif 94103

9410382478 C025

I-Aissa

**From:** Amna Ali
**To:** CPC.BalboaReservoir; Haneystaff (BOS)
**Subject:** Comment on SEIR for Balboa Reservoir Project
**Date:** Wednesday, September 18, 2019 6:13:31 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Department and Supervisor Matt Haney (whose district I reside in),
I am a librarian at City College of San Francisco and am deeply opposed to the use being proposed for the Balboa Reservoir land owned by SFPUC but leased to City College for many years. City College will be negatively impacted by this development, the brunt being borne by students from whom parking would be taken away and disruption caused due to construction activities. San Francisco is already suffering at the hands of construction of luxury housing masquerading as affordable housing, disrupting our lives and taking away resources utilized by needy San Franciscans. Please do not add to skyrocketing costs of living in the city and the fact that so called affordable housing is completely out of the reach of so many families and students in particular. Why are private developers given so much room to decide what belongs in our city? 1

I would request that the PUC place the needs of City College above those of a private developer. It should either continue to lease the land to City College or transfer it for once and all to City College to make use of according to principles of equity and relevance for the college community. 2

I would be extremely grateful for your kind attention to this matter.
Sincerely
Amna Ali
Librarian - City College of San Francisco

**From:** Lisa Anderson
**To:** CPC.BalboaReservoir
**Subject:** Please support the balboa project
**Date:** Thursday, September 12, 2019 10:55:48 AM

---

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

We need housing. There should be 5000 units on this lot. 1
-Lisa Anderson
46 San Jacinto way
Sf ca 94127

I-Barish2

Received at CPC Hearing 9/12/19

J. Pilz

To: San Francisco Planning Commission

From: Jean Barish

Date: September 12, 2019

Subject: Case No. 2018-007883ENV
Balboa Reservoir Project
Draft Subsequent Environmental Impact Report

Following are Public Comments regarding the referenced Project:

Good afternoon President Melgar and Commissioners.

My name is Jean Barish. I'm a former CCSF Faculty Member, teaching Anatomy, Physiology, and Health Education. I have also practiced law for over 20 years. 1

I am here to state my opposition to the Project, and to highlight some of the flaws in the Draft Subsequent EIR. (Att 1) 2

This oversized project could squeeze up to 1,550 units of housing, mostly market rate, onto a parking lot adjoining CCSF and a quiet neighborhood of single-family homes. (Att 1)

While it may be a developer's Field of Dreams, the project is a nightmare to the surrounding neighborhoods and to City College.

It will create congestion, transit problems, lack of access to CCSF, and many other environmental problems. It will also convert public land, currently owned by the SF PUC and used by CCSF for decades, into private property for profiteering developers. And it will not meet the growing need in San Francisco for affordable housing.

Coalition of San Francisco Neighborhoods, Westwood Park Neighborhood Association, and other groups have signed Resolutions opposing this project. Hundreds of people have signed petitions and letters. I hope you will pay attention to their concerns. 3

I urge the Commission to consider reducing the project to one that is about 400 units, such as illustrated in this drawing. (Att 2) 4

And now for a few specific flaws in the DSEIR.

1) The DSEIR Initial Study eliminated many environmental impacts for review by concluding they were not potentially significant. But these conclusions are flawed. The Study concluded that the project would not create adverse shadow effects, despite the fact that there would be new shadow on Unity Plaza for over 25% of the year, and there would be significant shadow on Riordan High School. 5

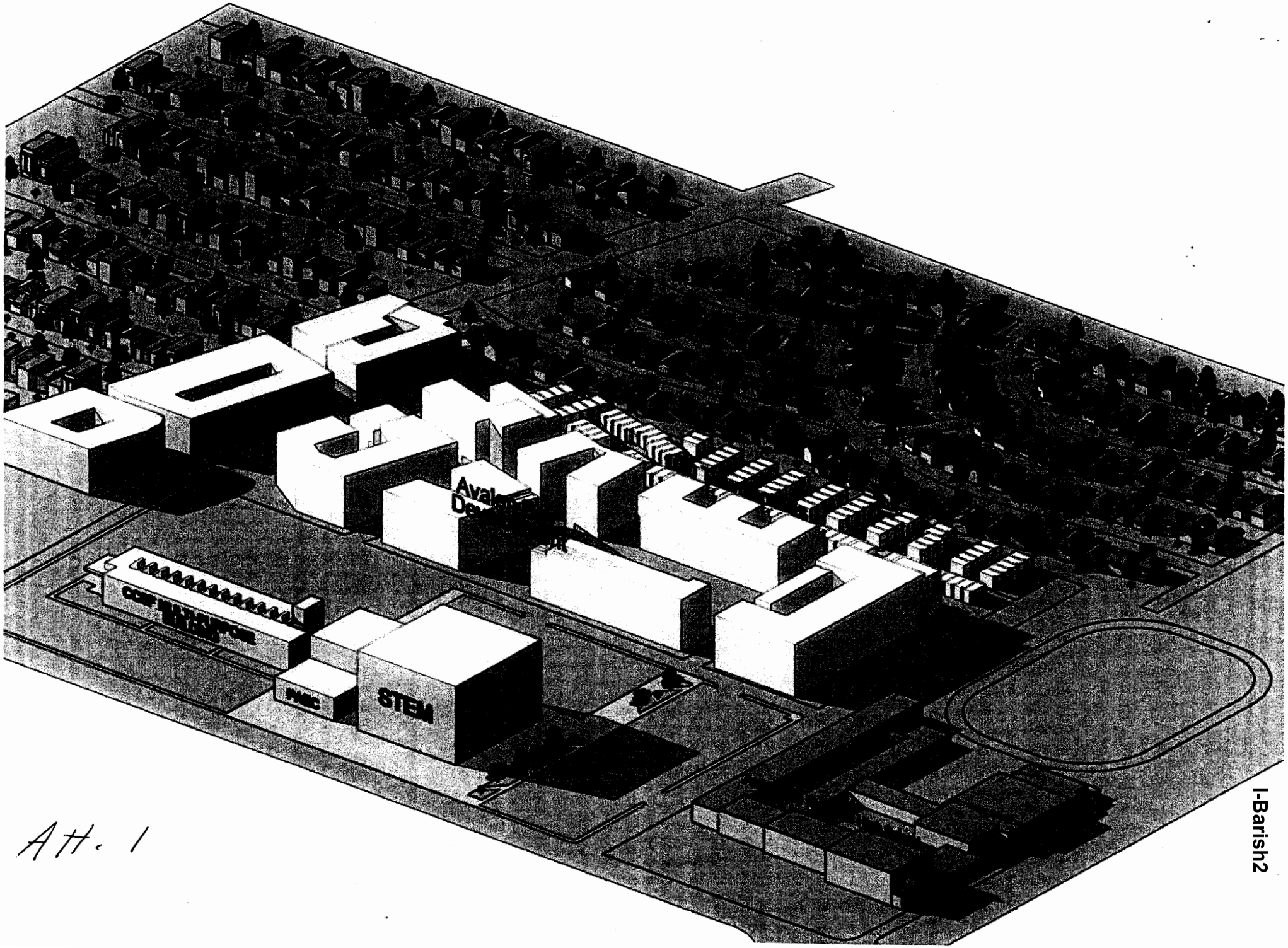
2) The Initial Study says there would be a population increase of over 100% in the plan area, but concludes there would be no significant cumulative population impact because this is a tiny increase compared to the population of the City as a whole. This is a flawed apples and oranges comparison, and should not be accepted. 6

3) Finally, the Initial Study concludes the project would not result in cumulative impacts on public services. Yet it did not analyze the impacts of the project on City College. Again, the DSEIR review of this impact is inadequate. 7

In these and many other areas, the DSEIR offers no objective criteria to serve as a basis for determining that the impacts are not significant. Accordingly, the it is a flawed document that must be revised before it is submitted for final review. 8

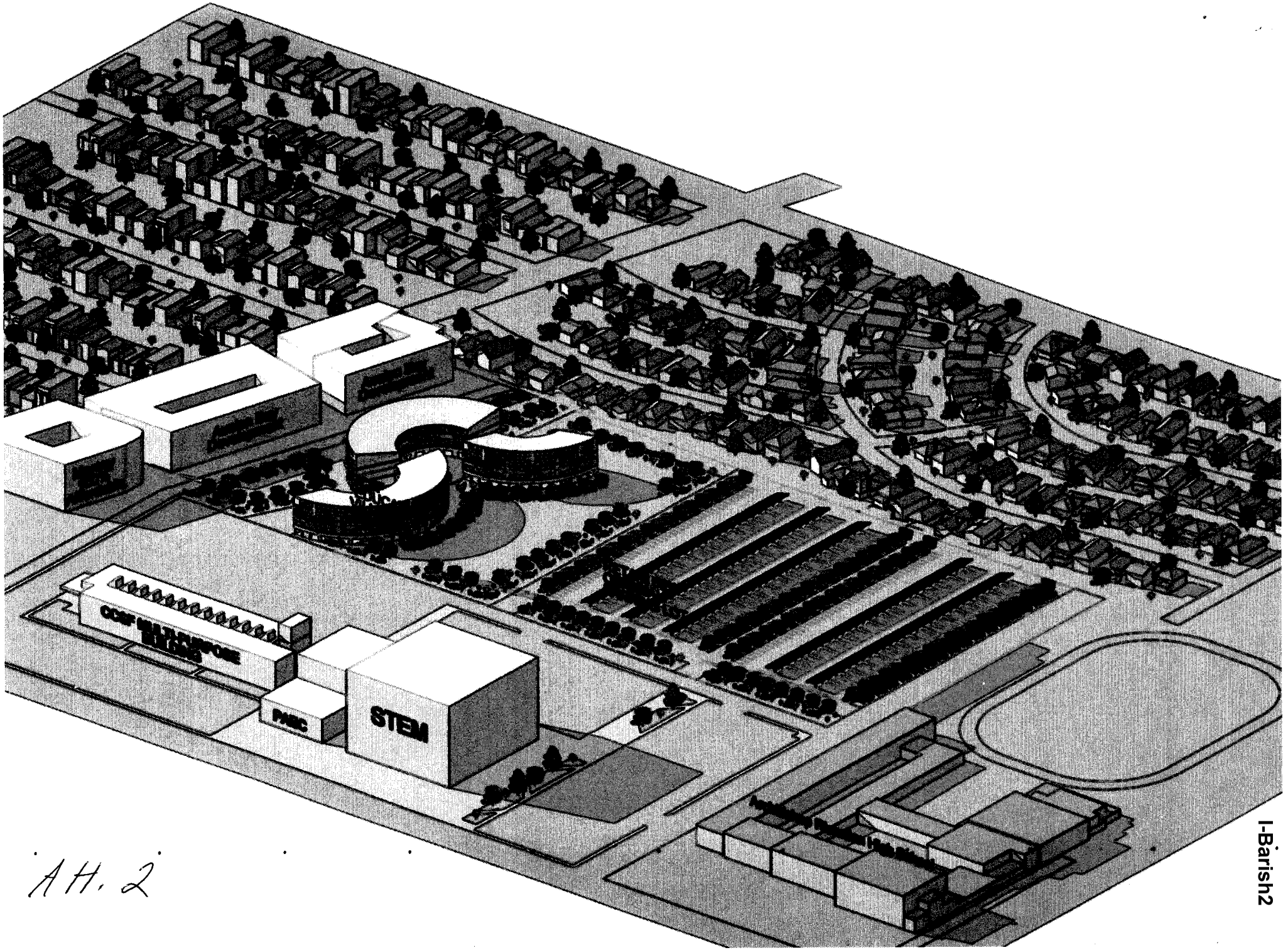
In conclusion, I hope you agree this Field of Dreams should be replaced with a scaled-down, environmentally sound, 100% affordable project with no significant environmental impacts. 9

Thank you.




Att. 1

I-Barish2




AH. 2

I-Barish2

Coalition for San Francisco

# Neighborhoods

## COALITION FOR SAN FRANCISCO NEIGHBORHOODS RESOLUTION REGARDING BALBOA RESERVOIR

**Whereas,** the SF Public Utilities Commission, in close cooperation with various San Francisco agencies, is proceeding with plans to build a private housing development on public land currently owned by the SF Public Utilities Commission (the "Development"); and;

**Whereas,** this Development is located on the section of the Balboa Reservoir that City College of San Francisco ("CCSF") has improved and leased from the PUC for decades and;

**Whereas,** public land should remain in public hands for the public good and;

**Whereas,** this Development would provide mainly market rate, not affordable, housing and;

**Whereas,** this Development would eliminate parking with no corresponding improvement of transit alternatives, thereby limiting access for students who do not have other viable options;and;

**Whereas,** construction of this Development could delay or prevent completion of the CCSF Performing Arts and Education Center (the "PAEC") approved by voters in 2001 and 2005 bond measures and;

**Whereas,** San Francisco public agencies must abide with State Surplus Land Statute 54222, which requires that any local agency disposing of surplus land shall send, prior to disposing of that property, a written offer to sell or lease the property . . . to any school district in whose jurisdiction the land is located and;

**Whereas,** this Development would have significant environmental impacts in the surrounding area and;

**Be it resolved,** the Coalition for San Francisco Neighborhoods (CSFN) asks the SF PUC to transfer this public property to City College of San Francisco and furthermore,

**Be it resolved,** the CSFN urges the CCSF Board of Trustees to exercise their right as a public institution to ask the SF PUC to transfer this public property to CCSF so as to keep it forever in public hands for the public good and furthermore;

**Be it resolved,** the CSFN urges the CCSF Board of Trustees to remain vigilant to ensure that the PAEC be built before any development on the Balboa Reservoir goes forward and furthermore;

**Be it resolved,** in the event that the transfer of title to the property to CCSF does not take place, and the Development is pursued, the CSFN urges the CCSF Board of Trustees to remain vigilant to ensure that any loss of parking be mitigated before any development on the Balboa Reservoir goes forward so as not to limit the educational access of any student.

George Wooding, President, CSFN

George Wooding

AH.3

**From:** Jean Barish
**To:** CPC.BalboaReservoir
**Subject:** Case No. 2018-007883ENV Balboa Reservoir Project Draft Subsequent Environmental Impact Report
**Date:** Monday, September 23, 2019 6:50:37 AM
**Attachments:** JB DSEIR Comment Letter.docx
Alternative Architect Drawing [1].pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Attached is a comment letter for the Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project, Case No. 2018-007883ENV. Also attached is a drawing of a feasible alternative project that the Final SEIR should consider. Please file both of these documents with the record of this case.

Please confirm receipt of these documents by return email.

Thank you for your consideration of these comments.

*Jean*

*Jean B Barish, Esq., MS*
*jeanbbarish@hotmail.com*
*415-752-0185*

***JEAN B BARISH***
***5758 Geary Boulevard, Suite 341***
***San Francisco, CA 94121***
***jeanbbarish@hotmail.com*** ***415-752-0185***

September 20, 2019

Via Electronic Mail

San Francisco Planning Department
Attn: Jeanie Poling, Senior Planner
1650 Mission Street, Suite 400
San Francisco, CA 94103
CPC.BalboaReservoir@sfgov.Org

Re: **Case No. 2018-007883ENV**
**Balboa Reservoir Project**
**Draft Subsequent Environmental Impact Report**

Dear Ms. Poling:

I am writing in response to the Draft Subsequent Environmental Impact Report ("DSEIR") for the Balboa Reservoir Project (the "Project") referenced above.

After reviewing the DSEIR it is clear there will be many significant environmental impacts to that cannot be mitigated if this project is approved. Additionally, the DSEIR is flawed because it fails to consider numerous environmental impacts that should have been considered. 1

Following are my questions and comments regarding this DSEIR.

Definitions

"Substantial Evidence," as used in this letter, shall mean: "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (14 Cal Code Regs Sec. 15384(a) ) "Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (14 Cal Code Regs Sec. 15384 (b) ) " Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence." (14 Cal Code Regs. Sec 15064(f)(5) )

"Feasible Alternatives", as used in this letter, shall mean: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code section 21061.1; 14 CCR section 15364)

## BALBOA PARK AREA PLAN

This DSEIR is a project-level EIR that is tiered from a previously certified program-level EIR ("PEIR") 2

The Project is a portion or sub-set of the Balboa Park Station Area Plan (the "Plan"). To better understand some of the defects with the DSEIR, it is important to refer to the Plan and several of its Objectives and Policies. (http://generalplan.sfplanning.org/Balboa_Park_Station.htm#BPS_HSG)

Policy 1.4.2 states*: If the PUC should decide that the west basin is not needed for water storage, it should consider facilitating the development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. The development on the site should recognize the opportunity to knit the surrounding neighborhoods together through the creation of a community open space and pedestrian connections*.

Policy 1.4.2, therefore, states that at best, only part of the west basin would be used for housing. The development of a project with up to 1,550 units goes far beyond partial development of the reservoir. It should be scaled back to be compliant.

Policy 4.4.1 states: *"If the PUC should decide that the west basin is not needed for water storage, it should consider development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing. Affordable housing should be considered a high priority per Policy 4.5.1."*

and

Policy 4.5.1 states: *"…Where publicly-owned parcels are being developed, . . . city policy directs that surplus public property be considered for development of affordable housing. Thus, when offering their land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income.*

Since the Project only requires the developer to provide less than 1/3 affordable units, it is not compliant with the Plan policies. This must be considered when the Final SEIR ("FSEIR") is prepared.

Policy 6.4.1 states: *Regardless of scale, new development should add to the district's character, create a human scale public realm, and fit within the city's traditional fabric; regardless of architectural style. Larger-scale development efforts must take great care to not overwhelm the scale of the area and to positively establish a pedestrian-scale pattern. Urban design guidelines have been developed for the plan area and compliance with the guidelines is mandatory.*

The Project is massive and out of scale with the surrounding neighborhoods. It will have buildings up to 8 stories high, casting shadows on public open space and Archbishop Riordan High School. It will dwarf the single family homes surrounding it, and it will remove open space that is used by City College of San Francisco ("City College") for both parking and recreational purposes. A Feasible Alternative must be considered.

In view of the foregoing, the Project is not in accord with the Plan and needs to be revised accordingly. 2 (cont.)

## INITIAL STUDY – APPENDIX B

### Introduction

Balboa Park Station Area Plan (p. B-3) 3

The area plan's land use map designates the site's land use as P (Public), and the height map indicates a 40-foot height limit (Maps 3 and 6). However, the Project will include buildings up to 78 feet in the Developer's Proposed Option and up to 88 feet in the Additional Housing Option. (B-4) The FSEIR must provide substantial evidence explaining why this increase in height limit will not have an unanticipated and significant environmental impact.

The Accountable Planning Initiative (p. B-5) 4

Under Proposition M, planning policies must include conservation and protection of existing housing and neighborhood character (B-5). The DSEIR fails to discuss how the will impact neighborhood character. In accordance with Proposition M, the FSEIR must provide substantial evidence explaining this analysis.

Effects Found Not to be Potentially Significant (p. B-10) 5

In some cases, the Initial Study identified mitigation measures in CEQA topic areas that would reduce potentially significant impacts to a less-than-significant level, supporting the conclusion that these topic areas do not need CEQA review under this SEIR.

The Initial Study found that the only effects found to be potentially significant in the Project were Transportation and Circulation; Noise; and Air Quality. All other potential individual and cumulative environmental effects considered in the PEIR were found to be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures in the DSEIR. These impacts that are not studied in this DSEIR are: Land use and land use planning; Population and housing; Cultural resources; Tribal cultural; resources; Greenhouse gas emissions; Wind; Shadow; Utilities and service systems; Public services; Biological resources; Geology and soils; Hydrology and water quality; Hazards and hazardous materials; Mineral resources; Energy; Agricultural and forestry resources; Wildfire.

However, for the reasons set forth below, the basis for these determinations are flawed. The effects below should, in fact, be analyzed in this DSEIR.

Land Use Impacts 6

*Impact LU-2: No conflict with applicable land use plans (p. B-14)*

According to this section, the proposed project would require rezoning to permit structures up to 88 feet tall. It would appear, therefore, that any significant land use conflict can simply be

mitigated by rezoning the land. This appears to be an abuse of legislative discretion. The FEIR must consider the appropriateness of this rezoning option. 6 (cont.)

*Impact C-LU-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative impacts to land use. (Less than Significant) (p. B-15)* 7

There is no objective data to support this conclusion. Rather, the DSEIR simply states that in combination with reasonably foreseeable future projects, the Project would have less-than-significant cumulative land use impacts. But absent a quantitative analysis of all the CEQA environmental impacts, it is improper to reach such a conclusion. The FSEIR must provide substantial evidence to support its conclusion. Absent an analysis of the substantial evidence, the FSEIR will be insufficient.

Population and Housing Impacts 8

*Impact C-PH-1 The proposed project, in combination with reasonably foreseeable future projects, would not result in significant cumulative population and housing impacts. (Less than Significant) (p. B-21)*

The Developer's Proposed Option and Additional Housing Option would increase the onsite residential populations by 2,530 and 3,565 respectively. Compared to the increase in population analyzed in the PEIR or 1,150 residents (Table 1, p. B-19) this is an increase of over 100% in the plan area. Yet, despite this significant increase in population compared to the PEIR, the DSEIR concludes it is not significant. It justifies this decision by saying it would not be substantial for the City as a whole. While that may be true, it improperly fails to consider the impact on the immediate neighborhood. The FEIR must thoroughly analyze this population increase within the Area Plan, not within the entire City.

Shadow Impacts 9

*Impact SH-1 The proposed project would not create shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces (Less than Significant) (p. B-46)*

The DSEIR states that there would be new shadow between May 1 and August 15 (B-47-50). Fig. 3 illustrates this new shadow. These are the warmer, drier summer months, when people are more likely to be outside closer to sunrise and sunset. Yet, despite any objective measure of significance and any substantial evidence, the DSEIR states that any new shadow would not be significant. The FSEIR must provide substantial evidence that such an increase in shadow is not significant.

*Impact C-SH-I The proposed project . . . would not result in cumulatively considerable impacts related to shadow. (Less than Significant) (p. B-50)* 10

The DSEIR discloses that the project would cast new shadow on the athletic field at Archbishop Riordan High School Athletic Field. (p. 51) But it appears this shadow is not subject to CEQA analysis since it is not a publicly accessible open space. That, however, is a technicality which should not justify disregarding this significant shadow impact on a high school adjacent to the project. The FSEIR should evaluate and determine if the shadow on Archbishop Riordan High School's Athletic Field is a significant environmental impact. 10 (cont.)

Utilities and Service Systems Impacts 11

*Impact UT-1 Sufficient water supplies are available to serve the proposed project … unless the Bay Delta Plan Amendment is implemented…Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term . . . (Less than Significant) (p. B-59)*

According to the DSEIR, page B-57, SFPUC Resolution 02-0084 determined that there was sufficient water supply to serve expected development projects in San Francisco through the year 2020, and the implementation of the Area Plan was not expected to have any substantial impact on water supply. Since the Project will not be completed until approximately 2027, it appears this projection is obsolete. Please explain.

Further, in the Conclusion on page B-73, the DSEIR states that there is too much uncertainty related to the possible implementation of the Bay-Delta Plan Amendment to identify environmental effects, and such effects are, therefore, speculative at this time. Please explain how an informed decision regarding the availability of an adequate water supply for the Project can be determined in view of these uncertainties, and why, in view of these uncertainties, the DSEIR states the environmental impact is less than significant.

Further, according to a September 22, 2019 article in the *San Francisco Examiner,* a recent civil grand jury report, "Act Now Before It Is Too Late: Aggressively Expand and Enhance Our High-Pressure Emergency Firefighting Water System," raised the alarm about the lack of coverage for western San Francisco neighborhoods. According to the report, The City's high-pressure emergency water supply system "does not cover large parts of Supervisorial Districts 1, 4, 7 and 11, roughly one-third of the City's developed area," the report said. "As a result, these districts are not adequately protected from fires after a major earthquake." (https://www.sfexaminer.com/news/report-large-parts-of-sf-not-adequately-protected-from-fires-after-major-earthquake/?fbclid=IwAR145KV4GH_CNfBJvCogj0bPF__iAYdlgyWcrmV5PyZkhjN995GTKpG6AOc)

The Project is in D 7. In view of the grand jury's report, the DSEIR is inadequate for not reviewing the environmental impact of building a massive development on a reservoir that could serve the area in case of an emergency. The DSEIR must provide substantial evidence that covering the Balboa Reservoir will not significantly impact Utilities and Service Systems.

Public Services Impacts – Failure to Consider Impact on City College of San Francisco ("City College") 12

*Impact C-PS-1: The proposed project, in combination with reasonably foreseeable future projects, would not result in cumulative impacts on public services. (Less than Significant)*

By way of the Initial Study, the DSEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address the impact on student attendance and enrollment and on part-time Instructors who have to travel between multiple community college sites. 12 (cont.)

The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the less-than-significant conclusion of the Project's impact on City College. The Initial Study states*: The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.*

*. . .*

*Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.* 13

This is incorrect. Removing parking would clearly increase demand for public services in the form of, among others, demand for increased public transit, demand for more TNC's, and demand for alternative parking in other areas of the City College campus. For the reasons set forth in the review below of the Kittelson TDM, DSEIR Appendix C, there are no effective mitigations proposed for the loss of parking due to this Project.

City College is the central educational, economic, and cultural focus of the neighborhood. Its interests cannot be allowed to be made secondary to the Project. 14

City College's educational mission makes it a target destination for students, staff, faculty. This simple fact needs to be recognized as being desirable, even if CCSF students need to drive to school and need parking.

The Project must take responsibility for mitigation of its own significant cumulative impacts on City College, traffic and parking. The burden of mitigation should not be shifted onto City College and neighborhoods.

Current Reservoir student parking is an existing physical condition. This physical reality cannot be ignored. Removal of student parking will have significant impact on student enrollment and attendance. 15 16

The proposed "solutions" to circulation, parking, and congestion problems be simply based on wishful thinking and "creative solutions". Conjecture and hope is not a solution for student access to education. 17

The substantial impact on City College's educational mission must be comprehensively and objectively examined in the DSEIR. The omission of this examination renders the DSEIR and Initial Study inadequate. 18

## DSEIR

The following flaws in the DSEIR must be considered.

Figures in DSEIR

Figures 2-1 through 2-8; Figures 2-9 through 2-12; Figure 2-16; Figures 2-18 through 2-21; Figure 3.B-4; Figures 5-1 through 5-4; Figure 6-1; and Figure 6-2 are inadequate and incorrect. They do not show the alterations to the Upper Lot, where the CCSF Multi Use Building is located, that are included in the Facilities Master Plan, approved by the CCSF Board of Trustees in March, 2018, and the subsequent Plan that was presented to the Board of Trustees for consideration of a San Francisco Bond Measure. Table 3.A-2 describes the New Facilities planned for this area. (P. 3,A-13). Accordingly, these Figures are all misleading and do not accurately represent buildings on the land adjoining the proposed project. The FSEIR must use accurate, updated Figures. 19

Chapter 2, Project Description

Size of the Balboa Park Reservoir Project

According to 2.D.1, the area plan PEIR estimated the area plan would result in a net increase of 1.780 residential units, and that as of Sept., 2018, 273 units have been built and excluding the Balboa Reservoir project, an addition 209 units are planned. (P. 2-6) Therefore, of the 1,780 total number of units, 482 are already accounted for, leaving 1,295 units as the maximum number that could be built at the Balboa Reservoir and still comply with the PEIR. Yet the DSEIR considers one option that would have 1,550 units, 255 more than allowed in the PEIR. A Balboa Reservoir project with more than 1,298 units, therefore, would be inconsistent with the PEIR, and should not be permitted. 20

Project Overview, 2.A

The DSEIR does not conform to California Code of Regulations, Title 14, 15125 (a) and (c).

According to the DSEIR, p. 2-1: *The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This Project Overview is inadequate, and does not conform to California Code of Regulations, Title 14, 15125 (a) which states*: An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. . . . The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

City College, Archbishop Riordan High School, and Lick Wilmerding High School are all large institutions in the vicinity of the Project. But the DSEIR does not always consider impacts of the Project on these institutions. Accordingly, the DSEIR is inadequate and must be revised to comprehensively review all the environmental impacts on these locations. 21

Further, *Antioch v. Pittsburg* (1986) 187 Cal. App. 3d 1325 (http://resources.ca.gov/ceqa/cases/1986/antioch_121686.html)
Stands for the proposition that an EIR must consider cumulative impacts on future projects. CCSF is planning to do additional construction on the upper parking lot adjacent to the Project, namely a Performing Arts Education Center and a STEAM building. But the DSEIR failed to consider the impact of the Project on this future construction. The FSEIR must review and evaluate this impact.

Further, California Code of Regulations, Title 14, 15125 (c) states: *Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a unique educational institution that provides services for tens of thousands of students daily, and employment for many more thousands. It is the only Community College in San Francisco, with a long and storied history of serving the entire City of San Francisco. There is no question that the Project will impact City College. The DSEIR is inadequate since it fails to comprehensively consider the environmental impacts of the Project on City College. The FSEIR must rigorously review all the substantial environmental impacts on City College in accordance with CEQA. Failure to do so would result in a flawed and inadequate FSEIR. 22

Approach to Cumulative Impact Analysis (p. 3.A-8)

The DSEIR states: *At the time of this DSEIR preparation, the project description detail for the facilities master plan projects for the Ocean Campus is limited, City College may change those projects or their details depending on funding availability, and City College has not conducted CEQA analysis for those projects. Therefore, the cumulative analysis for this SEIR will qualitatively assess the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the "City College Facilities Master Plan" using best available information at the time of this SEIR preparation.* (P. 3.A-14)

An analysis based on "best available information" is inadequate. CEQA reviews should not be based on speculation, but on quantifiable, objective data. The fact that the City College FMP is ambiguous and uncertain at this time raises serious questions about the validity of any conclusions about Cumulative Impact Analyses. 23

3.B Transportation and Circulation

Transportation Demand Management (TDM) Plan (-p. 3B-38)

The Project will significantly impact transportation and traffic in the neighborhood. The EIR must 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 DSEIR 24

must also consider these substantial impacts on lower income students who likely reside further away and must use automobiles. This study must also include the impact of increased traffic on congestion and parking in the neighborhoods impacted by the Project, and propose feasible alternative to these impacts. 24 (cont.)

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) 25

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 FSEIR must include a completed TDM. A Final SEIR should not be circulated until this completed TDM has been incorporated into the FSEIR.

Project travel demand refers to the number, type, and common destinations of new trips that people would take to and from the project. The memorandum containing the detailed methodology and results for the project travel demand is included in DSEIR Appendix C1, Travel Demand Memorandum.

The TDM Plan that was submitted by Kittelson in Appendix C1 is incomplete. It is a survey of trip generation and parking, but there is no analysis of alternative sources of travel or transit use. This omission is unacceptable. A complete and competent TDM Plan must be included in the FSEIR. Failure to do so would result in an inadequate EIR which should not be certified. Additionally, for the reasons set forth herewith, the Kittleson report is flawed, and does not provide a competent basis for transportation mitigation:

- The Kittelson TDM does not engage with important current transportation characteristics in the project area which would likely be impacted and transformed by the scale and intensity of the proposed development alternatives.

- The report indicates that the trip generation manual being employed is somewhat out of date but the most recent available.

- Recent academic studies in the last year have observed that there has been a very substantial increase in trips and congestion over the past two Years. They estimate that 40% of this increased congestion may be estimated to be attributed to Lyft and Uber car service trips. In the mode choice allocations the report models car service trips are treated as a small segment, less than 10%?

- Even if one estimates that car service trips are both a mode choice switch and a cause of changing traffic through increased trip generation... there are no level of service discussions LOS for morning and afternoon peaks and for off peak mid day... for the main streets serving the project. What is traffic like and what might be the impacts of increased trips on the level of service in the project area and on adjacent arteriales serving the project area. And how might one assess the cumulative transportation impacts of this project and planned development adjacent to the project area?

- The expected distribution of trips for residents seems very light for peak period travel. Is there any current transportation trip generation and travel diary data that might be employed to validate the time of day assumptions for residents of the new development?

- The current assumptions for residents are quite variant from the conceptual estimate of student trips that might be estimated from the parking lot driveway analysis... where we see a high density of trips around the morning and afternoon peaks. If the apartment dwellers trip characteristics more clearly follow the patterning of student car trips there may be serious congestion and LOS impacts. How might you assess this possible outcome? Particularly where you don't provide LOS data for main circulation routes.

25 (cont.)

- There is an aerial analysis of parking lot volumes by time of day. But there is no assessment of the current on-street parking supply. It is known from other campuses and from parking lots serving rail transit like Bart and Cal Train or from light rail in other cities that campuses and large developments put pressure on parking supply, particularly when TOD seeks to provide less parking to support alternative mode choice and to lower development costs. The scoping section has no assessments of the interactive impacts of the college, new apartments and regional parking supply/demand on neighborhood parking conditions post-Development.

26

Public Transit Delay (p. 3.B – 51 et seq)

27

There are significant and unavoidable cumulative transit impacts identified by the DSEIR.

Impact C-TR-4: *The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. (Significant and Unavoidable with Mitigation)*

Impact C-TR-6b*: Operation of the proposed project, including proposed street network changes, in combination with reasonably foreseeable future projects, would impact existing passenger and freight loading zones along Lee Avenue between Ocean Avenue and the project site, and may create potentially hazardous conditions for people bicycling and may substantially delay public transit. (Significant and Unavoidable)*

The DSEIR also states:

Impact TR-4: *Operation of the proposed project would not substantially delay public transit. (Less than Significant)*

However, the DSEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence.

The City Charter/SFMTA late criterion is a 4 minute delay relative to the MUNI schedule.

In comparison, the Reservoir late standard as applied for the segment from Monterey/Gennessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The DSEIR appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus the DSEIR reinterprets the MUNI 4-minute lateness standard to allow the Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant. This is an invalid, flawed analysis of acceptable transit delays. The FSEIR must recalculate transit delays validly.

Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would also violate the City's Transit First Policy.

27 (cont.)

## NOVEMBER 12, 2018 SCOPING LETTER

Included in this letter as Attachment 1 is the November 12, 2018 Scoping Letter submitted for this Project. Many of these issues were not addressed in the DSEIR. These comments should all be addressed during the preparation of the FSEIR.

28

## ADDITIONAL COMMENTS

The following additional comments regarding the DSEIR are submitted for your consideration.

***The DSEIR must consider the option of using this public land to build 100% affordable housing***

29

The DSEIR states the need to "Develop the reservoir in a manner that will best benefit the neighborhood, the city, and the region as a whole.

San Francisco is woefully behind in creation of affordable housing, and yet, this DSEIR does not study or offer the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would be have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco already owns this parcel, so why is the City of San Francisco planning to sell

public land that it already owns to a private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense? 29 (cont.)

Policy 4.5.1 in the Balbo Park Station Area Plan says that when offering public land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

*The DSEIR is inadequate because it fails to consider the impacts on the public service of City College of San Francisco.* 30

The Reservoir Project will have an adverse impact on higher public educational services offered by City College. According to a City College Ocean Campus Survey of City College students and workers conducted in May 2016, 45.7% commuted by car. Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules."

Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students' access to higher education services offered by City College.

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered.

The DSEIR says: "… it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..." and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the DSEIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." It avoids assessing the possibility that students might not be able to continue attending City College. 31

The DSEIR notes that the City College TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of City College. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact on City College's ability to provide public higher educational services. It is erroneous to extend 21099's parking exemption onto the elimination of the public benefit of providing access to higher education. 32

The Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students' access to higher education services offered by City College.

***The DSEIR must consider the impact of increasing the number of units from the original recommendation in the PEIR*** 33

The Reservoir Project's two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR's Housing option for the Reservoir referred to 425-500 units. From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR.

The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes "substantial unplanned growth." 33 (cont.)

***The DSEIR must consider the impact of market-rate units in working-class neighborhoods*** 34

The Draft SEIR also does not consider or compare the potential for gentrification impacts to the residents of the Ingleside, the neighborhood located across Ocean Avenue from the proposed development. A development solely devoted to affordable housing would better blend with the residents of this working class neighborhood. The proposed development of mostly market rate units leaves these residents vulnerable to displacement due to gentrification. The adjacent neighborhood, Excelsior, is also a working class neighborhood vulnerable to displacement due to gentrification.

***The DSEIR must consider the possibility of using this public land to build dedicated educator housing*** 35

Since approval of the PEIR the City of San Francisco has also identified a great need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers would be able to walk to work if they lived there.

***The DSEIR must consider the impact of the change of zoning*** 36

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing.

***The DSEIR must consider the option of leaving open space*** 37

The Balboa Reservoir is currently open space that allows for vistas of the Pacific Ocean to the Farralones from the CCSF Science Building. The BPS Area Plan contains a Streets and Open Space Element. Why is this consideration left out?

***The DSEIR must consider the impact of reduced parking without first putting viable transportation options in place*** 38

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school.

The goal of increasing ridership levels on the nearby public transportation services is laudable but not realistic. Both MUNI and BART have problems with capacity. They have more riders than they can handle. Regular riders of the 43 and 29 will be able to recount stories of crowded conditions and being passed up by buses. New Reservoir residents will only aggravate unreliable service on public transit.

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

38 (cont.)

***The DSEIR must consider the impact of costs incurred to CCSF***

The proposed Reservoir development has forced City College to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This secondary impact must be addressed.

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking.

39

***The DSEIR must consider the option of leaving open space***

The BPSAP contains a Streets and Open Space Element. Why is this left out?

40

***The DSEIR must consider the impact of creating a nuisance***

The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that *Land may be sold or transferred when….*
*Use of the land sold is not to result in activities creating a nuisance.*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance.

41

<u>Conclusion</u>

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

42

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
jeanbbarish@hotmail.com
415-752-0185

cc: San Francisco Board of Supervisors
City College of San Francisco Board of Trustees
San Francisco MTA Board of Directors
San Francisco Planning Commission
San Francisco Public Utilities Commission
San Francisco Office of Workforce and Economic Development

# ATTACHMENT 1

***JEAN B BARISH, Esq., MS***
***5758 Geary Boulevard, #341***
***San Francisco, CA 94121 jeanbbarish@hotmail.com***

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

<u>Hydrology and Water Quality</u> – 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

Att

AERIAL 2

I-Barish3

**From:** Julie Barnard
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Balboa Reservoir Housing Development
**Date:** Wednesday, September 11, 2019 6:32:17 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commissioners

I work in housing in local government (specifically housing) for the City of South San Francisco. I understand the complexities and concerns relating to the loss of control by City Planning Departments due to the passing of legislation such as SB50 and NIMBYism, I also dont need to explain the details of California (specifically SF's) housing crises.

I urge you to build SF's fair share of market rate housing and specifically affordable housing. Even providing allowing market rate housing will alleviate pressure on displacement, evictions and rent escalations for those who cant afford to live in SF. Further, this is an opportunity to increase the number of BMR units (either as inclusionary housing or as stand alone buildings). 1

San Francisco does a great job of providing space for new job creation and should really be approving and providing equal numbers of new units!

I would also like to remind you that for all those residents who are vocal about opposing new housing there are many more that are indifferent or supportive of initiatives such as these.

Thanks,
Julie

**From:** Sara Barz
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Cc:** laura@yimbyaction.org; Safai, Ahsha (BOS)
**Subject:** Yes to housing at Balboa Reservoir
**Date:** Wednesday, September 11, 2019 8:40:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi,
I am a District 11 resident and neighbor of Balboa Reservoir, and I strongly support adding 1,100 units of housing in place of the parking lot at Balboa Reservoir. 1

This is absolutely the right choice for our city to make. New residents will help support our local retail and hopefully bring much needed foot traffic to Ocean Ave and Mission. We absolutely need to build more housing to address the housing crisis, and that housing should ideally be built within walking distance from transit stations like Balboa Park BART and corridors with good Muni access like Ocean Ave. Finally the 50/50 affordability split is an incredible opportunity to bring in affordable homes for people at risk of displacement in Ingleside and the Excelsior.

We absolutely need this parking lot to turn into housing. Please support this project.

Thank you,
Sara Barz

--
Sara K. Barz
skbarz@gmail.com
+1 (415) 935-0738
LinkedIn | Twitter

**From:** Charles Belbin
**To:** CPC.BalboaReservoir
**Subject:** Parking, parking, parking
**Date:** Sunday, September 22, 2019 9:09:20 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Students work—this is obviously not a residential school, no dorms—and need to get to jobs all over the Bay Area on time. Schools come with parking lots, it's part of our car culture and the reality is we're still in a car culture.

Probably the most absurd moment in this fiasco of ignoring student (and faulty who often work several jobs) need is the survey done at midnight which found little use of the parking lot, duh!

The community has adjusted to the parking situation of the school for decades but this project will take away parking and add cars. Does anyone in their right mind imagine that people will buy expensive housing, work in Silicon Valley and own half a car? That dumps the parking problem on the neighborhood and, as a practical matter, deprives students of an education.

Please consider the following points from another concerned citizen..

"An EIR is supposed to give a description of the existing vicinity. Yet the Reservoir EIR Project SEIR's (Subsequent EIR) description limits it to the Reservoir lot/site itself. 1

This failure to place CCSF in the description will undermine CCSF's future.

Once the Reservoir Project gets built, the City and developers will establish the Project to be the "baseline existing condition." And at that point any future CCSF FMP projects will have to answer for CCSF's adverse impacts on the Reservoir Project.

BOT and Administration need to change its stance of being antagonistic to students, while being servile to the Reservoir Project. BOT and Administration need step up to defend CCSF interests, instead.

During the accreditation crisis many of us fought diligently to restore the BOT to power. Please don't continue to disappoint us.

To address the deliberate exclusion of CCSF from the description of the "Existing Setting", I have submitted the attached written comment. Here are excerpts:

INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already stated the following:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

The Initial Study's B. PROJECT SETTING states: The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.

Going to the referred Ch.2 Project Description produces this:

Project Description
2.A Project Overview
The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).
This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

California Code of Regulations Title 14 Section 15125
California Code of Regulations Title 14 Section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:
§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

In order for the public and decision-makers to acquire the "most accurate and understandable picture possible of the project's impacts", we are left with the SEIR's 2.A Project Overview contained in Chapter 2, Project Description. Contrary to § 15125's requirement for a description of the existing condition "in the vicinity of the project", SEIR 2.A only provides a description of the project site:

The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see Figure 2-1, Location Map). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).

THIS FAILS § 15125's REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.
requirement
14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.

1 (cont.)

City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

2

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

Subject: Input for planning – CCSF must be considered

Comments:
CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.

Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!

Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!
THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c)."

Charles Belbin
Retired CCSF Faculty
Neighborhood resident

2 (cont.)

3

4

**From:** Harry Bernstein
**To:** Poling, Jeanie (CPC)
**Subject:** Re: Balboa Reservoir EIR
**Date:** Sunday, August 11, 2019 11:25:43 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Thank you.

My mailing address is 235 Byxbee Street
San Francisco, CA 94132

Can you tell me, is this report going to be an original EIR or will it be based on some other EIR that's been done elsewhere in the immediate area? 1

Thanks again,

Harry Bernstein
---

> On Tuesday, June 11, 2019, 12:45:10 PM PDT, Poling, Jeanie (CPC) <jeanie.poling@sfgov.org> wrote:
>
> Hello Mr. Bernstein,
>
> I understand you requested that we send you a hard copy of the draft EIR when it's published. Please send me your mailing address.
>
> Thank you.
>
> **Jeanie Poling**
>
> **Senior Environmental Planner**
> San Francisco Planning Department
> 1650 Mission Street, Suite 400 San Francisco, CA 94103
> Direct: 415.575.9072 | www.sfplanning.org
>
> San Francisco Property Information Map
>
> *I will be out of the office Wednesday, June 12th through Monday, June 17th and will not be checking email.*

**From:** Harry Bernstein
**To:** CPC.BalboaReservoir
**Subject:** Fw: photo selected for cover of draft SEIR is misleading
**Date:** Monday, September 23, 2019 2:14:10 AM
**Attachments:** photo selected for cover of draft SEIR is misleading.pdf

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to Jeanie Poling, Senior Planner

I restate here the initial text of the comment submitted as an attachment.

The cover image for the Draft SEIR of the Balboa Reservoir Project, 1

case no. 12018-007883ENV, shows a large and nearly empty lot and thus does not fairly represent the actual usage of the Lower Reservoir site when City College is in session.

To support this contention, I append the following newspaper story from the Guardsman newspaper (CCSF) from September 13, 2017 titled "Parking crisis raises Balboa Reservoir Project concerns."
The story was written by Bethaney Lee; photo credits for Otto Pippenger.

Submitted by Harry Bernstein
riquerique@yahoo.com

The cover image for the Draft SEIR of the Balboa Reservoir Project, case no. 12018-007883ENV, does not fairly represent the actual usage of the Lower Reservoir site when City College is in session.

To support this contention, I append the following newspaper story from the Guardsman newspaper (CCSF) from September 13, 2017 titled "Parking crisis raises Balboa Reservoir Project concerns." The story was written by Bethaney Lee; photo credits for Otto Pippenger.

Submitted by Harry Bernstein
riquerique@yahoo.com

I-Bernstein3

# DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

# Balboa Reservoir Project

SAN FRANCISCO PLANNING DEPARTMENT
CASE NO. 2018-007883ENV
STATE CLEARINGHOUSE NO. 2018102028

SAN FRANCISCO
PLANNING
DEPARTMENT

| | |
|---|---|
| Draft EIR Publication Date: | AUGUST 7, 2019 |
| Draft EIR Public Hearing Date: | SEPTEMBER 12, 2019 |
| Draft EIR Public Comment Period: | AUGUST 8, 2019 – SEPTEMBER 23, 2019 |

Written comments should be sent to:
San Francisco Planning Department
Attention: Jeanie Poling, Senior Planner
1650 Mission Street, Suite 400 | San Francisco, CA 94103
or by email to: CPC.BalboaReservoir@sfgov.org

I-Bernstein3

# Sunnyside Neighborhood Association

Building our community every day.

# CCSF Guardsman: 'Parking crisis raises Balboa Reservoir Project concerns'

ON SEPTEMBER 26, 2017SEPTEMBER 27, 2017 / BY SUNNYSIDE NEIGHBORHOOD ASSOCIATION / IN BALBOA RESERVOIR PROJECT, CCSF, CITY COLLEGE OF SAN FRANCISCO, PARKING, SF PLANNING DEPT, SFMTA, UNCATEGORIZED

*Reprinted with permission from City College's newspaper, The Guardsman: http://theguardsman.com/parking-crisis/ (http://theguardsman.com/parking-crisis/)*

## Parking crisis raises Balboa Reservoir Project concerns

**I-Bernstein3**

Balboa Reservoir parking at 12:30 as classes get out. Taken Aug 28 2017 by Otto Pippenger.

September 13, 2017 The Guardsman
By Bethaney Lee

The Guardsman photographed the usage of the parking lot in contention with the Balboa Reservoir Project (BRP) every hour on Aug. 28, and concluded it was used consistently throughout the day. It was highly impacted at peak class hours and the surrounding neighborhoods and streets cannot support the amount of vehicles displaced by the removal of the lower parking lot.

Tensions first arose after the BRP reported its goal was to repurpose the lot into mixed-income level housing.

In October 2016, Nelson Nygaard released the Balboa Area Transportation Demand Management (TDM) Plan which was used to identify transportation needs for the Balboa Park area. The report identified limited roadway space, transit infrastructure and financial resources as three primary problems.

"Yet despite the obvious fact that the elimination of student parking and the addition of new Reservoir residents will increase demand placed on limited transportation resources, the Balboa Reservoir Project Team proposes no amelioration for adverse impacts other than TDM," Professor William McGuire said in an email sent in early January 2017.

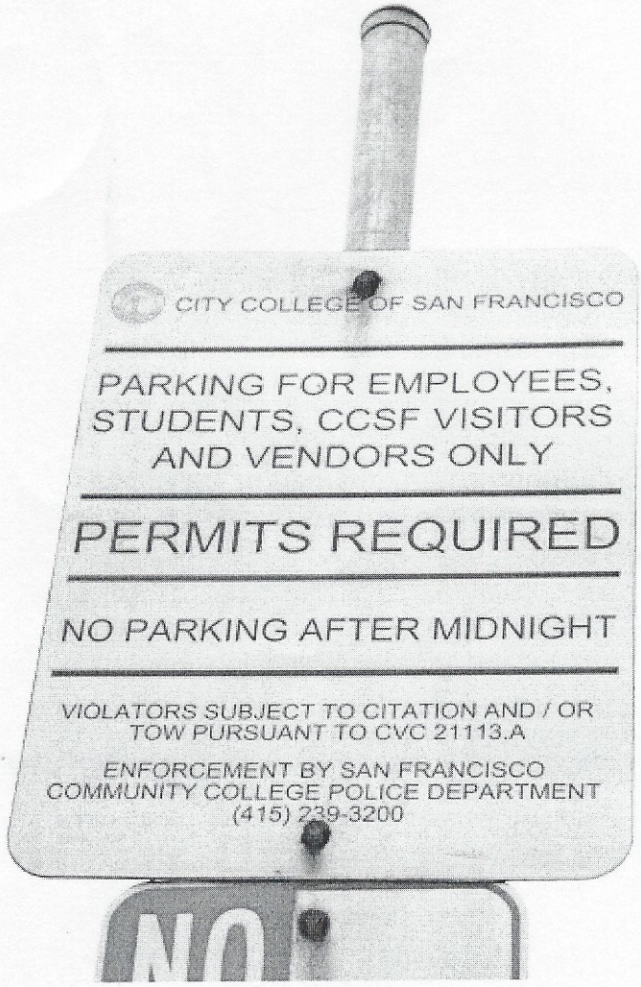
I-Bernstein3

Lower parking lot (Balboa Reservoir) at 11:30. Taken Aug 28 2017 by Otto Pippenger.

The Guardsman's observation took place over the course of several weeks, and the research provided legitimacy to Professor Rick Baum's fears that the project could "interfere with efforts to increase student enrollment."

I-Bernstein3

In an email, sent in late August to the Board of Trustees' President Thea Selby, Baum asked Selby to explain "how the housing project, that might be built on the Public Utilities Commission (PUC) section of the reservoir, could possibly serve the needs of CCSF's students?" Additionally, because many students must commute by car and use the controversial section of the reservoir for parking, Baum asked if Selby could "please explain how…any student [would] even be able to afford to live in the housing being contemplated?"




A sign looms over cars in the lower parking lot requiring permits to be purchased. Photo taken Aug 28 2017 by Otto Pippenger.

With inquiries stretching as far as potentially using the land for the voter approved Performing Educational Arts Center, Baum gave voice to what many people from Ocean Campus have already been talking about.

In response, Selby issued an email to the community on Aug. 24, 2017, which said, "City College is a vital partner to this project as it

I-Bernstein3

moves forward over the next several years."

For more information, visit the Balboa Reservoir Community Advisory Committee website. (http://sf-planning.org/balboa-reservoir-cac-meeting-schedule)

View of far end of Balboa Reservoir parking area at 9:30- out of frame portion is full. Taken Aug 28 2017 by Otto Pippenger.

**From:** Harry Bernstein
**To:** CPC.BalboaReservoir
**Subject:** comments on the Balboa Reservoir Project, Case No. 2018-007883ENV (for SF Planning)
**Date:** Monday, September 23, 2019 8:08:40 AM

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Hello, Ms. Poling

I would like to address several inadequacies of the draft SEIR, partly in relation to the PEIR

Objective 1.4 of the Balboa Park Station Area Plan, regarding Land Use-- 1

"This Plan encourages the owners of this site-to develop the reservoir in a manner that will best benefit the neighborhood, the city, and even the region as a whole."

Housing is one recommendation, along with this excerpt from the Streets and Open Space Element of the Balboa Park Area Station Plan, p. 30:

"A number of open spaces are proposed in the plan area, including the Phelan Loop Plaza, the Geneva Plaza, open space associated with the proposed freeway deck, Brighton Avenue, the Library playground and the proposed Balboa Reservoir open space.

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Policy 4.5.1 in the Balboa Park Station Area Plan (or PEIR) says that when offering public land for development, first consideration should be given by such public agencies making the land available for the development of housing affordable to individuals or families making less than 120 percent of the area median income. This is a very low priority for the current development. Selling the valuable asset of publicly owned land is not the only or best option. 2

The Draft SEIR must consider the possibility of using this public land to build dedicated educator housing. This is an option that has begun to be explored more fully since the current Balboa Reservoir project was initiated just a few

years ago.

2 (cont.)

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One of the greatest inadequacies of the Draft SEIR is that it is obligated to define existing conditions, not only at the site of the proposed development but also in the vicinity. The description is limited to the physical location and the perimeters of the lover Balboa Reservoir lot. It fails to mention that except for the approximately two years when the Reservoir site was excavated for the purpose of creating a possible reservoir (1956-1958), the land was used by City College since 1946—

3

From September 13, 1946 to 1954, the College occupied for the site, taking over the former WAVES barracks—this was called West Campus.

After being evicted over the years 1954-55, enabling a move to the newly built classroom, Cloud Hall, the existing facilities were razed and the Reservoir site was prepared. Parking was made available to City College again starting in 1958, first in one of the two Reservoir basins and later in both. City College spent considerable money raising the level of what is today the upper Reservoir site and eventually secured ownership of its 10+ acres in a land swap from the Public Utilities Commission. So this historic use of the site, and the impact of its loss should not be ignored in this planning process. More on this further below.

==========

I feel that I cannot do better than quote another prior submission regarding the inadequacy of addressing the impact on public services in the vicinity of the Balboa Reservoir site—and public services significantly includes area schools.

4

“On page 7 of the ESA Scope of Work, under "Task 4. Administrative Draft Initial Study-1", the only mention of impact on schools is: "The public services section will include a discussion of public school capacity, the findings of the water supply assessment, and a discussion of the potential need for access to the SFPUC water/wastewater easement along the south side of the project site. EP will provide ESA with language regarding public schools..." This merging of two environmental effects categories of "Utilities and Service Systems" with "Public Services" is grossly deficient. The evaluation of adverse impacts on schools should not be legitimately bypassed:

The question, as per item 12a under Public Services is:

Would the project result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services? 4 (cont.)

The answer is objectively yes for schools and fire protection from this list.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college. 5

That is the end of my current comments.

Harry Bernstein
San Francisco

**From:** Harry Bernstein
**To:** CPC.BalboaReservoir
**Subject:** additional comments on the Balboa Reservoir Project, Case No. 2018-007883ENV (for SF Planning)
**Date:** Monday, September 23, 2019 4:56:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello, Ms. Poling

From what I am reading in and about the draft SEIR, the document does not address the impact of the development on City College. Already mentioned was that

1) there's little acknowledgement of the effect of the development on City College as well as other nearby schools in terms of public services or 1

2) recognition of the College's long-term use of the lower Balboa Reservoir—the proposed development site—since 1946, as either part of the campus ("West Campus") and the 60+ years that the Lower Reservoir site has been used by students as a parking lot. Other factors are impacts on air quality and more pollution during construction. 2

3) The loss of parking in the Lower Reservoir lot is likely to have a significant impact on access to education, especially for those individuals who are tightly scheduled because they are working, going to school and perhaps having additional family responsibilities besides. That is, the loss of approximately 1000 spaces from the Lower Reservoir site will make it harder for many such people to get to the school in a timely manner. Even now many faculty members mention the difficulty that their students often have early in the semester getting to class on time because of traffic backing up and fewer spaces available, and those quite often located in the most distant lots. 3

4) Also related to access is further traffic congestion. Circulation and congestion would be worse than they are today because of the impact of the approximately 2500-3000 additional people, the access to the development through only to entrances, one coinciding with the road just south of Riordan High School—unless this is reconfigured—and the other via the extension of Lee Avenue. The interference of a through Lee Street extension with the operations of Whole Foods egress could become quite a serious problem. The extra cars and people from the development will likely make traffic on Ocean Avenue considerably worse. The impact that the extra traffic would have on buses—one of the common means of reaching the College (other than BART) is expected to be serious. A local retired bus driver has explained that a bus being late on one time point by four minutes results in a serious schedule problem. But for the no. 43 bus, the only bus running on Frida Kahlo Way, the delay anticipated is more like 12 minutes, not four minutes. This would affect other lines that cross the path of the 43 bus or connect with it. And as for Ocean Avenue, it currently has a number of lines passing within 1-2 blocks of the College—nos. 8, 29, 49 and K. 4 5

5) The question of having a shuttle provided for City College students and others needing access for that last mile from the BART station has been raised repeatedly at public meetings, such as the Balboa Reservoir CAC. The idea has consistently met with resistance. It's not considered to be a bad idea per se, but it appears to be a financial challenge. Representatives from the City and from the developer have dutifully written the suggestion on white boards but have never embraced it or 6

advocated it. YET THERE HAS TO BE MITIGATION FOR THE IMPACTS ON THE EXISTING CONDITION OF ESSENTIAL PARKING FOR STUDENTS AND FACULTY —for parking which may become unavailable due to a housing development. If there is a development, there will be impacts and consequences which can't just be ignored. 6 (cont.)

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Another part of the story not yet mentioned is the long promised Performing Arts Education Center (PAEC) at City College, which has been something of a political football. It was a strong component of the last two successful bond measures at the College—in 2001 and 2005—and is essential for the Music and Theatre Arts programs but also for the College as a whole. This project was shovel-ready in October, 2012, but final discussion about it was postponed and in less than a year, during a State takeover initiated in July, 2013, was abruptly canceled by the Special Trustee with Extraordinary Power. Some have doubted the legality of this takeover but the College community is still living with the consequences therefrom. That is why the future of the PAEC is still a current issue. Until about 2014, there was no doubt that the PAEC would eventually be built and that the majority of the parking for it would be in the Lower Reservoir lot. Trustees, when asked about their backup plan (in the event that the Lower Reservoir lot was sold or became otherwise unavailable) and seemed to say that they didn't know they needed such a plan. The Facilities Master Plan, which has had some interference from City agencies, has been inconsistent in pushing for the timely completion of the PAEC. After returning to power, the Board of Trustees once again advocated strongly for the PAEC's completion starting in 2016. City/City College meetings about land use, sometimes referred to as the City/City College Consortium have kept track of any progress on plans for the PAEC, and also on the Education Master Plan and Facilities Master Plan. (The former Mayor of San Francisco was in consultation with the State Chancellor of the College system at the time that the College was taken over by the State and did not oppose the maneuvers as he should have been willing to do.) 7

The PAEC is needed, partly because at present City College is an incomplete campus, lacking an auditorium as it does. This is an accreditation issue, but it has been so for more than 50 years. Plans for the College to complete the PAEC appear to be unclear, but the construction should begin before any housing development is approved. With or without the PAEC, it remains clear that a development of 1100 units or more is a threat to the survival of the College as presently constituted. That is one of the reasons that some have urged either to reduce the number of units of a projected Balboa Reservoir development—instead having 800 units or less, with greater emphasis on gardens and open space. The other option, even though rather peremptorily dismissed in the Draft SEIR, is to have the land transferred to the College, thereby retaining it as public land. At that point, modest plans might be made for some faculty or student housing without overwhelming the neighborhood or interfering significantly with traffic or parking—due to the smaller scope of the project. But this would have to be determined later. 8

Thank you.

Harry Bernstein

**From:** Garry Bieringer
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir Subsequent EIR
**Date:** Friday, August 16, 2019 12:11:19 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling, I live 3 blocks from the proposed Balboa Housing Project on the PUC owned parking lot at CCSF. The other day I was walking my dog there andI saw, taped to a circular light pole, a notice of a hearing for this project but it was extremely difficult to read because the poster was wrapped around the light pole. I have 2 questions for you:

1) Is it possible for you to send me, as an attachment, this notice so I can review it? and

2) The notice did say a 'subsequent EIR'. What is it subsequent to? Does this current analysis take the place of a previous EIR? What is the relationship between the previous one and this subsequent one? 1

Thank you in advance for your answers.

Sincerely,

Garry Bieringer
garryjbieringer@gmail.com

**From:** Garry Bieringer
**To:** CPC.BalboaReservoir
**Cc:** Garry Bieringer
**Subject:** DSEIR Feedback
**Date:** Monday, September 23, 2019 2:06:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am writing to give the planning comomission my feedback regarding the DSEIR about the massive proposed housing on the south Balboa Reservoir. I have lived near the proposed project for the past 40 years (since 1979) and I am appalled that the Planning Departmenti is even considering this project.

I first found out about this project while walking my dog in the proposed housing area, and saw a planning notice wrapped around a light pole. I tried to read the notice but had to keep walking around and around the pole and kept losing my place. I finally got a name and phone number from the planning dept. and i called to complain about this placement, The notice was clearly intended to make it very challenging, if not impossible, for anyone to read and showed extreme insensitivity thwards the community most impacted by this proposed housing development. This was a harbinger of things to come! 1

When I finally picked up a copy of o the SDEIR and read through it, I was appalled at how this document minimized all the problems this would cause the community and the 2 large educational institutions closest to this proposed housing: CCSF and Riordan High School. The routes laid out for the trucks (several estimated to be 20 trucks/hr), via the north access road (right off Frieda Kecko way (formerly Phelan Ave.) would cause years of distruption to of us that must drive, walk, or use MUNI down this street and will provide massive noise pollution along with air pollution. Using Lee Avenue would totally block traffic on Ocean Ave., and there is a very large children's climbing structure about 50 yards from the proposed Lee Ave. Route. There is no way we can have children climbing on that structure with all the trucks whizzing by so closely. 2

The above are only a few of my concern. Many of my neighbors, who are much more familiar with reading these types of planning reports, have written to you with several specifics which point out how this plan ignores the community and schools impacted. The use of o the term 'mitigated' and then 'waivers may be requested' indicate that there will be NO accomodations made for this project.

The proposed housing project is currentlly public land. PUBLIC LAND SHOULD BE USED EXCLUSIVELY FOR THE PUBLIC!!!, and not for the bennefit of private corporations/developers. 3

I strongly urge the Planning Commission to adopt recommoendation A, which is to scrap the entire projoect, and then go back to the drawing board and propose a smaller scale development to be exclusively for San Francisco public school educators, CCSF Educators, and CCSF stsudents. A smaller housing development like this will keep the land for public use and will tremendoully help those most impacated by the high cost of SF housing and it will help those who are contributing to the betterment of San Francisco.

Your proposed project is not designed for affordability. It will not help the housing shortage for lower income working San Franciscans. It will line the pocksst of rich developers while crushing 2 outstanding educational insstitutions and destroying the vitality of this community.

3 (cont.)

Please adopt Alternative A.

4

Sincerely,

Garry Bieringer

**From:** alex Burggraf
**To:** Poling, Jeanie (CPC)
**Cc:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir DEIR comments
**Date:** Monday, September 23, 2019 4:56:43 PM

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Dear Ms. Poling,
You have received a written comment via Email from Michael Ahrens and the Board of the Westwood Park Association in parallel. I am a resident of Westwood Park as well (in the 1300 Plymouth block) and I wholeheartedly agree and concur with all the comments made by the WPA board, especially with the comments made by other residents (Exhibit 5 and 6 respectively attached to the WPA comments). 1

In general, I think that a lot of the infrastructural impact (parking, traffic, noise during construction) on the neighborhood of the project - especially Westwood Park - is either not adequately addressed or drastically underestimated in the DEIR. 2 I especially agree with my neighbors on statements made in regards to traffic up and down on Plymouth Avenue already nowadays, which is a narrow street, with not a lot of open parking spots already and certainly not "sufficient opportunities to pull street parking spaces over into available on or driveway curb cuts", as mentioned in the DSEIR (page 6-37).
There are several incidents per week - occasionally per day - already where cars get stuck, because they cannot get out of each others way, subsequently stalling traffic both ways. This is already today's situation, that would just worsen with any alternative of the project (besides A: No Project). Parking and traffic on Plymouth Avenue - and all surrounding streets of the planned project - would increase tremendously, depending on the picked alternative, but especially, if San Ramon Way would be opened up, even just for pedestrian traffic, which would make parking in Westwood Park even more attractive to people wanting and needing parking and quick access to the new development. 3
Please provide evidence that backs up your statement that any project alternative - especially Alternative C (San Ramon Way Passenger Vehicle) would have a "less-than-significant impact", as my impression is to the contrary, namely that any project alternative (other than A) would have a stark impact in terms of parking and traffic on the whole surrounding neighborhood, specifically Westwood Park.
I also want to express the concern that the aesthetic effects of the proposed development, including height of buildings compared to surrounding areas, is gravely underestimated and downplayed, especially considering that Westwook Park has been declared a "Residental Character District" by the Board of Supervisors. 4
Best Regards,
alex Burggraf
WestWood Park / Plymouth Avenue resident since 2006

On September 23, 2019 at 9:56 AM, "Poling, Jeanie (CPC)" <jeanie.poling@sfgov.org> wrote:

> Hello Alex,
>
> The DEIR is available electronically at https://sfplanning.org/environmental-review-documents. Select review category “Environmental Impact Reports and Negative Declarations,” the “Apply,” and the search for “balboa.” Please note that the deadline

for public comments on the document is today at 5:00 pm. You may submit your comments to **CPC.BalboaReservoir@sfgov.org** or to me.

Thanks,

**Jeanie Poling**
**Senior Environmental Planner**
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9072 | www.sfplanning.org
San Francisco Property Information Map

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**From:** zwalex@icloud.com <zwalex@icloud.com>
**Sent:** Sunday, September 22, 2019 12:05 PM
**To:** Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
**Subject:** Balboa Reservoir DEIR

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,
I am here with requesting an electronic copy of the Balboa Reservoir DEIR.
Thanks and a Est Regards,
alex

thumbed while mobile...

**From:** Gary Button
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Public Comment on the Balboa Reservoir Project
**Date:** Thursday, September 12, 2019 10:49:27 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear SF planning commission,
My name is Gary and I live in the 94112 area code in Balboa Park. I wanted to let you know that I am pro the building at Balboa Reservoir because I think that San Francisco needs more housing. There are people that will always disagree with how things are done but we need to be urgent about the housing shortage and this project seems like a good step. 1
Thank you for your consideration,
Gary

**From:** Kathleen Ciabattoni
**To:** CPC.BalboaReservoir
**Subject:** 50/50 Housing Balboa Reservoir
**Date:** Thursday, September 12, 2019 11:52:07 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission,
Please support mixed affordable and market rate housing at the BALBOA RESERVOIR site. 1

My husband and I live in Zip Code 94127 and as such we are very aware of the neighborhood near the Balboa Reservoir. It is a perfect area for the planned 50/50 new market rate and new subsidized affordable housing plan. It is near public transit as well as stores and services on Ocean Avenue. The neighborhood already has new apartment development that is merging successfully into the community. It is perfect for this development.

We feel it is important to build mixed income housing. We do not need more large public housing development in SF. Both low income, working people and middle income working people need housing.

Please approve this project for 50/50 income housing. And move the project along as speedily as possible.

Thank you for your willingness to plan appropriately for housing in our wonderful city.

Sincerely,
Kathleen and Alger Ciabattoni

**From:** Monica Collins
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir Project DSEIR
**Date:** Wednesday, September 11, 2019 8:16:57 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Everyone I know has a different set of reasons for opposing the Balboa Reservoir Project under the nose of City College. Many focus on the effects to health for young ones, not only the children at CCSF day care, but CCSF students, exposed to carcinogens and other calamitous health threats, when young and having decades ahead to become ill and suffer. Riordan High School is across the street- the students are all teenagers.
Others are concerned with already horrible traffic on one-lane Frida Kahlo Way, on which the college is situated and on which the proposed large project is to be located, with thousands of new residents.
Many are upset at the terrible damage that will result to the civic gem that is City College.
Still others observe that there is little about this enormous, for profit development that will alleviate the housing crisis in a 7 x 7 square mile city or the zooming rents and mortgages.
This push for more for profit development, with a little actually affordable housing as a sidebar, is also advancing gentrification on steroids. We're becoming a city of wealthy professionals with a few token elders or poor people remaining and losing our working and middle classes and our families. People of color are not benefiting from this- few can afford to remain in the city. For profit development is DRIVING housing inflation.
I cannot help but be appalled by the problems arising from all of these effects of this huge, horribly situated project.
What brought us to the point that developer money from for profit corporations is all that matters? When car shaming, wishing away cars, and using Orwellian terms like "transit rich" stands in for planning, budgeting and spending? When was the last time the people making these decisions had to punch a clock? Had to worry about being late to work or school?
There are many vacant lots in San Francisco for so many years, no one can remember what stood on these fenced sites. And even more in Daly City, a few minutes from the county line. Some are now offered for sale. Besides those, what tax policies drive the hoarding of fallow land like this? This is a society. We can't do whatever we want with our property. Can't burn down our house to build a tent on the site to be one with nature. Can't have public nuisances and hazards on the property. Can't have a cross burning out front. We are governed by laws intended to protect the commonweal.
If the state can tell us we have no right to limit enormous developments in quiet residential neighborhoods, the state can manage tax policy to help the housing crisis.
This project would be disastrous for struggling students, for working class residents, for many people of color and families just squeaking by. In the 1960's our city saw the shameful bulldozing and development of the Fillmore, now gentrified into the Western Addition. Countless happy black homeowners saw their beloved Victorian houses bulldozed or run out of town on rails- literally, and were virtually deported, never to return. Ethnic cleansing. Bleaching, if you will. Are we doing same to Ocean/ Merced/ Ingleside using public policy instead of a bulldozer?
As to traffic policy, if we can dignify it with the term "policy", it's not policy deliberately to ignore traffic prolems or to create worse ones. This is not benign neglect. Car shaming feels good to the virtuous, I am sure and the effects have been disastrous. There are no provisions to

1

get people out  of their cars (in order to wait for packed buses to pass them by, one after another. To watch panicked drivers fill intersections hoping the green light will stay green, only to block the intersections when the light turns red, endangering pedestrians, cyclists, enraging cross traffic drivers and those waiting. Please keep in mind that bus riders, who are absolutely above reproach, also pay the price, getting stuck in traffic snarls on Frida Kahlo, Ocean (these are both horrible already, btw) or nearby. "Forget you" is not traffic planning. Coming after cars (and who likes the internal combustion engine? NO ONE!) OK, now what are you going to do to help the situation?

I worked for CCSF for decades. I've seen countless people with little hope get their degrees, go on to university/ careers/ vocations, to leave welfare and become happy taxpayers. Often this is their last chance at success. It's why public education is an investment, why CCSF is a lifeline for so many, and has been for generations. Boost the school, don't attack or undermine it. The day any of us concerned here have to live in an adjoining town, far from transit, and drop off a pre schooler in one spot and a 7 year old student in another, have to have two jobs to manage, or to struggle to pay the bills on public assistance, to follow an academic or vocational course of study as a commuting working parent, by all means, let's talk! You can help these people or you can doom their dreams with callous and short sighted disregard for their situation, and for the well being of the school, the neighborhood, and our beloved city. Please do your jobs and say no to this horribly misbegotten, for-profit calamity. There are lots of other and better sites to develop, and there is the money for subsidized housing in the city budget from the ubiquitous projects we see all over. It's a matter of priorities. Don't poor mouth people who need your help because they aren't developers brandishing big bucks. Some things are about more than just short sighted things like this mistake of a development.

Please excuse poor editing- it's hard to edit when you are dealing with countless points like we enumerate against this ill thought out, misbegotten development!

Thank you.

Monica Collins, former CCSF staffer, 94112 resident.

1 (cont.)

**From:** Monica Collins
**To:** Poling, Jeanie (CPC)
**Subject:** Balboa Reservoir SEIR
**Date:** Sunday, September 22, 2019 11:40:05 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello. Am writing to support alternative housing projects NOT located on Balboa Reservoir. I hope to enumerate various reasons for this here. 1

1. There are a lot of vacant, fallow lots not being used. Evidently these are now part of a passive Real Estate Investment Trust portfolio for folks who don't know they could do better if paid market rate by developers for building. Daly City is full of blighted vacant lots & closed businesses. Forward thinking developers have put in nice big apartments and condos literally minutes from the SF county line, very conveniently located.
2. No one is allowed to do whatever they want with their property. It's a society and we are strictly governed for the benefit of the commonweal. The benefit of neighbors, and visitors as well. We are a tourist city. 2
3. Tourist cities that depend heavily on revenue from visitors shouldn't be encouraging dense residential clusters or towers that detract enormously from the beauty of the city and create traffic nightmares. This is why Paris France keeps the beauty in the city- they rely on tourism- and keep dense housing developments just outside city limits. Not saying it's all for the best necessarily, but it's the reason why.
4. Frida Kahlo/ Phelan is a one way street, which like many regular streets in our city, such as Bernal Cut or Teresita, connect two parts of town. Our city not being flat, doesn't have a lot of rectangular grid, which means that one street is the one direction to get from one neighborhood to another. 3
5. No one wants to have to depend on cars! However we depend on reasonable, viable, practical alternatives. Muni can be a mess and too many buses zoom by at rush hour. "Road diets" converting two lanes down to one, create MORE traffic jams that confuse desperate motorists stuck in traffic, filling up crosswalks, endangering pedestrians and cyclists. You'd punish the wrong people and create angry cross traffic that can't move, and more calamityies
6. Buses are full of wonderful environmentally conscience non drivers who also get stuck in horrid traffic. Don't punish them!
7. Low income CCSF students include many parents of two kids, one in day care, another miles away in school, two jobs, an academic course of study or a vacational one at the college. BART doesn't serve all of them, most- even the commuters- aren't on a BART line or within walking distance. BART fares are quite high for adults. 4
8. Harming these students by impacting/ threatening/ replacing that admittedly ugly and retro parking lot is a huge mistake. I've seen countless grads go from welfare to being happy independent taxpayers and they are tremendously proud and very very grateful to CCSF.
9. The city definition of affordable housing, like the definition of transit rich, is frankly self serving and spurious. It has absolutely nothing to do with real lives, families, working classes, workers struggling with student loans, high rents, child care and other expenses. 5
10. AvalonBay developers charge $4000 now for a one bedroom apartment over Whole Foods one km away on Ocean. Not rent controlled either as it's new, I believe. Can we put to rest the false, rather offensive trope that this is affordable housing for other than the well paid?
11. "up to" 50% affordable or subsidized housing is similarly meaningless. "Up to" is another term for "LESS THAN". or "UNDER". The subsidies also very widely.

12. I'm a 3rd generation construction worker who's pro housing. But not all housing at any cost. Our tiny city isn't Los Angeles Dallas or Atlanta and can't spread at will. We can no more allow all comers physically, than the aforementioned city of Paris, and an infinite number of people would live here as they would there. These are fantasy or dream cities to so many. We're more like Manhattan. EVERYONE in NYC knows why New York has suburbs and five boroughs, which are mostly for residential purposes. How sensible is that! 6
13 SF has lost working classes, families, elders, poor and people of color due to gentrification and to eminent domain. This last in the 1960's notoriously, in the now Western Addition, then the Fillmore, working class lively neighborhood heavily populated by proud African American property owners who lost their homes, their cities, their community. DON'T DO TO OMI by gentrification, what was done to the Fillmore by the bulldozer.
14 City College management is not REMOTELY the City College community. The Diego Rivera mural on campus is now threatened with being taken elsewhere permanently. Please listen not to well paid, elite college leadership, but to the actual CCSF community: neighbors, graduates, students, faculty, supporters.
15. CCSF is beloved by all San Franciscans. Please don't let rich corporate developers from elsewhere threaten or destroy it just to generate some revenue for now. This is an answer only insofar as a fix of drugs is an answer to a drug addict. Please look at the long game and the wonderful investment that is public education.
16. The effects on the neighborhood would be horrifying and ridiculous. As written F Kahlo Way is jammed on school days and nights now. Add thousands of residents (who will lack infrastructure, decent grocery and other shopping- prepare for tons of catering vans, Amazon vans, also Uber/Lyft as parking is limited on development). You will see, as a firefighter friend points out, that the firefighters and EMS or SFPD can't reach the housing development let alone reach other blocks nearby. They can't FLY over traffic that's jammed. Please don't do this to us. 7
Thank you so much for your kind consideration.
Monica Collins

**From:** Phil Crone
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Please support housing at Balboa Reservoir
**Date:** Thursday, September 12, 2019 8:59:31 AM

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Dear Members of the SF Planning Commission,

I am writing to urge you to support the Balboa Reservoir Project, which would create 1,100 new units of housing, 50% of which would be subsidized affordable units. The entire Bay Area must do more to build housing, both market rate and below market rate, in order to address our chronic housing crisis. I live in the vicinity of the project (zip code 94112), and I welcome the prospect of having new housing occupy what is currently a 17-acre surface parking lot. 1

Thank you,
Phil Crone

**From:** Liana Manukyan
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** In support of Balboa Reservoir Project
**Date:** Wednesday, September 11, 2019 7:09:11 PM

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Dear Planning Commission,

I'm a homeowner in San Francisco and I enthusiastically support the Balboa Reservoir building project. There is strong evidence to support the fact that the more housing we build, the more it will bring down the cost of housing for all. And with 50 percent of it being set aside for affordable housing, I'm confident that this will be a good thing for the neighborhood, and for the city. 1

Those that oppose the project use the 100% affordable or nothing as a tactic to get nothing built, to maintain the status quo and keep the parking spots for their vehicles, which for some reason they feel they have a right to park on public land. We need to make this city a livable one with great public transportation, fewer cars, and more housing for those who cannot afford the market rate housing.

Please approve this project so we can develop housing for those that need it most. Homelessness or the threat of it is the most critical issue facing our city today, and this is a very important step toward its resolution.

Thank you in advance for your support of this project,
Liana M. Crosby

**From:** Merritt Cutten
**To:** CPC.BalboaReservoir
**Subject:** A good plan?
**Date:** Monday, September 16, 2019 6:39:00 PM

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SF Planning Commission:
This proposal has nothing to do with providing benefits to anybody. It's all about the money and basically is a done deal. Most all of the objections are valid. I can't wait for the day when most of what is going on in SF implodes on the residents. Good luck! 1
Merritt Cutten, registered voter in SF

Sent from my iPad

**From:** Ronnie Del Rosario
**To:** CPC.BalboaReservoir
**Cc:** Cheryll Abriam
**Subject:** Balboa Reservoir
**Date:** Wednesday, September 11, 2019 9:31:10 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Attention Jeannie Poling, Senior Planner

Ms. Poling,
I've been a resident/owner in Westwood Park community for a little over 2 years. My family absolutely loves our neighborhood.
The only ongoing headache has been the traffic through Plymouth Avenue (between Ocean Avenue and Monterey Boulevard).
I'm told and concerned that your office is considering opening San Ramon to vehicles?? The streets are very narrow as it is, causing regular arguments between drivers, and accidents to parked cars when drivers attempt to squeeze through. Please reconsider so that this issue does not get worse for residents of this neighborhood. 1

Thank you for your understanding and consideration.

Mr. Del Rosario
1321 Plymouth Avenue
San Francisco, CA 94112

Sent from my iPhone

**From:** EDWARD HANSON
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir SEIR Comments
**Date:** Monday, September 23, 2019 12:55:02 PM

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Public Comments in response to
Draft Subsequent Environmental Impact Report
Balboa Reservoir Project.

As faculty at CCSF and a resident of the community I have been following the Balboa Reservoir Project closely and am writing to express my concerns. The DSEIR is not only inadequate, it stands as evidence to a planning process that runs contrary to the principles of good planning, fair input and democracy. 1

From the onset the project has been biased and selective in the way facts have been presented to the public for input. The SEIR clearly downplays and minimizes the potential impacts of the project on City College of San Francisco, and the surrounding educational institutions in the following ways:

1. The very fact that this process utilizes a Subsequent EIR is obfuscation. If the project from day 1 started with an impact assessment of 1550 units of housing on such a small footprint of 17 acres than it would be clear that the surrounding environment and neighborhoods would be severely impacted, as it stands the original plan has been expanded within the existing process of a previous EIR as a means to mitigate public concern. 2
2. Accompanying this is a SEIR document that does not address the potential impacts of the development on education or access to education. The existing condition of the 17 acre PUC owned land is that it is not only surrounded on two sides by educational institutions with more schools located in close proximity, its current use is by City College and has been so since the 1940's. Historically the college has always used this public space and this fact is downplayed in the SEIR restricting the impact on the college to "Areas of Known Controversy and Issues to be Resolved". The historical uses of the site have not been documented in the SEIR in context of historical significance of the site and to the civic functions of the City have been minimized. 3 4
3. The SEIR does not clearly document the existing conditions of parcel sharing between the PUC and CCSF, or the lengthy agreements that went into place to split the lot when CCSF decided to build upon its half of the shared parcel. If the plan is to complete the lot spilt when the land is transferred to a private developer, then this should be documented with clear reference to the sharing of the parcel in its existing condition, and spell out the consequences of a potential lot split as it constitutes transfer of lands from public to private ownership. In this context there is no analysis of the amount of public lands or other public land projects in the SEIR. Land being something of very limited supply on the peninsula the impacts of public vs. private ownership is of relevance to future potential projects and civic developments. 5
4. Currently the site is the location of a motorcycle safety-training course, 6

which is not mentioned in the SEIR. This is a direct educational use of the site, taking place right now, which would be displaced by the development. 6 (cont.)

5. Parking while not a mitagatable factor under CEQUA, is connected to historical use and the viability of the educational institutions that surround the site. If the impact of the development on parking has the potential to disrupt businesses surrounding the site causling them to close or significantly alters their future potential, than that inpact needs to be documented in this report. The current report minimizes the impact report on enrollment consequences inherent in the removal of access to education. Nobody wants to argue for parking but in reality due to the unique student population and constraints of the urban environment ease of parking is related to enrollment dynamics and this factor should be taken into account in the projects impact on the surrounding institutions. Comparisons to other equivalent educational institutions should be analyzed. 7

6. To be more specific: The law states (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. The current SIER does not do this choosing instead to substitute an analysis restricted to the "project site" this substitution invalidates the impact analysis. 8

Submitted By

Edward Simon Hanson PhD
74 Cotter St.
San Francisco CA, 94112
eshanson@sbcglobal.net

--
Edward Simon Hanson PhD
City College San Francisco
50 Phelan Ave.
San Francisco, CA 94112

Phone (415) 239-3027
eshanson@ccsf.edu

**From:** Rita M EVANS
**To:** Poling, Jeanie (CPC)
**Subject:** Balboa Reservoir Project 2018-007883ENV--Comments on EIR
**Date:** Monday, September 23, 2019 4:35:01 PM
**Attachments:** SEIR Transit Delay Comments 09 12 2019.doc
SEIR Comments Plan Comm Hearing 09 12 2019.doc

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Ms Poling,

Pls find attached my comments on the Environmental Impact Reports for the Balboa Reservoir Project.

Rita Evans
226 Judson

--
Rita Evans

**2018-007883ENV**
**BALBOA RESERVOIR PROJECT – (Assessor's Block 3180, Lot 190)**
**Public Hearing on the Draft Environmental Impact Report**

**TRANSIT DELAY** 1

The SEIR states that transit delay induced by the Balboa Reservoir project will be insignificant but this conclusion is based on a completely arbitrary, unauthorized definition of delay on the part of the consultants.

The MUNI on-time performance standard allows for a 4-minute delay for an entire route. The SEIR instead allows for a 4-minute delay on any segment of a route (i.e., between two stops), a completely invalid assumption, meaning almost no amount of delay would be considered significant.

EXAMPLE: The 43-Masonic travels from the Balboa Reservoir project site on Frida Kahlo Way to the Balboa Park Station in ***7 minutes***. Using the consultants' re-definition of transit delay, additional delays of up to four minutes in just three segments, resulting in a travel time of ***19 minutes*****,** a **171% increase**, is somehow deemed "**insignificant**." No one riding that 43 would find the delay to be insignificant. And this utterly faulty reasoning is allowed to be presented in the SEIR as justification for a finding of "insignificant delay," meaning no mitigation is required.

From any perspective, whether legal, ethical or engineering, this is wrong. The SEIR is in error in using this faulty, invalid method of determining transit delay. The transit delays as a result of this project will be significant and appropriate mitigation must be identified before the SEIR is approved.

**2018-007883ENV**
**BALBOA RESERVOIR PROJECT – (Assessor's Block 3180, Lot 190)**
**Public Hearing on the Draft Environmental Impact Report**

Submitted by Rita Evans, 226 Judson Avenue

**SHUTTLE—WHERE IS THE SHUTTLE???** 2

Members of the public participating in the public input process for the Balboa Reservoir development have consistently, repeatedly, and loudly requested that a developer-funded shuttle be part of the solution to the traffic and transportation problems created by the project. The shuttle would run between the Balboa Reservoir site and the Balboa Park Station and would also serve students, faculty and staff at City College of San Francisco.

We believe that a free shuttle with frequent service is an absolutely necessity if the residents of the BR project are actually expected to use public transit. Since this expectation of public transit use is an essential component of a successful project, every reasonable measure to promote the use of transit must be used. In a city saturated with shuttle buses, this a logical part of the solution. The shuttle idea has been brought in public meetings, in meetings with the developer, in meetings with city representatives, and at neighborhood association meetings.

Despite this consistent, loud call for a shuttle, there is no mention of any shuttle in the SEIR. It does not appear to have even been discussed as part of the effort to manage transportation demand. This is a huge deficiency that must be corrected before the SEIR is approved.

**TRANSIT ASSESSMENT** 3
**C2 Transit Assessment Memorandum**
**Transit reentry delay analysis**

According to the SEIR, transit delay is calculated based on empirical data from 2010 *Highway Capacity Manual (HCM)*. Data used in the 2010 *HCM* are at least 15 years old.

In 2016, the *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis (HCM)* was published by the Transportation Research Board. This current manual the consultants should have used as "...it serves as a fundamental reference on concepts, performance measures, and analysis techniques for evaluating the **multimodal** operation of streets, highways, freeways, and off-street pathways. The Sixth Edition incorporates the latest research on highway capacity, quality of service, and travel time reliability..."

What justification did the consultants provide for using an outdated *HCM* and its outdated data? Why did they not use the most recent, comprehensive source that addresses the multimodal aspect of street use, a basic component of the area around the Balboa Reservoir project site?

Before the SEIR is adopted, the consultants must explain their data sources and methodology used to reach their conclusion that, "Based on the findings from this corridor delay analysis, the project would not result in a substantial delay to public transit along Frida Kahlo Way, Ocean Avenue, or Geneva Avenue." The findings and conclusion as presented in the SEIR are erroneous.

**Passenger boarding delay analysis**
What source was used to assume "two seconds per passenger boarding"? Is it again outdated data? Does it include students and instructors carrying books, supplies, and other material? Does it include students traveling with children? Disabled users? Riders carrying shopping bags or using a wheeled cart? 4

The consultants again are using an arbitrary and likely outdated standard—two seconds of boarding time—that does not equate to actual operating conditions.

Before the SEIR is adopted, data on the actual passenger boarding delay must be gathered and analyzed. Any transit delay analysis must be based on the actual delay experienced by riders in the project area.

**City College Loop analysis**
The consultant concludes that despite increases in traffic volume, no additional delay will be generated. Consultant makes repeated reference to "existing signal timing coordination and optimization." As anyone who travels these corridors knows, having actuated signals and having those signals actually work are two different things. Broken and mis-timed signals have plagued traffic on Phelan/Frida Kahlo for years and the city has either ignored the problems or addressed them only after years of complaints. 5

There is no assurance that the signal timing problems experienced on Frida Kahlo Way will not recur. We have no reason to believe the city will be more responsive to addressing timing and optimization problems in the future than they have been in the past.

It is erroneous for the SEIR to assume that the presence of actuated signals and signal optimization will address traffic delay in the project area. A firm commitment from the city for regular, scheduled monitoring and maintenance of the traffic signals in the area is a necessary component of addressing transportation issues in the project area. Such a commitment must be in place before the SEIR is approved.

**C1 Travel Demand Memorandum**
This section refers repeatedly to two sources for trip generation data. One is the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th edition and the other is the *San Francisco Planning Trip Generation Workbook (SF Workbook)*. While the ITE *Trip Generation Manual* is indeed a standard source, it also is recognized as a very flawed source of information due to its reliance on datasets with very little input, generally from suburban, not urban, sources. 6

The *SF Workbook* is not available on the Planning Department's website nor does it appear to be available elsewhere. We are unable to determine whether it addresses any of the flaws mentioned or simply compounds them. If the SEIR and consultants are referencing this Planning Department *SF Workbook*, it must be made publicly available for review and comment.

We challenge the use of the trip generation data from the *ITE Manual* and we find the use of the *SF Workbook*, which appears not to be available to the public, as inappropriate.

**From:** Marria Evbuoma
**To:** CPC.BalboaReservoir
**Cc:** Breed, Mayor London (MYR); Ionin, Jonas (CPC); Board of Supervisors, (BOS); Hood, Donna (PUC); alexrandolph@ccsf.edu; ttemprano@ccsf.edu; Fewer, Sandra (BOS); Yee, Norman (BOS)
**Subject:** Proposed development of Balboa Reservoir
**Date:** Thursday, September 19, 2019 4:00:35 PM

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Dear SF Officials,

As a former CCSF student and mother, I'm writing you to voice my concern over the selling off of the lower Balboa Reservoir to a private company. Selling this this land to private developer puts at risk the future vitality of City College, Ingleside, and San Francisco as a whole.

When I was teaching in Mill Valley, living in the Outer Richmond, and earning my Early Childhood Education certification from CCSF, a car was a must. Without the parking lot, I cannot imagine how I would be able to get to evening classes on time. Even back in 2005, commuting cross-town was difficult. And with so many people now "gigging" as independent contractors, cars are vital. Unfortunately, MUNI and BART are just not efficient enough for people who work and go to school to depend on. People should not have to choose between work and education. For me, gaining my ECE units meant I went from being an assistant teacher to a lead teacher- a huge gain for my career and finances. If this land is to be developed, plans should at least include parking for CCSF students. 1

Also, the land was supposed to have been the site for the Performing Arts Education Center. My son just started Kindergarten at Creative Arts Charter School in the Western Addition. I chose this school because I know how much academics are improved through art. There's a reason why schools switched from S.T.E.M. to S.T.E.A.M. Art is essential for a well rounded education! Should my son want to take up performing arts, I should hope he could have the opportunity to study in the city where he was born instead of leaving and/or having to spend thousands of dollars to attend a private art school. 2

On the subject of leaving San Francisco, too many families have been promised "affordable housing" only to find themselves on a ridiculous waitlist. Have you ever been in a housing lottery? I have. There were over 1,000 other applicants for 30 apartments. And when my application was finally looked at a year later, I had 24 hours to gather the paperwork to prove my eligibility. It's a demoralizing process. If this land is to be developed into housing, the city should own the property, not Avalon Bay. We should invest in our residents, our workers in all trades- not just tech. And having publicly owned housing would do this. 3

I urge you to stop this project, for our collective future. 4

In Kindness,

Marria Evbuoma
415.317.7602
IG: @disarmsf
marriaevbuoma.com

**From:** Allan Fisher
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir Project
**Date:** Thursday, September 12, 2019 3:31:03 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Balboa Reservoir project - Public Comment

I strongly oppose the massive housing project that is being planned for the Balboa Reservoir. A lot of money will be made by for-profit corporation and banks, but I am deeply concerned about the negative effects on CCSF, a gem of a school that serves the community. . CCSF students tend to be working class, low income, people of color and stressed between balancing school work, jobs and family life. Many need to drive to school. We must protect their parking . 1 2

I urge the BOS to oppose the use of public land to construct privately owned market rate housing, A smaller project with 100% of the housing units affordable to low- and moderate-income residents, could merit our support. But this massive project will not be beneficial to the students who will not be able to afford these housing units. Instead they will suffer from reduced and more expensive parking and increased road congestion. To propose this project without a guarantee of more efficient mass-transit possibilities, and without compensation to CCSF is unconscionable. 3 4 5

Sincerely,

Allan Fisher
Retired faculty member (ESL Department)

--
Allan Fisher
afisher800@gmail.com
415-954-2763

**From:** Andrew Fraknoi
**To:** CPC.BalboaReservoir
**Subject:** Public Comment on the Balboa Reservoir DSEIR
**Date:** Saturday, September 21, 2019 5:04:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

As a long-time San Francisco resident and voter, I am appalled that the environmental report on the plan to do away with the parking for students on the Reservoir at CCSF did NOT consider the impact it would have on the college, the students, and the neighborhood. ' 1

City College, where I have taken classes, is a jewel in the crown of San Francisco, a vital community resource used by people of all economic and racial groups. It is wrong (and sneaky) to ignore its needs when planning to take away one of its key parking resources. 2

The planning for this project must take those issues into consideration. Not everyone has the luxury of being on a MUNI line to get to the college or the luxury of a schedule that allows waiting for a MUNI line.

The developer should be required to build a parking facility which replaces most of the lost parking spaces and makes them available for students. I'd rather see a taller building with more parking underneath or fewer buildings and a parking structure. 3

Andrew Fraknoi

_____

Andrew Fraknoi
Emeritus Chair, Astronomy Department
Foothill College
(Currently teaching at U. of San Francisco & San Francisco State U.)
415-484-5350 (voice mail)
E-mail: fraknoiandrew@fhda.edu
Web site: www.fraknoi.com
AstroProf Facebook Pages: www.facebook.com/Fraknoi

**From:** Laura Lee Frey
**To:** CPC.BalboaReservoir
**Subject:** feedback on the draft EIR
**Date:** Sunday, September 22, 2019 8:36:47 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling and Commissioners,

I was at the meeting Sept. 12, but I'm sending this email to clarify, hopefully, my spoken points.
I have 3 main concerns:

First is City College. This is public land. I have heard from City College people, as well as long-time SF residents that the reservoir area had been set aside for City College use, if it were to be developed. This draft EIR does not sufficiently examine the long-term impact of this project on City College. Also the timing of the development should be remembered. The process for this proposed development began at the same time as City College's accreditation crisis began--this probably kept City College from having the time and resources to properly consider the impact of this development on its future at the very beginning... and it has probably been "behind" ever since. 1

Second issue is density. This is a very high density project--without the large streets or the fire-fighting infrastructure/water pipes to accommodate dense housing. (The fire-fighting infrastructure in dense parts of the City is different than in this area.) The lack of a sufficient fire-fighting infrastructure would be a hazard for the residents of any new dense housing project at Balboa Reservoir and for the residents in the surrounding areas. 2

I have gone to all of the BRCAC meetings, and the Planning Department often assured us that the parameters developed at the BRCAC meetings would have a strong bearing on the final plan. This plan far exceeds the density that would be built if the BRCAC parameters were followed. In the URBAN DESIGN parameters, it is stated that the height would be 28' to the west and GRADUALLY increasing to 65' to the east. In the current proposed plan the height quickly jumps to 48'-58' on the west and goes up to 78'-88' on the east. 3

Thirdly, a very big concern is allowing vehicle traffic on San Ramon Way (alt. C). We live on the 1200 block of Plymouth between Ocean and San Ramon. Plymouth is the only north/south road between Monterey and Ocean, and we have cars on Plymouth all day. All parking spaces on either side of the 1200 block of Plymouth are usually filled. As stated in the Draft EIR drivers continually have to yield to each other because it is a single lane of traffic between parked cares. Usually the pullout space (the driveway) is small, and if the car is not small or the driver not great this can take awhile. Often people get impatient, sometimes they get nasty. Commute times and weekends are especially congested and nasty. It is a continual problem. The Draft EIR dismisses this problem as helping with speed, but drivers sometimes still go fast on Plymouth, which exacerbates the ONE LANE traffic problem. Getting in-and-out of driveways is difficult because of space and traffic, and side-swiping is a problem. Opening San Ramon to vehicles would increase traffic, so it would increase the problems we already have. And, I believe the predictions of traffic are inaccurately low in the Draft EIR--perhaps, resident traffic will be greater than the prediction, but the Draft EIR does not even address the traffic from non-resident cars--i.e. "cutting through" the development. 4

Thank-you for taking public comments,
Sincerely, Laura Frey

**From:** Wilson Oswaldo Gomez
**To:** Poling, Jeanie (CPC)
**Subject:** Golden Gate Xpress: Questions about the Balboa Project
**Date:** Wednesday, August 28, 2019 2:11:51 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello, my name is Wilson Gomez. I'm a reporter with the Golden Gate Xpress. I'm currently going through the Environmental Impact Report concerning the Balboa Reservoir Project as part of a story. I was wondering if you could answer a few questions.

1) I noticed the impact report mentions the decrease in parking needs after the first week of a semester, and the proposal of a new parking lot that accommodates 750 vehicles. How many spaces would be reserved for students as opposed to residents who would live in the new development? 1

2) Do you believe that the loss of parking, both during the construction of the new development as well as once the new, smaller parking lot is built will have an impact on enrollment and retention of students at city college? 2

3) What do you want students at City College to understand about the need for this development and how do you think it would benefit them?

Thank you in advance.

**From:** Daniel Matias Gonzalez
**To:** CPC.BalboaReservoir
**Subject:** Public Comment on the Balboa Reservoir Project
**Date:** Thursday, September 12, 2019 10:29:41 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission and Representatives,

As a resident of 94112, and student of CCSF, I was very excited to hear of the plan to build affordable and market rate housing at the Balboa Reservoir site.

I am writing in full support of building the maximum number of 50/50 new market rate and new subsidized affordable units of housing at this site. 1

This project will bring much needed housing to our community which drastically needs it, and is a substantially better use of the space than parking.

This is a voting issue for me and will influence my vote in the upcoming and future elections.

Best,
Daniel Gonzalez

| | |
|---|---|
| **From:** | Aaron Goodman |
| **To:** | CPC.BalboaReservoir |
| **Subject:** | Fw: Balboa Reservoir Project Comments - A.Goodman |
| **Date:** | Thursday, September 12, 2019 4:30:24 PM |
| **Attachments:** | Balboa Reservoir - comment memo AGoodman.pdf |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Please see the attached comments in regards to the transit impacts of the proposal, and the cumulative impact concerns on mass-transit.

Thank you

A.Goodman D11

----- Forwarded Message -----
**From:** Aaron Goodman <amgodman@yahoo.com>
**To:** Secretary Commissions (CPC) <commissions.secretary@sfgov.org>
**Cc:** seungyen.hong@sfgov.org <seungyen.hong@sfgov.org>; jeanie.poling@sfgov.org <jeanie.poling@sfgov.org>
**Sent:** Thursday, September 12, 2019 03:32:36 PM PDT
**Subject:** Balboa Reservoir Project Comments - A.Goodman

Please see the attached memo and image in regards to today's discussion on the Balboa Reservoir.

Thank you

A.Goodman

NOTE: The image attached shows the T-Line Geneva Harney linkage to Brisbane and the future HSR caltrains station, the J-Line along San Jose, the M-Line link to Upper Yards and the Geneva Car Barn, and K-Line that runs on ocean, with blue area indicating east side area of redevelopment proposed for parking and solutions for CCSF to relocate parking to the eastern edge of the site, and build housing above using topography as a solution also to an elevated high-line green-way to Tony Sacco way and re-aligned transit at Balboa Station to improve the linkages at this intermodal hub, this is an approx. only graphic suggested solution for a transit and public infrastructure major transformation similar to prior scope and scale of platforming over the freeway and solving for additional housing and transit improvements to connect D7 and D10 through D11. The future removal of the CCSF bridge, and changes by Caltrains to the off ramp southbound should also be seriously considered as impactful to the transit and transportation serving this area and project proposal.

Aaron Goodman
25 Lisbon St. SF, CA 94112
Email: amgodman@yahoo.com

SF Planning Commissioners
J.Poling SF Planning Department
Email: Commissions.secretary@sfgov.org

RE: SF Planning Commission meeting on 9.12.2019 - Item #12 – **2018-007883ENV Balboa Reservoir Project**

As I was unable to attend the September 12, 2019 planning commission hearing on the Draft Environmental Impact Report for the Balboa Reservoir Project please note and accept my following comments to this project.

I was chair for more than 2 years at the Balboa Park Area Plan CAC prior to its discontinuation. The Balboa Reservoir CAC was appointed post the BPSACAC committee. We reviewed this project and others along Ocean Ave, discussing the CCSF masterplan, Lick Wilmerding HS proposal, and other projects proposed with the Balboa Park Station Area Plan CAC.

My concerns have always focused on the concerns about capacity, and if we are really seeing significant transit infrastructural planning to deal with the capacity concerns of growth and growth population impacts including traffic, pedestrian, and multi-modal concerns. Safety is also another major concern due to the concerns of schools and traffic injuries in and around the Balboa Park Station area. 1

I had attended many of the Reservoir project meetings providing comment and concerns on the proposals. Also indicating the joint/dual nature of the Balboa Reservoir and CCSF planning efforts and that they should not be looked at independently, but jointly as cummalative impacts on an area. 2

This is very similar to the growth impacts of SFSU-CSU and Parkmerced and Stonestown. The growth and impacts of institutions in the areas and the flow of traffic along ocean ave is directly impacted by the ongoing developments and the increased traffic which will occur with this development. The City College masterplan is underway but does not indicate the fact that they have considerable land to redevelop, and this includes the eastern edge of their property which abuts the freeway and can easily be transformed vertically into parking with buildings above using a layering concept to allow joint use of the parking for the CCSF and other adjacent parking needs for BART, LWHS, and even the Balboa Park, and Police station across the freeway. The prior proposals for the Balboa Park Station included concepts for platforming over the freeway. My interest is in indicating the direct linkage that can occur from a more robust transit/parking and pedestrian “green-way” linkage from Frida Kahlo Way corner of ocean down towards the BART station, on or along the southern edge of CCSF with a more gradual walkway that crosses the freeway and brings people directly into an intermodal station at Balboa Park that would treat the station as an intermodal hub that links the T-Geneva Harney, M-Line and J and K lines with significant bus and other systems in the district. 3

The increase in housing over near Alemany, and at the opposite end of Ocean ave at the El-Ray theater, means that more congestion will be impacting an already heavily trafficked and gridlocked area. 3 (cont.)

I am for the design and proposal of the housing development as an individual, and feel the need for 100% affordable units and a more robust look at water-use and retention on the site for reclamation and sewage issues and infrastructure must be a part of both sites (Balboa Reservoir and CCSF land developments). My concerns were raised during meetings where I attended SFPUC water games planning charrettes and we indicated the importance of water/sewer systems above sea-level that can begin to alleviate lower down systems elevation wise. 4

The transit issue is by far the biggest concern, as was very much ignored as a concern on the SFSU-CSU and Parkmerced and Stonestown redevelopment projects, congestion has worsened along 19th, and with eventual starting of undergrounding of the M-Line, additional concerns will increase on cross-city traffic and transit impacts. It is not possible to force one development to bear the brunt of the costs of public infrastructure, however when multiple sites are involved it is critical to ensure that the publics interests and impacts are seriously addressed in regards to safety, and continuity of public transit services. 5

Currently muni buses cannot pull over at Howth to drop passengers and delays in bus services occur regularly at this area. A proposed solution to off-ramp directly into a parking garage on the eastern edge of CCSF could directly alleviate some traffic from heading up Ocean Ave to the existing lots at the reservoir. It should be considered as an alternative, and a feasible solution that lessens the impacts of traffic and on public transit that runs along Ocean Ave. 6

Please take into consideration the impacts on MUNI systems and the need to address the impacts on transit as a serious concern that garners a broader and possible larger solution or alternative that includes cummalative projects and impacts as the main concern and solution to lessen pedestrian injuries, traffic impacts, and ensuring more rapid flow of public transit systems in this area due to the impacts on the second largest transit hub in SF.

Thank you for your attention to these issues.

Sincerely

Aaron Goodman District 11
Resident / Neighbor / former Chair Balboa Park Area Station CAC

**From:** Daniel Halford
**To:** CPC.BalboaReservoir
**Subject:** Saving the Balboa Reservoir for City College
**Date:** Monday, September 09, 2019 7:42:02 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

The proposed plan to sell the lower Balboa Reservoir to a private developer to build housing would be a disaster for City College. Three times already, in 1987, 1988 and 1991, San Francisco voters defeated propositions that would have sold this land to private developers. The will of the people is clear: City College needs this land, and all of us need City College. Mayor Agnos even said in 1991: "Housing will never be built on this land." So why do we have to fight this threat again?

The proposed housing would cost City College over a thousand parking spaces, thus denying access to education to thousands of CCSF students who cannot attend classes unless they drive. The typical CCSF student is a part-time student, meaning that s/he needs to drive in order to be able to juggle a job (or two jobs), family responsibilities and classes. Therefore eliminating parking spaces seriously limits access to education. City College is still recovering from the massive loss of students caused by the accreditation crisis; we simply cannot afford to lose more students. 1

In 2001 and again in 2005 San Francisco voters approved bond measures to build the Performing Arts Education Center (PAEC), which was already shovel ready in fall 2013, when the state-appointed special trustee Robert Agrella put it on hold. The college has already invested $30 million toward its construction, including the basement (which the PAEC shares with the Multi-Use Building), which is already finished. The latest revision of the PAEC construction plan has extensively downsized the education portion of the PAEC because it would remove too many parking spots! Sufficient parking is so crucial that it is actually endangering the award-winning design of a long-needed building. City College is the only community college in California without a required auditorium. It also does not have the required facilities for students majoring in music. This is a disgrace in a city that is world-famous for performing arts. 2

We all know that our city needs more affordable housing, but affordable for whom? The private developers define *affordable* as $139,000 a year, single income! But building market-rate luxury housing on land that City College clearly needs, a need affirmed by the voters three times already, is more than immoral. It's just crazy. 3

The best outcome to this controversy would be for the SFPUC to transfer the 'reservoir' land once and for all to the College, or at least the current lease could be extended for a 60-year contract, for the benefit of all the people of San Francisco. We look for your support in this outcome. 4

Yours truly,
Daniel T. Halford, ESL Instructor, CCSF
COSIGNERS, CCSF FACULTY (Current or Retired):
Lea Gabay, English as a Second Language

Anita Axt, Foreign Languages/World Languages and Cultures
Denise Selleck, English as a Second Language
Anjali Sundaram, Cinema
Gloria Keeley, English as a Second Language
James Armstrong, Chemistry
Dan Brook, Political Science
Dina Wilson, English as a Second Language
Dana Jae Labrecque, Broadcast Electronic Media Arts
Carla Crocomo, English as a Second Language
Lauri Fried-Lee, English as a Second Language
Pamela Kamatani, Music
Tehmina Khan, English and Interdisciplinary Studies
Claire Brees, Art
Lu Marla Dea, English as a Second Language
Alexandra Nickliss, Social Science
Diane Presler, Visual Media Design
Raymond H. Fong, Chemistry
Mary Devereaux, English as a Second Language
Tina Martin, English as a Second Language
Ann Overton, English as a Second Language
Robin Mackey, English as a Second Language
Rick Baum, Social Studies
Kelli Crow, English as a Second Language
Darlene Alioto, Social Sciences
Max Luttrell. Computer Science
Amy Shimm, Visual Media Design
Clare Corcoran, English as a Second Language
Paul Gallo, Fashion
Andrea Massalski, Photography
Michele Ochoa Oross, RN, Registered Nursing
Deborah Levy, English as a Second Language
Christina Yanuaria, English as a Second Language
James ZM Wong, Counseling
Armen Hovhannes, English as a Second Language
Allan Fisher, English as a Second Language
Kelley O'Neil, English as a Second Language
Lori Cabansag, English as a Second Language
Gretchen Owens, English as a Second Language
Jeanne Hughes. Dance and Physical Education
Deborah Goldsmith, Social Sciences
Harry Bernstein, Music
Robert Price, Chemistry
Jean Barish, Biology
Donna Hayes, Counseling
Jean Sieper, English
Janet Carpenter, Art
Frank Duhl, Child Development and Family Studies
Linda, Sudak, Child Development and Family Studies
Sally Gati, English as a Second Language
Lenni Terao, English as a Second Language
Gloria G. Milhoa, English as a Second Language
Marguerite Fishman, Dance and Physical Education
<u>COSIGNERS, OTHER CONCERNED CITIZENS:</u>

Iris Vaughan
Michael Adams
Manuel Peroni
Cheryl Meeker
Amy Rathbone
JB Damian Lucas
Julie Beth Napolin
Sarah Glanville
Sudhir Puri

**From:** Daniel Halford
**To:** CPC.BalboaReservoir
**Subject:** Saving the Balboa Reservoir for City College
**Date:** Monday, September 16, 2019 10:52:44 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

The proposed plan to sell the lower Balboa Reservoir to a private developer to build housing would be a disaster for City College. Three times already, in 1987, 1988 and 1991, San Francisco voters defeated propositions that would have sold this land to private developers. The will of the people is clear: City College needs this land, and all of us need City College. Mayor Agnos even said in 1991: "Housing will never be built on this land." So why do we have to fight this threat again?

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We all know that our city needs more affordable housing, but affordable for whom? The private developers define *affordable* as $139,000 a year, single income! But building market-rate luxury housing on land that City College clearly needs, a need affirmed by the voters three times already, is more than immoral. It's just crazy. 3

The best outcome to this controversy would be for the SFPUC to transfer the 'reservoir' land once and for all to the College, or at least the current lease could be extended for a 60-year contract, for the benefit of all the people of San Francisco. 4

We look for your support in this outcome.

Yours truly,

CCSF FACULTY (Current or Retired):
Carolyn Cox, English as a Second Language
Monica Bosson, English
Marina Osnovikov, Registered Nursing
Jeanette Bernis, Health Science
Camila Bixler, English as a Second Language
Ron Bixler, English as a Second Language
Tom Menendez, Economics
Kimberly Honda, English
Robert Schuricht, English as a Second Language
Francine Podenski, Broadcast Electronic Media Arts
Ann MacAndrew, English as a Second Language
Sally Winn, English as a Second Language
Kim McGovern, English as a Second Language
Dr. Karl Westerberg, Physics
Barbara A. Johnson, Administration of Justice/Fire Science Department
Craig Kleinman, English
Osa Kauffman, English as a Second Language
Lee Vogt, English as a Second Language
OTHER CONCERNED CITIZENS:
Daniel Beery
Craig Blackstone
Linda Cain
John Hayes
Mary Ritter
Roger Ritter

**From:** Robert Hall
**To:** CPC.BalboaReservoir
**Subject:** Public comment: Balboa Reservoir Draft Supplemental Environmental Impact Report
**Date:** Wednesday, August 21, 2019 10:31:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I'm greatly disappointed to learn that the Balboa Reservoir Draft Supplemental Environmental Impact Report fails to take into consideration San Francisco's vanishing biodiversity. 1

Although the reservoir was meant to be a hard surface where plants shouldn't grow, over the years native coyote brush (Baccharis pilularis), yellow bush lupine (Lupinus arboreus) and various non-native shrubs have colonized the area. The result is a patchy habitat that has attracted a thriving flock of Coastal Nuttall's white-crowned sparrows. I saw breeding evidence this Spring. About 60 of the birds were counted. A local resident, Greg Gaar, assures me that they've been breeding there since, at least, the 1970s. The attraction is the native coyote brush, an amazing plant that offers cover for our local birds and sustenance for over 54 insect species (https://plants.usda.gov/plantguide/pdf/pg_bapi.pdf). Also present are house finch, red tail hawk, California scrub jay, Anna's hummingbird, West Coast lady butterfly, bumblebee, grasshopper and various lichens.

A recent World Wildlife fund study points out that the world has lost 52% of its biodiversity since the 1970s (https://www.cbsnews.com/news/world-wildlife-fund-wwf-half-the-worlds-biodiversity-gone-over-last-40-years/). This means that, in San Francisco, where habitat for biodiversity is at a premium, we need to be careful where we trod. City and state officials agree, with each entity rolling out biodiversity resolutions that have the goal of protecting flora and fauna.

(https://sfenvironment.org/policy/resolution-adopting-citywide-biodiversity-goals)

(http://opr.ca.gov/docs/20180907-CaliforniaBiodiversityActionPlan.pdf)

I-Hall

I urge you to hire an ecologist and make plans to mitigate by building new local native habitat in the immediate proximity of your development so biodiversity can adapt to the stark changes you're proposing. Most of the creatures on this property are non-migratory and have no where else to go. Please include biodiversity mitigation in your report. 1 (cont.)

Bob Hall

1946 Grove St. Apt. 6

San Francisco, CA 94117

**From:** Christine Hanson
**To:** Poling, Jeanie (CPC)
**Subject:** draft SEIR versus DEIR
**Date:** Thursday, August 08, 2019 11:04:53 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Jeanie,
Until the release of the draft SEIR we were told to expect a DEIR. 1
What is the difference and why has this difference been applied to the Balboa Reservoir project?
Thank you,
Christine Hanson

**From:** Christine Hanson
**To:** CPC.BalboaReservoir
**Subject:** Public Comment case 2018-007883ENV
**Date:** Wednesday, September 11, 2019 12:26:56 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Public Comment on the Balboa Reservoir Project.
Air Quality and Children in the City College Multi-Use Building

Impacts related to construction emissions are discussed in the draft SEIR Section 3.D, Air Quality. The draft SEIR finds Impact AQ-2a (During construction, the proposed project would generate criteria air pollutants that would violate an air quality standard, contribute substantially to an existing or projected air quality violation) and Impact AQ-4 (Construction and operation of the proposed project would generate toxic air contaminants, including Diesel Particulate Matter) will result in impacts that are Significant and Unavoidable with mitigation during the construction period of both the Developer's Proposed Option and the Additional Housing Option. The impact on air quality is greatest if the construction period is accelerated--completed in three years, and with the maximum number of units constructed. The finding for both of these categories in the Pre Environmental Impact Report (Balboa BART Station Area Plan) with a smaller development was no significant impact with mitigation.

The Draft SEIR discusses risks in the APEZ, which is the Air Pollutant Exposure Zone. The risk is highest for children, referred to as "sensitive receptors," at Childcare Centers, and the SEIR identifies Childcare Centers in the area and their distance to the construction zone. The Childcare Center at City College, located in the bungalows is identified and though it is not the closest in proximity it is the only center noted that lies within the APEZ, sits to the East and is in the prevailing path of the wind. 1

The draft SEIR fails to note the Childcare classes that are centered in the City College Multi-Use Building (MUB), which teaches classes with children on site. Though these children are not playing outside of the building, the MUB sits approximately 150 feet away from the proposed development (per figure 2-3) is to the East of the construction site, and downwind.

Because of the proximity of the MUB to the construction site, its location is comparable to the planned childcare site within the proposed construction area. The SEIR classifies the danger to those children for future health impacts as being significant but says that because the development's future daycare centers won't be

up and running during construction this isn't likely to be an issue as follows:

1 (cont.)

From the draft SEIR page 3.D-71: "in the unlikely event that the daycare would be completed in Phase 1 and be operational during Phase 2 construction, the potential for future health risk impacts from exposure of daycare receptors to Phase 2 construction TAC emissions would be potentially significant, especially given the potential that the project could be developed under an accelerated construction schedule of as little as three years' duration, increasing the DPM exposure of daycare receptors."

The proposed project must study the potential danger to the children who participate in the classes in City College's MUB. The data shows that they are not included in this study. Because the draft SEIR identifies significant health impacts for children at the future daycare centers located within the construction area, those concerns must be addressed as well with the children in the MUB whose proximity and direction of location put them at similar risk. These children in the MUB are within the APEZ and the building they are in is to the East, and downwind of the proposed project. The danger to these children is also increased with the potential for an accelerated construction schedule for both alternatives, **after <u>studying</u> the impacts**; the SEIR must offer mitigations for these children for all of the alternatives studied in the draft SEIR.

Christine Hanson

**From:** Christine Hanson
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir public comment Hanson
**Date:** Monday, September 23, 2019 4:57:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Here is my comment on 3.B.5 in regards to the DSEIR:
3.B.5 Regulatory Framework

This section of the SEIR provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site. 1

3.B.5 as it is written in the SEIR, critically omits the Land Use Framework that was adopted by the San Francisco Public Utilities Commission in 2012. The lease and sale of PUC property is governed by this SFPUC document, "FRAMEWORK FOR LAND MANAGEMENT AND USE." The document lays down conditions for sale of SFPUC land to include Economic, Environmental, and Community criteria.

Here is the excerpt from the SFPUC Land Use Framework:

4. Use of the land sold will not to result in activities creating a nuisance.

The Balboa Reservoir Project fails enormously to uphold Condition 4 of "Community Criteria."

The SEIR also fails to account for the existing conditions. 2

The current plan for the proposed development will access Lee Avenue, which serves as a route to Ocean Avenue. Within 100 feet of Ocean Avenue, traffic on Lee Avenue will pass the outlet of the parking lot for Whole Foods. Data from Kittleson's queue analysis and intersection total delay analysis on pages 10-13 in Appendix C of the SEIR shows 3

The SEIR states:
During the weekday p.m. peak hour, the greatest increase in total delay would occur for southbound movements on Lee Avenue, increasing by 91.3 seconds. This increase in delay would not directly impact transit, as the southbound approach on Lee Avenue is not a transit route.

The data collected by Kittelson however took place on January 31, 2018 which is at least 6 months before Whole Foods began offering 2 hour free delivery to Amazon Prime customers and the traffic passing through the Whole Foods parking lot increased, especially during the evening rush hour which showed 100 cars traveling South on Lee Avenue—presumably cars leaving Whole Foods parking lot since there are no residences or through ways currently connected to Lee Avenue. Now however, periodically throughout the day and week, traffic is so bad in the Whole Food lot that employees must direct traffic using walkie-talkies. Even with this extra help at times there is not enough parking to accommodate the cars trying to

park, and so the cars back up at the entrance all the way out to Ocean Avenue. Because there is a Muni stop near the entrance to Whole Foods in the left lane, the cars in the right lane cannot pass and so all traffic stops in the right lane until the traffic inside the parking lot begins to move.

3 (cont.)

The entrance to Whole Foods is one half block from Lee Avenue. Because no traffic comes from residences on Lee Avenue now the cars leaving the Whole Foods parking lot are only delayed by their own burgeoning numbers, but if traffic is added from the proposed Reservoir development this parking lot traffic will have to wait for the reservoir traffic to pass in order to leave the parking lot and create space for more cars waiting out on Ocean avenue (headed south) to turn right into the parking lot. The que on Lee Avenue as shown in the DSEIR completely blocks the driveway from the parking lot.
This will back up the cars further attempting to enter the Whole Foods lot a half block away and so this combination will create its own gridlock and subsequent nuisance.

**In fact it will be beyond a nuisance because when the anticipated 91.3 second delay happens on Lee Avenue South, the cars heading into and out of Whole Foods parking lot will be stuck and create a blockage which will indeed affect the transit system behind it.**

**From:** Christine Hanson
**To:** CPC.BalboaReservoir
**Subject:** Public Comment on Balboa Reservoir
**Date:** Monday, September 23, 2019 4:52:06 PM
**Attachments:** Hanson admin comment.pdf
Appendix C.pdf
Appendix D.pdf
Appendix A.pdf
Appendix B.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

The Attached are one public comment and are meant to be included together.
Thank you,
Christine Hanson

The Administrative record of the draft SEIR, is incomplete and misleading in regards to a portion of the communications between multiple City agencies and City College Administrative staff. The communications NOT INCLUDED in the draft SEIR were based on multiple subjects including the creation of the City College Facilities Master Plan (FMP), communications around transportation, parking and the presentation of the City's Transportation Demand Management (TDM) plan. They show that the administrative interaction between City Agencies and City College Administrators has been about the exertion of control upon the school's sovereign process, focusing pressure and attention on a small minority of administrators—most of who were hired by the State imposed Trustee and NONE of whom had any experience or even operational knowledge of the school during its robust days before the accreditation crisis. 1

The entries INCLUDED in the Administrative record of the draft SEIR in regards to City College consist primarily of more recent communications between City agencies, City College Chancellor Mark Rocha, City College's Facilities planner Kitchell, and consultant Charmaine Curtis. The Facilities Master Planning process at City College which begun during the state takeover of the school, is barely noted in the DSEIR Administrative record even though many meetings were held at that time between City agencies and City College staff.

A public records search by City College Community members in August 2017 showed that by that time at least 17 of these earlier meetings had occurred at SF Planning offices or by phone. The Board of Trustees did not know of these meetings, including Trustee Davila who represents City College on the Balboa Reservoir CAC.

The use and frequent appearance of the City College Facilities Master Plan throughout the draft SEIR cannot be separated from the Administrative record, therefore the Administrative record of transactions between City Agencies and City College staff is INCOMPLETE. Even when considering all of the communications in this public comment the Administrative Record will still fall short of accurately depicting the depth of influence that San Francisco Planning, San Francisco Municipal Transportation Agency, SF Office of Employment and Workforce Development, and San Francisco Public Utilities Commission have inflicted upon the planning for City College in the interests of a private development, in the name of, but instead of, the educational planning needs of the school.

The bottom line is that most of the stakeholders at City College know very little about the true potential impact of this project and when the effects play out it will affect the overall health of the school and the people who support it. **For this reason, Planners evaluating this DSEIR must take a close and careful look at the administrative record and make inquiries into the process that has brought the DSEIR for Balboa Reservoir to this stage because the Administrative record that SF Planning staffers have submitted is incomplete.**

**City College Facilities Master Planning**

The RFP for the City College Facilities Master Planner collected final proposals in May 2015, and as described in its introduction: "A wide range of input from community members and College staff, faculty, staff and students is anticipated to identify issues and evaluate alternatives, as described in this RFP. The RFP is intended to provide a framework for proposals which identifies key issues, stakeholders and tasks."
http://www.ccsf.edu/~facilpln/RFP/RFP%20047%20Facilities%20Master%20Plan%204-3-2015%20final.pdf

The overview from the RFP states:
"The District expects the Facilities Master Plan and the Educational Master Plan to complement each other and be a reflection of the District's commitment to its Mission." The RFP includes a link to the Education Master plan
http://www.ccsf.edu/dam/Organizational_Assets/Department/Research_Planning_Grants/E MP/EMP_DRAFT_Report2014-10-02.pdf
which was being finalized at the same time that the FMP was starting.

The RFP does include City Agencies among a list of stakeholders, and outlines the expected participation as such:

**"Current and Potential Governmental and Community Partners**
City and County of San Francisco - City Manager, Planning Director, Cultural Services Director Chambers of Commerce
Non-profit Youth Services Organizations
*Preferred methods of input: Meetings with key City leadership including relevant Commissions to identify possible options, develop strategies for new facilities, briefings to Commissions or Councils, community meetings on options and draft plan.*

A schedule for future meetings between FMP staff and stakeholders anticipates:

| **DISTRICT, COMMUNITY & PUBLIC AGENCY INVOLVEMENT PROCESS**<br>Number in each column represents number of meetings with group in each phase | | | | | |
|---|---|---|---|---|---|
| District, Public Agency or Community Group: | Phase 1: Involve-ment Proces | Phase 2: Assessm ent | Phase 3: Issues & Needs | Phase 4: Plan Proposals | Phase 5: Imple-mentation |
| Board of Trustees | 1 meeting | 1 | 1 | 2 | 2 |
| Faculty & Classified staff | | 1 | | 1 | |
| Executive Management Meetings | 1 meeting | 1 | 1 | 1 | 1 |
| Facilities Master Plan | 2 meetings | 2 | 2 | 3 | 2 |

| | | | | | |
|---|---|---|---|---|---|
| Facilities Project Meeting | 3 meetings | 2 | 2 | 3 | 2 |
| Participatory Governance Committee | | | 16 | 16 | |
| Community-wide Workshops | | | 2 | 2 | |
| City Staff (City Managers, Comm. Services & Planning | 2 meetings | | | | 2 |
| City Commissions | | | | 4 | |
| City Councils | | | | 2 | |

The RFP includes guidelines for these meetings in its tasks:

**TASK 1.2 Schedule and Materials for District and Community Involvement**
Develop a detailed schedule for District and community involvement which shows key meetings in relation to completion of draft or final documents, the major phases and the types of input solicited from various groups. At a minimum, the schedule should include the following types of meetings for District and community input into the process. District staff will provide public noticing required under the Brown Act and assist with agenda coordination with other public agencies.
*Deliverables: Proposed schedule for District and community involvement, showing all proposed district, community and public agency meeting dates. Draft and final presentations, meeting materials, and summary notes will be provided for all meetings by end of each phase. Where surveys are proposed to evaluate facility needs, consultant will provide draft and final survey and analysis of results.*

The public records that were released show many more meetings occurred than this RFP anticipated. Since none of the meetings were publicly noticed or reported on to the Board or community per the Brown act, the process did not follow the instructions in Task 1.2 of the RFP. The Brown Act was completely ignored in the process.

The City College Facilities Master Plan went through a "reboot" in 2018 with Kitchell onboard to create another version of the FMP. When asked in two separate public presentations--what is the appropriate place for City agencies to address the Facilities Master Plan, John Watkins of Kitchell said—"in public comment". The Administrative record presented in the draft SEIR would seem to give the impression of appropriate inter agency boundaries that fall along those lines however the agendas of the City/City College meetings compiled in Appendix A show a different interaction. Some of the minutes from these meetings are compiled in Appendix B.

**City Staff and City College Facilities Master Plan**

San Francisco Planning's intrusion into City College's Facilities Master Planning process began before the school hired its facilities planning consultant. Planner Jeremy Shaw submitted interview questions for the consultant hiring interviews via Fred Sturner, former City College VP of Facilities. Shaw appears to have attended at least one of the interview sessions on June 8, 2015. In addition to the FMP consultant interview questions, Jeremy Shaw also forwarded questions for a student/faculty/staff survey transportation survey.

Some of the emails from these years are collected together in Appendix C.
They show diligent, persistent and collegial staff from SF Planning, OEWD, and SFMTA politely bombarding a mostly agreeable City College staff with unsolicited feedback, suggestions and "help" with the Facilities Master Plan. In the interest of time and brevity not all of the emails are included.
Below is a short synopsis of some of the emails from the public records search:

<u>April 16, 2015</u>
Jeremy Shaw, SF Planning, to Jeff Hamilton, CCSF
"We realize Balboa is slightly ahead of your master planning process. But after strategizing with the SFMTA, we see great opportunities that could support your data collection, master plan and future operations."

<u>April 28, 2015</u>
Jeremy Shaw to to Jeff Hamilton:
"See the attached transportation survey draft that we discussed, for potentially distribution to students/faculty/staff of CCSF. In the chance that your student survey has not gone out, it could be a good opportunity to use these questions for campus transportation needs."

<u>May 1, 2015</u>
Jeremy Shaw to Jeff Hamilton:
"Just wanted to follow up on the potential for the transportation survey. Are you interested in distributing it with the student survey or otherwise?"

<u>June 10, 2015</u>
Jeremy Shaw to Jeff Hamilton
"For additional info and some talking points, please consider our draft TDM Objectives for Balboa, which could easily apply to CCSF:
Minimize auto trip generation and maximize access

- guiding performance measure for most objectives
- 2. Create choice and incentives for "lower car lifestyle"
- - e.g. transit "class pass," capital improvements on Ocean Avenue, carshare programs
- 3. Manage parking availability for those who need it while avoiding an oversupply
- - e.g. shared parking facilities with nearby uses, demand-responsive pricing

- - better managed parking means better bottom line (and more affordable housing in City's case)
- 4. Encourage sustainable travel through coordinated programs & communications
- - e.g. joint transportation management area, incentive campaigns, commuter
- benefits, real-time information on transit, shared bikes and carshare
- - Coordinated survey between CCSF and nearby uses
- 5. Design site to minimize congestion
- - e.g. Coordinate urban design, vehicle and pedestrian access, and circulation
- between CCSF, SF Planning and MTA
- We believe working together on a survey to assess existing needs and ongoing coordination for a neighborhood-wide TDM are two great first steps to achieve our joint goals."

Thursday June 18, 2015
Jeremy Shaw to Fred Sturner, Former Head of CCSF Facilities
"Hi Fred, Are interviews tomorrow? Can I send you questions today?"
*(the "interviews" referred to were for the selection of the Facilities Master Planner)*

June 25, 2015
Jeremy Shaw to Fred Sturner
"I just saw that these interview questions were in my draft box. I thought I sent them. How did the interviews go??
Jeremy

Please provide an example of providing an innovative transportation or access solution to a client.
What did you approach the problem creatively, politically or analytically?
What solutions or approach would you propose for a complex and diverse urban neighborhood such as the CCSF Ocean Avenue campus?
In a political and academic climate that is very active, how would you engage CCSF campus planning and transportation as distinct from other CCSF topics? How would you address issues such as parking, access and neighborhood planning that the surrounding communities continue to see as a challenge and have discussed for years?"

August 14, 2015
Fred Sturner to Jeremy Shaw
"Coffee, same place Monday?"

August 14, 2015
Jeremy Shaw to Fred Sturner
"How are things? We should catch up if you have a minute (though I won't be free til Monday). Also, wondering, does your shop keep data on where students are coming from or any other location/transportation related data? If not, who would that be?"

February 10, 2016
Jeremy Shaw to Ron Gerhard
"Though we're not meeting this month, we want to address the issues the Trustees brought up two weeks ago, namely a student survey and student location/demographic data. The sooner our groups understand these data, the sooner we can craft transportation solutions for city college."

Tuesday, March 07, 2017
Jeremy Shaw to Linda Da Silva Former Head of CCSF Facilities
"Attached are most of the slides used at the last BRCAC meeting. I deleted those that were of least interest to the BOT. Can we discuss how much time I have and what my main objectives would be on Thursday?"
*(Shaw presented TDM to the Board of Trustees within the agenda item 2009 Sustainablility Plan, his name did not appear on the agenda)*

Feb 11, 2016
Jeremy Shaw to Ron Gerhard, CCSF VP of Facilities, and Pam Mery CCSF Director of Institutional Effectivenes
"Thank you Ron.
Greetings Pam. You may be aware that as City College initiates a master plan, the City of San Francisco is planning affordable housing for a number of City-owned sites, including the Balboa Reservoir (currently the lower CCSF parking lot). We believe City College can benefit from participating in the City's studies and outreach efforts for Balboa Reservoir. With the great need to manage parking and access for City College, we have hired consultants to focus on "Transportation Demand Management" (i.e. strategies to manage parking and encourage alternatives to driving alone). The City Collegemaster plan will incorporate TDM as well, so participating in City efforts can save time and increase its efficacy. For any of this to work, we'd like to:
- Share student and faculty data (e.g. residence location, time of arrival, demographic data)
- Identify data needs for both of us
- Execute a survey for additional data (particularly transportation and access)
Any chance you can chat in the next week or
two? "

Jeremy Shaw to Pam Mery,
"I know eveone's really busy in your shop, but I just wanted to follow up with on this request with more specifics. In particular for transportation studies, we hope to share data on or faculty, staff and students
- Counts – full-time, part-time, which campus
- Demographic data – age, income
- Address, place or zip code of residence
- Class schedules and/or students on campus(es) by time of day
- Mode of transport to campus
- Projected or aspirational numbers for any of the above"

February 17, 2017
Linda Da Silva to John Francis, SF Planning
"My facilities master planning consultants are not designing solutions, they are not contractually engaged at a project implementation level. So they are pushing back on providing the kind of detailed traffic analysis and data that MTA is currently requesting - and I can understand their position. I'm also not planning to augment their contract to allow them to drill down to that level of detail, since we are in master planning mode."

March 16, 2017
John Francis to Linda Da Silva
"I have not been able to reach you for the last couple weeks and wanted to reach out again because I am concerned about where we are in terms of preparation for the FMP presentation to the Planning Commission on April 6th. Providing the Commission a thorough update on the proposed FMP is a critical step in the collaborative effort between City College and the City to ensure that the FMP meets the needs of all stakeholders, including the CCSF community and the College's Ocean Campus neighbors. At this point, the only substantive work describing the FMP that has been made public is a high level site plan that leaves undefined a number of critical issues, particularly related to parking and vehicular access.

My concern is that such a high level overview of the FMP will not provide the Commission with enough information to be able to provide constructive feedback on the Plan. Unfortunately, given your aggressive goal of BOT adoption of the FMP by the end of May, this will likely be the only opportunity for the Commission to weigh in. As City staff has noted many times, we are committed to supporting the mission and goals of City College and see our role in collaborating with you on the FMP process as a crucial part of that effort. As such, while we still have concerns about specific elements of the FMP that we have seen thus far, we want to make sure that your presentation to the Commission is both productive and well received. Toward this end, it would be appreciated if you could provide a status update on the FMP draft and what elements will be ready in time for transmittal to the Commission by March 30. I am out of the office starting tomorrow 3/17 and will return on 3/27—during that time, I would ask you to be in touch with Jeremy Shaw in order to provide an update and to coordinate the overall shape of the Commission presentation."

March 21, 2017
Linda Da Silva to Jeremy Shaw:
"When I agreed to bring our FMP to the Planning Commission in early April, I was under the impression it was more as an informal information item on our planning process, timeline and status. I was not aware that the Commissioners would be providing constructive feedback on CCSF's FMP."

*None of the emails between former Head of Facilities Linda Da Silva and staff of SF Planning or other agencies is included in the draft SEIR. The SEIR does include an official memo from SFMTA with comments on City College's Facilities Master Plan addressed to Da Silva.*

**Institutional Master Plan**

A search of the SF Planning website shows a list of educational institutions and the status of their latest Institutional Master Plans. City College is listed as exempt: https://sfplanning.org/resource/institutional-master-plans
However in July 2016, SF Planning staff researched City College's ability to exempt itself from this process and prepared comments for Interim Chancellor Susan Lamb offering to "to create the plan and to coordinate feedback from all City agencies".

This communication thread is included in Appendix D

**Costs to City College**

In addition to the inability of City College to design its own transportation plan without the insistent input from City Agencies, and the diversion—especially in the earliest days of the planning process—away from the focus on the Educational Master Plan or even the school in its entirety, the actual monetary costs to the college were exacerbated by the City Agencies unrelenting focus on transportation. Initially, in October 2015 when City College first hired tBP to be its Facilities Master Planner, the resolution was for the amount $672,900. In April 2016, the contract with tBP was updated "due to additional work necessary related to traffic pattern analysis" as well as a peer review of local theatres for the PAEC project. This boosted the contract with tBP to a total of $874,900. The traffic study generated by this contract was produced by Sandis, and the data produced was adopted by Kitchell and used in this draft SEIR. The Sandis consultants as well as tBP, appear on the agendas for the early City/City College meetings.

In the summer of 2018, the Facility Master Plan was officially "rebooted" and Kitchell, the group that had been hired in March 2018 with a contract for $350,000 to provide Program Management Services, was approved for a contract increase to $2,763,496. The school also hired Fehr and Peers to do a TDM and parking study in August 2018 for $75,000. The Fehr and Peers study is quoted widely in this draft SEIR by the Kitchell consultants wrote the Transportation Memo for this DSEIR. An additional Balboa Reservoir related expense has been the contract for developer/consultant Charmaine who appears in the Administrative record in her role with CCSF which has been renewed multiple times. Her role does not include any liason between the College's Facilities Committee and City Agencies. The City College expenses listed above have been funded by 2005 Bond monies.

**City College, Lost in the Shuffle**

In 2012, the Accrediting Commission For Community and Junior Colleges (ACCJC) placed City College on the accreditation version of probation called “show cause”. In July 2013 the ACCJC announced it would remove the school’s accreditation one year later. San Francisco’s City Attorney kept the doors at City College open with a lawsuit which bought the school a little more time while the Federal Accreditation oversight Commission NACIQI investigated ACCJC and found that the Accreditor had indeed denied City College due process, was not uniform in its punishments nor was it clear in its standards. Armed with the findings of NACIQI, the California Task Force on Accreditation, which was a statewide taskforce encompassing California Community College Faculty and staff, took on the ACCJC who finally had to answer for the damage they had capriciously spread throughout the California Community College system.

Even with the advantage that Free City has given the school, City College still has not recovered. A good number of the students have returned, but now they face class cancellations. For staff and Community who have loyally “saved City College” year after year since the start of the Accreditation Crisis, the marathon of concern has taken a long, slow, hard, emotional toll. It was into this dark period of time that this project came with its host of jolly, insistent, planners and staff to “help” City College draft a future that like way too much of the draft SEIR, may not even include the school.

From: Shaw, Jeremy (CPC)
To: Fred Sturner
Bcc: Lesk, Emily (ECN)
Subject: Re: Follow-up Materials
Date: Monday, June 08, 2015 12:04:43 PM

Hi Fred
Thanks for being open to my attending today. Will you have a minute to chat before the meeting? I'll be on campus by 12:30 or so
Feel free to call if easier 415-860-7429
Jeremy

On Jun 4, 2015, at 9:34 AM, Lesk, Emily (ECN) <emily.lesk@sfgov.org> wrote:
Fred,
Thanks so much for all of this. I believe we are still waiting to hear when and where Monday's meeting will be. Can you please send that information our way?
Thanks,
Emily
Emily Lesk
Direct: (415) 554-6162
Email: emily.lesk@sfgov.org

From: Fred Sturner [mailto:fsturner@ccsf.edu]
Sent: Tuesday, June 02, 2015 2:41 PM
To: Lesk, Emily (ECN)
Cc: Martin, Michael (ECN); Shaw, Jeremy (CPC)
Subject: RE: Follow-up Materials

From: Lesk, Emily (ECN) [mailto:emily.lesk@sfgov.org]
Sent: Tuesday, June 02, 2015 1:53 PM
To: Fred Sturner
Cc: Martin, Michael (ECN); Shaw, Jeremy (CPC)
Subject: Follow-up Materials
Hi Fred,
It was great to connect a few minutes ago. We look forward to receiving the follow-up
materials that you mentioned—the masterplan consultant selection schedule, the consultant proposals, and the white paper.
Most pressingly, can you confirm that timing of the consultant selection meetings on June 8 and 18? We understand that it may not be possible for someone from the City to attend on the 18th, but we appreciate your effort to try to make that work.
Thanks,
Emily
Emily Lesk
Project Manager
Office of Economic and Workforce Development

San Francisco City Hall
1 Dr. Carlton B. Goodlett Place, Room 448
San Francisco, CA 94102
Direct: (415) 554-6162
Email: emily.lesk@sfgov.org
www.oewd.org

From: Shaw, Jeremy (CPC)
To: Fred Sturner (fsturner@ccsf.edu)
Subject: master planner interviews
Date: Thursday, June 25, 2015 11:39:00 AM

Hi Fred,

I just saw that these interview questions were in my draft box. I thought I sent them. How did the interviews go??

Jeremy

.
Please provide an example of providing an innovative transportation or access solution to a client.
What did you approach the problem creatively, politically or analytically?
.
What solutions or approach would you propose for a complex and diverse urban neighborhood such
as the CCSF Ocean Avenue campus?
.
In a political and academic climate that is very active, how would you engage CCSF campus
planning and transportation as distinct from other CCSF topics? How would you address issues
such as parking, access and neighborhood planning that the surrounding communities continue to
see as a challenge and have discussed for years?

JEREMY SHAW | Planner/Urban Designer | SF PLANNING | 415.575.9135

From: Teague, Corey (CPC)
To: Shaw, Jeremy (CPC)
Cc: Francis, John (CPC)
Subject: RE: IMPs
Date: Tuesday, August 08, 2017 12:58:05 PM

Not too much. They mostly talked about how it would be good to have standard formatting requirements for all IMPs, and then to maybe also have some minimum standards for the type/level
of data included in each IMP. John stated that creating these formatting and substance standards
was or will be on our work program.

Corey A. Teague, AICP, LEED AP
Assistant Zoning Administrator
Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9081 Fax: 415-558-6409
Email: corey.teague@sfgov.org
Web: www.sfplanning.org
Planning Information Center (PIC): 415-558-6377 or pic@sfgov.org
Property Information Map (PIM):http://propertymap.sfplanning.org

From: Shaw, Jeremy (CPC)
Sent: Tuesday, August 08, 2017 11:20 AM
To: Teague, Corey (CPC)
Cc: Francis, John (CPC)
Subject: IMPs

Hi Corey
Anything significant come about from your IMP presentation that we should be aware of as we work with City College for their facilities master plan update? (yes, they're exempt, but we're encouraging them to come to CPC regardless)
Thanks!
Jeremy
JEREMY SHAW | Planner/Urban Designer | SF PLANNING | 415.575.9135

From: Fred Sturner
To: Shaw, Jeremy (CPC)
Subject: Re: checking in
Date: Friday, August 14, 2015 12:12:07 PM

Coffee, same place Monday?

From: Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org>
Sent: Friday, August 14, 2015 11:14 AM
To: Fred Sturner

Subject: checking in

Hi Fred,
How are things? We should catch up if you have a minute (though I won't be free til Monday).
Also, wondering, does your shop keep data on where students are coming from or any other

location/transportation related data? If not, who would that be?
Jeremy
JEREMY SHAW | Planner/Urban Designer | SF PLANNING | 415.575.9135

1
Lesk, Emily (ECN)
From: Linda Da Silva <ldasilva@ccsf.edu>
Sent: Thursday, August 25, 2016 7:54 PM
To: Lesk, Emily (ECN)
Cc: Shaw, Jeremy (CPC); Francis, John (CPC)
Subject: Re: CPPC Meeting
Hi Emily,
Your inquiry is timely - we just posted the agenda and meeting materials on the Facilities Master Plan website's Advisory Working Group page.
One of the meeting materials links is to the July 28th Board Resolution on the Development of the Balboa Reservoir Property (this is the final, amended resolution that you've been wanting to cite in your housing developer RFQ; I just got it today!).
Monday's meeting is 2-6pm at Ocean campus Multi-Use Building Room 140. We did not anticipate a presentation from you (this time) -- but in the second part of the charrette tBP/Architects will be leading the Advisory Working Group through brainstorming and development of options. During that portion, if you notice any ideas developing that would be informed by projects or initiatives that the City is planning, you should
definitely speak up! That would be the benefit of your attendance - that kind of coordination and
communication.
As a clarification (and since this is my "day 19", it was just yesterday that I got clear about this): the
meetings/charrettes of the Facilities Master Plan Advisory Working Group (FMP AWG) is the best venue for
City Planning coordination. I previously had cited the CPPC's meetings; CPPC is the core of FMP AWG, with a
few additional individuals to help expand the perspective of CPPC which was tasked by the Board to work on
the facilities master plan. The FMP has been consuming the CPPC's attention. However, just to share my
newfound clarity on the difference, the CPPC does still meet separate from the FMP AWG to do other more
mundane capital project related things - things that are very internal and wouldn't have City involvement. So
to wrap this up, I'm inviting City Planning to FMP AWG sessions, not CPPC sessions. I hope this makes sense
Linda da Silva
Associate Vice Chancellor, Facilities Planning & Construction
City College of San Francisco
50 Phelan Avenue, San Francisco, CA 94112
ldasilva@ccsf.edu
p 415.239.3495
www.ccsf.edu
From: Lesk, Emily (ECN) <emily.lesk@sfgov.org>

Sent: Thursday, August 25, 2016 3:38:13 PM
To: Linda da Silva
Cc: Shaw, Jeremy (CPC); Francis, John (CPC)
Subject: CPPC Meeting
Hi Linda,
2
Nice to see you on Monday and again on Tuesday this week. I'm following up on Monday's CPPC meeting, with Jeremy
and John looped in. Can you clarify exactly what you're looking for us to present? Is there an agenda yet?
Thanks,
Emily
Emily Lesk
Project Manager
Office of Economic and Workforce Development
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place, Room 448
San Francisco, CA 94102
Direct: (415) 554-6162
Email: emily.lesk@sfgov.org
www.oewd.org

**From:** Shaw, Jeremy (CPC)
**To:** Paine, Carli (MTA)
**Cc:** Lesk, Emily (ECN); Francis, John (CPC)
**Subject:** RE: CCSF study session?
**Date:** Wednesday, March 01, 2017 11:35:18 AM
**Attachments:** Balboa Area TDM - BPS CAC - 012417.pdf

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Carli,
Linda got back to us late last night. She wants to include slides I presented at the BPS CAC some time ago (attached are slides, all of which I would update to ensure consistency with what we presented at the BRCAC).
My plan is to update these slides and present with her. Part of our message would be the point we have been making for over a year now – that the FMP should include alternative parking scenarios, that are coordinated with ongoing TDM implementation and monitoring. Perhaps we can discuss this message more after our meeting today?
Jeremy

---

**From:** Paine, Carli [mailto:Carli.Paine@sfmta.com]
**Sent:** Wednesday, March 01, 2017 11:11 AM
**To:** Shaw, Jeremy (CPC); Francis, John (CPC); Lesk, Emily (ECN)
**Subject:** RE: CCSF study session?

John, will you ask one more time? If she does want us there, we need to know what she expects and have time to prepare.

I personally would not be sad to forgo a night meeting, but absolutely want to have our input be valuable if they want us to participate.

**Carli Paine**
Land Use Development and Transportation Integration Manager
San Francisco Municipal Transportation Agency
1 South Van Ness, 7th Floor
San Francisco, CA 94103
415-646-2502

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**From:** Shaw, Jeremy (CPC) [mailto:jeremy.shaw@sfgov.org]
**Sent:** Tuesday, February 28, 2017 4:37 PM
**To:** Paine, Carli; Francis, John (CPC); Lesk, Emily
**Subject:** RE: CCSF study session?

On Mar 22, 2017, at 20:11, Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org> wrote:
Hi Linda,
Sounds like you have a ton going on. If we don't get the chance to talk, I wanted to be sure to respond to your email.
Your sense is right, there was the expectation that the Planning Commission would see
more than the high-level, Ocean Campus graphic. Presenting just that graphic will invite more questions than it answers. And yes, it was assumed the presentation would be "informational" and that City College would vote to exempt themselves from
Planning Commission approval, as per code. (Without the Trustees voting to exempt,
the FMP will have to go to the Commission for formal approval.)
However, even informational agenda items require staff review, a summary memo and
presentation to the Commission (due by March 30, in this case). We are really proud to
have been working with you! The hope was that a Commission presentation would be
the one formal opportunity with the City to recognize that partnership. And since so many of our challenges must be addressed in partnership, it would be valuable to address the Commission before CCSF moves forward to approve the Plan. But if the consultant doesn't hasn't given you a draft then we have a challenge. I believe John looked for alternative dates, and this was the final remaining opportunity. How firm is
BoT review on May 11th?
I am around Thursday if you want to chat, 12-3 works best.
Thanks
Jeremy
P.S. ALSO: Can you tell me whether I should attend this week's BoT meeting? I was planning to, but I don't see the FMP on the agenda.

From: Shaw, Jeremy (CPC)
Sent: Wednesday, March 22, 2017 7:44 AM
To: Linda Da Silva
Subject: Re: FMP at Planning Commission
Thanks Linda. Yes please call me this morning .
// Sent from the field //
JEREMY SHAW | Planner/Urban Designer | SF PLANNING | 415.575.9135

On Mar 21, 2017, at 10:12 PM, Linda Da Silva <ldasilva@ccsf.edu> wrote:
Hi Jeremy,
Actually, the "busy prepping for BoT Thursday" occurs in the weeks
ahead of the Board meeting. That plus some facilities-related drama

and crisis have left little time for me to catch a breath until now, here at 10pm. My apologies to you and John for the lack of communication.
When you and I spoke in early March, I got the feeling that if I were to present the CCSF FMP to the Planning Commission, there'd be an expectation that there would be something more substantive that the single Ocean Avenue graphic that we at this point continue to tweak. Our facilities master planner tBP Architects is drafting the FMP narrative for CCSF review/notes; so far we have seen the TOC and introduction. We will be very busy in the coming weeks through end of April getting to the "final draft" stage that I need to bring to the Board of Trustees at their May 11th meeting for feedback, and then the "final recommendation" for their approval at the May 25 meeting.
When I agreed to bring our FMP to the Planning Commission in early April, I was under the impression it was more as an informal information item on our planning process, timeline and status. I was not aware that the Commissioners would be providing constructive feedback on CCSF's FMP. Can we discuss via telephone at 11:45am tomorrow?
Linda da Silva
Associate Vice Chancellor, Facilities
City College of San Francisco
50 Phelan Avenue, San Francisco, CA 94112
ldasilva@ccsf.edu
p 415.239.3495
c 650.642.7143
www.ccsf.edu/facilities

From: Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org>
Sent: Tuesday, March 21, 2017 5:50:32 PM
To: Linda Da Silva
Subject: RE: FMP at Planning Commission
Hi Linda
Just wanted to follow up on this. Do you have any thoughts on presenting to the Planning Commission?
Also, I imagine you're busy prepping for the BOT Thursday. If you don't have time to talk before then, I understand. I don't see the FMP on the agenda, can you confirm that the FMP will not be presented this Thursday?
Thanks
Jeremy

From: Francis, John (CPC)
Sent: Thursday, March 16, 2017 4:10 PM
To: Linda Da Silva
<image003.png>
Cc: Exline, Susan (CPC); Shaw, Jeremy (CPC); Lesk, Emily (ECN)
Subject: FMP at Planning Commission
Importance: High

Hi Linda,

I have not been able to reach you for the last couple weeks and wanted to reach out again because I am concerned about where we are in terms of preparation for the FMP presentation to the Planning Commission on April 6th. Providing the Commission a thorough update on the proposed FMP is a critical step in the collaborative effort between City College and the City to ensure that the FMP meets the needs of all stakeholders, including the CCSF community and the College's Ocean Campus neighbors. At this point, the only substantive work describing the FMP that has been made public is a high level site plan that leaves undefined a number of critical issues, particularly related to parking and vehicular access. My concern is that such a high level overview of the FMP will not provide the Commission with enough information to be able to provide constructive feedback on the Plan. Unfortunately, given your aggressive goal of BOT adoption of the FMP by the end of May, this will likely be the only opportunity for the Commission to weigh in.

As City staff has noted many times, we are committed to supporting the mission and goals of City College and see our role in collaborating with you on the FMP process as a crucial part of that effort. As such, while we still have concerns about specific elements of the FMP that we have seen thus far, we want to make sure that your presentation to the Commission is both productive and well-received.

Toward this end, it would be appreciated if you could provide a status update on the FMP draft and what elements will be ready in time for transmittal to the Commission by March 30. I am out of the office starting tomorrow 3/17 and will return on 3/27—during that time, I would ask you to be in touch with Jeremy Shaw in order to provide an update and to coordinate the overall shape of the Commission presentation.

Thanks and I look forward to hearing from you.

John

John M. Francis
Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF
Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
<image001.png>

From: Francis, John (CPC)
Sent: Monday, March 13, 2017 3:08 PM
To: 'Linda Da Silva'
Cc: Exline, Susan (CPC)
Subject: RE: Follow ups for City College data and analysis
Hi Linda,
Just following up again on prep timeline for the Planning Commission hearing on April 6th. In order for the City to be able to review the draft plan, write up comments, and submit them to the Planning Commission by the March 30th PC packet deadline we'll need to receive materials from City College by this week. Do you anticipate having a draft to share by then? Otherwise, we'll just have to rely on the latest plan map (attached) as our basis for feedback, and hopefully you'll be able to share more details as part of your informational presentation at the PC hearing. Please let me know your plans as soon as you can.
Thanks,
John
John M. Francis
Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF
Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
From: Francis, John (CPC)
Sent: Friday, March 03, 2017 12:01 PM
To: 'Linda Da Silva'
Subject: RE: Follow ups for City College data and analysis
Hi Linda,
Thanks for your message. I suggest you and I have a check up via phone early next week—would you have some time on Tuesday? My day is fairly open right now other than 9-10am and 12:30-1pm.
In the meantime, do you have a schedule of when the draft plan will be released and ready for review? I'm just thinking about our timeline for the Planning Commission hearing on April 6th and want to make sure we
<image007.png>
have enough time to review and digest at least a draft of the document by then. Also note, I will need to send a letter to the Commission the week prior (3/30) giving an overview of the Plan and our Planning process.
Thanks and hope your week down south has been enjoyable!
Best,
John
John M. Francis

Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF
Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

From: Linda Da Silva [mailto:ldasilva@ccsf.edu]
Sent: Tuesday, February 28, 2017 10:37 PM
To: Francis, John (CPC)
Subject: Re: Follow ups for City College data and analysis

Hi John,

First, I want to apologize for my early departure from our last meeting on February 16th; unfortunately, I had to return to the Ocean Campus for a Participatory Governance Council meeting.

I am sensing a slight disconnect on our collaboration efforts. For the time I was in our last CCSF/City agency workshop on February 16th, I was disappointed with the level of engagement. CCSF is in facilities master planning mode right now, which is at the highest level of facilities planning in which we operate. Our intent with the access workshops with City agencies is to tease out the possibilities for improved pedestrian, bicycle and vehicular routes along Ocean and Phelan primarily, but also Judson and Havelock. My facilities master planning consultants are not designing solutions, they are not contractually engaged at a project implementation level. So they are pushing back on providing the kind of detailed traffic analysis and data that MTA is currently requesting - and I can understand their position. I'm also not planning to augment their contract to allow them to drill down to that level of detail, since we are in master planning mode.

When we began discussing the approach to joint collaboration on access planning, my team and I were concerned about whether MTA had a planner operating at a broad enough level to resonate with the high level master planning CCSF is undertaking. It seems that MTA has multiple individuals working on distinct aspects - but that there is not an overall regional or area "planner" who has all the pieces and is visioning at a master planning level as is CCSF.

I'm in Asilomar at a workshop this week, very busy schedule from breakfast through 9pm each day. I will telephone tomorrow during a break to reach you in real time to discuss further.

Linda da Silva
Associate Vice Chancellor, Facilities
City College of San Francisco
50 Phelan Avenue, San Francisco, CA 94112

ldasilva@ccsf.edu
p 415.239.3495
c 650.642.7143
www.ccsf.edu/facilities
From: Francis, John (CPC) <john.francis@sfgov.org>
Sent: Tuesday, February 28, 2017 4:48:55 PM
To: rsanzo@sandis.net
Cc: Linda Da Silva; PNewsom@tbparchitecture.com
Subject: RE: Follow ups for City College data and analysis
Ron, Linda, and Phil,
Following up on this, as the March 9 CCSF/City Staff joint presentation to the CCSF BOT is just around the corner. Please respond with your availability to have a follow up on the Ocean Ave access workshops with MTA staff.
Thanks,
John
John M. Francis
Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
From: Francis, John (CPC)
Sent: Friday, February 24, 2017 1:29 PM
To: 'rsanzo@sandis.net'
Cc: 'Linda Da Silva'; 'Phil Newsom (PNewsom@tbparchitecture.com)'
Subject: RE: Follow ups for City College data and analysis
Ron, can you confirm receipt of materials from MTA and your availability for a conference call next Friday?
Thanks,
John
John M. Francis
Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
From: Francis, John (CPC)
Sent: Thursday, February 23, 2017 4:15 PM
To: 'rsanzo@sandis.net'
Subject: FW: Follow ups for City College data and analysis
Ron, it sounds like some of the core MTA people are available on 3/3 after 3pm. Would that work for you?
John M. Francis

Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
From: Shahamiri, James [mailto:James.Shahamiri@sfmta.com]
Sent: Thursday, February 23, 2017 4:04 PM
To: Francis, John (CPC)
Subject: RE: Follow ups for City College data and analysis
Hi John,
Carli, Tony and I are available Friday 3/3 after 3:00.
Thanks.
James
From: Francis, John (CPC) [mailto:john.francis@sfgov.org]
Sent: Wednesday, February 22, 2017 9:58 PM
To: rsanzo@sandis.net
Cc: Shaw, Jeremy <Jeremy.Shaw@sfgov.org>; Linda Da Silva <ldasilva@ccsf.edu>; Phil Newsom (PNewsom@tbparchitecture.com) <PNewsom@tbparchitecture.com>; ce_bchin@ccsf.edu; Henderson, Tony <Tony.Henderson@sfmta.com>; Katz, John <John.Katz@sfmta.com>; Shahamiri, James <James.Shahamiri@sfmta.com>; Hunter, Mari E <Mari.Hunter@sfmta.com>
Subject: FW: Follow ups for City College data and analysis
Hi Ron,
Attached please find data from SFMTA collected in 2015 for the LWHS study as well as the signal timing cards for the Geneva/Howth and Ocean/Howth intersections.
In terms of your analysis, from a transit point of view, MTA would be interested in seeing the following items:
· LOS/Delay and queuing of existing conditions at the three intersections
· Trip generation/assignment based on their anticipated garage size/placement
· LOS/Delay and queuing for existing conditions plus the traffic generated by the new garages for existing lane/turning configurations
o If they want to propose any modifications to lane/turning configurations we would like to see the associated operational analysis
o If an eastbound left-turn lane is to be proposed at Ocean/Howth, they would need to assume it's a dedicated left-turn lane with protected signal phasing
o If they want to propose changing the signal cycle length it should be no more than 110 seconds.

Please let me know if you need further information or would like me to set up/facilitate a call with the MTA team to discuss further. That said, I do think a core group of us should plan to touch base next week to discuss the output of your analysis. Ron and MTA folks, please send me a note back indicating your availability for a call next Friday, 3/3.
Thanks,
John
John M. Francis
Planner & Urban Designer, Citywide Planning Division
415-575-9147 | john.francis@sfgov.org
SF Planning
Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
From: Henderson, Tony [mailto:Tony.Henderson@sfmta.com]
Sent: Friday, February 17, 2017 10:41 AM
To: Shaw, Jeremy (CPC); Francis, John (CPC); Shahamiri, James (MTA)
Cc: Katz, John (MTA); Hunter, Mari (MTA)
Subject: RE: Follow ups for City College data and analysis
Hi Jeremy – Thanks for putting this together. I looked through our records and found that counts were collected in 2015 for the LWHS study, which I've attached. Also attached are the signal timing cards for the Geneva/Howth and Ocean/Howth intersections. This data should give City College's consultant a good starting point to set up operational analysis for the two intersections that they can use to test scenarios.
Thanks,
Tony

**From:** Francis, John (CPC)
**To:** Linda Da Silva
**Cc:** Shaw, Jeremy (CPC); Exline, Susan (CPC); Paine, Carli (MTA); Shahamiri, James (MTA); Lesk, Emily (ECN); jhamilton@ccsf.edu
**Subject:** CCSF FMP Status?
**Date:** Tuesday, May 30, 2017 12:17:00 PM
**Attachments:** image001.png
image002.png

Hi Linda,

I hope this email finds you well! I wanted to check in to find out if you have an update on when CCSF will have a draft of the FMP to share with the City Family. When we spoke last it sounded like your consultants were on a June/July timeline for completing the draft and I wanted to see if that is still the plan. If so, do you have a more precise estimate for draft completion? Because the Planning Commission calendar is often booked 2-3 months out, it would be great to get a sense of your timing so that we can make sure to get on the PC calendar at the proper time. I will go ahead and cancel the Monday 6/5 CCSF/City monthly coordination meeting; do you think we'll be in a place where we should meet in July?

Thanks,
John

From: Shaw, Jeremy (CPC)
To: Francis, John (CPC)
Subject: RE: Ccsf today
Date: Monday, August 28, 2017 12:17:45 PM
I talked to Linda this morning, who I believe also left a voicemail for you regarding the agenda.
I downloaded it from FMP site only after talking to her, not quite grasping the severity of the
language.
It's not clear to me how likely this is to move forward.
From: Francis, John (CPC)
Sent: Monday, August 28, 2017 12:16 PM
To: Shaw, Jeremy (CPC)
Subject: Re: Ccsf today
Have you talked to Linda? Who sent it to you?
Sent from my iPhone
On Aug 28, 2017, at 11:59, Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org> wrote:
FMP working group.
Or at least a subset of it.
From: Francis, John (CPC)
Sent: Monday, August 28, 2017 11:57 AM
To: Shaw, Jeremy (CPC)
Subject: Re: Ccsf today
Is that a resolution from the FMP working group or some other body?
Sent from my iPhone
On Aug 28, 2017, at 11:53, Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org>

wrote:
Yah.
Apparently a late addition to the agenda … see attached.
From: Francis, John (CPC)
Sent: Monday, August 28, 2017 11:46 AM
To: Shaw, Jeremy (CPC)
Subject: Re: Ccsf today
No I'm out today. Is there a working group meeting?
Sent from my iPhone
On Aug 28, 2017, at 11:33, Shaw, Jeremy (CPC)
<jeremy.shaw@sfgov.org> wrote:
Are you going to FMP meeting today?
// Sent from the field //
JEREMY SHAW | Planner/Urban Designer | SF
PLANNING | 415.575.9135
<Item 4.h FacComm Draft Resolution.pdf>

Web: www.sfplanning.org
From: Kate.Stacy@sfgov.org [mailto:Kate.Stacy@sfgov.org]
Sent: Wednesday, July 13, 2016 4:01 PM
To: Exline, Susan (CPC)
Subject: Re: FW: institutional master plan for city college

CONFIDENTIAL AND PRIVILEGED
ATTORNEY-CLIENT COMMUNICATION
AND ATTORNEY WORK PRODUCT

Sue,

You asked whether City College was subject to San Francisco's local zoning regulations, in particular the requirement to provide an Institutional Master Plan to the Planning Commission. California Government Code Section 53091 requires a Community College District (City College in San Francisco) to comply with all applicable building and zoning ordinances of the City. However, California Government Code Section 53094 allows City College to exempt a proposed use of property for classroom facilities from local ordinances by a vote of 2/3 of the members of the City College Board of Trustees. Once that vote is taken, the Board must notify the City of its action within 10 days.

Kate Herrmann Stacy
Deputy City Attorney
City Hall Room 375
San Francisco, CA 94102
Tel: 415-554-4617
Fax: 415-554-4757
email: kate.stacy@sfgov.org

From: Shaw, Jeremy (CPC)
To: Francis, John (CPC)
Subject: RE: Notes for john to call chancellor lamb
Date: Friday, July 22, 2016 2:21:31 PM

Good one.
Not small at all

-----Original Message-----
From: Francis, John (CPC)
Sent: Friday, July 22, 2016 2:21 PM
To: Shaw, Jeremy (CPC); Exline, Susan (CPC)
Subject: RE: Notes for john to call chancellor lamb

Just one small addition...

San Francisco planning code requires every institution to submit an institutional master plan and we would like to work with you to ensure that this plan is accepted by the Planning Commission.

My staff and the Mayor's Office have been meeting monthly with your administration to express the need for real collaboration because City College is such a critical institution for the city. We want to ensure the facilities master plan is coordinated with the City projects around all of your campuses – including design, transportation, development opportunities and community outreach. Many community college campuses are more isolated or suburban, whereas City College is very much woven into the fabric of our city--especially the Balboa Park neighborhood; we look forward to continuing and strengthening this tradition in San Francisco. As we seek Commission approval and full enrollment for CCSF, we'd like to collaborate more closely.

We are offering our staff's assistance in helping to create the plan and to coordinate feedback from all City agencies.

John M. Francis
Planner & Urban Designer, Citywide Planning

Direct: 415-575-9147 | Fax: 415-558-6409
SF Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
-----Original Message-----
From: Shaw, Jeremy (CPC)
Sent: Friday, July 22, 2016 1:34 PM
To: Exline, Susan (CPC)
Cc: Francis, John (CPC)
Subject: RE: Notes for john to call chancellor lamb
Maybe:
San Francisco planning code requires every institution to submit an institutional master plan and we would like to work with you to ensure that this plan is accepted by the Planning Commission.
My staff and the Mayor's Office have been meeting monthly with your administration to express the need for real collaboration because City College is such a critical institution for the city. We want to ensure the facilities master plan is coordinated with the City projects around all of your campuses – including design, transportation, development opportunities and community outreach. Many community college campuses are more isolated or suburban. But City College is very much woven into the fabric of our city - especially the Balboa Park neighborhood. As we seek Commission approval and full enrollment for CCSF, we'd like to collaborate more closely.
We are offering our staff's assistance in helping to create the plan and to coordinate feedback from all City agencies.
-----Original Message-----
From: Exline, Susan (CPC)
Sent: Thursday, July 21, 2016 9:35 PM
To: Shaw, Jeremy (CPC)
Cc: Francis, John (CPC)
Subject: Notes for john to call chancellor lamb
Some rambling thoughts for johns talking points for his conversation with chancellor lamb. Can you both edit and then we'll send to john. Thanks!
Our planning code requires every institution to submit an institutional master plan and we would like to work with you to ensure that this plan is accepted by our commission.
My staff and other city staff from oewd have been meeting monthly with your administration to express the need for real collaboration because city college is a critical institution for the city. We want to ensure its plan is coordinated with all the city projects that surround it. Other community college campuses are located in more suburban locations and not as woven into the fabric of the city. City college is very much integrated into the city and especially the balboa neighborhood.
We would like to offer our staff's assistance in helping to create the plan and also coordinate the city's feedback.
Sent from my iPhone

From: Teague, Corey (CPC)
To: Shaw, Jeremy (CPC)
Cc: Francis, John (CPC)
Subject: RE: IMPs
Date: Tuesday, August 08, 2017 12:58:05 PM

Not too much. They mostly talked about how it would be good to have standard formatting requirements for all IMPs, and then to maybe also have some minimum standards for the type/level
of data included in each IMP. John stated that creating these formatting and substance standards
was or will be on our work program.

Corey A. Teague, AICP, LEED AP
Assistant Zoning Administrator
Planning Department, City and County of San Francisco

1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9081 Fax: 415-558-6409
Email: corey.teague@sfgov.org
Web: www.sfplanning.org
Planning Information Center (PIC): 415-558-6377 or pic@sfgov.org
Property Information Map (PIM):http://propertymap.sfplanning.org

From: Shaw, Jeremy (CPC)
Sent: Tuesday, August 08, 2017 11:20 AM
To: Teague, Corey (CPC)
Cc: Francis, John (CPC)
Subject: IMPs

Hi Corey

Anything significant come about from your IMP presentation that we should be aware of as we work
with City College for their facilities master plan update? (yes, they're exempt, but we're encouraging
them to come to CPC regardless)

Thanks!

Jeremy

JEREMY SHAW | Planner/Urban Designer | SF PLANNING | 415.575.9135

## Lesk, Emily (ECN)

**From:** Jeff Hamilton <jhamilton@ccsf.edu>
**Sent:** Monday, June 08, 2015 7:32 PM
**To:** Lesk, Emily (ECN)
**Cc:** Martin, Michael (ECN); Russell, Rosanna (PUC); Freeman, Craig (PUC); Shaw, Jeremy (CPC); Exline, Susan (CPC); Ronald Gerhard; Fred Sturner
**Subject:** Re: Draft Agenda for 6/9 Balboa Reservoir Meeting

Hi Emily,

Got your call. Fred and I are confirmed to attend tomorrow's meeting at 1p.

Jeff Hamilton

From my iDevice

On Jun 4, 2015, at 3:53 PM, Lesk, Emily (ECN) <emily.lesk@sfgov.org> wrote:

> Hi all,
>
> We're looking forward to this Tuesday's CCSF/City meeting on the Balboa Reservoir project, including but not limited to a discussion of site access. We've confirmed the City Hall, Room 448 conference room as the meeting location.
>
> Our proposed agenda is as follows:
>
> 1. CCSF Master Plan Process
>    a. Consultant selection
>    b. Performing Arts Center status
>    c. Consideration of parking
> 2. Access Routes to SFPUC Site
>    a. Prior agreements
>    b. Future needs
> 3. Potential partnerships
>    a. Child Development Center
>    b. CCSF faculty/staff/student housing
>    c. Parking on SFPUC site
>    d. Transportation demand management
> 4. 33 Gough status
> 5. Next meetings
>
> Please feel free to be in touch with questions and suggestions.
>
> Thanks,
> Emily
>
> Emily Lesk
> Project Manager
> Office of Economic and Workforce Development

San Francisco City Hall
1 Dr. Carlton B. Goodlett Place, Room 448
San Francisco, CA 94102

Direct: (415) 554-6162
Email: emily.lesk@sfgov.org
www.oewd.org

| | |
|---|---|
| **From:** | Lesk, Emily (ECN) |
| **To:** | Mendoza, Hydra (MYR); Susan Lamb; Guy Lease (glease@ccsf.edu); Steve Bruckman; mzacovic@ccsf.edu |
| **Cc:** | Martin, Michael (ECN); Rich, Ken (ECN); Corteza, Florence (CHF); Shaw, Jeremy (CPC) |
| **Subject:** | RE: Conference Call next Tuesday, August 11th |
| **Date:** | Thursday, August 06, 2015 2:39:00 PM |

Hi all,

The OEWD team is looking forward to joining next Tuesday's call. Jeremy Shaw, our partner at the Planning Department, will join us as well.

We'd like to discuss the following items, in addition to anything else that the CCSF team would like to cover:

1. Status of CCSF real estate staffing
2. Balboa Reservoir Project
    a. Coordination on CCSF masterplan
    b. Neighborhood transportation study
    c. Site access considerations
    d. CCSF housing opportunity
3. Status of 33 Gough

Thank you,
Emily

Emily Lesk
Direct: (415) 554-6162
Email: emily.lesk@sfgov.org

---

**From:** Mendoza, Hydra (MYR)
**Sent:** Tuesday, August 04, 2015 5:51 PM
**To:** Susan Lamb <slamb@ccsf.edu>; Guy Lease (glease@ccsf.edu) <glease@ccsf.edu>; Steve Bruckman <sbruckman@ccsf.edu>; mzacovic@ccsf.edu
**Cc:** Lesk, Emily (ECN) <emily.lesk@sfgov.org>; Martin, Michael (ECN) <michael.martin@sfgov.org>; Rich, Ken (ECN) <ken.rich@sfgov.org>; Corteza, Florence (CHF) <florence.corteza@sfgov.org>
**Subject:** Conference Call next Tuesday, August 11th

Dear Susan, Guy, Steve and Mark,

Thank you for jumping on a call with my colleagues next Tuesday regarding the Balboa Reservoir and Ocean Avenue. There are some time sensitive issues so we wanted to take advantage of our regularly scheduled time to bring a few things to your attention. You will be joined by Emily Lesk and Mike Martin, project managers for the site from our Office of Economic Development.

Emily and Mike: In addition to Chancellor Lamb, the call will also have Guy Lease, Special Trustee, Steve Bruckman, General Counsel and Mark Zacovic, newly appointed CFO taking Ron Gerhard's

place, all from CCSF.

Short overviews of the site for discussion are on the home page of our project website and the latest newsletter that the Planning Department sent out to community members.

I look forward to an update when I return on the 15th.

Best,

Hydra

Hydra Mendoza-McDonnell
Office of Mayor Edwin M. Lee
Senior Advisor on Education and Family Services
1 Dr. Carlton B. Goodlett Place
City Hall, Room 200
San Francisco, CA 94102-4641
Hydra.mendoza@sfgov.org
Office: (415) 554-6298

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**415.558.6378**

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***Agenda***

## City/City College Collaboration | Monthly Land Use Meeting
## September 16, 2016, 2-3pm @ SF Planning

1. Introductions
2. Rescheduling October meeting – October 21st?
3. Facilities Master Plan
    - Planning Department feedback on preliminary scenarios
    - Preview of transportation and parking findings
4. Balboa Reservoir
    - RFQ process and panel
5. 750 Eddy Update
6. SFMTA proposed bus stop
    - Loss of white zone at Chinatown North Beach Center

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# City/City College Collaboration | Monthly Land Use Meeting
# October 21st, 2016, 2-3:30pm @ SF Planning

## *Agenda*

1. Introductions 2:00 – 2:05pm
2. Transportation Section of Facilities Master Plan 2:05 – 2:35pm
    a. Scope
        i. What are City College's transportation goals for the FMP?
        ii. What does the transportation content of the FMP look like?
    b. City Staff participation plan?
    c. City feedback on FMP parking demand memo
3. Overview of TDM Plan, Existing Conditions & next tasks 2:35 – 3:15pm
4. Update: Chinatown Center loading/white zone Update 3:15 – 3:20pm
5. Next Steps 3:20 – 3:30pm

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***Agenda***

## City/City College Collaboration | Monthly Land Use Meeting
## November 7, 2016, 2-3pm @ SF Planning

1. Intros/Agenda
2. CCSF Update on Feedback from FMP Working Group and Community Workshops (Linda/Phil, 5 min)
3. Review/discuss City feedback on Draft Preferred FMP (All, 20 min)
4. Present/discuss Draft Goals and Targets for TDM plan (Planning/MTA/All, 20 min)
5. Balboa Reservoir RFQ Update (Emily, 5 min)

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## CCSF Facilities Master Plan Update

*Ocean Campus Urban Design & Access Workshop Agenda*
*January 19, 2017, 2-5pm @ Planning (1650 Mission Street, 4th Floor)*

| | |
|---|---|
| **Welcome, Introductions, Review Agenda & Goals**<br>• Workshop Goals<br>  o Provide opportunity for CCSF and City to share high level urban design and physical access priorities for CCSF Ocean Campus<br>  o Discuss/workshop specific urban design and access challenges as they relate to draft FMP<br>  o Where possible, find consensus on potential solutions and method for incorporating them into the FMP<br>  o Where needed, discuss a framework for continuing dialogue on unresolved issues<br>• Workshop Format<br>  o Focused presentations<br>  o Discussion<br>  o Group sketching (maps, trace, and markers will be provided) | 2-2:15pm |
| **Ocean Avenue Frontage**<br>1. Presentation by Planning on Ocean & Geneva Corridor Design Options and Recommendations (Planning). Followed by focused discussion on:<br>  o Pedestrian & bike access<br>  o Muni access & station location<br>  o Relationship to FMP-proposed plaza and pedestrian routes and coordination with SFMTA (All)<br>2. Related Topics for Discussion<br>  o Auto access to FMP-proposed parking structures (east of campus and under students services) (CCSF/All)<br>  o I-280 Offramp Realignment (All)<br>  o Urban design related to FMP-proposed Student Services building (All) | 2:15-3:15pm |
| **Ocean/Phelan/Geneva Intersection**<br>1. Presentation by Planning on Ocean & Geneva Corridor Design Options and Recommendations (Planning)<br>2. Relationship to FMP-proposed plaza and pedestrian routes and coordination with SFMTA (All) | 3:15-3:45pm |

| | |
|---|---|
| **Phelan Avenue & West Campus**<br>1. Presentation by tBP outlining pedestrian-oriented vision proposed for Phelan and urban design concepts for West Campus (CCSF)<br>2. Related Topics for Discussion<br>o Roadway access between Phelan and Balboa Reservoir site (All)<br>o Pedestrian crossing, bike access, transit access, and auto traffic on Phelan (All)<br>o Auto access to FMP-proposed parking structure (adjacent to Riordan HS) (All)<br>o Urban design related to FMP-proposed buildings on west side and opportunities for street/open space activation (All) | 3:45-4:30pm |
| **Judson & Havelock Frontages**<br>1. Judson<br>o FMP vision for Judson frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>o Judson and Phelan intersection, opportunities for safety improvements (All)<br>2. Havelock<br>o FMP vision for Havelock frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>o Access to FMP-proposed parking structure | 4:30-4:45pm |
| **Next Steps** (All)<br>• Recap of consensus areas<br>• Issues for further discussion | 4:45-5pm |

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## CCSF Facilities Master Plan Update

*Ocean Campus Urban Design & Access Workshop #2 Agenda*
*February 16, 2017, 3-5pm @ Planning (1650 Mission Street, 4th Floor)*

| | |
|---|---|
| **Welcome, Introductions, Review Agenda & Goals**<br>• Workshop Goals<br>  ○ Provide opportunity for CCSF and SFMTA to discuss/workshop technical campus access challenges along Ocean Ave, particularly related to the Howth Street Ocean Campus entrance<br>  ○ Discuss/workshop campus and Balboa Reservoir access challenges from Phelan Ave<br>  ○ Where possible, find consensus on potential solutions and method for incorporating them into the FMP<br>  ○ Where needed, discuss a framework for continuing dialogue on unresolved issues<br>• Workshop Format<br>  ○ Focused presentations<br>  ○ Discussion<br>  ○ Group sketching (maps, trace, and markers will be provided) | 3-3:15pm |
| **Ocean Avenue Access**<br>*Topics for discussion*<br>• Anticipated new parking demand on east side of campus<br>• Reconfiguration of CCSF athletic building driveway to accommodate parking access and car storage<br>• Trip generation and distribution by time of day and access/entry point on east side of campus<br>• Ideas for mitigating left hand turn challenges from EB Ocean to Howth<br>• Potential for converting Howth to two-way traffic<br>• Pedestrian & bike access along Ocean, particularly at Howth<br>• Continue discussion on Muni access & station location | 3:15-4pm |
| **Phelan Avenue & West Campus**<br>*Topics for Discussion*<br>• Roadway access options from Phelan and Ocean to Balboa Reservoir site<br>• Potential mode conflicts (auto, transit, pedestrian) with introduction of new Phelan pedestrian crossings and Reservoir site road connection | 4-4:30pm |

| | |
|---|---|
| • Status of CCSF-proposed cross-section for Phelan | |
| **Judson & Havelock Frontages**<br>1. Judson<br>o FMP vision for Judson frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>o Judson and Phelan intersection, opportunities for safety improvements (All)<br>2. Havelock<br>o FMP vision for Havelock frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>o Access to FMP-proposed parking structure | 4:30-4:45pm |
| **Next Steps** (All)<br>• Recap of consensus areas<br>• Issues for further discussion | 4:45-5pm |

I-Hanson5

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## City/City College Collaboration | Monthly Land Use Meeting
## October 21st, 2016, 2-3:30pm @ SF Planning

### *Agenda*

1. Introductions 2:00 – 2:05pm
2. Transportation Section of Facilities Master Plan 2:05 – 2:35pm
    a. Scope
        i. What are City College's transportation goals for the FMP?
        ii. What does the transportation content of the FMP look like?
    b. City Staff participation plan?
    c. City feedback on FMP parking demand memo
3. Overview of TDM Plan, Existing Conditions & next tasks 2:35 – 3:15pm
4. Update: Chinatown Center loading/white zone Update 3:15 – 3:20pm
5. Next Steps 3:20 – 3:30pm

Jeremy Shaw 10/20/16 10:45 AM
**Comment [1]:** Add "draft", avoid "replacement" or promises about parking supply, consider "transportation demand" holistically, of which parking is one part

Jeremy Shaw 10/20/16 10:45 AM
**Comment [2]:**
TDM Overview
- Purpose of TDM Plan and our efforts
- Highlights from Existing Conditions Report
    - Parking survey findings (midday utilization, management discussion)
    - CCSF Ocean Campus intercept survey findings (mode choice, potential for mode shift)
- Discussion of next steps – where are we going from here

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***Agenda***

## City/City College Collaboration | Monthly Land Use Meeting
## October 21st, 2016, 2-3pm @ SF Planning

1. Introductions
2. Follow Ups from 9/26 Meeting
    - 750 Eddy Update
    - Chinatown Center loading/white zone Update
3. Facilities Master Plan
    - What are City College's transportation goals for the FMP?
    - What does the transportation content of the FMP look like?
4. Balboa Area TDM MOU Concepts
5. Balboa TDM Existing Conditions
    - Briefing on Nelson Nygaard's existing conditions memo
    - Parking demand methodology questions
6. Next Steps
    - Writing of and City College participation in TDM recommendations for area

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***Agenda***

## City/City College Collaboration | Monthly Land Use Meeting
## November 7, 2016, 2-3pm @ SF Planning

1. Intros/Agenda
2. CCSF Update on Feedback from FMP Working Group and Community Workshops (Linda/Phil, 5 min)
3. Review/discuss City feedback on Draft Preferred FMP (All, 20 min)
4. Present/discuss Draft Goals and Targets for TDM plan (Planning/MTA/All, 20 min)
5. Balboa Reservoir RFQ Update (Emily, 5 min)

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## CCSF Facilities Master Plan Update

*Ocean Campus Urban Design & Access Workshop Agenda*
*January 19, 2017, 2-5pm @ Planning (1650 Mission Street, 4th Floor)*

| | |
|---|---|
| **Welcome, Introductions, Review Agenda & Goals**<br>• Workshop Goals<br>  ○ Provide opportunity for CCSF and City to share high level urban design and physical access priorities for CCSF Ocean Campus<br>  ○ Discuss/workshop specific urban design and access challenges as they relate to draft FMP<br>  ○ Where possible, find consensus on potential solutions and method for incorporating them into the FMP<br>  ○ Where needed, discuss a framework for continuing dialogue on unresolved issues<br>• Workshop Format<br>  ○ Focused presentations<br>  ○ Discussion<br>  ○ Group sketching (maps, trace, and markers will be provided) | 2-2:15pm |
| **Ocean Avenue Frontage**<br>1. Presentation by Planning on Ocean & Geneva Corridor Design Options and Recommendations (Planning). Followed by focused discussion on:<br>  ○ Pedestrian & bike access<br>  ○ Muni access & station location<br>  ○ Relationship to FMP-proposed plaza and pedestrian routes and coordination with SFMTA (All)<br>2. Related Topics for Discussion<br>  ○ Auto access to FMP-proposed parking structures (east of campus and under students services) (CCSF/All)<br>  ○ I-280 Offramp Realignment (All)<br>  ○ Urban design related to FMP-proposed Student Services building (All) | 2:15-3:15pm |
| **Ocean/Phelan/Geneva Intersection**<br>1. Presentation by Planning on Ocean & Geneva Corridor Design Options and Recommendations (Planning)<br>2. Relationship to FMP-proposed plaza and pedestrian routes and coordination with SFMTA (All) | 3:15-3:45pm |

| | |
|---|---|
| **Phelan Avenue & West Campus**<br>1. Presentation by tBP outlining pedestrian-oriented vision proposed for Phelan and urban design concepts for West Campus (CCSF)<br>2. Related Topics for Discussion<br>o Roadway access between Phelan and Balboa Reservoir site (All)<br>o Pedestrian crossing, bike access, transit access, and auto traffic on Phelan (All)<br>o Auto access to FMP-proposed parking structure (adjacent to Riordan HS) (All)<br>o Urban design related to FMP-proposed buildings on west side and opportunities for street/open space activation (All) | 3:45-4:30pm |
| **Judson & Havelock Frontages**<br>1. Judson<br>o FMP vision for Judson frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>o Judson and Phelan intersection, opportunities for safety improvements (All)<br>2. Havelock<br>o FMP vision for Havelock frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>o Access to FMP-proposed parking structure | 4:30-4:45pm |
| **Next Steps** (All)<br>• Recap of consensus areas<br>• Issues for further discussion | 4:45-5pm |

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## CCSF Facilities Master Plan Update

*Ocean Campus Urban Design & Access Workshop #2 Agenda*
*February 16, 2017, 3-5pm @ Planning (1650 Mission Street, 4th Floor)*

| | |
|---|---|
| **Welcome, Introductions, Review Agenda & Goals**<br>• Workshop Goals<br>  ○ Provide opportunity for CCSF and SFMTA to discuss/workshop technical campus access challenges along Ocean Ave, particularly related to the Howth Street Ocean Campus entrance<br>  ○ Discuss/workshop campus and Balboa Reservoir access challenges from Phelan Ave<br>  ○ Where possible, find consensus on potential solutions and method for incorporating them into the FMP<br>  ○ Where needed, discuss a framework for continuing dialogue on unresolved issues<br>• Workshop Format<br>  ○ Focused presentations<br>  ○ Discussion<br>  ○ Group sketching (maps, trace, and markers will be provided) | 3-3:15pm |
| **Ocean Avenue Access**<br>*Topics for discussion*<br>• Anticipated new parking demand on east side of campus<br>• Reconfiguration of CCSF athletic building driveway to accommodate parking access and car storage<br>• Trip generation and distribution by time of day and access/entry point on east side of campus<br>• Ideas for mitigating left hand turn challenges from EB Ocean to Howth<br>• Potential for converting Howth to two-way traffic<br>• Pedestrian & bike access along Ocean, particularly at Howth<br>• Continue discussion on Muni access & station location | 3:15-4pm |
| **Phelan Avenue & West Campus**<br>*Topics for Discussion*<br>• Roadway access options from Phelan and Ocean to Balboa Reservoir site<br>• Potential mode conflicts (auto, transit, pedestrian) with introduction of new Phelan pedestrian crossings and Reservoir site road connection | 4-4:30pm |

| | |
|---|---|
| • Status of CCSF-proposed cross-section for Phelan | |
| **Judson & Havelock Frontages**<br>1. Judson<br>  o FMP vision for Judson frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>  o Judson and Phelan intersection, opportunities for safety improvements (All)<br>2. Havelock<br>  o FMP vision for Havelock frontage vis-à-vis streetscape design and pedestrian/bike access (CCSF/All)<br>  o Access to FMP-proposed parking structure | 4:30-4:45pm |
| **Next Steps** (All)<br>• Recap of consensus areas<br>• Issues for further discussion | 4:45-5pm |

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***Agenda***

## City/City College Collaboration | Monthly Land Use Meeting
## November 7, 2016, 2-3pm @ SF Planning

1. Intros/Agenda
2. CCSF Update on Feedback from FMP Working Group and Community Workshops (Linda/Phil, 5 min)
3. Review/discuss City feedback on Draft Preferred FMP (All, 20 min)
4. Present/discuss Draft Goals and Targets for TDM plan (Planning/MTA/All, 20 min)
5. Balboa Reservoir RFQ Update (Emily, 5 min)

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# City College Facilities Master Plan

*Coordination Update – 8. November 2016*

**City/CCSF Engagement/Coordination To Date**

| Date | Event | Agenda | Notes |
|---|---|---|---|
| 1x per month | City/CCSF Monthly Coordination Meeting | High level coordination, with some in-depth discussion of planning issues | Attended regularly by Planning (and TDM consultants), CCSF (and consultants), OEWD, MTA, PUC, BART |
| Thursday, August 18 | BOT Meeting | Present existing conditions to BOT | Planning attended |
| Monday, October 18 | Community Workshops | Present draft FMP options for Ocean Campus | Planning attended and submitted written comments on options. |
| Tuesday, October 25 | Advisory Working Group Meeting | Present draft preferred option for Ocean Campus | Planning attended and submitted written comments on preferred option. |
| Tuesday & Wednesday, November 1 & 2 | Community Workshops | Present draft preferred option for Ocean Campus | Planning attended |

**Upcoming City/CCSF Engagement/Coordination**

| Date | Event | Agenda | Notes |
|---|---|---|---|
| 1x per month | City/CCSF Monthly Coordination Meeting | High level coordination, with some in-depth discussion of planning issues | Attended regularly by Planning (and TDM consultants), CCSF (and consultants), OEWD, MTA, PUC, BART |
| TBD | City/CCSF Design Workshop/Charrette | Working sessions for detailed coordination on specific areas of importance | To be attended by CCSF and City specialists in key subject areas |
| Thursday, November 17 | CCSF Board of Trustees Meeting | CCSF to present draft preferred option | Planning to attend and submit formal comments to BOT (written and oral) |

| | | | |
|---|---|---|---|
| Friday, December 9 | Advisory Working Group Meeting | Review workshop and BOT feedback | Planning to attend |
| *Future Meetings with Community, Working Group and BOT* | *TBD* | *TBD* | *Planning to remain engaged throughout the planning process* |

## *Planning Director's Letter to CCSF Board of Trustees*

- Prepared for and presented at November 17th BOT meeting
- Will highlight collaborative and responsive dialogue between City and CCSF staff
- Will include high level summary of primary issues of concern for the City with detailed comments submitted in writing. High level issues to be addressed:
    a) Parking/access/TDM
        - Implement TDM strategies to increase non-auto access and reduce parking demand
    b) Urban design
        - Well-designed and considered campus/community interface
        - Activated public realm
        - Permeability and openness to community
    c) Access and interface between CCSF and future Balboa Reservoir development
        - Allow flexibility for complementary design as west campus and Reservoir develop
        - Create logical vehicular access between Phelan Ave and Reservoir
    d) Ocean Avenue
        - Incorporation of Ocean and Geneva Corridor Design recommendations into FMP
        - Create a welcoming campus gateway and complement Ocean Ave development

**From:** Lesk, Emily (ECN)
**To:** Martin, Michael (ECN); Russell, Rosanna (PUC) (rsrussell@sfwater.org); Freeman, Craig (PUC) (cfreeman@sfwater.org); Shaw, Jeremy (CPC); Exline, Susan (CPC); Fred Sturner (fsturner@ccsf.edu); Jeff Hamilton
**Subject:** Balboa Reservoir - City/CCSF Follow-Up Call

---

The purpose of this call is to address the agenda items that we ran out of time to cover on June 9. As a reminder, those remaining items are:

1. Potential Partnerships
o Child Development Center
o CCSF faculty/staff/student housing
o Parking strategies
o Transportation demand management

2. 33 Gough Status

[redacted]

**From:** Lesk, Emily (ECN)
**To:** Martin, Michael (ECN); Russell, Rosanna (PUC) (rsrussell@sfwater.org); Freeman, Craig (PUC) (cfreeman@sfwater.org); Shaw, Jeremy (CPC); Exline, Susan (CPC); Fred Sturner (fsturner@ccsf.edu); Jeff Hamilton
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1. Potential Partnerships
o Child Development Center
o CCSF faculty/staff/student housing
o Parking strategies
o Transportation demand management

2. 33 Gough Status

[redacted]

## Lesk, Emily (ECN)

**From:** Ronald Gerhard <rgerhard@ccsf.edu>
**Sent:** Friday, May 08, 2015 9:54 AM
**To:** Martin, Michael (ECN); Jeff Hamilton; Fred Sturner
**Cc:** Rich, Ken (ECN); Lesk, Emily (ECN)
**Subject:** RE: Tuesday meeting followup

Good morning.
Do apologize for the delayed response. I believe we are all on the same page as outlined below. In response to outstanding tasks:

- Fred will get you on the next CPPC (Capital Projects and Planning Committee) agenda. Some of those individuals were at the community forum earlier this week. Two items that will come us is parking and PAC. We can talk more about those topics later.
- Regarding the coordination of future meetings, Toni would be the best resource to facilitate scheduling those meetings for individuals on our side. She is out on vacation through next Tuesday. So, I will let her know to expect Phillip reaching out to her to facilitate in scheduling both the reoccurring monthly meetings between OWED and CCSF as well as a future meeting with PUC, OWED, CCSF, and Planning.

Regards,
Ron

Ronald P. Gerhard
Vice Chancellor for Finance and Administration
City College of San Francisco
33 Gough Street
San Francisco, CA 94103
Phone - (415) 241-2229
www.ccsf.edu

---

**From:** Martin, Michael (ECN) [mailto:michael.martin@sfgov.org]
**Sent:** Friday, May 01, 2015 12:31 PM
**To:** Ronald Gerhard; Jeff Hamilton; Fred Sturner
**Cc:** Rich, Ken (ECN); Lesk, Emily (ECN)
**Subject:** Tuesday meeting followup

Dear Ron, Jeff and Fred-
Thanks again for a good meeting on Tuesday, I believe we made a lot of progress in understanding our mutual objectives. I am writing to provide my sense of the followups from our meeting:

- General next steps:
    - All will work to evaluate the approach to the MOU we discussed as it relates to 33 Gough and Balboa Reservoir. To that end, I propose that the City team drafts an overview the "principles of cooperation" we talked about in advance of the May monthly meeting noted above, to help serve as the agenda for that discussion.

- Ron and Jeff to provide feedback on the City's engagement strategy with CCSF in an effort to provide transparency on the SFPUC site process. (Related note: Andrew Chandler of the CCSF Capital Planning Committee had reached out to us previously, and he has suggested that the 5/13 Capital Planning Committee meeting would be a good place to begin our effort to inform the various CCSF constituencies before the summer break. Would you agree? If so, I think we'd want to move quickly to seek a spot on that agenda since it is now less than two weeks away.)

- Jeff to work with City Planning Department and SFMTA on survey of college staff and students regarding transportation.

- Mike to develop understanding of potential for SFPUC being the 33 Gough power provider.

- Fred to provide further detail on space/infrastructure needs relating to a childcare facility on-site at Balboa Reservoir.

- Next meetings:

  - In response to our discussed adoption of a monthly meeting schedule, a late May meeting with all of the participants from Tuesday (Ron I will have Ken's assistant Phillip contact Toni Lee to coordinate unless you would prefer to handle differently).

  - In the meantime, I would also like to schedule a meeting of OEWD, CCSF, SFPUC and Planning Department staff to discuss opportunities to collaborate in more detail. Please advise how best to coordinate the correct CCSF participants, based on the intended topics below:

    - Potential partnerships in connection with Balboa Reservoir housing proposal (site access, parking, child development center, partnership to build CCSF housing, etc)

    - Strategy and expected process for CCSF master plan update

    - Others?

Please call or email if you have comments, questions or additions to the above. Have a good weekend.

Best regards,
Mike

**********
Michael Martin
City and County of San Francisco
Office of Economic and Workforce Development
Office: (415) 554-6937
[redacted]

| | |
|---|---|
| **From:** | Lesk, Emily (ECN) |
| **To:** | mzacovic@ccsf.edu; Fred Sturner; Adam Engelskirchen; Martin, Michael (ECN); Wong, Phillip (ECN); Exline, Susan (CPC); Shaw, Jeremy (CPC); Freeman, Craig (CWP); Russell, Rosanna (PUC); Guy Lease; sbruckman@ccsf.edu; Jeff Hamilton |
| **Subject:** | Yesterday"s City/CCSF Meeting - Recap of Tasks |
| **Date:** | Tuesday, November 03, 2015 2:40:00 PM |

Thanks to all for a good meeting yesterday. Here is a recap of the tasks that we each agreed to take on.

- **Emily** will provide the CCSF team with the proposed Balboa Reservoir development parameters.
- **Rosanna** will send the CCSF team the land swap transaction documents, including the access easement agreement.
- **Mike and Emily** will draft a statement describing current access conditions and obligations, to be incorporated into the Balboa Reservoir RFP, and will share this draft statement with CCSF for feedback.
- **Emily and Mike** will contact **Jeff** in late November/early December to discuss proposed development parameters on "Project's Relationship to CCSF" prior to finalizing those draft parameters for public dissemination. *[Jeff—your colleagues thought you would be the right person for this role, but please let us know if you would prefer for us to work with someone else.]*
- **Rosanna** will provide CCSF with contact information for the City's title officer, who may be able to assist with CCSF's tennis court question.
- **Sue** will speak with Planning Department colleagues about CCSF's tennis court question.
- **Mark** will serve as point of contact for City requests for transportation data.
- **Mark** will disseminate the City's transportation usage survey to the CCSF community.
- **Emily** will reserve a room in City Hall for the December check-in meeting.
- **Emily** will add Steve Bruckman to future meeting invites.

Please let me know if anything is missing or mischaracterized.

Thanks,
Emily

Emily Lesk
Project Manager
Office of Economic and Workforce Development
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San Francisco, CA 94102

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***Meeting Minutes***
**City/City College Collaboration | Monthly Land Use Meeting**
**September 16, 2016, 2-3pm @ SF Planning**

***In Attendance:***

- CCSF
  - Linda Da Silva
  - Ron Gerhard
  - Phil Newsom (TBP Architecture)
  - Amy Jane Frater (TBP Architecture)
  - Mike _____ (Sandis, *via phone*)
- SF Planning
  - Sue Exline
  - John M. Francis
- OEWD
  - Emily Lesk *(via phone)*

***Follow Up Action Items:***

- OEWD
  - Send out meeting invitation for October 21st meeting; 2pm at Planning (Emily)
- Planning
  - Send Linda dates, times, and scope of Nelson\Nygaard data collection effort (Jeremy)
  - Follow up with Carli Paine at MTA re: Chinatown Center white zone relocation/removal (John)
  - Send electronic copy of FMP Options to CCSF team (attached to this file and sent separately)
- CCSF
  - Keep City team informed on outcome of MTA/Chinatown Center meeting re: white zone relocation/removal (Linda)
  - Send City team electronic copy of parking data (Phil/Amy Jane)
  - Keep City informed on next steps for 750 Eddy (Linda)
- All
  - Coordinate integration of Heather Green/City Admin Office into FMP conversation. Ron, please forward email from Heather to City Team.

***Detailed Minutes:***

1. **Rescheduling October Meeting**
    - October 21 @ 2pm works for everyone, will book at conference room at Planning

2. **Facilities Master Plan Options Background**
    - Phil and Amy Jane provided some background on the ideas that informed the development of the preliminary Options for the FMP
        - o Age of facilities is a driving factor; many buildings on Ocean campus are toward the end of their useful life, facilities on other campuses are more mixed.
        - o There is a lot of excess space based on current enrollment, but the College's goal is to increase enrollment to pre-recession levels
        - o Building renovations will require juggling of existing uses to other facilities while old facilities are renovated; phasing of new construction will play a role in this process.
        - o Planning for campus "flow"; i.e. how people move through and experience the campus, the entry sequence, how uses/facilities are clustered base on use, etc.
        - o Concern from many quarters around parking capacity and demand
        - o Desire to phase out portable classrooms
        - o Many existing classroom facilities are too small
        - o Location of Arts Complex is fairly well established on the site west of Phelan Ave and east of Balboa Reservior
    - Ron received an email from Heather Green at City Administrator's Office requesting a meeting to upate her on FMP progress. All agree that it would be good to loop Heather into the ongoing conversations CCSF and City teams have been having and will continue to have over the coming months. Ron will forward City team Heather's email for coordination purposes.

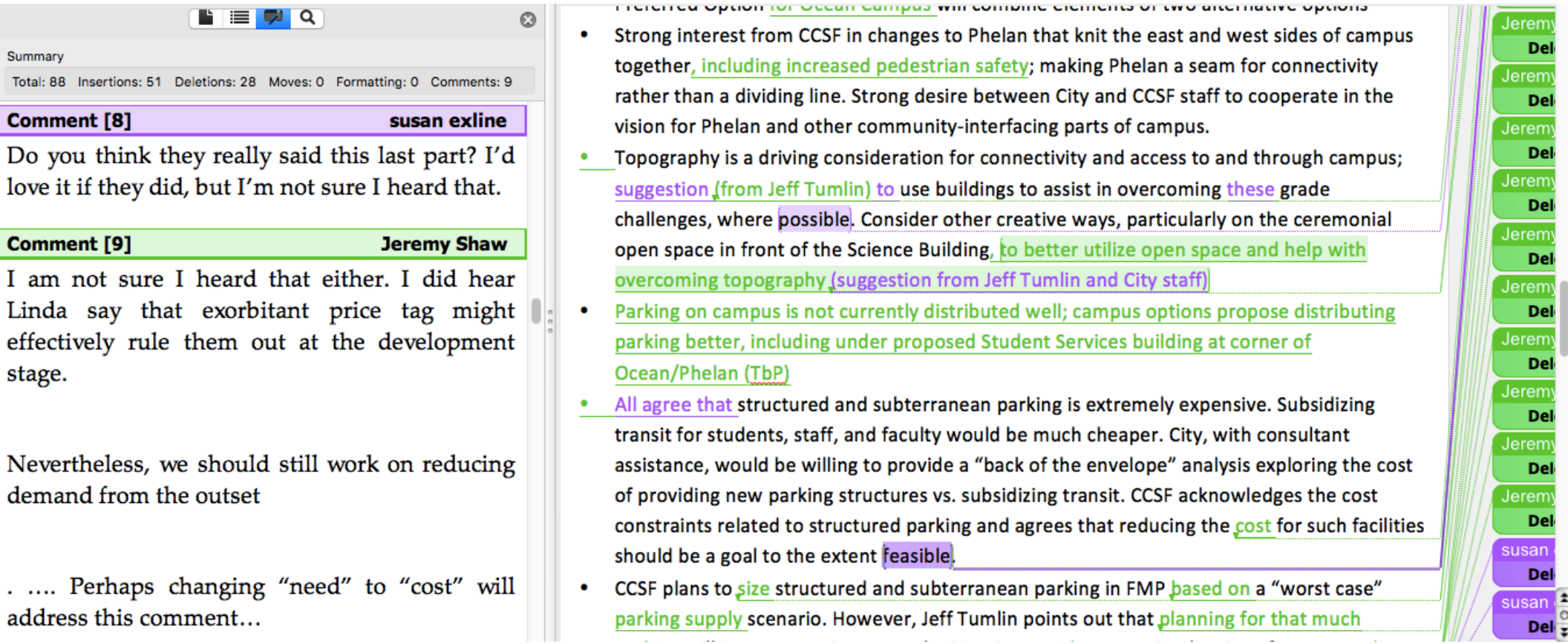
3. **Planning Department Feedback on FMP Options**
    - John and Sue provided a summary of Planning Department feedback on the FMP Options presented to the FMP Advisory Working Group on August 29, 2016. See comments attached below.
    - Linda, Phil, and Amy Jane all feel the feedback is helpful and resonates with their vision for the FMP and Campus. Specific points of agreement include:
        - o The desire for a campus that is open, accessible, and well-integrated into the community.
        - o The desire to strike the right balance between parking demand and supply based on solid data; acknowledging the goal to increase the percentage of people taking transit, walking, and biking to campus while strategically managing parking demand over the time horizon of the FMP and beyond.

4. **CCSF Parking Data Findings Preview**
    - Phil provided a brief summary of the campus parking data recently collected by Sandis.
    - Would be great if City could have an electronic copy, if possible.
    - Overall, parking is not well distributed on campus; some facilities are over capacity while others are under capacity. Goal is to reach an overall level of ~85% capacity campus-wide.
    - City's traffic consultant Nelson\Nygaard will be collecting additional parking in and around campus in the near future. Jeremy should let Linda know ASAP when that will occur and what the scope of work is.
    - CCSF, the City, and their consultants will use the October 21st meeting for a "deep dive" into the parking and traffic data. Goal is to share data and analyze the takeaways.

5. **Balboa Reservoir RFQ Process and Panel**
    - RFQ language and review panel were finalized by Balboa Park CAC at its last meeting.
    - RFQ will be issued at the end of the month.
    - Linda will sit on the RFQ panel.

6. **750 Eddy Update**
    - CCSF has continued to analyze the opportunities to redevelop 750 Eddy as a mixed-use facility.
    - Linda will be presenting analysis to the CCSF Board next Thursday (9/22) and seeking feedback on whether CCSF should continue more detailed analysis of the property.

7. **SFMTA Proposed Bus Stop at Chinatown Center**
    - SFMTA is proposing to convert the white passenger loading zone in front of the CCSF Chinatown Center to a bus stop.
    - There is concern that the lack of a passenger loading zone will lead to sidewalk and street congestion.
    - Unclear whether MTA is planning to eliminate the white zone completely or just move it elsewhere on the block.
    - Staff at Chinatown Center is meeting with project manager Kathleen Phu at MTA to understand the full nature of the change. Linda will let Planning know the outcome of this meeting.
    - Planning will follow up with Carli Paine at MTA to gather further information.



Summary

Total: 88 Insertions: 51 Deletions: 28 Moves: 0 Formatting: 0 Comments: 9

**Comment [8]** **susan exline**

Do you think they really said this last part? I'd love it if they did, but I'm not sure I heard that.

**Comment [9]** **Jeremy Shaw**

I am not sure I heard that either. I did hear Linda say that exorbitant price tag might effectively rule them out at the development stage.

Nevertheless, we should still work on reducing demand from the outset

. …. Perhaps changing "need" to "cost" will address this comment…

- Strong interest from CCSF in changes to Phelan that knit the east and west sides of campus together, including increased pedestrian safety; making Phelan a seam for connectivity rather than a dividing line. Strong desire between City and CCSF staff to cooperate in the vision for Phelan and other community-interfacing parts of campus.
- Topography is a driving consideration for connectivity and access to and through campus; suggestion (from Jeff Tumlin) to use buildings to assist in overcoming these grade challenges, where possible. Consider other creative ways, particularly on the ceremonial open space in front of the Science Building, to better utilize open space and help with overcoming topography (suggestion from Jeff Tumlin and City staff)
- Parking on campus is not currently distributed well; campus options propose distributing parking better, including under proposed Student Services building at corner of Ocean/Phelan (TbP)
- All agree that structured and subterranean parking is extremely expensive. Subsidizing transit for students, staff, and faculty would be much cheaper. City, with consultant assistance, would be willing to provide a "back of the envelope" analysis exploring the cost of providing new parking structures vs. subsidizing transit. CCSF acknowledges the cost constraints related to structured parking and agrees that reducing the cost for such facilities should be a goal to the extent feasible.
- CCSF plans to size structured and subterranean parking in FMP based on a "worst case" parking supply scenario. However, Jeff Tumlin points out that planning for that much

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***Meeting Minutes***
**City/City College Collaboration | Monthly Land Use Meeting**
**October 21, 2016, 2-3pm @ SF Planning**

***In Attendance:***

| | |
|---|---|
| CCSF | • Linda Da Silva<br>• Jeff Hamilton |
| TBP Architecture | Phil Newsom |
| Sandis | • Ron Sanzo<br>• Andrea Fortun |
| Planning | • Sue Exline<br>• John M. Francis<br>• Jeremy Shaw |
| OEWD | Emily Lesk |
| MTA | • Carli Paine<br>• Keith Tanner |
| Nelson\Nygaard | • Jeff Tumlin<br>• Peter Costa |
| SFPUC | • Martin Gran<br>• Chris Wong |

***Follow Up Action Items:***

- ***All***
  - Accept new/updated calendar invite for monthly City/CCSF coordination meeting sent by John Francis (next meeting November 7)
- ***Planning***
  - Send CCSF consolidated City comments on preferred option (John, Nov. 4th)
  - Share link to existing conditions report of the Balboa TDM study (Jeremy, ASAP)
  - Coordinate with MTA and N\N on parking/TDM cost/benefit analysis; to be included in TDM Plan. Progress report at next meeting (Jeremy, November 7)
  - Coordinate with N\N to share updated neighborhood parking data and speed data with City College
  - Coordinate agenda with CCSF and OEWD for November 7 coordination meeting

- ***MTA***
  - Invite CCSF to Balboa Park CAC meeting to present on FMP (Keith Tanner)
  - Continue to coordinate with/provide updates to CCSF on bus stop installation/loading zone relocation at Chinatown Center
- ***CCSF***
  - Work with City team (Jeremy, Carli, Jeff) to schedule a time to present to the TDM Study findings to the CCSF Facilities Committee and other CCSF bodies, as necessary (Linda, ASAP)

***Detailed Minutes:***

1. **Next Meeting**
   - Returning to regular meeting time; note renewed calendar invite from John Francis
   - Monday, November 7, 2-3pm @ Planning (4th Floor)

2. **Facilities Master Plan Options and TDM Discussion**
   - Preferred Option for Ocean Campus will combine elements of two alternative options
   - Strong interest from CCSF in changes to Phelan that knit the east and west sides of campus together, including increased pedestrian safety; making Phelan a seam for connectivity rather than a dividing line. Strong desire between City and CCSF staff to cooperate in the vision for Phelan and other community-interfacing parts of campus.
   - Topography is a driving consideration for connectivity and access to and through campus; suggestion (from Jeff Tumlin) to use buildings to assist in overcoming these grade challenges, where possible (ie buildings that have entrances at multiple grades connected by elevators). Consider other creative ways, particularly on the ceremonial open space in front of the Science Building, to better utilize open space and help with overcoming topography (suggestion from Jeff Tumlin and City staff). See Simon Fraser University campus plan (link) as a precedent.
   - Parking on campus is not currently distributed well; campus options propose distributing parking better, including under proposed Student Services building at corner of Ocean/Phelan (TbP)
   - All agree that structured and subterranean parking is extremely expensive. Subsidizing transit for students, staff, and faculty would be much cheaper. City, with consultant assistance, would be willing to provide a "back of the envelope" analysis exploring the cost of providing new parking structures vs. subsidizing transit. CCSF acknowledges the cost constraints related to structured parking and agrees that reducing the cost for such facilities should be a goal to the extent feasible.
   - CCSF plans to size structured and subterranean parking in FMP based on a "worst case" parking supply scenario. However, Jeff Tumlin points out that planning for that much parking will increase environmental mitigation requirements, with greater implications for

surrounding roadway, infrastructure, or transportation demand mitigations. The City recommends that the FMP reflect desired (but reasonable) parking scenarios as opposed to "worst case" outcomes. If the "worst case scenario" is necessary for FMP approvals, then the City suggests incorporating options, including an option(s) which utilizes a range of TDM strategies to reduce parking demand.

- Nelson\Nygaard presented highlights from the existing conditions report of the Balboa TDM study (document to be posted online soon—Planning will send out link when available).
- Roads and capacity are geometrically constrained, but there remains the need for both agencies (MTA and CCSF) to provide access to those who have fewest travel choices. TDM measures can support this; many measures can also reduce individuals' transportation costs. Different measures will be required for different segments of population; parking is one strategy among many.
- If parking charges resulted in full cost recovery for parking infrastructure, the share of alternative travel modes would go up, including uber pool/lyft line.
- The TDM recommendations included in the FMP will not be as exhaustive as CCSF's previous FMP from 2004. City College suggests that Facilities Master Plan is designed to show how facilities can help achieve Educational Master Plan goals (LD); CCSF's Sustainability Plan is CCSF's venue for incorporating TDM strategies into campus planning; the Plan Appendix will be updated in the near future.
- CCSF would like the City to comment on the preferred Ocean Campus option, which will be released the week of 10/24 and then presented at the following venues:
    - FMP Working Group meeting Oct. 25
    - Community Workshops on Nov. 1 and 2
    - BOT Meeting Nov. 17
- Balboa Park CAC would like to invite CCSF to present on FMP updates.
- Generally FMP schedule: Options development in the fall; implementation, sequencing, and cost estimating in Spring semester; board adoption and then CEQA compliance

3. **SFMTA Proposed Bus Stop at Chinatown Center**
    - SFMTA is proposing to convert the white passenger loading zone in front of the CCSF Chinatown Center to a bus stop and move the loading zone 60 feet (approx. 3 parking spaces) up the block.
    - The Chinatown Center dean met with project manager Kathleen Phu at MTA to understand the full nature of the change.
    - MTA is conducting additional on-site analysis to understand the impact on the CCSF community. Staff went out to the field in mid-October but class was not in session that day so they could not collect sufficient data. They will return in late October and provide Linda and Chinatown Center dean an update on their findings.

I-Hanson5

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***Meeting Minutes***
**City/City College Collaboration | Monthly Land Use Meeting**
**October 21, 2016, 2-3pm @ SF Planning**

***In Attendance:***

| | |
|---|---|
| CCSF | • Linda Da Silva<br>• Jeff Hamilton |
| TBP Architecture | Phil Newsom |
| Sandis | XXX |
| Planning | • Sue Exline<br>• John M. Francis<br>• Jeremy Shaw |
| OEWD | Emily Lesk |
| MTA | • Carli Paine<br>• Keith Tanner |
| Nelson\Nygaard | • Jeff Tumlin<br>• Peter Costa |
| SFPUC | • Martin Gran<br>• |

John M. Francis 10/25/16 5:25 PM
**Comment [1]:** Team, please assist rounding this out, I know I missed some people/didn't catch everyone's name.

susan exline 10/26/16 9:45 AM
**Deleted:** XXX

susan exline 10/26/16 9:45 AM
**Deleted:** XXX

***Follow Up Action Items:***

- ***All***
  - Accept new/updated calendar invite for monthly City/CCSF coordination meeting sent by John Francis (next meeting November 7)
- ***Planning***
  - Send CCSF consolidated City comments on preferred option (John, Nov. 4th)
  - Coordinate with MTA and N\N on parking/TDM cost/benefit analysis; send to CCSF (Jeremy, by DATE)
- ***MTA***
  - Invite CCSF to Balboa Park CAC meeting to present on FMP (Keith Tanner by DATE)
  - Continue to coordinate/provide updates to CCSF on bus stop installation/loading zone relocation at Chinatown Center
- ***CCSF***

John M. Francis 10/25/16 5:26 PM
**Comment [2]:** Is there any data sharing/coordination that still needs to happen between N\N and Sandis?

susan exline 10/26/16 9:46 AM
**Deleted:** ASAP

susan exline 10/26/16 9:47 AM
**Deleted:** NAME,

- Work with City team (Jeremy, Carli, Jeff) to schedule a time to present to the TDM Study findings to the CCSF Facilities Committee (Linda, ASAP)

***Detailed Minutes:***

1. **Next Meeting**
   - Returning to regular meeting time; note renewed calendar invite from John Francis
   - Monday, November 7, 2-3pm @ Planning (4th Floor)

2. **Facilities Master Plan Options and TDM Discussion**
   - Preferred Option will combine elements of two alternative options
   - Strong interest from CCSF in changes to Phelan that knit the east and west sides of campus together; making Phelan a seam for connectivity rather than a dividing line. Strong desire between City and CCSF staff to cooperate in the vision for Phelan and other community-interfacing parts of campus.
   - Topography is a driving consideration for connectivity and access to and through campus; suggestion is to use buildings to assist in overcoming these grade challenges, where possible. Consider other creative ways, particularly on the ceremonial open space in front of the Science Building. Open Space is underutilized currently so these are suggestion to improve its utilization. (suggestion from Jeff Tumlin and City staff)
   - All agree that structured and subterranean parking = extremely expensive. Subsidizing transit for students, staff, and faculty would be much cheaper. City, with consultant assistance, would be willing to provide a "back of the envelope" analysis exploring the cost of providing new parking structures vs. subsidizing transit. CCSF acknowledges the cost constraints related to structured parking and agrees that reducing the need for such facilities should be a goal to the extent feasible.
   - CCSF plans to include structured and subterranean parking in FMP as a "worst case" scenario. However, Jeff Tumlin points out that doing so will require environmental mitigations that meet the standards for associated traffic flows, which would have enormous implications for the types of roadway and other infrastructure facilities required on campus and in the surrounding neighborhood. Is the City recommends that the FMP reflect desired (but reasonable) outcomes as opposed to "worst case" outcomes. If there's a need to provide an option with the most parking feasible given land constraints (not $$ constraints) then the City suggests providing two options, one that is "preferred" and focuses on TDM strategies to reduce parking needs and another alternative option that assumes a higher parking demand.
   - Nelson\Nygaard presented the data they have collected for the Balboa TDM study.
   - The TDM recommendations included in the FMP will not be as exhaustive as CCSF's previous FMP from 2004. City College suggests that CCSF's Sustainability Plan will be a better venue for incorporating TDM strategies into campus planning; the Plan Appendix will be updated in

susan exline 10/26/16 9:48 AM
**Comment [3]:** Might want to note here or in the email about our 1st agenda item to get the agenda started for that meeting. you can also ask Linda to contact you with additional agenda items.

susan exline 10/26/16 9:49 AM
**Comment [4]:** Might want to flesh this out a bit more, because I know I didn't get the concept until jeff elaborated on what he meant.

susan exline 10/26/16 9:51 AM
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susan exline 10/26/16 9:52 AM
**Comment [5]:** Do you think they really said this last part? I'd love it if they did, but I'm not sure I heard that.

susan exline 10/26/16 9:52 AM
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susan exline 10/26/16 9:52 AM
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susan exline 10/26/16 9:52 AM
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susan exline 10/26/16 9:53 AM
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susan exline 10/26/16 9:53 AM
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susan exline 10/26/16 9:54 AM
**Comment [6]:** Can we link to the study if its' available on our website somewhere?

the near future. Linda chairs the Facilities Committee responsible for this document. City requests to be added to an upcoming agenda to present on TDM Study findings.

susan exline 10/26/16 9:55 AM
**Comment [7]:** Should we highlight this action item somehow?

- CCSF would like the City to comment on the preferred Ocean Campus option, which will be released the week of 10/24 and then presented at the following venues:
    - o FMP Working Group meeting Oct. 25
    - o Community Workshops on Nov. 1 and 2
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- Balboa Park CAC would like to invite CCSF to present on FMP updates.

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    - The Chinatown Center dean met with project manager Kathleen Phu at MTA to understand the full nature of the change.
    - MTA is conducting additional on-site analysis to understand the impact on the CCSF community. Staff went out to the field in mid-October but class was not in session that day so they could not collect sufficient data. They will return in late October and provide Linda and Chinatown Center dean an update on their findings.

**I-Hanson5**

# Re: City/CCSF 10/21 Meeting Minutes

Linda Da Silva

Mon 10/31/2016 2:41 PM

To: Francis, John (CPC) <john.francis@sfgov.org>;

Hi John,

I have a correction to the meeting minutes. Page 3, 5th bullet re the TDM recommendations included in the FMP. I'm requesting that the bullet get reworded as shown below (note the ~~strikeouts~~ and **additions**).

The TDM recommendations included in the FMP will not be as exhaustive as CCSF's previous FMP from 2004. City College suggests that Facilities Master Plan is designed to show how facilities can help achieve Educational Master Plan goals (LD); CCSF's Sustainability Plan ~~will be a better~~ **is CCSF's** venue for incorporating TDM strategies into campus planning; the Plan Appendix will be updated in the near future. ~~Linda chairs the Facilities Committee responsible for this document.~~

Thank you,

*Linda da Silva*
Associate Vice Chancellor, Facilities Planning & Construction
City College of San Francisco
50 Phelan Avenue, San Francisco, CA 94112
ldasilva@ccsf.edu
p 415.239.3495
c 650.642.7143
www.ccsf.edu

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**From:** Francis, John (CPC) <john.francis@sfgov.org>
**Sent:** Friday, October 28, 2016 1:10:58 PM
**To:** Wong, Phillip (ECN); Martin, Michael (ECN); Shaw, Jeremy (CPC); Exline, Susan (CPC); Wong, Christopher J; Ronald Gerhard; Jeffrey Hamilton; Adam Engelskirchen; PNewsom@tbparchitecture.com; gmoon@tbparchitecture.com; Aliza Paz (apaz@nelsonnygaard.com); rsanzo@sandis.net; Peter Costa; Paine, Carli (MTA); Linda Da Silva; Lesk, Emily (ECN); jtumlin@nelsonnygaard.com; Rich, Ken (ECN); Amy Jane Frater; Gran, Martin (PUC); Russell, Rosanna (PUC)
**Subject:** City/CCSF 10/21 Meeting Minutes

Hi Everyone,

Attached please find the minutes from our City/CCSF monthly coordination meeting on 10/21. Included on page one is a list of follow up action items. If I missed anything, please feel free to email me with any additions or corrections to the minutes by COB Wednesday and I will update them and recirculate if needed.

Please note, our next meeting will be at 2pm on November 7th at Planning. Please let me know if you didn't receive the meeting invitation I sent out earlier this week.

Thanks,
John

**I-Hanson5**

**John M. Francis**
*Planner & Urban Designer, Citywide Planning*

**Direct:** 415-575-9147 | **Fax:** 415-558-6409

San Francisco Planning

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***Meeting Minutes***
**City/City College Collaboration | Monthly Land Use Meeting**
**November 7, 2016, 2-3pm @ SF Planning**

***In Attendance:***

| | |
|---|---|
| CCSF | • Linda Da Silva<br>• Jeff Hamilton |
| TBP Architecture | Phil Newsom |
| Planning | • Sue Exline<br>• John M. Francis<br>• Jeremy Shaw |
| OEWD | Emily Lesk |
| MTA | Carli Paine |
| BART | Tim Chan |
| SFPUC | • Martin Gran<br>• Chris Wong |

***Follow Up Action Items:***

- ***Planning***
  - Send concept design for I-280/Ocean southbound off-ramp (link) to Linda/Phil (John, completed 11/18)
  - Send Draft *Citywide Urban Design Guidelines* (link) to Linda/Phil (John, completed 11/18)
  - Send *Ocean and Geneva Corridor Design* (link) to Linda/Phil (John, completed 11/18)
  - Share info on proposed bike facility on Lee Ave (link, see PDF page 18) with Linda/Phil (John, completed 11/18)
  - Send *Balboa Park Station Area Plan* (link) to Linda/Phil (John, completed 11/18)
  - Send *Balboa Area TDM Plan Existing Conditions Memo* (link) to Linda/Phil (John, completed 11/18)
  - C encroachment issues (John, completed 11/10)
  - Schedule follow up "charrette" session(s) between CCSF and technical experts on specific topic areas (John, ASAP)
  - Coordinate agenda with CCSF and OEWD for December coordination meeting

- ***CCSF***
  - Send info on campus "goat paths" to Jeremy (Phil, ASAP)
  - Provide schedule for next round of design work and community outreach (Linda/Phil, ASAP)

***Detailed Minutes:***

1. **Next Meeting**
   a) Monday, December 5, 2-3pm @ Planning (4th Floor)

2. **Feedback on FMP from FMP Working Group & Community Workshops**
   a) Feedback from Working Group and community generally indicates consensus on major programmatic moves proposed in FMP
   b) Next steps:
      - TBP will now focus on further fleshing out technical details (e.g. building square footage, parking count, etc.) and sequencing of FMP implementation.
      - Further coordination needed with City related to public realm interface, TDM, access.
      - There will be additional opportunities for community input and CCSF/City coordination throughout the Spring semester as the FMP is drafted further.

3. **Discussion on TDM Strategies**
   a) *BART:* does CCSF know who is parking on campus? Do they know where they are coming from? As part of a TDM strategy, BART would be interested in working with CCSF to implement a "class pass" for CCSF students; BART already has a similar agreement with SFSU.
   b) *TBP:* the goal is to write a durable and adaptable FMP
      - For example, if TDM measures successfully shift transportation mode share away from the auto, then parking demand projections can be adjusted in the future.
      - Neighbors will want to see evidence that TDM is working. Explaining the cost/benefit of paying for parking structures will hopefully help with community prioritization.
      - The FMP will not make final decisions related to TDM, but will recommend possible strategies that CCSF could incorporate into the campus Sustainability Plan.
      - Where elements are less certain (Reservoir development, TDM), the FMP will leave flexibility to respond.
      - At parking construction costs cited ($50,000-$80,000 per space), CCSF would not have funding to meet all its other needs
   c) *Planning:* is it possible to incorporate TDM *goals* (as opposed to strategies) into the FMP?

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# *Meeting Minutes*
# City/City College TDM Workshop
# December 22, 2016, 2-4pm @ SF Planning

**Attendees**

- Linda Da Silva (CCSF)
- Jeff Hamilton (CCSF)
- Phil Newsom (tBP)
- Ron Sanzo (Sandis)
- Carli Paine (SFMTA)
- John M. Francis (Planning)
- Jeremy Shaw (Planning)
- Pete Costa (Nelson Nygaard)
- Calli Cenizal (Nelson Nygaard)
- Tim Chan (BART)
- Martin Gran (SFPUC)

**Action Items**

- ***Phil/Ron***: Send Pete Ocean Campus existing and future student/employee headcount data by 12/30/2016.
- ***Nelson Nygaard***: Clarify how and why the two survey results (NN and CCSF) differ, particularly on mode share? What is the significance of the difference?
- ***Linda/Phil/Ron***:
    - Obtain raw data from City College transportation survey; clarify if respondents are identified as students/employees/visitors.
    - Provide feedback/comments on TDM Strategy Presentation by COB on 1/6/2017.
- ***Linda***: Request to be agendized for March 9 Board of Trustees Study Session. Preliminary agenda items include:
    - Update on the CCSF Sustainability Plan implementation
    - Presentation on Balboa Area TDM Plan and potential TDM strategies that could be adopted by CCSF.
    - Discussion on proposed FMP parking scenario(s).
    - Update on Ocean Campus access and urban design issues
- ***John/Linda***: Schedule date of TDM follow-up discussion
- ***Jeremy***: Refine presentation based on comments from meeting

**Intro**

- Jeremy reviews agenda, background and desired meeting outcomes. (See Attached)
- Carli reviews Guiding Goals for TDM (City and CCSF existing Transportation Goals, see attached powerpoint)
    - Phil: parking and enrollment are connected. CCSF feels that parking issue should not hinder enrollment goals.
    - Linda: Also note that CCSF Board of Trustees (BoT) has a transportation-related policy (7.22, Environmental Policies and District Activities) that commits CCSF to "promoting the use of alternatives to single-occupancy motor vehicle use by students, faculty, and staff."
    - Phil: Also note the BoT list of resolutions related to reservoir site.
- Carli reviews list of high level TDM strategies that can support CCSF FMP goals (see attached powerpoint).
- Jeff: what is timeline of Reservoir RFP?
    - Jeremy: RFQ due mid-January, RFP due May/June (Jeremy)
    - Jeff: Confusion in community around how the process works (RFQ vs. RFP, choosing how developer is selected). CCSF/developer interaction will be very important.
    - Linda is point person for interaction between CCSF and developer selection committee. Questions from CCSF community can be directed to her.
- Linda: likes that FMP is on a track to finish in 2017 to provide context for development on the Reservoir site. Pete seconds this in terms of TDM Plan.

**CCSF FMP Update**

- Linda:
    - BoT meeting: didn't hear anything that fundamentally changes the course of the FMP process. The locations of facilities are grounded, but still working out program within each facility. Next four months will continue to flesh out the plan.
    - What's in the plan?
        - Buildings: description and cost estimates. Input from BoT: should consider reuse of more existing buildings.
        - Public Spaces: what are activities that will occur in these spaces? Cost estimates.
    - Timing for plan development
        - Sections of the draft plan available end of February
        - Chancellor office and other executive review in April
        - Adoption in May
        - Everything has to be done before summer or else will have to wait for adoption until the fall when school is back in session.

**Nelson Nygaard TDM Presentation**

- Pete/Calli present (See presentation attached)
- Context and Data
    - TDM is all about providing multiple options and reliable travel information to people trying to access campus to help them make the best/most efficient/cost effective travel decisions for themselves.
    - TDM plan is meant to be complementary to CCSF FMP, goal is to be collaborative/share ideas.
    - Linda: how does mode split data compare to the data CCSF collected?
        - NN included CCSF data in the Balboa Area TDM Existing Conditions Report. Somewhat different methodology (online vs. intercept) but mode splits were similar—maybe slightly more respondents who drive alone in CCSF data.
        - Linda: Is CCSF mode split data broken down by visitor type (student, employee, etc.)? Would be good to resolve or explain any discrepancies between two data sets, if the data is different. CCSF data is online on FMP website.
        - Jeremy: CCSF/City questions were coordinated.
    - Tim: Should clarify the slide for the question "I am interested in trying…" (slide # XX)—confusing as currently designed.
    - Phil: student enrollment at Ocean will be 24K in 10 years, 32% above current enrollment.
- Suggested TDM Measures
    - Real time travel data
        - Linda: how is this implemented/coordinated?
        - Can contract with companies or build in-house (could be a student project).
        - Carli: real time transit data is all open source and publicly available.
    - Carpool
        - Tim: how effective? At Bart we're seeing carpool numbers somewhat in decline.
        - Pete/Calli: Ride matching is the most difficult part. "Scoop" is a program that facilitates ride matching; financial incentive for drivers (they are paid to drive other people) and riders (because rider cost is quite low).
        - Carli: what is the role of the institution?
        - Pete: Institutions can be fairly pro-active to partner with ride matching services. Listservs help people learn about options.
    - Transit Passes
        - Jeff: how receptive are transit agencies to these programs?
        - Carli: MTA has existing legislation establishing "class pass" program. Administrative component is responsibility of institution.
        - Tim: BART has pilot program. Integrated with Clipper card. SF State: student champions are critical. BART can help coordinate with MTC/Clipper Card.

        - Linda: What is benefit to CCSF?
            - Carli: university commits to getting a reduced fee pass for every student. Fee is set so that it is revenue neutral to MTA.
            - Linda: CCSF already has transit voucher program for students in need and pre-tax benefits for employees.
            - Linda has already reached out to Associated Students leadership about organizing around transit passes but has not received a response yet.
    - Parking Pricing
        - Linda: Re: education code restrictions—maximum price established by education code unless CCSF can prove cost to provide parking is higher. But it will be politically challenging to raise parking price while in enrollment growth mode—probably not tenable in the near term. Employee parking is free. If want to raise employee parking fees, then it will have to be part of salary negotiations in the labor agreement with employees.
        - Carli: consider TDM suite as part of employee benefits package.
        - NN: This strategy should be considered as part of an entire TDM suite, not just a punitive "stick"—there are carrots too. Parking pricing is an important strategy—makes other strategies much more impactful. Funds are reinvested into TDM practices that support access via other modes.
    - Last Mile
        - Purpose is to bridge small gaps between modes.
        - Linda: linkages between campuses are also important.
        - NN: Bike link cards at Bart.
        - Tim: can add more bike lockers at Balboa Bart if desired.
    - Develop, Monitor, Refine Plan
        - Tim: make sure to include targets and how you achieve targets.
    - Should explore design strategies for adaptable parking facilities—i.e. parking structure design that is flexible and allows the building to convert to other uses over time as parking needs reduce. There are a few examples around the country for this practice. See for example:
        - "Universal Structures as Long-Term Sustainable Assets," by Will Macht for the Urban Land Institute, January 2015
        - "We Need to Design Parking Garages With a Car-less Future in Mind: Building adaptable structures will save time, money, and material waste," by Eric Jaffe for Citylab, November 2013

- General Discussion
    - Phil: While parking is important, CCSF community is sustainability-minded. FMP will need to address where parking will be placed, but it's difficult to marry TDM and parking needs in FMP in the short term. FMP can make recommendations about TDM, but there will be a lot of anxiety around whether TDM can deliver as promised. FMP will say "this

is how much parking you have, this is what you'd need if your enrollment meets targets given existing conditions." Determining right parking number and the mix of TDM strategies and going to be a work in progress.

- Linda: Some parts of the campus Sustainability Plan have been implemented since it was adopted in 2006, but the Plan has not moved forward in many areas. This will be on my plate. Perhaps within the context of the Sustainability Plan, it would make sense to share with the BoT the impacts and costs of parking on campus. Let's consider presenting in March—would love help from City in presenting. Let's have an update on the Sustainability Plan that incorporates our current thinking on TDM.
- Tim: If it's helpful for Bart directors lend their support, happy to reach out to them. Let me know.
- What do the next steps look like in communicating with BoT?
  - Request to be on agenda for March 9 Board of Trustees Study Session.
  - Pete: NN will have a draft document ready end of February, so it will be good timing for presenting to BoT.
  - Linda: TDM document should not include any commitments from CCSF.
- Jeremy: can make some refinements on presentation based on recommendations today.
- Linda: Let's have a follow up discussion on TDM in January.
- John F. will send CCSF minutes and presentation for review and comment.
- Jeremy: No construction is likely on reservoir site for the next five years—can focus on non-pricing strategies in the first five years to see what works. Low-hanging fruit.
- Can NN get Ocean Campus current/future daily student/employee headcount from CCSF? Yes.

**Follow-Up Conversation: CCSF and Planning**

- Linda: presenting Sustainability Plan update and TDM Study/Strategies during a BoT Study Session will allow for a good dialogue on parking/access issues with the Board. Can also provide update on outcome of City/CCSF Access Workshop on January 19. Let's aim for the March 9 Study Session.
- John/Jeremy: City understands the seriousness of the parking question for the Ocean Campus—the City does not want to hinder CCSF's enrollment goals, but also recognizes the limited roadways and college's resource constraints (physical and financial). As such, the City recommends that CCSF include alternative scenarios in the FMP. Since the FMP will be implemented over at least a 10 year period, building flexibility into the plan would allow the college to respond to conditions as they develop. For example, if CCSF implements a suite of TDM strategies and reaches its targets for reducing drive-alone automobile trips, it may be able to plan for and construct fewer parking spaces in the future. Developing scenarios that reflect a range of potential futures will put CCSF in a better planning position in a few years when it will need to make choices about construction projects.

- CCSF to consider the potential for parking phasing strategies and for parking garages designed for future conversion to alternative uses

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***Meeting Minutes***

Ocean Campus Urban Design & Access Workshop
January 19, 2017, 2-5pm @ Planning

**Attendees**

- Linda da Silva (City College)
- Barry Chin (City College)
- Phil Newsom (tBP)
- Gary Moon (tBP)
- Patricia _____ (tBP)
- Ron Sanzo (Sandis)
- Tim Chan (BART)
- John M. Francis (Planning)
- Jeremy Shaw (Planning)
- Patrick Race (Planning)
- Martin Gran (SFPUC)
- Chris Wong (SFPUC)
- John Katz (SFMTA)
- Tony Henderson (SFMTA)

**Action Items**

- **City College/SFPUC**
    - Record water pipeline easement (in process)
    - Understand limits on trucks/weight over pipeline. SFPUC to provide CCSF available information on depth and load limitations of pipeline.
- **Sandis**
    - Further study geometrics of Wellness roundabout and ideal traffic operations, consider large trucks. Diagram pedestrian and vehicular flow in/out including impacts on EB Muni Metro tracks and how far Ocean Avenue ROW can encroach on City College property
- **Planning**
    - Send CAD of Ocean Avenue design to tBP
    - Provide estimates on incursion on CCSF property if Phelan Intersection Concept 1 is paired with bike lanes.

- **SFMTA/Planning/City College:** Organize small session to examine Muni boarding islands, Howth intersection vis-à-vis Wellness Center driveway, Howth two-way concept, Phelan intersections. Need MTA traffic, transit engineers, operations and designers.
- **SFMTA/Planning/City College:** Explore design alternatives/constraints for southern roadway connection between Phelan Avenue and Reservoir site.

**Intro**

- John reviews agenda, background, and desired meeting outcomes. (See agenda attached)
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**Ocean Ave**

- Presentation of *Ocean & Geneva Corridor Design* project by Patrick Race
    - Project Goal: develop design that improves walking experience, balances the needs of many different users, creates more enjoyable and pleasing street
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        - Need to limit what is built on top of SFPUC water line and be aware that if SFPUC needs to work on the line, access to future parking may be impeded
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***Meeting Minutes***

Ocean Campus Urban Design & Access Workshop
January 19, 2017, 2-5pm @ Planning

**Attendees**

- Linda da Silva (City College)
- Barry Chin (City College)
- Phil Newsom (tBP)
- Gary Moon (tBP)
- Patricia _____ (tBP)
- Ron Sanzo (Sandis)
- Tim Chan (BART)
- John M. Francis (Planning)
- Jeremy Shaw (Planning)
- Patrick Race (Planning)
- Martin Gran (SFPUC)
- Chris Wong (SFPUC)
- John Katz (SFMTA)
- Tony Henderson (SFMTA)

**Action Items**

- **City College/SFPUC**
    - Record water pipeline easement (in process)
    - Understand limits on trucks/weight over pipeline. SFPUC to provide CCSF available information on depth and load limitations of pipeline.
- **Sandis**
    - Further study geometrics of Wellness roundabout and ideal traffic operations, consider large trucks. Diagram pedestrian and vehicular flow in/out including impacts on EB Muni Metro tracks and how far Ocean Avenue ROW can encroach on City College property
- **Planning**
    - Send CAD of Ocean Avenue design to tBP
    - Provide estimates on incursion on CCSF property if Phelan Intersection Concept 1 is paired with bike lanes.

- **SFMTA/Planning/City College:** Organize small session to examine Muni boarding islands, Howth intersection vis-à-vis Wellness Center driveway, Howth two-way concept, Phelan intersections. Need MTA traffic, transit engineers, operations and designers.
- **SFMTA/Planning/City College:** Explore design alternatives/constraints for southern roadway connection between Phelan Avenue and Reservoir site.

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# CCSF Facilities Master Plan Update

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*January 19, 2017, 2-5pm @ Planning (1650 Mission Street, 4th Floor)*

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- Some challenges with access for team buses at Howth entrance. Trucks accessing corp yard shouldn't have a problem.
- Concern about taking away crosswalk on east side of Ocean/Howth intersection—people will jay walk, but CCSF believes it could improve auto operations into/out of campus. MTA would not support closing crosswalk, want to make crossing as safe as possible for pedestrians.
- What is the path of travel from BART to campus?
  - CCSF prefers people to walk along south side of Ocean
- Major concern around left turns from EB Ocean into Howth/campus
  - There are ways to deal with this, but need to talk through some ideas.
  - Need to set up time to talk through tech details?
  - Number of auto trips is going to be large due to the new parking structure
  - What is the net amount of parking vs. existing? Net will be less than existing. Reconcentrating parking on east and west.

- What are some scenarios that could mitigate the challenges at Ocean/Howth given larger number of vehicles accessing
    - Make Howth 2 way in order to better access SB 280.
    - Why is Howth one way currently?
        - Neighbors didn't want?
        - Signalization at Geneva
        - No reason that it couldn't be 2 way operationally. Would need to quantify the delay to transit at Geneva intersection.
        - Linda: proportionality of impacts is important to consider, given the small number of people who live in Howth.
    - Protected left turns (green arrow)—important for safety even though it slows transit and traffic.
    - Left turn lane—would need more ROW. Concern about queuing—could back up all the way to Phelan.
    - Using Geneva and Howth as an alternative to left turn from Ocean.
    - Automated wayfinding to let people know how much parking is available.
- SFMTA applauds west bound bike lane and Ocean widening—CCSF cautions that it is not a done deal because it is a governing board decision. Having bike facilities on Ocean would mean that proposed bike facilities on Howth wouldn't have to happen. Then Howth could be two way.
- Next steps: sharing data between Sandis and MTA on counts and traffic modeling on ocean. Look at TA study. James: let's make sure we can use the best possible data, not just historical—very concerned about traffic. Also, Howth is a narrow street, which has limits.
- Are we comfortable with a range of options for access? CCSF: yes, will have to be done this way. MTA: but need to have a certain level of certainty that they will work.
- John will help convene exchange of data between MTA and CCSF.
- Send Ron other version of Ocean/Phelan intersection.

Phelan/Reservoir access

- Major points of access are Lee, Riordan access point, currently
- Providing additional access on Phelan raises challenges due to lots of mode conflict.
- Location of proposed crosswalk crossing Phelan is fungible.
- Discussions around what to do with former bookstore site.
- Connection to unity plaza.
- CCSF desire for separation between parking and any new roadway.

- Lots of potential queuing challenges here.
- Would be better to having cars enter stream of traffic on Phelan from Reservoir further north. CCSF: per CCSF Board, we won't bifurcate west campus buildings with a road
- Could direct northern and southern parking areas on their own egresses north and south on Phelan.
- Existing parking structures is just as much a challenge as entering. Is there a way to program parking by user in order to have more control over flow over the course of the day? Yes.
- CCSF team can provide some numbers of cars for each lot in order to understand best potential access points to west campus parking and reservoir.
- Is southern connection too flawed to pursue? MTA concerned if it will work—should be CCSF concern as well. Concern about pedestrian connection as well.
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- CCSF should show Lee punching through and discuss with PUC
- Is there any opportunity to punch through mid-Phelan? Probably not given push back from Board and CCSF community.
- MTA: Need to have trip generation data to make these decisions. Board also needs to have some understanding of the stakes and potentially compromise. Want City and CCSF to work together to find mutually beneficial solutions.
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**From:** Jennifer Heggie
**To:** CPC.BalboaReservoir
**Cc:** Poling, Jeanie (CPC); Yee, Norman (BOS); Low, Jen (BOS)
**Subject:** Balboa Reservoir DEIR comments 9/23/19
**Date:** Monday, September 23, 2019 3:53:58 PM
**Attachments:** FINALnoisecomments.odt

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Jeanie Poling and the Planning Department,

I would like to thank the Planning Department for this SEIR. It identifies and analyzes neighborhood concerns that have been brought up about noise, transportation and air quality. In the comments that are attached are questions, identification of possible oversights, and further concerns. But first, a few more general comments:

Knowing that the development will cause serious risks to our educational institutions, neighbors, students and small children, I believe it is worth taking a step back and asking what is the highest good for this area that causes the least damage to the City and the immediate surroundings. In that light, please identify what number of units could be safely constructed in the Balboa Reservoir without creating significant adverse impacts to transportation and circulation, air quality, and noise, and secondary public benefits, such as educational services. 1

As we are aware, City College is an engine for the service jobs of San Francisco and provides opportunity including childcare and child development for students who need them while taking classes to develop skills and a better future. There are reasons that a 100% affordable housing building which houses aged-out foster youth among others was constructed next to City College at the Balboa Reservoir. Adding to the public good is an adjacent private school which is well-known as a high school, but also for its special treatment facilities for learning disabilities. Those institutions as well as many childcare, nursery school and other educational institutions are located nearby. This education hub is important for providing services to all of San Francisco. Therefore, it would benefit the City to first identify what number of units would meet City standards before shoe-horning in a project that is known in advance to have unmitigable adverse impacts.

In addition, some of the testing reports appear to provide inconsistent testing. This makes it difficult for non-professionals to compare apples to apples, track the meaning of the data and encourages misinterpreting possibly impactful conclusions. For example, adding a note below the Balboa Reservoir truck Roadway Noise Analysis on Page 1of 2, in Appendix D2, would provide clarification of why the numbers of road segments tested differ depending on whether the test is for the existing environment, the existing plus developer's project, the existing plus additional housing scenario, or the cumulative plus developer's project. 2

The focus of my specific DEIR comments that are attached is noise, though there are

a few non-noise-related comments at the end. Noise and vibration were not addressed in the PEIR, and we thank the Planning Department for recognizing that the earlier Balboa area plan offered a high level view, not a project view, anticipating that they could not take into account every change to the area before a project is ready for consideration. Since the time the PEIR was developed, many new buildings; educational, service-oriented, commercial and residential; have been constructed near and adjacent to the Balboa Reservoir. At the time of the PEIR, there was an expectation that no more than 500 housing units would be constructed in the Balboa Reservoir. 3

Thank you again for the opportunity to comment. I look forward to reading your responses.

Regards,

Jennifer Heggie

Sunnyside resident

Please consider the following specific comments and requests about expected impacts of the Balboa Reservoir development. Points 1-16 are related to noise impacts, and points #17 to 20 relate to others.

1. Noise effects on residences and child care centers in adjacent Sunnyside have not been tested although they are located within the 900 foot zone of project noise consideration. Two childcare centers and preschools were identified in the EIR in this area Northeast of the project. The sensitive receptors in this area are closer to some parts of the development than the studied 24-hour LT-3 location in Westwood Park, and the Northeast sites lie in an area that is typically downwind of the construction site. Like many childcare or nursery schools in the area, the Staples and Frida Kahlo Way Mighty Bambini location at the border of Sunnyside and Westwood Park appears to be a residence as well as childcare and preschool center. Like other childcare centers in surrounding residential neighborhoods, it deserves a 24-hour noise study. Additionally, noise testing will be needed at the corner of Judson and Frida Kahlo Way (formerly Phelan Avenue) where a replacement City College childcare center is planned within the construction timeframe, according to Dr. James Sohn of the City College of San Francisco. 4

2. The first Mitigation Measure for noise recommends selecting truck haul routes that "avoid the North Access Road and adjacent Riordan High School and residential uses along Plymouth Avenue." But there is only one alternative route, Lee Avenue to Ocean Avenue, which is also adjacent to a sensitive receptor, Harmony Family Childcare. A high school, nursery schools and daycare centers are located at, or near, all the identified possible entrance and exit points of the project. The Lee Avenue alternative is already identified in Cumulative Transportation Items 4 and 6b [C-TR-4 and C-TR-6b] as a route that poses significant and unavoidable adverse impacts to transportation and circulation, even after mitigation. It appears that the mitigation measure for noise #1 would exacerbate another unmitigable project issue. 5

3. The first mitigation measure of the Report also recommends undertaking the noisiest activities during "times of least disturbance" to surrounding residents and occupants which are identified as from 9am-4pm [per page 3.C-30], a period prior to the maximum existing use of the adjacent land at City College, which is between 11am and 1pm. This coincides with the period when daycare centers and nursery schools are in session, Riordan HS holds classes and after school activities, and the majority of City College classes, including child development classes in the Multi-Use Building, are in session. The times of least disturbance needs to be redefined. There may be no time of least disturbance for the many diverse uses of the area, and if that is the case, that should be noted.

4. The draft SEIR fails to include the City College Multi-Use Building (MUB) as a sensitive receptor. MUB is approximately 150 feet from the construction site (per the scale of Figure 2-1, p 2-2) and is used for childcare classes where children attend classes on site. The short-term measurement location information in the SEIR for ST-3 (page 3.C-9) notes that "The Multi-Use Building is the nearest City College building to the project site; however, college campuses are generally not considered a noise-sensitive receptor." The MUB has been used for childcare classes for children on site for several 6

years and is expected to continue to be used for that purpose and therefore needs to be recognized as a noise-sensitive receptor site that qualifies as such for noise testing. 6 (cont.)

5. Additional noise studies need to be made to create a noise baseline at all noise monitoring sites. Long term (24-hr) sound assessments were made on the Western side of the project. Only short-term sound assessments were made on the East side at the City College MUB and Riordan High School, which is also a boarding school, and that testing was for a short period, less than half an hour before 9:30am. Not only will 24-hour noise monitoring enable an apples to apples comparison with the other 24-hour noise tests, 24-hour monitoring should be included to take into account the wide variation in sound levels as the City College lot fills, empties, and refills at different times of the day. 7

6. During Phase 0 of construction, there will be up to 200 one-way trips per day during peak activity, and the noisiest period will continue for two months (page 3.C-26). 22 truck trips are anticipated per hour. This is a truck trip every two to three minutes between the hours of 7am and 4pm. The noisiest period in Phase 1 would last four months. There is no school vacation that lasts for four months; so, even without including the seven-month noisiest period of Phase 2, during Phases 0 and 1, the level of truck hauling activity will occur during class hours and disturb classes as well as access to classes due to equipment VMT. 8

7. The project construction is “anticipated to occur in three main phases over the course of six years,” (page 2-3). If that is the case, then why does Table S-3 identify Alternative D: Six Year Construction Schedule” as an alternative rather than the plan? (pp s-44 to S-48.) 9

8. Four alternatives for number of units were proposed: 0, 800, 1100, and 1550. Why is the alternative for 800 units not included in assessments? The impacts and results of mitigation on the 800-unit proposal needs to be addressed. 10

9. In the Notes section at the bottom of Table 2-2 on p.2-38, “Phases 1 and 2 could occur simultaneously for a duration of two years following Phase 0.” But above, in the same table, Phase 1 and Phase 2 are each estimated to have a duration of 2.5 years. Please explain how the condensed schedule would take two years rather than 2.5 years for Phases 1 and 2. 11

10. We would appreciate a clear understanding of the noise impact of cutting the construction period from six to three (or four) years. Would the noisiest period of construction occur in the first two or three (or four) years whether the time period of the project is three (to four) or six years? 12

11. We understand the same equipment will be used whatever the time schedule. But will a compressed time schedule mean more equipment will need to be operated simultaneously, increasing the noise level at certain times? It is to be expected that construction compressed into two phases would increase the level of disruption along community streets due to more frequent construction truck hauling near multiple sensitive receptors, residences, and education institutions. 13

12. If the construction schedule is compressed, please address the likelihood of the need for additional hours of work per day or night required to meet the compressed timeframe. Will compressing the time frame into three years increase the risk of emergency requests for special permits for night work? 14

13. If the City grants special work permits for periods outside of the standard allowable 7am to 8pm construction hours, boarding school students at Riordan HS and residents living along Plymouth, Ocean, Lee and on the Northeast side of the development in Sunnyside and Westwood Park, will likely experience sleep disturbance. The SEIR leaves open the possibility for special night permitting. This will affect the health, well-being and productivity of all concerned, and negative night permitting impacts should not be acceptable in this residential area. 15

14. Construction-related vibration impacts were not addressed in the PEIR. Studies do not include an evaluation of the vibration impact of construction equipment although as noted on p. 3.C-32, equipment used for demolition, site preparation and excavation activities, including the hoe ram and vibratory roller/compactor, which will be used, could generate varying degrees of temporary groundborne vibration. 16

Per Table 3.C-6 on page 3.C-14, older buildings may be damaged at .1 PPV (in/sec) if they are fragile though old buildings or residential structures would normally be able to withstand a maximum of .25 to .3 PPV when subjected to continuous or frequent intermittent sources. The Vibratory Roller/Compactor, a piece of equipment that will be used, creates .21 PPV (in/sec) at 25 feet. Although it may not be likely, it is possible there are homes along Plymouth Avenue that are in close enough proximity and fragile enough to be damaged by vibration. Have the homes along Plymouth been evaluated for their distance and fragility for possible vibration impacts?

15. In general, although SF Planning doesn't include City College students in their learning environment as sensitive receptors in noise assessments, due to the type of activity and the duration and amount of noise exposure, they should be considered in this category. Per the World Health Organization, as stated in the SEIR document, a known health effect from noise is decreased performance on complex cognitive tasks (reading, attention, memorization and problem solving.) 17

16. As you note, because City College has been making changes to their master plan, checking in with them for their most current plans for development in the areas closest to the Balboa Reservoir is an ongoing process. A recent plan calls for constructing a Performing Arts Education Center building twice as tall as the one indicated in the DEIR on the City College-owned “upper reservoir.” Please take into account the cumulative impact to noise of new plans. 18

Non-Noise-related Comments:

17. Air Quality: 19

Please include the sensitive receptors identified above for noise in assessments of air quality as appropriate, although air travels farther than noise. The EIR construction modeling of air 20

quality in Appendix D assumes three years. Again, six years is the Developers Option and should be the default, not three years which is not recommended due to air quality and other impacts. 20 (cont.)

18. Use of Natural Gas:

Per the EIR, efforts will be made to move away from fossil fuels toward renewable energy sources in accordance with the 2017 Clean Air Plan. As of 2017, electricity supplied to San Franciscans was 82% emissions-free, with 64% of electricity generated from renewable sources that include wind, solar and existing large hydropower. (DOE's Focus 2030: A Pathway to Net Zero Emissions report of July 2019, p. 7.) “Should the city fail to meet its renewable electricity goal by 2030, and continues to use natural gas and other fossil fuels, San Francisco could see up to five times more cumulative emissions by 2050.” (Focus 2030 report, page 8.) 21

It is in the interest of San Francisco that all new buildings are powered by electricity and not natural gas. In the interest of meeting San Francisco's Net Zero Emissions plan, please identify only electrical infrastructure and appliances in all structures built on the Balboa Reservoir.

19. San Francisco ensures fire safety primarily through provisions of the building code and fire code. Do those codes take into account the lack of a water supply for emergencies for the western part of the City and any need for water storage? The City has been through many fire emergencies, and it would be irresponsible to take these issues lightly. Ignoring or postponing the issue of a water supply for emergencies is not going to help us during an emergency. The potential housing loss due to a fire could be much greater than the housing gain from any one development. Is there a need for water storage for fire emergencies, and if so, there needs to be an evaluation of possible sites while they still exist, including at the Balboa Reservoir. 22

20. Wind Impacts:

The creation of wind tunnels is a risk of constructing buildings up to or over 80 feet. But the DEIR indicates there is no significant impact from wind. To anyone who lives, studies or works in the area, the power of the wind coming off the ocean is already well known. To mitigate the risk of tunneling already strong winds into educational and residential communities, no new building should exceed 79-80 feet. The developers' option does not exceed 80 feet, but the additional housing option is likely to create wind tunnels. If San Francisco wants to sweep the many young children who congregate in the area off their feet, the additional housing option will do it. 23

**I-Hong**

| | |
|---|---|
| **From:** | Dennis Hong |
| **To:** | Poling, Jeanie (CPC); CPC-Commissions Secretary |
| **Cc:** | Rahaim, John (CPC); Gibson, Lisa (CPC); Board of Supervisors, (BOS) |
| **Subject:** | 9/12/2019 PC Meeting - Balboa Reservoir |
| **Date:** | Wednesday, September 11, 2019 4:13:27 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Poling, as promised, here are a view of my comments to this project; Please use this as my continued support for this project. I live in District 7, just on the boarder of this Project. I'm a long time resident of the city, seventy plus years. Born and raised here in SF. I attended CCSF in the early 60's. Used public transit most of the time. 1

Hello Planning Commissioners, I'm sorry I will be unable to attend your Thursday meeting to address this item on your agenda. Here are my preliminary thoughts with the project for this case: 2018-007883ENV, BALBOA RESERVOIR PROJECT – (Assessor's Block 3180, Lot 190).

1. We desperately need housing. The city can not afford to do this work. The sponsors and the community have worked hard on this project. This project fits the bill as it address' our housing issues. 2

2. We need to address the parking for the college. 3

3. I'm concerned with the traffic exiting this site on to Ocean Ave. and how it may impact this retail section. 4

4. During the construction period, this massive project will need a lot of daily communication from the sponsor to the community . All to often this process fails. 5

5. I would like your comments good or bad so that the sponsor and the community can continue to work together to get this project moving with out further delays. In my opinion by working together and solving these issues before the DEIR is certified only makes sense so there aren't any road blocks before it is certified. As I see it, these road blocks all too often hold up the progress and some times we loose the project completely. 6

6. I'm not too sure how the current SB's and other bills will impact this wonderful project.

7. I like the open space. Since this project focus on family, I would like to see a few four bedroom units. 7

8. Finally, we must move quickly before we loos another project like this. I will be submitting additional comments for the RTC. 8

If any one has any questions to my rambling email, please feel free to reach back to me.

Sincerely, Dennis

**I-Hong**

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2. We need to address the parking for the college.

3. I'm concerned with the traffic exiting this site on to Ocean Ave. and how it may impact this retail section.

4. During the construction period, this massive project will need a lot of daily communication from the sponsor to the community . All to often this process fails.

5. I would like your comments for this project so that the sponsor and the community can continue to work together to get this project moving with out further delays. By working with these groups it only makes sense so there aren't any road blocks. As I see it, these road blocks all too often hold up the progress and some times we loose the project completely.

6. I'm not too sure how the current SB's and other bills will impact this wonderful project.

7. I like the open space. Since this project has a focus on family, I would like to see a few four bedroom units.

I will be submitting further Responses and comments for the RTC next week or so.

Finally, I too would like your support.

**From:** michell houwer
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Subject:** Opposition to Balboa Reservoir Development
**Date:** Thursday, September 12, 2019 10:08:12 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am writing in opposition to this proposal. I live in the neighborhood and feel that this project especially with the amount of proposed units that you wish to develop would produce a negative impact on both the college and the surrounding community. First of all, anyone who lives in the area understands what a nightmare traffic is already in the morning, afternoon and after work. The busses area already overcrowded with students and commuters. Parking is already virtually impossible with the two existing parking lots for the college. If you were to take away the reservoir parking option this would further strain and impact students, the outlying community and other institutions in the area. Further, the proposed developer that you have selected is already charging a premium for the other apartments that are on ocean which is unaffordable and means that you have double or triple the amount of tenants living in these units just to be able to afford the ridiculous rents. There are other vacant lots such as the old Geneva Drive In where you could place these units. It is not necessary to place a huge amount of units in a small place which critically impacts both the students of CCSF and the outlaying community. CCSF has a huge student population and this land should be provided for further development of the college which will provide a better education for our own local residents and not be concerned about techies from other regions. Often times these techies get their housing subsidized by their companies. When are the supervisors going to consider the fact that we need to be more concerned about our local tax payers than these techies from other areas. No doubt techies will uber or lyft to where they need to go; therefore, you will see an influx of additional traffic in our area. We do not need an additional transient population to contend with in our area. If the rents are similar to the sister properties this proposal is a joke and further how long is this developer required to support a portion of lower income housing? It is bad enough that the supervisors are putting a homeless triage center to be replaced by units at Balboa Park Bart. Please add this to the record in opposition of this proposal.

1
2
3
4
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6
7

Thank you,
Michell Houwer

**From:** aj
**To:** Poling, Jeanie (CPC)
**Cc:** Alex Randolph; Tom Temprano; Brigitte Davila; Ivy Lee; J. Rizzo; Thea Selby; Shanell Williams; studenttrustee@mail.ccsf.edu; Rueben Smith; Marian Lam; L. Battiste; Geisce Ly; Cherisa Yarkin; Wendy Miller; Jeffrey Kelly; Athena Steff; aciscel@ccsf.edu; tryan@ccsf.edu; Maria Salazar-Colon; Steven Brown; Wynd Kaufmyn; Madeline Mueller; Muriel Parenteau; Lenny Carlson; Alan D"Souza; Suzanne Pugh; Brenna Stroud; Mark Rocha
**Subject:** Impact on CCSF
**Date:** Thursday, August 08, 2019 9:38:24 AM

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Comment on Reservoir Draft EIR:

The Draft EIR concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." 1

It says: "Furthermore, it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..."

Yet to justify the "less than significant" determination, the Draft EIR itself relies on the speculation that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, Others to rearrange their shcedule to travel at other times of day..."

The draft EIR avoids assessing the possibility that students might stop attending CCSF.

And, as predicted, TDM/Sustainability Program is trotted out as justification: "The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict."

The following had been submitted during the Scoping period before the City College Fehr& Peers TDM Plan came out. My October 2018 submission refers to the Nelson/Nygaard Balboa Area TDM, but the comment still pertains.

The DEIR's assumption of the success of TDM to obviate student parking is **purely speculative**.

## DEFICIENT MITIGATIONS FOR ADVERSE IMPACTS ON PUBLIC SERVICES OF SCHOOLS, TRANSIT

1. SCHOOLS, ESPECIALLY CITY COLLEGE

There are many schools in the surrounding area: City College, Riordan, Sunnside, Aptos, Lick Wilmerding, Denman, Balboa.

City College is a commuter school. City College students, faculty, and staff commute to school. According to a CCSF Ocean Campus Survey conducted in May 2016, these City College stakeholders—in addition to those using public transit (42%) and

walking/biking (9.4%), 45.7% commuted by car.

The mission of any school is to provide education. But if access to an institution is made difficult, the goal of providing education will be curtailed due to impaired physical access.

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College.

The interests of students, faculty, and staff will inevitably be harmed by the Reservoir Project. Unless willfully blind, the 1100-1550 unit Reservoir Project will obviously create significant adverse impact on the public service provided by the area's schools, especially City College.

1 (cont.)

Transportation Demand Management As Mitigation

From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.

2

Consequently, the City Team ponied out a Balboa Area Area TDM Framework in response to community concern. The City Team misled the public by giving the impression that it would be an objective study of parking and circulation issues. But in reality the result was a foregone conclusion. The SFCTA contract specified the parameters of this study: *"The Planning Department and SFMTA are proposing a Transportation Demand Management (TDM) study in coordination with CCSF Ocean Campus to reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents."*

In other words, the burden of dealing with the adverse impacts on City College and the neighborhoods of 2,200 to 3,100 new adult Balboa Reservoir residents would be shifted onto the victims.

The Nelson-Nygaard TDM Framework will undoubtedly be brought forth as support for TDM as appropriate mitigation.

The Nelson-Nygaard TDM Framework fails to rise to the standard of providing substantial evidence that TDM would be able to resolve the effects of lost student parking on student enrollment.

The Nelson-Nygaard TDM Framework, lacking substantial evidence of its efficacy, falls back on speculation and wishful thinking. Its dubious evidence in support of the efficacy of a TDM solution for City College are a couple case studies: University of Louisville's Earn-a-Bike Program and Santa Monica College's Corsair Commute Program which provide financial incentives for using sustainable transportation.

3

NO EVIDENCE IS PROVIDED THAT A SIMILAR FINANCIAL INCENTIVE PROGRAM WOULD SUCCEED IN MAINTAINING ENROLLMENT AT CITY COLLEGE. 4

Please refer to the attached critique of the Nelson-Nygaard TDM Framework entitled “Balboa Reservoir’s TDM Non Sequitur” (attached) and enter it into the Administrative Record, as well.

Impact on Public Service of City College and Other Schools
From my 10/11/2018 submission “Comment on Balboa Reservoir NOP re: "Summary of Potential Environmental Issues"**:**
*Although 21099 exempts parking adequacy as a CEQA impact "**for the** (Reservoir Project itself) **project**", 21099 does not exempt the secondary parking impact on CCSF's public educational service to students from assessment and consideration.*

*Student parking, **being the existing condition and setting**, cannot be be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.*

*The proposed Reservoir development has forced City College to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This is the secondary [physical--aj] impact that must be addressed in the Subsequent EIR.*

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Subject:** Comment on 3.A.1 Initial Study, 3.A.2 Overall Approach, 3.B.3 Summary of Balboa Park Station Area Plan PEIR Transportation Section
**Date:** Tuesday, August 13, 2019 3:58:33 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Jeanie,

Here's comment on 3.A.1, 3.A.2, 3.B.3:

# 3.A.1 Scope of Analysis

## Initial Study

1

*In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no In some cases, the initial study identified mitigation measures in these topic areas that would reduce potentially significant impacts to a less-than-significant level to support the determination that under these resource areas, the proposed project would have no new significant impacts or no substantially more severe significant impacts than those previously identified in the PEIR. Therefore, the topics addressed in the initial study are listed below and are not analyzed in this SEIR chapter.*

Under Public Services, the PEIR did not analyze the impacts of a Reservoir Project on City College.

2

By way of the Initial Study, the SEIR offhandedly dismisses impacts on City College. The Initial Study fails entirely to address impact on student attendance and enrollment and on gig-working part-time Instructors who have to travel between multiple community college sites.

3

The Initial Study cites City College's TDM/Sustainability Plan's goal to reduce car travel as justification for the "less-than-significant" conclusion of impact on City College. The Initial Study states:

*The City College sustainability plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict.*

- Removal of parking would not conflict with CCSF sustainability plan.....**but it would conflict with access to education.**

*Thus, the proposed project would not – in order to maintain acceptable service ratios, response times, or other performance objectives – be expected to increase demand for public services to the*

*extent that would require new or physically altered public facilities, the construction of which could result in significant environmental impacts, and the proposed project would not result in new or substantially more-severe impacts than those identified in the PEIR.*

- This is an non sequitur. Just because CCSF TDM doesn't conflict with loss of existing parking, does not mean that TDM measures will be able to solve the problem of student access to education. The success of TDM is speculative. Finally, reference to the PEIR is mystifying because CCSF was not assessed in the BPS Final EIR's Public Services section to begin with.

3 (cont.)

The SEIR/Initial Study implicitly considers TDM to be the overriding goal of City College instead of recognizing that the main purpose of CCSF is education, with TDM being a secondary consideration.

**The SEIR's speculative possibility of success of TDM to alleviate loss of student parking in the Initial Study is an inadequate justification to come to a conclusion of less-than-significant impact on CCSF.**

**Instead of being relegated to the Initial Study, impact on City College's educational mission and on access to education must be comprehensively and objectively examined. The SEIR and Initial Study are inadequate.**

## 3.A.2 Overall Approach to Impact Analysis

4

*As a subsequent EIR to the PEIR certified in 2008, this SEIR, including the initial study, identifies and considers all mitigation measures that were identified in the PEIR and determines their*

*applicability to the currently proposed project.*

Considering mitigation measures contained in the PEIR is insufficient. The Initial Study and DEIR has failed to identify and consider the PEIR rejection of the Lee Extension that had been proposed by CCSF.

**The fact that the PEIR had rejected the Lee Extension has direct relevance and "applicability to the currently proposed project."**

Here's what the PEIR says about the Lee Extension (westbound Ocean onto northbound Lee into Reservoir):

*Access Option #1: Under this option, CCSF would be allowed westbound right-turn-only ingress*

*on Lee Avenue.*

*It should also be noted that Option #1, the provision of westbound right-turn-only ingress to CCSF, would be expected to result in secondary design and*

4 (cont.)

*operational issues at the Ocean/Lee intersection. With access provided into CCSF from Lee Avenue, it would not be possible to fully restrict access from other directions, such as the eastbound left-turn movement or the northbound through movement. As a result, vehicles would be unable to directly access the Phelan Loop or the Balboa Reservoir development sites from the west. Instead, these vehicles (approximately 44 vehicles during the weekday PM peak hour) would be required to divert into the residential neighborhood south of Ocean Avenue to be able access Lee Avenue from the south or the west. In addition, approximately 75 vehicles destined to CCSF during the weekday PM peak hour are anticipated to come from the west. With the restriction of the eastbound left-turn movement, it is likely that a portion of these vehicles would also divert into the residential neighborhood south of Ocean Avenue instead of using the Phelan Avenue access. The prohibition of the eastbound left turn movement would affect the access and circulation patterns of residents and visitors of the Phelan Loop and Balboa Reservoir development sites. In addition, the rerouted traffic from these two projects and CCSF would noticeably increase traffic volumes on the adjacent neighborhood streets, potentially affecting access into individual residences and resulting in other secondary impacts.*

*To discourage these vehicles from using neighborhood streets as a means to enter Lee Avenue, the northbound and southbound approaches to the Ocean/Lee intersection would need to be reconfigured to provide left-turn and right-turn movements only, precluding northbound through movements altogether. This would require the installation of a physical barrier (such as a channelizing island) at both approaches. Conversely, it may be possible to turn the south leg of the Ocean/Lee intersection into a right-in/right-out configuration. By prohibiting these through movements on Lee Avenue, it would no longer be advantageous for CCSF-destined vehicles to cut through the neighborhood south of Ocean Avenue. However, such a restriction in access would negatively affect access and circulation for the adjacent residences and would further complicate access routes for the Phelan Loop Site and Balboa Reservoir development traffic from the west by requiring these vehicles to cut further into the neighborhood south of Ocean Avenue to make a northbound left turn from Harold Avenue, and enter the westbound right-turn queue at Lee Avenue.*

*Therefore, as a result of the excessive queuing that would affect operations at the Ocean/Phelan/Geneva intersection and the secondary effects that the provision of westbound right-turn-only ingress would cause, the provision of CCSF westbound right-turn ingress at the Ocean/Lee intersection would result in substantial adverse transportation impacts. Restricting CCSF ingress would allow normal access to Area Plan projects and would avoid potential spillover effects on neighborhoods south of Ocean Avenue. As a consequence, Access*

*Option #1 is rejected from further consideration as part of the Area Plan.*

4 (cont.)

# 3.B.3 Summary of Balboa Park Station Area Plan PEIR

# Transportation Section

## Balboa Park Station Area Plan PEIR Impacts and Mitigation Measures

### *Program-Level Impacts*

#### Transit

*Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

The BPS Area Plan PEIR contains a comprehensive analysis of the Lee Extension. The Lee Extension analysis is directly applicable to the Balboa Reservoir Project.

Crucially, all Lee Extension options were eliminated from the BPS Area Plan.

Although the Lee Extension is referenced in the “Traffic“ Section, the “Transit” Section only mentions Ocean/Geneva/Kahlo and the two Geneva/I-280 on/ off ramps.

It is only with willful disregard for objectivity that the BPS Final EIR’s rejection of a Lee Extension has not been incorporated into the Reservoir SEIR and Initial Study as it relates to transit delay.

The Kittelson Memorandum pales in comparison to the analysis that had been contained in the BPS PEIR.

**The Lee Extension analysis contained in the PEIR cannot be legitimately omitted from Transit Delay analysis. Thus the SEIR/Initial Study is defective and inadequate.**

Submitted by:

Alvin Ja

**From:** aj
**To:** CPC.BalboaReservoir; Poling, Jeanie (CPC)
**Subject:** Comment on 3.B.4 Existing Conditions (Transportation)
**Date:** Monday, August 26, 2019 8:51:53 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Jeanie,

My comment on 3.B.4:

3.B.4 Existing Conditions [Transportation & Circulation]

1

> *The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land Use Planning, p. B-12.*

This description of the existing condition is less than adequate. This description avoids and evades the existing condition of the project site being a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service.

Although 2.D.2, Project Site notes the site's use by CCSF stakeholders, it fails to acknowledge the reality that the current use of the Reservoir serves a public benefit in providing physical access to education.

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

From the Association of Environmental Professional's (AEP) CEQA Portal:

> *What Are Baseline and Environmental Setting?*
> *Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting.*
>
> *Why Is Baseline Important?*
> *Establishing an appropriate baseline is essential, because an inappropriately defined baseline can cause the impacts of the project either to be under-reported or over-reported. A considerable number of CEQA documents have been litigated over the choice of a baseline for a given project, and many CEQA documents have been invalidated for the use of an inappropriate baseline (see Important Cases below).*

**The draft SEIR is inadequate because it fails to recognize the baseline condition of the Reservoir's current use by City College to serve a public benefit for its students.**

1 (cont.)

**********

Parking Conditions

*The proposed project meets all of the criteria, and thus the transportation impact analysis does not consider the adequacy of parking in determining the significance of project impacts under CEQA. Parking is not discussed further in this SEIR.*

My 10/11/2018 scoping comment stated:

*Although 21099 exempts parking adequacy as a CEQA impact "**for the** (Reservoir Project itself) **project**", 21099 does not exempt the secondary parking impact on CCSF's public educational service to students from assessment and consideration.*

*Student parking, **being the existing condition and setting**, cannot be be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college.*

*The proposed Reservoir development has forced City Colllege to include in its Facilities Master Plan 2-3 new parking structures to make up for the loss of existing parking in the PUC Reservoir. This is the secondary impact that must be addressed in the Subsequent EIR.*

**The draft SEIR is inadequate and defective in failing to treat parking in the main body of the SEIR. Although the Initial Study does discuss the subject, the Initial Study's assessment is similarly inadequate and defective.**

2

Submitted by:
Alvin Ja

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Subject:** comment on 3.B.5 Regulatory Framework
**Date:** Monday, August 26, 2019 9:50:17 PM
**Attachments:** LANDuseFramework.pdf

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Hi Jeanie,

My comment on 3.B.5:

3.B.5 Regulatory Framework

1

> *This section provides a summary of the plans and policies of the City and County of San Francisco,*
> *and regional, state, and federal agencies that have policy and regulatory control over the project site. No federal regulations, plans, or policies are relevant to the project.*

3.B.5 critically omits the Land Use Framework that was adopted by the Public Utilities Commission in 2012, attached (PUC Resolution 12-0044).

**Balboa Reservoir in context of PUC's Land Use Framework**
The lease and sale of PUC property is governed by the PUC document, "FRAMEWORK FOR LAND MANAGEMENT AND USE."

The document lays down conditions for sale of PUC land to include economic, environmental, and community criteria.

The Balboa Reservoir Project has been promoted as part of the Public Land for Housing Program whose purpose is to build affordable housing.

Public Land for Housing in the context of Balboa Reservoir, will fail its overarching goal of affordability. Instead, Balboa Reservoir will achieve 67% unaffordable housing, in exchange for 33% affordable housing.

The PUC Land Use document states:

> *COMMUNITY CRITERIA: Land may be sold or transferred when:*
>
> *1. The sale or transfer is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.*
>
> *2. The sale or transfer would not significantly adversely affect the implementation of an adopted resource agency plan for the*

*area.*

*3. The sale would not increase the risk of loss, injury or death to SFPUC employees or others on or near the parcel.*

*4. Use of the land sold will not to result in activities creating a nuisance.*

1 (cont.)

The Balboa Reservoir Project fails Condition 4 of "Community Criteria."

The current plan removes existing parking for City College students. It deliberately limits parking within the Reservoir to 0.5 parking spaces per residential unit in the unrealistic expectation that this will discourage car ownership by new Reservoir residents.

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance that would inhibit student enrollment and attendance at City College [The word "nuisance" understates the problem].

The Balboa Reservoir Project fails to comply with PUC's "Framework for Land Management and Use."

The sale of Balboa Reservoir to private developers would provide a short–term cash infusion to PUC Water Enterprise. However the short-term gain of quick cash doesn't justify losing this valuable piece of public land in perpetuity to private developers in the guise of "affordable housing."

**The draft SEIR is deficient in its omission of the PUC Land Use Framework within the Regulatory Framework.**

--Alvin Ja

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

**FRAMEWORK FOR LAND MANAGEMENT AND USE**

By adoption of this Framework for Land Management and Use, the Commission is seeking to advance the analytical and decision-making process surrounding the administration of real estate assets under the San Francisco Public Utilities Commission's (SFPUC) exclusive jurisdiction. Properties under the jurisdiction of the Commission shall first and foremost serve the mission of the SFPUC to provide our customers with high quality, efficient and reliable water, power, and sewer services in a manner that is inclusive of environmental and community interests, and that sustains the resources entrusted to our care.

In connection with the operation of its water, wastewater and power systems, the SFPUC has jurisdiction over a wide range of property types both inside and outside the City and County of San Francisco. In total, the SFPUC has jurisdiction over:

- 210 miles of water pipelines rights-of-way, owned in fee title or by easement
- 280 miles of electrical transmission lines
- 900 miles of sewer lines and 1200 miles of water distribution lines
- Facilities including impounding and distribution reservoirs, dams, powerhouses, treatment plants, maintenance yards and warehouses, pump stations, tanks, electric substations, administration buildings, and various properties acquired for, or formerly used for these purposes.
- Tuolumne River and Bay Area Watersheds
    - In the Tuolumne River Watershed, the SFPUC owns some land in fee but operates water and power facilities primarily under right of way easements granted by the United States under the Raker Act of 1913. Primary responsibility for managing these lands lies with the National Park Service and the United States Forest Service, as described in agreements with the SFPUC (below). The SFPUC coordinates with and assists the National Park Service in its management of the 459-square-mile Tuolumne River watershed and the 79-square-mile Eleanor Creek watershed located in Yosemite National Park; and similarly coordinates with and assists the Stanislaus National Forest in its management of the 114-square-mile Cherry Creek watershed located within the National Forest boundaries.
    - In the Bay Area (Alameda and Peninsula Watersheds), the SFPUC manages approximately 60,000 acres of land acquired by the City and County of San Francisco (CCSF) primarily from the Spring Valley Water Company in 1930. The SFPUC manages

Edwin M. Lee
Mayor

Anson Moran
President

Art Torres
Vice President

Ann Moller Caen
Commissioner

Francesca Vietor
Commissioner

Vince Courtney
Commissioner

Harlan L. Kelly, Jr.
General Manager

these watershed lands pursuant to adopted Watershed Management Plans that incorporate policies for the purpose of protecting these watershed lands that surround the local water supply, to ensure a reliable and high quality drinking water for the Bay Area customers, and also address public use, secondary use, and acquisition and disposition of lands.

- Lake Merced Tract
    - Lake Merced is located in the southwest corner of San Francisco near Skyline and Lake Merced Boulevards. It consists of four inter-connected freshwater lakes: North Lake, South Lake, East Lake and Impound Lake that are fed by rain water and seepage from historic springs and creeks. Lake Merced is an emergency source of water for the City of San Francisco to be used for fire fighting or sanitation purposes if no other sources of water are available. The San Francisco Recreation and Park Department manages the recreational areas of the Lake under a 1950 agreement with the SFPUC. The SFPUC manages the water aspects of the Lake.

***Existing Policies Related to Land Management***

The SFPUC has managed most of these lands for decades, and the Commission has established a broad range of policy guidance specifically for their use and administration, including:

A. **Water Enterprise Environmental Stewardship Policy** adopted by the Commission in June 2006 to acknowledge responsibility for the protection of natural resources that affect or are affected by operation of the SFPUC water system. The Watershed and Environmental Improvement Program (WEIP) is an important Stewardship Policy implementation strategy – the WEIP will provide $50 million over 10 years to protect and restore natural resources within SFPUC watershed lands, including the acquisition of easements and/or title to additional watershed lands for protection of source quality water.

B. **Hetch Hetchy Watershed Protection 5-Year Agreement** with the National Park Service, initially adopted by the Commission in June 2005 and again as revised in August 2010, to meet federal and state criteria for source water protection instead of providing filtration. The Agreement sets priorities and schedules for water quality protection, environmental stewardship, and security activities in the Tuolumne River Watershed within Yosemite National Park by the Park Service using funding provided by Hetch Hetchy Water and Power.

C. **Wild and Scenic River Management Plans**. The National Park Service is preparing a wild and scenic management plan for the Tuolumne River within the National Park, and is scheduled to release a draft plan for public comment in 2012. The US Forest Service completed their plan for the reach of the Tuolumne River in the Stanislaus National Forest in 1988.

D. **Alameda Watershed Management Plan**. This comprehensive Plan thoroughly examines all aspects of land management in the Alameda Watershed, and was adopted by the Commission in 2000. The primary goal of the Plan is the protection and enhancement of source water quality. The purpose of the Plan is to provide a policy framework for the SFPUC to make consistent decisions about the activities, practices, and procedures that are appropriate on Alameda Watershed lands. The Plan divides the watershed between the primary watershed (areas tributary to the SFPUC's drinking water sources) and the secondary watershed (areas downstream of drinking water intakes, primarily the Sunol Valley). The Sunol Valley Resource Management Element of the Plan guides the SFPUC's quarry leasing activities in Sunol Valley. Finally, the SFPUC is developing a 50-year habitat conservation plan to protect certain sensitive species in the SFPUC's Alameda Watershed lands while allowing operation, maintenance, repair and replacement of water supply facilities.

E. **Peninsula Watershed Management Plan**. This comprehensive Plan thoroughly examines all aspects of land management in the Peninsula Watershed, and was adopted by the Commission in 2001. The primary goal of the Plan is the protection and enhancement of source water quality. The purpose of the Plan is to provide a policy framework for the SFPUC to make consistent decisions about the activities, practices, and procedures that are appropriate on Peninsula Watershed lands. The Peninsula Watershed is also covered in large part by two scenic easements administered by the United States Department of the Interior through the Golden Gate National Recreation Area. The scenic easements prohibit certain activities in the watershed and generally seek to preserve open space values.

F. **Right-of-Way Encroachment Policy**. In 1999 the SFPUC adopted a Right of Way Encroachment Policy intended to safeguard the water, power and sewer utilities and other related appurtenances on right of ways through lands controlled by the SFPUC or the City. The Right of Way Encroachment Policy provides guidance for the types of secondary uses and legal arrangements that should be authorized in these situations. The Commission amended the policy in 2007 to further address situations raised by the construction of projects under the Water System Improvement Program regarding permitted uses, or encroachment on the Rights of Way, by adjacent property owners.

G. **Vegetation Management Policy**. This Policy was adopted by the Commission in 1999 to establish guidance for secondary uses of the Right of Way with respect to permissible vegetation incorporated in third party landscaping and gardening uses. For example, the Policy generally prohibits the planting of trees on the right of way to protect the pipelines. The Commission also adopted site specific mitigation measures when it approved the various WSIP pipeline improvement programs (e.g. Bay Division, San Joaquin Pipeline) that specify the types

of permissible vegetation for use in post construction restoration of the right of way.

H. **Real Estate Services Guidelines**. Currently there are approximately 100 properties under lease and another approximately 300 properties where permits are issued. Leases and permits for certain uses on SFPUC lands are managed by SFPUC Real Estate using the Real Estate Services Guidelines. These Guidelines, and the Commission approved forms of specific lease or permit agreements, reflect policies for the protection of land and facilities, as well as the SFPUC's financial interests.

I. **Environmental Mitigation and Monitoring Plans.** The Commission, in approving the Water System Improvement Program, projects within the WSIP, and other construction projects by all SFPUC enterprises, also has adopted environmental mitigation and monitoring plans or approved project related regulatory permit conditions that may include provisions for the protection of habitat, cultural resources, and water quality related to that specific project or property under construction.

J. **MOU/MOAs.** The Commission has authorized Memorandum of Understanding or Agreement (MOU/MOA) with other governmental agencies, or city departments, concerning certain properties that incorporate policies for the use and management of those SFPUC lands. For example, there is an MOU between SFPUC and the Recreation and Park Department for the use and management of the Reis Tract, a pipeline right of way in Visitacion Valley, relating to surface improvements for community use. Another MOU with San Mateo County addresses use and access to the Sawyer Camp Trail System. An MOU between SFPUC and the Recreation and Park Department for the Lake Merced Watershed is under development and review by the Commission as a replacement for the 1950 resolutions of the two departments that generally assign responsibility for managing surface recreational uses to the Recreation and Park Department.

K. **Policies of General Applicability**. Many other Commission policies of general applicability also guide the administration and use of SFPUC lands – including Community Benefit, Environmental Justice, Sustainability, and Storm Water Management Plan.

The Board of Supervisors has also established policies applicable to the management of all City owned properties, including the Recreation and Open Space Element of the San Francisco General Plan, Green Building Ordinance, Pesticide Ordinance, Graffiti Removal, among others. In addition, the Charter and San Francisco Administrative Code contain policies and procedures governing land acquisition, disposition, leases and permits.

***Focus on Land Management Guidance for Secondary Uses, Acquisitions and Disposition of SFPUC Lands***

As detailed above, the Commission has established a number of land management policies, and the nothing in this Framework is intended to amend or revise those policies currently in place. The focus of this document is on SFPUC land management in three key areas for lands not otherwise subject to specific policy guidance (e.g. Alameda and Peninsula Watershed Management Plans): I) Leases or Permits for Secondary Uses on SFPUC Land, II) Disposition of SFPUC owned Lands; and III) Acquisition of Land by the SFPUC.

**I. Leases or Permits for Secondary Uses on SFPUC Land**

The primary use of SFPUC land is for the delivery, operation, maintenance and protection of its water, power, and sewer systems. Secondary uses of lands devoted to these purposes may be permitted if those uses do not in any way interfere with, endanger or damage existing or future operations or the security of those systems, and there is a benefit to the SFPUC in permitting that use.

Due to the diverse nature of the SFPUC properties, each property must be evaluated individually to determine the appropriateness for secondary uses. To determine if a secondary use is allowed, the SFPUC staff will evaluate the use in light of the following additional economic, environmental, and community considerations.

ECONOMIC: Leases or permits for secondary uses may be allowed when:

1. There is no other primary SFPUC use for which the land is required at the time, and the use is compatible with the existing or anticipated future SFPUC use of the land.

2. Fair market rent or fees are received, except as provided in the SFPUC Real Estate Services Guidelines ("RES Guidelines"), and such use is at least revenue neutral.

3. The terms of the lease or permit are consistent with the SFPUC RES Guidelines, including provisions related to the forms of agreements approved by the Commission.

4. The use is subject to conditions that preclude improvements that would adversely affect the SFPUC's ongoing use of the land.

5. The use does not displace secondary uses that are more consistent with the SFPUC's mission and policies.

6. The use requires no ongoing maintenance by the SFPUC, unless specifically described and agreed to in the lease or permit.

7. The use creates no new legal liability for the SFPUC.

8. The use does not rely on use of any other SFPUC land to function.

9. Following the secondary use, the SFPUC may use the parcel for other SFPUC uses or purposes, without remediation, in a timely manner.

ENVIRONMENTAL: Secondary uses may be allowed when:

1. The use is consistent with existing SFPUC policies.

2. The use is subject to appropriate environmental review so that the environmental effects of the use, if any, can be considered and mitigated to the extent feasible.

3. The use does not pose unacceptable health or safety risks for SFPUC employees or others on or near the land.

COMMUNITY: Secondary uses may be allowed when:

1. The use is consistent with the SFPUC's Environmental Justice and Community Benefit policies and objectives.

2. The applicant is required to obtain all required permits and authorizations from the local jurisdiction.

3. If the proposed use involves a change of use from the existing condition, the applicant is first required to obtain SFPUC authorization to seek any necessary approvals of the local jurisdiction, and approval of the permit or lease is subject to SFPUC first considering the adjacent community's or local jurisdiction's concerns.

4. The use does not hamper emergency access to any surrounding SFPUC parcels.

## II. Disposition of SFPUC Lands

In certain instances, land owned by the SFPUC may no longer serve a primary utility purpose, nor an anticipated future purpose, for use by any of the utilities under the SFPUC jurisdiction (water, sewer, power). Parcels that may be subject to a determination by the Commission that the property in question is surplus to the needs of any utility may be sold or transferred to another city department. The sale or transfer of surplus property must achieve fair market value compensation for the benefit of ratepayers, and is subject to bond covenant provisions protecting the bondholders' security for SFPUC indebtedness. Sales of property and interdepartmental jurisdictional transfers are also subject to Board of Supervisors approval, and that of the receiving department, consistent with the City Charter and ordinances.

The SFPUC's ratepayers bear the costs of significant seismic and operational upgrades to the SFPUC's utility systems. Revenues realized from the sale of surplus assets reduce the need to recover a comparable amount of funding from ratepayers through utility rates. Accordingly, the sale or transfer of a particular parcel under the jurisdiction of the SFPUC should be preferred over retention in instances where (i) such parcel is not currently being used for a primary utility purpose, (ii) staff has determined that there is not a reasonably foreseeable utility purpose for which the parcel would be uniquely suited by any of the utility enterprises under SFPUC jurisdiction, (iii) the sale or transfer of such parcel would achieve a financial return consistent with SFPUC's fiduciary duties to ratepayers and bondholders, and (iv) sale or transfer of such parcel would not result in the permanent loss of a significant asset to the cultural history of the City and County of San Francisco and the SFPUC. Additionally, the following economic, environmental, and community criteria should be considered:

ECONOMIC CRITERIA: Land may be sold or transferred when:

1. The sale or transfer does not jeopardize the future use or potential sale of functionally related and/or adjoining SFPUC land.

2. The sale or transfer will result in savings of operational costs expended to manage the property.

3. The sale or transfer does not result in a change of use of the property that would increase SFPUC exposure to liability related to conditions in the soil or structures that are not warranted by the return to SFPUC from the sale or transfer.

ENVIRONMENTAL CRITERIA: Land may be sold or transferred when:

1. The sale or transfer is subject to appropriate environmental review, so that the SFPUC can consider the environmental effects, if any, and determine whether the sale or transfer is consistent with existing SFPUC policies.

COMMUNITY CRITERIA: Land may be sold or transferred when:

1. The sale or transfer is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.

2. The sale or transfer would not significantly adversely affect the implementation of an adopted resource agency plan for the area.

3. The sale would not increase the risk of loss, injury or death to SFPUC employees or others on or near the parcel.

4. Use of the land sold will not to result in activities creating a nuisance.

**III. Property Acquisitions**

From time to time the Commission actively seeks out or is presented with opportunities to acquire or exchange additional land, or an easement, that would be beneficial to the SFPUC's utility operations or objectives. In such instances staff shall perform an evaluation of the utility need or objectives that would be addressed by such proposed acquisition, including whether there are other feasible alternatives that would also achieve comparable objectives while mitigating the costs or liabilities associated with the property acquisition opportunity. Staff shall present the result of such evaluation to the Commission in connection with its consideration of the acquisition. The acquisition of property is also subject to approval by the Board of Supervisors, following a determination by the Planning Commission as to the consistency of such acquisition with the San Francisco General Plan. The following additional economic, environmental, and community criteria should be considered when making the decision to acquire property.

ECONOMIC CRITERIA: Land, or easements, may be acquired or exchanged when:

1. Acquisition of the land or easement provides additional resources to further the SFPUC objectives.

2. The price does not exceed fair market value.

3. Acquisition of the land or easement would mitigate against future SFPUC costs, for instance, where SFPUC utilities are located on property owned by third parties and thus subject to displacement.

4. Current uses of the land are not compatible with adjoining SFPUC land usage, in a manner that interferes with SFPUC utility objectives.

5. A proposed exchange of surplus property for lands to be acquired can reduce the need for an appropriation of funding derived from ratepayers for the acquisition.

ENVIRONMENTAL CRITERIA: Land may be acquired when:

1. The acquisition is subject to appropriate environmental review, so that the SFPUC can consider the environmental effects, if any, and determine whether the acquisition of the land or easement furthers the SFPUC's existing policies (e.g., Water

Enterprise Environmental Stewardship Policy, Alameda and Peninsula Watershed Management Plans).

2. There is no unwarranted site remediation the SFPUC would be required to undertake.

3. The acquisition and use can be found to be consistent with any adopted resource agency plan for the area.

4. The acquisition enables the SFPUC to secure one or more resource agency permits for the construction or operation of utility facilities.

COMMUNITY CRITERIA: Land may be acquired when:

1. The acquisition is evaluated under SFPUC Community Benefit and Environmental Justice policies and objectives.

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Subject:** Inadequacy of Initial Study/PEIR
**Date:** Friday, August 30, 2019 11:32:03 AM
**Attachments:** 2017-10-5 ROAD TO RESERVOIR PROJECT--THE BALBOA PARK STATION AREA PLAN IN RELATION TO THE RESERVOIR 2017 update.pdf

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Comment on Initial Study:

The Initial Study discounts almost all environmental factors as needing assessment except for Transportation, Air Quality, and Noise. 1

The Initial Study erroneously carries over the program-level determinations of the Balboa Park Station FEIR/PEIR to the project-level Balboa Reservoir SEIR. 2

I had already written about this several years ago in "The Road to the Balboa Reservoir Project: The Balboa Park Station Area Plan in Relation to the Reservoir Project".

"The Road to the Balboa Reservoir Project: The Balboa Park Station Area Plan in Relation to the Reservoir Project" has been submitted at multiple stages throughout the Project's "public engagement process." It has been submitted to the Reservoir CAC, the Reservoir City Team (Planning, OEWD, PUC), Reservoir Community Partners, Environmental Planning Scoping.

Here it is again (also attached as pdf):

**THE ROAD TO THE BALBOA RESERVOIR PROJECT:**

**THE BALBOA PARK STATION AREA PLAN IN RELATION TO THE RESERVOIR**

**(updated 10/5/2017)**

The Balboa Park Station Area Plan is one of the foundational justifications for the Balboa Reservoir Project.

The City Team commissioned AECOM to do a 2014 preliminary study for the Balboa Reservoir Project. The AECOM study for the Reservoir used the Balboa Park Station Area Plan in making their findings. Yet there are substantial shortcomings contained in the Balboa Park Station Area Plan as it relates to the Reservoir.

In addition to the shortcomings, AECOM further complicates the matter by misinterpreting the contents of the Balboa Park Station Area Plan.

LAND USE: BEST USE OF THE RESERVOIR

The First Element of the Balboa Park Station Area Plan contains:

> *OBJECTIVE 1.4 DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE.*

Despite this "best benefit" objective, no discussion or analysis has been made regarding what constitutes the best use of the western Reservoir.

Then drilling down further:

> *POLICY 1.3.2* [sic--This should more correctly read Policy 1.**4**.2—aj] *Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods. If the PUC should decide that the west basin is not needed for water storage, it should consider facilitating the development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing.*

Policy 1.3.2 [sic] suggests that PUC "consider" developing the site for housing. There is no documentation or evidence presented in the 2004 BPS Initial Study or in the Balboa Park Station Area Plan itself to arrive at a conclusion that 425-500 housing units would be the best use of the property.

The Fourth Element of the BPS Area Plan contains:

> *OBJECTIVE 4.4 CONSIDER HOUSING AS A PRIMARY COMPONENT TO ANY DEVELOPMENT ON THE RESERVOIR.*
>
> *The Balboa Reservoir represents one of the largest remaining undeveloped sites in San Francisco and currently forms an unpleasant void in the neighborhood. Developing housing on this site would help fill this void in two ways. First, housing here would add more people to the area; enlivening the commercial district and increasing ridership levels on the nearby public transportation services.*

Objective 4.4, just like Policy 1.3.2 [sic] asks PUC to "consider" using the Reservoir for housing. It does not mandate that it do so. Despite this, the City has made Reservoir housing appear to be a mandate.

Furthermore the arguments used in support for housing at the Reservoir are weak:

<!--[if !supportLists]-->• <!--[endif]-->"*currently forms an unpleasant void in the neighborhood"*

This characterization is totally subjective. In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways. It is also objectively open space that allows for vistas of the Pacific Ocean to the Farralones from the CCSF Science Building.

<!--[if !supportLists]-->• <!--[endif]-->“*increasing ridership levels on the nearby public transportation services”*

Both MUNI and BART have problems with capacity. They have more riders than they can handle. Regular riders of the 43 and 29 will be able to recount stories of crowded conditions and being passed up by buses. New Reservoir residents will only aggravate unreliable service on public transit.

PUC RESERVOIR AS OPEN SPACE IS ALSO PROPOSED IN THE BPS AREA PLAN; HOUSING WAS NOT THE SOLE PROPOSAL

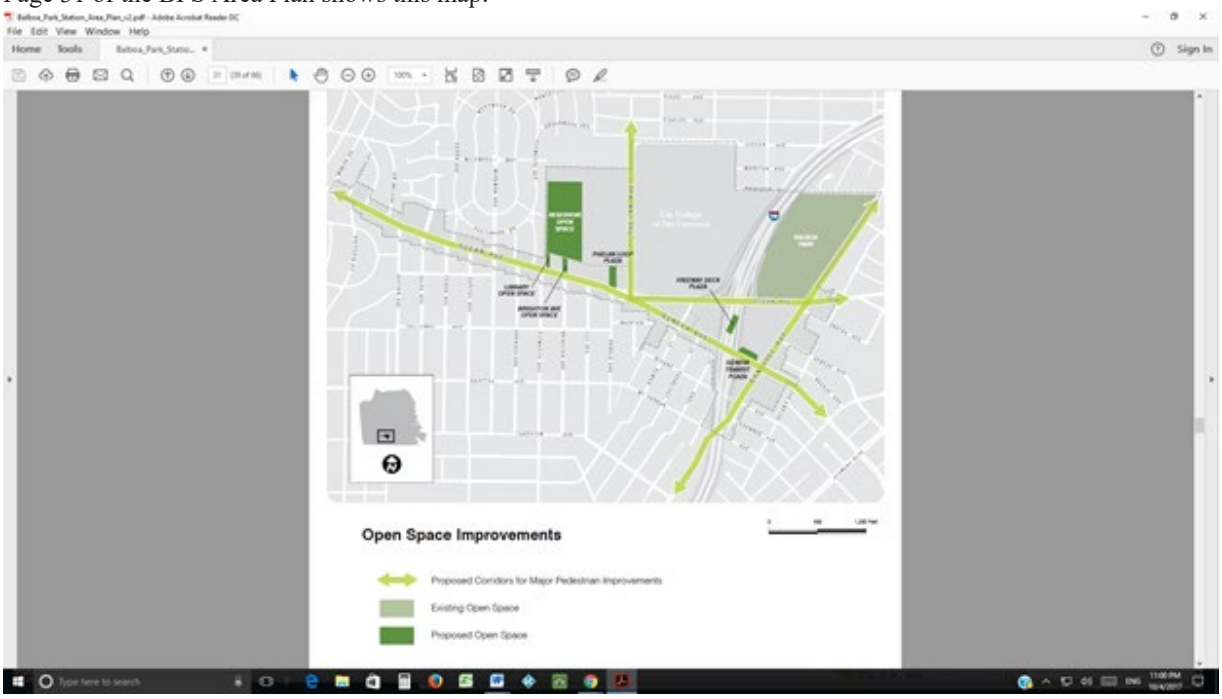
The Balboa Reservoir Project is frequently misrepresented as being called for by Balboa Park Station Area Plan. In reality, the BPS Area Plan actually calls for housing to “be considered” as a use for the PUC Reservoir. This is contained in the Housing Element of the Area Plan.

In addition to the Housing Element, the BPS Area Plan also contains a Streets and Open Space Element.

The Streets and Open Space Element contains this:

> *A number of open spaces are proposed in the plan area,including the Phelan Loop Plaza, the Geneva Plaza, open space associated with the proposed freeway deck, Brighton Avenue, the Library playground, and the* ***proposed Balboa Reservoir open space***. (page 30)

Page 31 of the BPS Area Plan shows this map:



**What this shows is that housing was not the sole possibility offered by the BPS Area Plan for the use of the Reservoir. This BPS Area Plan map shows the entire PUC Reservoir as open space.**

**********

**THE AECOM STUDY'S MISINTERPRETATION OF BPS AREA PLAN**

The Balboa Reservoir Project is a project-level sub-section of the Balboa Park Station Area Plan's program-level Final EIR.

Analysis of a Balboa Reservoir project is minimal within the Balboa Park Station Area Plan. The Reservoir is relegated to Tier 2 (long-term, up to year 2025) development and lacks detail.

The program-level EIR allows for early consideration of possible area-wide impacts. This would minimize reinventing the wheel for every project within the BPS Area.

The Balboa Park Station Area plan, as a program-level plan, is unable to address the specifics and particularities of impacts on the project-level, except in the most general sense.

The fatal flaw of the current Balboa Reservoir Project is that it relies on the foundation of a very general determination contained in the BPS Final EIR.

ROOT OF THE PROBLEM: "EFFECT ON PUBLIC SERVICES LESS THAN SIGNIFICANT"

The Final BPS EIR determined that the Area Plan's effect on public services would be insignificant or less-than-significant:

> *"An Initial Study, published in July 2006, determined that implementation of the proposed Area Plan and its associated public improvements and development projects may result in potentially significant environmental impacts; therefore, preparation of an EIR was required. The Initial Study determined that the following effects of the Area Plan would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included in the Area*
>
> *Plan and, thus, required no further analysis: land use; visual quality; climate (wind); utilities/public services (except hydrology and water quality); biology; geology/topography; water; energy/natural resources; and hazards (see Appendix A for a copy of the Initial Study).*
>
> *"With the exception of land use, which is included in the EIR for informational purposes and to orient the reader to the Project Area,* ***the EIR does not discuss the environmental***

***topics listed***

***above.”***

Here is the section in Appendix A of the FEIR which discusses public schools. No reference whatsoever is made to CCSF. The Initial Study and FEIR is not specific enough to deal with impacts of the project-level scale of the Balboa Reservoir Public Lands for Housing Project:

AECOM BALBOA RESERVOIR INITIAL STUDY STANDS ON THE SHAKY FOUNDATION OF THE BPS FEIR

The AECOM Study’s sections on Existing Conditions and Surrounding Development takes note of the many educational institutions near the Reservoir. Yet the AECOM Initial Study fails to assess the impact of the BR Project on the Bay area-wide public service that CCSF and other schools provide.

The AECOM Study’s failure to assess the impact of the BR Project on the public service provided by CCSF and other schools is based on an incorrect interpretation of the BPS FEIR.

The AECOM Study states:

> *“The* [BPS FEIR] *finds that speculative development of 500 residential units on Balboa Reservoir would not result in significant land use impacts…Although any future proposed projects would require individual environmental review, development on Balboa Reservoir has received programmatic environmental clearance through the Balboa Park Plan FEIR.”*

This AECOM interpretation is wrong. Contrary to the quoted AECOM passage, the BPS FEIR did not refer specifically to Balboa Reservoir. The “less-than-significant” determination was for the program-level BPS Area Plan and for the specific project-level Kragen (Mercy housing) and Phelan Loop Projects.

There was insufficient detail contained in the FEIR for the Tier 2 Reservoir project to merit extension of the “less-than-significant” determination for the program-level FEIR to the project-level Balboa Reservoir.

CALL FOR RESET

The fundamental assumptions for the BR Project rests on the shaky foundation of a generalized program-level determination of non-significance for the category of “Public Service” contained in the BPS FEIR.

OEWD/Planning’s Principles & Parameters similarly rests on a shaky foundation because of its failure to address the fundamental environmental review concept of assessing "immediate and long-range specific and cumulative impacts of a proposed project on its surrounding physical environment."

So instead of continuing to call for CCSF and the neighborhood to accommodate the

BR Project, OEWD/Planning needs to reset its MO to adhere to its own Initial Study Checklist guidelines to include “Public Services.”

OEWD/Planning needs to adhere to its own 3/17/2011 Environmental Review Process Summary document instead of pushing on with its inversion of environmental review principles.

Submitted by:

Alvin Ja

Ratepayer

**THE ROAD TO THE BALBOA RESERVOIR PROJECT:**

**THE BALBOA PARK STATION AREA PLAN IN RELATION TO THE RESERVOIR**

**(updated 10/5/2017)**

The Balboa Park Station Area Plan is one of the foundational justifications for the Balboa Reservoir Project.

The City Team commissioned AECOM to do a 2014 preliminary study for the Balboa Reservoir Project. The AECOM study for the Reservoir used the Balboa Park Station Area Plan in making their findings. Yet there are substantial shortcomings contained in the Balboa Park Station Area Plan as it relates to the Reservoir.

In addition to the shortcomings, AECOM further complicates the matter by misinterpreting the contents of the Balboa Park Station Area Plan.

LAND USE: BEST USE OF THE RESERVOIR

The First Element of the Balboa Park Station Area Plan contains:

> *OBJECTIVE 1.4 DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE.*

Despite this "best benefit" objective, no discussion or analysis has been made regarding what constitutes the best use of the western Reservoir.

Then drilling down further:

> *POLICY 1.3.2* [sic--This should more correctly read Policy 1.**4**.2—aj] *Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods. If the PUC should decide that the west basin is not needed for water storage, it should consider facilitating the development of a mixed-use residential neighborhood on part of the site to address the city-wide demand for housing.*

Policy 1.3.2 [sic] suggests that PUC "consider" developing the site for housing. There is no documentation or evidence presented in the 2004 BPS Initial Study or in the Balboa Park Station Area Plan itself to arrive at a conclusion that 425-500 housing units would be the best use of the property.

The Fourth Element of the BPS Area Plan contains:

> *OBJECTIVE 4.4 CONSIDER HOUSING AS A PRIMARY COMPONENT TO ANY DEVELOPMENT ON THE RESERVOIR.*
>
> *The Balboa Reservoir represents one of the largest remaining undeveloped sites in San Francisco and currently forms an unpleasant void in the neighborhood. Developing housing on this site would help fill this void in two ways. First, housing here would add more people to the area;*

> *enlivening the commercial district and increasing ridership levels on the nearby public transportation services.*

Objective 4.4, just like Policy 1.3.2 [sic] asks PUC to "consider" using the Reservoir for housing. It does not mandate that it do so. Despite this, the City has made Reservoir housing appear to be a mandate.

Furthermore the arguments used in support for housing at the Reservoir are weak:

- "*currently forms an unpleasant void in the neighborhood"*
  This characterization is totally subjective. In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways. It is also objectively open space that allows for vistas of the Pacific Ocean to the Farralones from the CCSF Science Building.
- "*increasing ridership levels on the nearby public transportation services"*
  Both MUNI and BART have problems with capacity. They have more riders than they can handle. Regular riders of the 43 and 29 will be able to recount stories of crowded conditions and being passed up by buses. New Reservoir residents will only aggravate unreliable service on public transit.

PUC RESERVOIR AS OPEN SPACE IS ALSO PROPOSED IN THE BPS AREA PLAN; HOUSING WAS NOT THE SOLE PROPOSAL

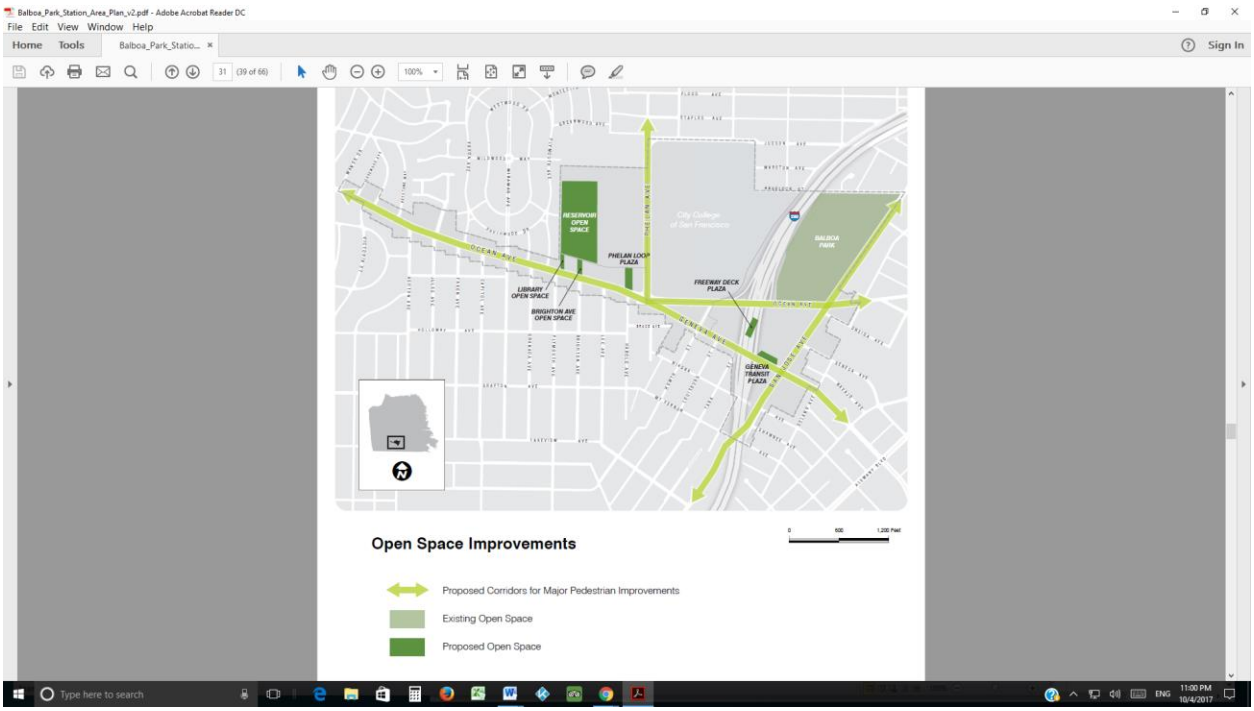
The Balboa Reservoir Project is frequently misrepresented as being called for by Balboa Park Station Area Plan. In reality, the BPS Area Plan actually calls for housing to "be considered" as a use for the PUC Reservoir. This is contained in the Housing Element of the Area Plan.

In addition to the Housing Element, the BPS Area Plan also contains a Streets and Open Space Element.

The Streets and Open Space Element contains this:

> *A number of open spaces are proposed in the plan area,including the Phelan Loop Plaza, the Geneva Plaza, open space associated with the proposed freeway deck, Brighton Avenue, the Library playground, and the* ***proposed Balboa Reservoir open space****.* (page 30)

Page 31 of the BPS Area Plan shows this map:




**What this shows is that housing was not the sole possibility offered by the BPS Area Plan for the use of the Reservoir. This BPS Area Plan map shows the entire PUC Reservoir as open space.**

**********

**THE AECOM STUDY'S MISINTERPRETATION OF BPS AREA PLAN**

The Balboa Reservoir Project is a project-level sub-section of the Balboa Park Station Area Plan's program-level Final EIR.

Analysis of a Balboa Reservoir project is minimal within the Balboa Park Station Area Plan. The Reservoir is relegated to Tier 2 (long-term, up to year 2025) development and lacks detail.

The program-level EIR allows for early consideration of possible area-wide impacts. This would minimize reinventing the wheel for every project within the BPS Area.

The Balboa Park Station Area plan, as a program-level plan, is unable to address the specifics and particularities of impacts on the project-level, except in the most general sense.

The fatal flaw of the current Balboa Reservoir Project is that it relies on the foundation of a very general determination contained in the BPS Final EIR.

ROOT OF THE PROBLEM: "EFFECT ON PUBLIC SERVICES LESS THAN SIGNIFICANT"

The Final BPS EIR determined that the Area Plan's effect on public services would be insignificant or less-than-significant:

*"An Initial Study, published in July 2006, determined that implementation of the proposed Area Plan and its associated public improvements and development projects may result in potentially significant environmental impacts; therefore, preparation of an EIR was required. The Initial Study determined that the following effects of the Area Plan would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included in the Area Plan and, thus, required no further analysis: land use; visual quality; climate (wind); utilities/public services (except hydrology and water quality); biology; geology/topography; water; energy/natural resources; and hazards (see Appendix A for a copy of the Initial Study).*

*"With the exception of land use, which is included in the EIR for informational purposes and to orient the reader to the Project Area,* ***the EIR does not discuss the environmental topics listed above."***

Here is the section in Appendix A of the FEIR which discusses public schools. No reference whatsoever is made to CCSF. The Initial Study and FEIR is not specific enough to deal with impacts of the project-level scale of the Balboa Reservoir Public Lands for Housing Project:

*Public Schools*

The San Francisco Unified School District (SFUSD) provides public primary and secondary education in San Francisco. The district is comprised of 78 elementary schools, 17 middle schools, and 21 high schools; the total enrollment is approximately 56,000 students.[15] Schools in proximity of the Project Area include the Sunnyside Elementary School at 250 Foerster Street, about 0.5 mile north of the Project Area; the Commodore Sloat Elementary School at 50 Darien Way, about 1.5 mile northwest of the Project Area; the James Denman Middle School at 241 Oneida Avenue, about 0.5 miles east of the Project Area; Aptos Middle School at 105 Aptos Avenue, about 1.0 miles northwest of the Project Area; and Balboa High School at 1000 Cayuga Avenue about 0.5 miles east of the Project Area.[16] The SFUSD is currently not a growth district. According to the *SFUSD Facilities Master Plan* of 2003, the District had excess capacity at most existing school facilities. Excess capacity is expected to increase district-wide as enrollment is projected to decline over the next 10 years.[17] Several schools were closed by the School Board in 2006: Golden Gate Elementary, De Avila Elementary, Franklin Middle School, and Yoey Child Development Center. Despite this excess capacity overall, certain schools were overcrowded in 2003, such as Galileo High School, at 107 percent capacity, Lincoln High School, at 115 percent capacity, and Herbert Hoover Middle School, at 126 percent capacity. No construction of new schools is planned for the City. An increase in students associated with the Area Plan would not substantially change the demand for the schools that are likely to be attended by new residents in the Project Area, nor for the entire school system overall. For the above reasons, significant impacts to school facilities would not occur as a result of implementation of the Area Plan, including proposed development on the Kragen Auto Parts and Phelan Loop sites, and this topic will not be discussed in the EIR.

*Recreation*

Four new open spaces are planned for the Project Area: the Geneva Transit Plaza on the north side of Geneva Avenue between San Jose Avenue and I-280; the Phelan Loop plaza; Balboa Reservoir open space; and Brighton Avenue open space. The proposed Area Plan envisions the creation of a system of neighborhood open spaces, including active, passive, and informal gathering areas that would contribute to the overall neighborhood character of the Project Area. In addition, smaller publicly accessible neighborhood and transit-oriented parks, plazas, and a children's playground would be created, particularly in the Transit Station Neighborhood and Ocean Avenue Neighborhood Commercial District subareas.

The Project Area includes Balboa Park, a Recreation and Park Department property. It is located along the entire northern frontage of Ocean Avenue between I-280 and San Jose Avenue and

[15] San Francisco Unified School District website, http://orb.sfusd.edu/profile/prfl-100.htm, accessed July 5, 2006.
[16] San Francisco Unified School District website, http://portal.sfusd.edu/apps/SCHFIND/showmap.cfm, accessed June 29, 2006.
[17] San Francisco USD, *SFUSD Facilities Master Plan*, January 2003, Section V, pp. 14-37.

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The AECOM Study's sections on Existing Conditions and Surrounding Development takes note of the many educational institutions near the Reservoir. Yet the AECOM Initial Study fails to assess the impact of the BR Project on the Bay area-wide public service that CCSF and other schools provide.

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The fundamental assumptions for the BR Project rests on the shaky foundation of a generalized program-level determination of non-significance for the category of "Public Service" contained in the BPS FEIR.

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OEWD/Planning needs to adhere to its own 3/17/2011 Environmental Review Process Summary document instead of pushing on with its inversion of environmental review principles.

Submitted by:

Alvin Ja

Ratepayer

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Subject:** ATTACHMENT FOR Re: INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY
**Date:** Thursday, September 05, 2019 5:58:06 PM
**Attachments:** INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Jeanie,

I forgot to attach the WORD file. It's now attached.

--aj

On Thursday, September 5, 2019, 05:47:52 PM PDT, aj <ajahjah@att.net> wrote:

## INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY

1

The City Charter/SFMTA late criterion is a 4 minute delay relative to MUNI schedule for the 43 Masonic at the Balboa Park Station (BPS). [The 4 minute lateness criterion is relative to MUNI schedule for any particular MUNI time point.]

In comparison, the Reservoir late standard as applied for the segment from Monterey/Gennessee to Balboa Park Station allows for a 12 minute delay relative to MUNI schedule.

The Reservoir Project SEIR, apparently without proper authority, appropriates a 4-minute delay standard for the each of the 43's segments (Judson-Ocean and Ocean-Geneva/San Jose) in the BPS Area, thus giving the Project the privilege of contributing 8 minutes of Reservoir-related delay before its delay is considered significant.

EXAMPLE:

If a 43 is running on time until the Reservoir Project, but the Project-related delay is allowed to be up to 8 minutes, then instead of 7 minutes to get to BPS, it would be considered by SEIR definition to be insignificant if a 43 gets to BPS in 19 minutes—an additional 12 minutes.

This constitutes a 171% increase over the scheduled running time of 7 minutes between Monterey/Gennessee and Balboa Park Station. Yet the SEIR deems a **171% increase** (from a scheduled 7 minutes to a travel time of 19 minutes to be insignificant.

1 (cont.)

**SOUTHBOUND 43 MASONIC DELAY:**

**MUNI STANDARD v. RESERVOIR STANDARD**

| | | TIME POINT | | ON-TIME | ADDITIONAL DELAY TIME | |
|---|---|---|---|---|---|---|
| | | | | MUNI on-time | MUNI late standard<br><br>(4 min) | Reservoir<br><br>Late standard<br><br>(additional 4 min) |
| | | Monterey/Gennessee | | 0:00 | 0:00 | 0:00 |
| Monterey/Genn to Bookstore<br><br>Running time (r.t.) | | **4 min running time** | | +4 r.t. | +4 r.t. + 4 late | +4 r.t. +4 MUNI<br><br>+4 Reservoir |
| **ELAPSED TIME:**<br><br>**Monterey/Genn to Bookstore** | | CCSF Bookstore<br><br>(City College Terminal) | | **0:04** | **0:08** | **0:12** |
| Bookstore to BPS<br><br>Running time | | **3 min running time** | | +3 r.t. | +3 r.t.<br><br>(4 min standard NOT allowed to be cumulative) | +3 r.t. + 4 Reservoir<br><br>(4 min standard construed to accumulate) |
| **ELAPSED TIME:**<br><br>**Monterey/Gen**<br><br>**to BPS** | | Balboa Park Station<br><br>(Geneva/San Jose) | | **0:07** | **0:11** | **0:19** |

The SEIR justifies its arbitrary and capricious use of a generously defined 4-minute delay standard by citing the MUNI on-time performance standard contained in the City Charter:

> *The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*[96]

1 (cont.)

Footnote 96:
*96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85* [sic--should be 8A.103 (c)1--aj], *percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

It is critically important to understand of the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

> *1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

**The SEIR is inadequate and defective in its use of an egregiously generous definition of acceptable Reservoir-related transit delay. The SEIR's "less-than-significant" determination for Impact TR-4, Transit Delay cannot be considered valid.**

**The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, or by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.**

**There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay. There is no substantial evidence--if any evidence at all--to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.**

Submitted by:

Alvin Ja

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Subject:** Comment on 3.B.6 Impacts & Mitigation Measures
**Date:** Saturday, September 07, 2019 12:36:38 AM
**Attachments:** 3.B.6.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

**Comment on 3.B.6 Impacts & Mitigation Measures** (p. 3.B-34)

**Operation** (p. 3.B-35)

**Approach to Analysis**

Roadway Network Features (p. 3.B-36)

*Circulation changes implemented by the proposed project include the extension of Lee Avenue...*

The operational impact analysis includes the following significance criteria:

<!--[if !supportLists]-->• <!--[endif]-->*Cause substantial additional VMT or substantially inducing additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network;...*

<!--[if !supportLists]-->• <!--[endif]-->*Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit*

**Despite the fact that the Lee Extension would induce "additional automobile travel by increasing physical roadway capacity in a congested area" and would substantially delay many MUNI lines on Ocean Avenue, no mention is made here regarding impacts on these significance criteria. (And as mentioned before, the PEIR had already rejected a Lee Extension from being included in the BPS program-level FEIR because its adverse impact on transit. The PEIR's discussion regarding the Lee Extension is brought up in 3.B.3. Yet, its relevance and applicability to the Reservoir Project's Lee Extension is omitted.)** 1

**********

Operational Impacts (p. 3.B-46)

*Public Transit Delay* (p. 3.B-52)

2

> *The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*[96]

Footnote 96:
*96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85* [sic--should be 8A.103 (c)1--aj], *percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

It is critically important to understand the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:

*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

Example: The 43 line runs on a 12 minute headway. A four-minute Project-related contribution to delay added to a City Charter defined 4-minute late standard for a MUNI line's on-time performance would create an eight-minute delay. So, for the 43 line, instead of a 12-16 wait, the Project interprets that a wait of 16-20 minutes at Kahlo/Ocean (City College Bookstore time point) is acceptable and less-than-significant.

NO! It is NOT OK to consider this to be non-significant.

The City Charter's Section 8A.103 (c)1 does not authorize the Project to impose an additional Reservoir-related 4 minutes of delay at the City College Bookstore time point.

The SEIR's self-defined threshold of significance would grant the Project the privilege of doubling the lateness standard relative to the MUNI schedule from 4 minutes to 8 minutes.

2 (cont.)

This violates both the language and intent of City Charter Article VIIIA's Section on Service Standards and Accountability--8A.103 (c)1.

**The draft SEIR is fundamentally flawed in highjacking and misapplying the SFMTA/MUNI 4-minute lateness standard. The 4-minute lateness standard is relative to MUNI schedules. The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, and especially by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.**

**There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay.**

**There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.**

**********

**Impact Evaluation**

***Existing plus Project***

***Impact TR-4: Operation of the proposed project would not substantially delay public transit. (Less than Significant)***

Transit Delay

*Developer's Proposed Option* (p. 3.B-74)

2 (cont.)

*As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.*

*The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, the Developer's Proposed Option would result in a less-than-significant impact related to transit delay.*

*The Additional Housing Option would not result in transit delay greater than or equal to four Minutes.* [123] *Therefore, the Additional Housing Option would result in a less-than-significant impact related to transit delay.* [FOOTNOTE 123 refers back to Footnote 122 which then refers to Fire Code 503.2.1 which has nothing to do with transit delay.—aj]

RESERVOIR-RELATED DELAY FOR 43 MASONIC

The SB Kahlo figures of **73 sec** (for Option 1), and **83 sec** (for Option 2 are presented in the SEIR as the applicable 43 delay between Judson and Ocean.

These figures fail to reflect the Transit Delay for the 43 route segment between CCSF Bookstore (Ocean) to Balboa Park Station (Geneva/San Jose). This route segment is located in the Area Plan area and must be included to properly assess Reservoir-related delay for the 43 Masonic.

In order to reflect the full effect of Reservoir-related delay in the Balboa Park Station Area Plan area, another 42 seconds (using Table 3.B-18 Transit Delay Analysis) for the 43's EB Geneva segment must be added to the 73 seconds cited by the SEIR. So instead of just 73 seconds of delay, Reservoir-related delay totals **115 seconds (1.9 min) of for Option 1.**

For Option 2, the 43's delay (using Table 3.B-18 Transit Delay Analysis) should be the sum of SB Kahlo (83 sec) and EB Geneva (58 sec), which totals **141 seconds (2.4 min) of Reservoir-related delay in the BPS Area Plan area.**

The scheduled running time between Monterey/Gennessee to Balboa Park Station is

7 minutes.

2 (cont.)

Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a **27.4% increase in travel time** for the 7-minute running time segment.between Monterey/Gennessee and Balboa Park Station.

Option 2's contribution of 141 seconds (2,4 minutes) of Reservoir-related delay represents a **33.6% increase in travel time** over the scheduled 7 minute running time between Monterey/Gennessee to Balboa Park Station.

A 115-141 second delay for this short 43 segment (from Monterey/Gennessee to BP Station) is substantial. it is NOT insignificant as the SEIR purports. Only with willful disregard for reality could a 27.4% to 33.6% increase in travel time be considered less than significant.

Relative to the City Charter-mandated MUNI on-time standard of 4 minutes:

<!--[if !supportLists]-->• <!--[endif]-->Option 1's 115 second contribution to MUNI delay constitutes **48.0%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point;

<!--[if !supportLists]-->• <!--[endif]-->Option 2's 141 second contribution to MUNI delay constitutes **58.8%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point.

Unless willfully blind, a 48.0% or a 58.8% contribution towards a 4-minute late standard is SIGNIFICANT.

The way that the SEIR tries to evade this problem of objectivelycontributing significantly towards MUNI's 4-minute standard is ingenious.

Incorporating Footnote 96 on p. 3.B-52, the SEIR, **insinuating City Charter and**

**"quantitative" authority**, proclaims:

2 (cont.)

> *The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*

The SEIR blows open a gigantic hole of an extra four minutes for itself before a delay "**might**" (!!) be significant. But contrary to the Project's arrogation to itself of a four-minute privilege to hold up MUNI before its contribution to delay counts to be significant, the City Charter citation of a 4 minute is relative to the MUNI schedule--not relative to the Reservoir Project SEIR's own standard.

So, the "less-than significant impact" to transit delay is a result of an inappropriate definition and standard of "transit delay."

I discuss this in more detail in my 9/5/2019 submission "INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY". Please refer to it.

**********

**City College Terminal**

> *Given the considerations described above, the Developer's Proposed Option and Additional Housing Option would have a* ***less-than-significant*** *impact on transit delay.*
>
> ***Mitigation:*** *None required.*

The TR-4 section ends with the pronouncement of less-than-significant impact requiring no mitigation. This overall TR-4 conclusory statement misleadingly follows and is slid into a section that actually discusses City College Terminal.

**This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**

**The SEIR is egregiously deficient in formulating its less-than-significant**

2 (cont.)

**determination of the Project's contribution to transit delay:**

- **It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**
- **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**
- **In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**
- **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**********

***Comparison of Impact TR-4 to PEIR Impact Analysis*** (p. 3.B-77)

*As discussed in SEIR Section 3.B.3, Summary of Balboa Park Station Area Plan PEIR TransportationSection, p. 3.B-1, under the 2025 with Area Plan scenario, ….. Project operation would result in a less-than significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR.*

The statements that "*Project operation would result in a less-than-significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR*" is **unsupported by anything contained in SEIR 3.B.3**. It appears out of thin air. In fact, 3.B.3 states the opposite:

- **Transit**

*Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

2 (cont.)

Furthermore, the claimed L-T-S impact of the Introductory paragraph for this section is contradicted once again in the body on p. 3.B-78:

<!--[if !supportLists]-->• <!--[endif]--> *The PEIR identified significant impacts to transit delay under the 2025 with Area Plan scenario and project-level analysis of 1150 Ocean Avenue (former Kragen Auto Parts site).*

**The introductory paragraph expresses a desired outcome of less–than-significant impact on public transit in the form of an unsupported assertion/conclusion. The SEIR is deficient by making unsupported conclusions.**

**********

> *Operation of the Balboa Reservoir Project would result in a less-than-significant impact related to transit delay. Therefore, the proposed project would not have any new or substantially more-severe effects than those identified in the PEIR related to transit delay impacts.*

This concluding paragraph for TR-4 is nothing but a claim unsupported by evidence. It's a tautology: The Reservoir Project results in less-than-significant impact on transit delay……Therefore (?!!) it will not have new transit delay impacts.

Where is the logic in this conclusion?!!!

The SEIR Significance Criteria states:

> *The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**SEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence. Rather it is based on tautology. FAIL…FUBAR!**

**This SEIR does not qualify for certification.**

Submitted by:

Alvin Ja

**Comment on 3.B.6 Impacts & Mitigation Measures** (p. 3.B-34)

**Operation** (p. 3.B-35)
**Approach to Analysis**

Roadway Network Features (p. 3.B-36)
*Circulation changes implemented by the proposed project include the extension of Lee Avenue...*

The operational impact analysis includes the following significance criteria:

- *Cause substantial additional VMT or substantially inducing additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network;...*
- *Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit*

**Despite the fact that the Lee Extension would induce "additional automobile travel by increasing physical roadway capacity in a congested area" and would substantially delay many MUNI lines on Ocean Avenue, no mention is made here regarding impacts on these significance criteria. (And as mentioned before, the PEIR had already rejected a Lee Extension from being included in the BPS program-level FEIR because its adverse impact on transit. The PEIR's discussion regarding the Lee Extension is brought up in 3.B.3. Yet, its relevance and applicability to the Reservoir Project's Lee Extension is omitted.)**
**************************************

Operational Impacts (p. 3.B-46)
*Public Transit Delay* (p. 3.B-52)

> *The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.96*

Footnote 96:
*96 The threshold uses the adopted the Transit First Policy, City Charter section 8A.103 85* [sic--should be 8A.103 (c)1--aj], *percent on-time performance service standard for Muni, with the charter considering vehicles arriving more than four minutes beyond a published schedule time late.*

It is critically important to understand the meaning and (mis)interpretation of the citation of SF Charter's MUNI 85% on-time performance standard. The critical language in City Charter 8A.103 (c)1 is as follows:
*1. On-time performance: at least 85 percent of vehicles must run on-time, where a vehicle is considered on-time if it is no more than one minute early or four minutes late as measured against a published schedule that includes time points*

The draft SEIR engages in an egregiously unsupported case of overreach. The SEIR reinterprets the MUNI 4-minute lateness standard to allow the Reservoir Project itself to

independently contribute an additional 4 minutes of transit delay before the Project's impact "might" be considered significant.

Example: The 43 line runs on a 12 minute headway. A four-minute Project-related contribution to delay added to a City Charter defined 4-minute late standard for a MUNI line's on-time performance would create an eight-minute delay. So, for the 43 line, instead of a 12-16 wait, the Project interprets that a wait of 16-20 minutes at Kahlo/Ocean (City College Bookstore time point) is acceptable and less-than-significant.

NO! It is NOT OK to consider this to be non-significant.

The City Charter's Section 8A.103 (c)1 does not authorize the Project to impose an additional Reservoir-related 4 minutes of delay at the City College Bookstore time point.

The SEIR's self-defined threshold of significance would grant the Project the privilege of doubling the lateness standard relative to the MUNI schedule from 4 minutes to 8 minutes.

This violates both the language and intent of City Charter Article VIIIA's Section on Service Standards and Accountability--8A.103 (c)1.

**The draft SEIR is fundamentally flawed in highjacking and misapplying the SFMTA/MUNI 4-minute lateness standard. The 4-minute lateness standard is relative to MUNI schedules. The Project's self-entitled contribution of an additional 4-minutes of lateness to transit delay is neither permitted or acceptable--by law, legislative intent, and especially by common sense--in City Charter VIIIA. This constitutes a fundamentally arbitrary and capricious arrogation of authority to substantively and substantially worsen transit reliability for the broader public.**

**There is no substantive rationale to justify a 4-minute contribution by the Project to transit delay.**

**There is no substantial evidence--if any evidence at all-- to permit the Reservoir Project to consider its own 4-minute delay standard to be non-significant.**
**********

**Impact Evaluation**
***Existing plus Project***

***Impact TR-4: Operation of the proposed project would not substantially delay public transit. (Less than Significant)***

Transit Delay
*Developer's Proposed Option* (p. 3.B-74)

*As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound direction, weekday p.m. peak hour), and a maximum of 81 seconds along Geneva Avenue (westbound direction, weekday p.m. peak hour). The majority of the transit delay increase is attributable to the increase in passenger boarding delay resulting from the project-generated transit riders. The Developer's Proposed Option would not create additional transit reentry delay during the a.m. or p.m. peak hours.*

*The Developer's Proposed Option would not result in transit delay greater than or equal to four minutes. Therefore, the Developer's Proposed Option would result in a less-than-significant impact related to transit delay.*

*The Additional Housing Option would not result in transit delay greater than or equal to four Minutes.* [123] *Therefore, the Additional Housing Option would result in a less-than-significant impact related to transit delay.* [FOOTNOTE 123 refers back to Footnote 122 which then refers to Fire Code 503.2.1 which has nothing to do with transit delay.—aj]

RESERVOIR-RELATED DELAY FOR 43 MASONIC

The SB Kahlo figures of **73 sec** (for Option 1), and **83 sec** (for Option 2 are presented in the SEIR as the applicable 43 delay between Judson and Ocean.

These figures fail to reflect the Transit Delay for the 43 route segment between CCSF Bookstore (Ocean) to Balboa Park Station (Geneva/San Jose). This route segment is located in the Area Plan area and must be included to properly assess Reservoir-related delay for the 43 Masonic.

In order to reflect the full effect of Reservoir-related delay in the Balboa Park Station Area Plan area, another 42 seconds (using Table 3.B-18 Transit Delay Analysis) for the 43's EB Geneva segment must be added to the 73 seconds cited by the SEIR. So instead of just 73 seconds of delay, Reservoir-related delay totals **115 seconds (1.9 min) of for Option 1.**

For Option 2, the 43's delay (using Table 3.B-18 Transit Delay Analysis) should be the sum of SB Kahlo (83 sec) and EB Geneva (58 sec), which totals **141 seconds (2.4 min) of Reservoir-related delay in the BPS Area Plan area.**

The scheduled running time between Monterey/Gennessee to Balboa Park Station is 7 minutes.

Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a **27.4% increase in travel time** for the 7-minute running time segment.between Monterey/Gennessee and Balboa Park Station.

Option 2's contribution of 141 seconds (2,4 minutes) of Reservoir-related delay represents a **33.6% increase in travel time** over the scheduled 7 minute running time between Monterey/Gennessee to Balboa Park Station.

A 115-141 second delay for this short 43 segment (from Monterey/Gennessee to BP Station) is substantial. it is NOT insignificant as the SEIR purports. Only with willful disregard for reality could a 27.4% to 33.6% increase in travel time be considered less than significant.

Relative to the City Charter-mandated MUNI on-time standard of 4 minutes:

- Option 1's 115 second contribution to MUNI delay constitutes **48.0%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point;
- Option 2's 141 second contribution to MUNI delay constitutes **58.8%** of the 4 minutes of lateness allowed the SB 43 at the Geneva/San Jose time point.

Unless willfully blind, a 48.0% or a 58.8% contribution towards a 4-minute late standard is SIGNIFICANT.

The way that the SEIR tries to evade this problem of objectivelycontributing significantly towards MUNI's 4-minute standard is ingenious.

Incorporating Footnote 96 on p. 3.B-52, the SEIR, **insinuating City Charter and "quantitative" authority**, proclaims:

> *The department uses a quantitative threshold of significance and qualitative criteria to determine whether the project would substantially delay public transit. For individual Muni routes, if the project would result in transit delay greater than equal to four minutes, then it might result in a significant impact.*

The SEIR blows open a gigantic hole of an extra four minutes for itself before a delay "**might**" (!!) be significant. But contrary to the Project's arrogation to itself of a four-minute privilege to hold up MUNI before its contribution to delay counts to be significant, the City Charter citation of a 4 minute is relative to the MUNI schedule--not relative to the Reservoir Project SEIR's own standard.

So, the "less-than significant impact" to transit delay is a result of an inappropriate definition and standard of "transit delay."

I discuss this in more detail in my 9/5/2019 submission "INAPPROPRIATE SEIR DEFINITION OF TRANSIT DELAY". Please refer to it.

**********

**City College Terminal**

*Given the considerations described above, the Developer's Proposed Option and Additional Housing Option would have a* ***less-than-significant*** *impact on transit delay.*

***Mitigation:*** *None required.*

The TR-4 section ends with the pronouncement of less-than-significant impact requiring no mitigation. This overall TR-4 conclusory statement misleadingly follows and is slid into a section that actually discusses City College Terminal.

**This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**

**The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:**

- **It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**
- **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**
- **In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**
- **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**********

***Comparison of Impact TR-4 to PEIR Impact Analysis*** (p. 3.B-77)

*As discussed in SEIR Section 3.B.3, Summary of Balboa Park Station Area Plan PEIR TransportationSection, p. 3.B-1, under the 2025 with Area Plan scenario, ….. Project operation would result in a less-than significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR.*

The statements that "*Project operation would result in a less-than-significant impact related to public transit. Therefore, the proposed project would not have any new or substantially more severe effects than those identified in the PEIR*" is **unsupported by anything contained in SEIR 3.B.3**. It appears out of thin air. In fact, 3.B.3 states the opposite:

- **Transit**

  *Significant transit impacts were also identified under the 2025 with Area Plan scenario on the K Ingleside line and at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections.*

Furthermore, the claimed L-T-S impact of the Introductory paragraph for this section is contradicted once again in the body on p. 3.B-78:

- *The PEIR identified significant impacts to transit delay under the 2025 with Area Plan scenario and project-level analysis of 1150 Ocean Avenue (former Kragen Auto Parts site).*

**The introductory paragraph expresses a desired outcome of less–than-significant impact on public transit in the form of an unsupported assertion/conclusion. The SEIR is deficient by making unsupported conclusions.**

**********

*Operation of the Balboa Reservoir Project would result in a less-than-significant impact related to transit delay. Therefore, the proposed project would not have any new or substantially more-severe effects than those identified in the PEIR related to transit delay impacts.*

This concluding paragraph for TR-4 is nothing but a claim unsupported by evidence. It's a tautology: The Reservoir Project results in less-than-significant impact on transit delay……Therefore (?!!) it will not have new transit delay impacts.

Where is the logic in this conclusion?!!!

The SEIR Significance Criteria states:

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**SEIR's determination of less-than-significant impact on transit delay (TR-4) is not based on the standard of substantial evidence. Rather it is based on tautology. FAIL…FUBAR!**

**This SEIR does not qualify for certification.**

Submitted by:
Alvin Ja

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir; CPC-Commissions Secretary
**Cc:** BRCAC (ECN)
**Subject:** Comment on C-TR-4. Cumulative Transit Delay
**Date:** Tuesday, September 10, 2019 12:37:24 AM
**Attachments:** Comment 8.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

COMMENT ON 3.B.6 IMPACT AND MITIGATION MEASURES (continued)--also attached as WORD file herein:

## ***2040 Cumulative Conditions*** (p. 3.B-91)

1

> *The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

**The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:**

> *The "Project Area" of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*

<!--[if !vml]--><!--[endif]-->

**The SEIR is deficient in its selection of the parameters of geographic context for analysis.**

**********

**Impact C-TR-4: The proposed project, in combination with reasonably foreseeable**

**future projects, may result in a potentially significant cumulative impact related to**

**public transit delay and the project could contribute considerably. (Significant and**

**Unavoidable with Mitigation)** (p. 3.B-94)

2

> *In the PEIR, under the 2025 with Area Plan scenario, transit delay impacts were identified at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections. However, as discussed under Impact TR-4, p. 3.B-73, operation of the proposed project would not substantially delay public transit, and this impact would be less than significant.*

In my previous submission of 9/7/2019, I had presented a picture of the real-life impact, based on SEIR/Kittelson's figures of Reservoir-related delay on the 43 Masonic. Instead of just using the delay figures for the restrictive limits of geographic context in the Figure 3.B-2 map, the submission showed **27.4 to 33.6% increases in Reservoir-related travel time** within the BPS Area Plan "Project Area".

Relative to the MUNI on-time-performance's late criterion of 4 minutes, **Reservoir-related delay contributes 48 to 58.8% of the 4 minutes.**

The only way that the SEIR can conclude a less-than-significant transit delay impact is to change the standards.

It did this by creating a quantitative "threshold of significance" of an **additional 4 minutes over and above the SF Charter's 4 minutes**. Thus, with this this creatively invented threshold of significance that totals 8 minutes, objectively significant delay relative to MUNI schedules are magically transformed into "less-than-significant."

Here's copy & paste from my previous submission:

> **This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**
>
> **The SEIR is egregiously deficient in formulating its less-than-**

2 (cont.)

**significant determination of the Project's contribution to transit delay:**

- **It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**
- **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**
- **In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**
- **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**********

*As discussed in Table 3.B-18, p. 3.B-74, under Impact TR-4, under existing plus project conditions, the increase in transit delay associated with either the Developer's Proposed Option and the Additional Housing Option would not result in significant transit delay impacts. However, the transit delay contribution from City College's Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.*

As shown previously, that Reservoir-related delay "would not result in significant transit delay Impacts" has been shown to be objectively false.

After the false assertion that portrays the Reservoir Project as

blameless for transit delay, C-

2 (cont.)

TR-4 then throws the blame for cumulative Transit Delay on City College when its Facilities Master Plan gets up and running in the future. The phrasing of the passage essentially shifts the blame for cumulative transit delay impacts on City College, instead of admitting that the primary/proximate cause for transit delay is the Project itself.

The main error in C-TR-4 is that the Reservoir is presumed to be the baseline condition when in fact City College should be treated as the baseline condition.

Crucially, City College's Facilities Master Plan is essentially a **renovation and replacement program** for existing deteriorated, end-of-useful life buildings/facilities. Other than normal growth, build-out of the FMP will not generate new, appreciably substantial vehicle trips above what exists today as the existing condition. Furthermore any parking structures in FMP would be a direct result of the Reservoir Project's elimination of student parking. Although the Planning Dept would want to categorize FMP parking as new, objectively the FMP parking will be replacement parking, not "new."

In contrast, it is the Reservoir Project's new residents that will generate new vehicle trips that would cause transit delay.

**The SEIR reverses cause and effect in C-TR-4. It does this by treating the Reservoir Project as if it's the existing setting in its assessment of cumulative effects and treats CCSF as the new kid on the block. The fact of the matter is that CCSF must be treated as the baseline condition, and the Reservoir Project as the new kid on the block. I offer as an example a critique of a 11/17/2016 Planning Dept letter that was sent to City College authorities:**

## HYPOCRISY OF BALBOA RESERVOIR PROJECT PLANNERS

In reviewing Sunshine Ordinance documents, I have come across a 11/17/2016 Planning Dept letter addressed to City College BOT signed by its Director, John Rahaim (attached for your convenience).

The 11/17/2016 letter provided the City's input on the City College draft FMP.

2 (cont.)

Under the heading of “Access, Parking, and Transportation Demand Management”, the letter states:

> *“CCSF has stated that it anticipates maintaining or increasing the number of parking spaces associated with the campus as on-and off-campus surface parking is replaced with buildings. This level of parking provision would have negative consequences for neighborhood congestion…”*

Further down in the letter, under the heading “Balboa Reservoir Development Access & Interface”, the letter states:

> *“While the design of the Reservoir site has not yet begun, roadway access to the Reservoir site* [cutting through City College property—aj] *is a critical element that needs to be considered now as part of CCSF's master planning process…”*

Back in November 2016 when you first read this letter, I assume that BOT and Administration were able to discern the brazen hypocrisy contained in this letter to SFCCD.

ONE STANDARD FOR CITY COLLEGE……
The City had the audacity in this letter to blame the FMP for negative consequences of proposed FMP parking. The City shows lack of self-awareness and dishonesty when the reason for needing replacement parking is ultimately the Balboa Reservoir’s own elimination of student parking—parking which constitutes the existing condition.

……..ANOTHER STANDARD FOR BALBOA RESERVOIR PROJECT
The Planning Dept letter raises the importance for SFCCD to provide roadway access for the Reservoir Project. The letter says “roadway access is a critical element that needs to be considered now…”

Since the City planners say that the parking needs of CCSF stakeholders can be resolved with TDM, the TDM solution should obviate the need for roadway access for the Reservoir Project , too, doncha think?

But, no. A double standard applies.

Did you notice that the City’s concern for “negative consequences for neighborhood congestion” only applied to City College, but not to the Reservoir Project? FYI, throughout the “public engagement process”, Reservoir Project has not shown serious concern for its own negative

consequences.

If BOT and Administration allow the City to abuse the City College stakeholders whose interests you are supposed to represent, you are failing in your compliance with Accreditation Standard IV.C4.

--aj 10/9/2017

2 (cont.)

**********

*To reduce the project's considerable contribution, implementation of* ***Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay*** *was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures to keep transit travel times within four minutes of existing levels.*

> ***Mitigation Measure M-C-TR-4: Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay.*** *The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*
>
> ***Transit Travel Time Performance Standard.*** *Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods,are shown in Table M-C-TR-4. The routes and study segments shown in Table M-C-TR-4 represent routes and study segments most likely to have a cumulative impact to which the project would have a considerable cumulative contribution.*

What is the "transit travel time performance standard" that is to be met?

The SEIR presents Table M-C-TR-4 Transit Travel Time Performance Standard that, by appearance looks oh, so impressive and credible, and "quantitative"! The Table presents "Existing Transit Travel Time" and "Performance Standard." And it looks SOOO legitimate and objective!

But the key is literally in the fine print of Performance Standards' Footnote "b".

Footnote “b” states: b The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

2 (cont.)

As presented in earlier submissions this Performance Standard of “existing travel time plus four minutes” is based on the misappropriation and misuse of the Charter Section 8A.103 (c)1.

Here I present some examples of the increase in travel time that results from the generous “plus four minutes” Performance Standard based on figures from Table M-C-TR-4:

| Transit Line | Study Segment | Existing Transit Travel Time--PM | Performance Standard--PM | Percent Increase in Travel Time |
|---|---|---|---|---|
| K/T | Jules Ave/Ocean Ave to Balboa Park BART | 8:42 | 12:42 | **46.0%** |
| 29 | Mission St/Persia Ave to Plymouth Ave/ Ocean Ave | 9:55 | 15:10 | **52.9%** |
| 43 | Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance | 4:23 | 8:23 | **91.3%** |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave | 10:04 | 14:04 | **39.7%** |
| | | | | |

The Planning Dept-created threshold of significance of an additional 4 minutes results in **increases in Reservoir-related travel times of 46%, 52.9%, 91.3%, and 39.7% respectively for the K-T, 29, 43, and 49 line segments in the Table. By any objective measure, these would be extremely substantial contributions to transit delay.**

The only legitimate standard to be used to comply with the Transit First Policy is: four minutes late as measured against a MUNI time point…….Not a “plus 4” creatively designed qualitative threshold of significance.

2 (cont.)

Regarding Mitigation Measure M-C-TR-4's "*The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments…. the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

ARE YOU KIDDING ME?!! Monitor and implement "**feasible"** measures?!!

Once the Project has been approved and built, monitoring will only confirm what people who have actual ground-level, real-life based experience in the area have been saying all along about traffic issues that would ultimately cause severe MUNI delay.

And at that point, there will be no **feasible** measures to implement because the damage will have already been done.

There will be no feasible measures because the Reservoir Project the project area is characterized by streets that cannot be widened. There will be no feasible way to effectively reduce transit delay. A 2012 Haas School of Business study about a possible Reservoir Project recognized the difficulties of "*… limited access points and large influx of new residents".* for such a project.

To think that monitoring transit delay and implementing "feasible" measures such as TDM will be able to satisfactorily mitigate the impact of the Reservoir would be ludicrous.

**Thankfully, the SEIR arrives at a realistic determination (except for the undue blame given to a City College contribution to future transit delay) for C-TR-4:**

> *In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and the uncertainty of SFMTA approval of other measures under their jurisdiction, the impact of the proposed project options would remain* ***significant and unavoidable with mitigation,*** *even with implementation of Mitigation Measure M-C-TR-4.*

I-Ja9

***Significance after Mitigation:*** *Significant and Unavoidable.*

2 (cont.)

Submitted by:

Alvin Ja

COMMENT ON 3.B.6 IMPACT AND MITIGATION MEASURES (continued)

3

## ***2040 Cumulative Conditions*** (p. 3.B-91)

> *The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 3.B-1, p. 3.B-7.*

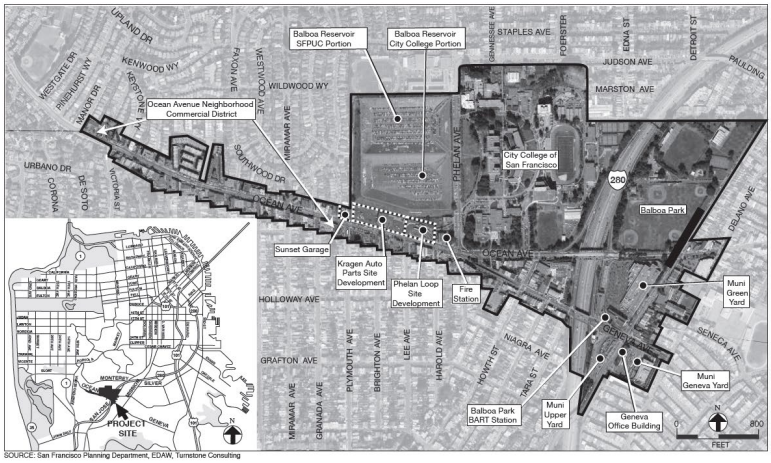
The geographic context for the analysis shown in Fig. 3.B-1 is limited to an eastern boundary of Frida Kahlo Way. This eastern boundary is inappropriately restrictive.

The Reservoir Project SEIR is a project-level document that falls within the Balboa Park Station Area Plan. To cut off the boundary at Frida Kahlo strangles the possibility of a thorough assessment of the Reservoir Project effects on the entire BPS Area Plan area—an area of which the Reservoir Project is a **part**.

**The SEIR can only have the potential to be fair if the geographic context for analysis is the Balboa Park Station area. From the BPS FEIR (p. 72) the area is:**

> *The "Project Area" of the Balboa Park Station Area Plan is generally bounded by parcels along the northern edge of Ocean Avenue, the southern boundary of Riordan High School, Judson Avenue, and Havelock Street to the north; the northeastern edge of the City College campus, and San Jose and Delano Avenues to the east; Niagara and Mount Vernon Avenues, and parcels along the southern edges of Geneva and Ocean Avenues to the south; and Manor Drive to the west (see Figure 2: Project Area Plan).*

[redacted]




73

**The SEIR is deficient in its selection of the parameters of geographic context for analysis.**

**********

**Impact C-TR-4: The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably. (Significant and Unavoidable with Mitigation)** (p. 3.B-94)

4

> *In the PEIR, under the 2025 with Area Plan scenario, transit delay impacts were identified at Ocean Avenue/Geneva Avenue/Frida Kahlo Way and the new Geneva Avenue/I-280 NB Off-Ramp and Geneva Avenue/I-280 SB On-Ramp intersections. However, as discussed under Impact TR-4, p. 3.B-73, operation of the proposed project would not substantially delay public transit, and this impact would be less than significant.*

In my previous submission of 9/7/2019, I had presented a picture of the real-life impact, based on SEIR/Kittelson's figures of Reservoir-related delay on the 43 Masonic. Instead of just using the delay figures for the restrictive limits of geographic context in the Figure 3.B-2 map, the submission showed **27.4 to 33.6% increases in Reservoir-related travel time** within the BPS Area Plan "Project Area".

Relative to the MUNI on-time-performance's late criterion of 4 minutes, **Reservoir-related delay contributes 48 to 58.8% of the 4 minutes.**

The only way that the SEIR can conclude a less-than-significant transit delay impact is to change the standards.

It did this by creating a quantitative "threshold of significance" of an **additional 4 minutes over and above the SF Charter's 4 minutes**. Thus, with this this creatively invented threshold of significance that totals 8 minutes, objectively significant delay relative to MUNI schedules are magically transformed into "less-than-significant."

Here's copy & paste from my previous submission:

> **This concluding determination regarding TR-4 Transit Delay is invalid for the reasons already presented above:**
>
> **The SEIR is egregiously deficient in formulating its less-than-significant determination of the Project's contribution to transit delay:**
>
> - **It omits applicability of the PEIR's analysis of the Lee Extension causing significant impact;**
> - **It arrogation of a four-minute Project-related delay standard is based on misapplication of City Charter 8A.103 (c)1 whose 4-minute standard is relative to the MUNI schedule;**
> - **In the example of the 43 Masonic, the SEIR's fails to account for the route segment between CCSF Bookstore and Balboa Park Station, thus grossly lowballing the Project's contribution to transit delay.**
> - **The Kittelson Travel Demand Memo and Kittelson Transit Delay Memo fail to evaluate EB left turns at Brighton. It fails to assess the (high--aj) probability that BR residents will turn left at**

**Brighton, cut through Whole Foods ingress/egress, and then turn left again onto Lee.**

4 (cont.)

**Finally, the TR-4 determination fails the substantial evidence standard of the Significance Criteria:**

*The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence.*

**********

*As discussed in Table 3.B-18, p. 3.B-74, under Impact TR-4, under existing plus project conditions, the increase in transit delay associated with either the Developer's Proposed Option and the Additional Housing Option would not result in significant transit delay impacts. However, the transit delay contribution from City College's Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.*

As shown previously, that Reservoir-related delay "would not result in significant transit delay Impacts" has been shown to be objectively false.

After the false assertion that portrays the Reservoir Project as blameless for transit delay, C-TR-4 then throws the blame for cumulative Transit Delay on City College when its Facilities Master Plan gets up and running in the future. The phrasing of the passage essentially shifts the blame for cumulative transit delay impacts on City College, instead of admitting that the primary/proximate cause for transit delay is the Project itself.

The main error in C-TR-4 is that the Reservoir is presumed to be the baseline condition when in fact City College should be treated as the baseline condition.

Crucially, City College's Facilities Master Plan is essentially a **renovation and replacement program** for existing deteriorated, end-of-useful life buildings/facilities. Other than normal growth, build-out of the FMP will not generate new, appreciably substantial vehicle trips above what exists today as the existing condition. Furthermore any parking structures in FMP would be a direct result of the Reservoir Project's elimination of student parking. Although the Planning Dept would want to categorize FMP parking as new, objectively the FMP parking will be replacement parking, not "new."

In contrast, it is the Reservoir Project's new residents that will generate new vehicle trips that would cause transit delay.

**The SEIR reverses cause and effect in C-TR-4. It does this by treating the Reservoir Project as if it's the existing setting in its assessment of cumulative effects and treats CCSF as the new kid on the block. The fact of the matter is that CCSF must be treated as the baseline condition,**

**and the Reservoir Project as the new kid on the block. I offer as an example a critique of a 11/17/2016 Planning Dept letter that was sent to City College authorities:**

4 (cont.)

**HYPOCRISY OF BALBOA RESERVOIR PROJECT PLANNERS**

In reviewing Sunshine Ordinance documents, I have come across a 11/17/2016 Planning Dept letter addressed to City College BOT signed by its Director, John Rahaim (attached for your convenience).

The 11/17/2016 letter provided the City's input on the City College draft FMP.

Under the heading of "Access, Parking, and Transportation Demand Management", the letter states:

> *"CCSF has stated that it anticipates maintaining or increasing the number of parking spaces associated with the campus as on-and off-campus surface parking is replaced with buildings. This level of parking provision would have negative consequences for neighborhood congestion…"*

Further down in the letter, under the heading "Balboa Reservoir Development Access & Interface", the letter states:

> *"While the design of the Reservoir site has not yet begun, roadway access to the Reservoir site* [cutting through City College property—aj] *is a critical element that needs to be considered now as part of CCSF's master planning process…"*

Back in November 2016 when you first read this letter, I assume that BOT and Administration were able to discern the brazen hypocrisy contained in this letter to SFCCD.

ONE STANDARD FOR CITY COLLEGE……
The City had the audacity in this letter to blame the FMP for negative consequences of proposed FMP parking. The City shows lack of self-awareness and dishonesty when the reason for needing replacement parking is ultimately the Balboa Reservoir's own elimination of student parking—parking which constitutes the existing condition.

……..ANOTHER STANDARD FOR BALBOA RESERVOIR PROJECT
The Planning Dept letter raises the importance for SFCCD to provide roadway access for the Reservoir Project. The letter says "roadway access is a critical element that needs to be considered now…"

Since the City planners say that the parking needs of CCSF stakeholders can be resolved with TDM, the TDM solution should obviate the need for roadway access for the Reservoir Project , too, doncha think?

4 (cont.)

But, no. A double standard applies.

Did you notice that the City's concern for "negative consequences for neighborhood congestion" only applied to City College, but not to the Reservoir Project? FYI, throughout the "public engagement process", Reservoir Project has not shown serious concern for its own negative consequences.

If BOT and Administration allow the City to abuse the City College stakeholders whose interests you are supposed to represent, you are failing in your compliance with Accreditation Standard IV.C4.

--aj 10/9/2017

**********

*To reduce the project's considerable contribution, implementation of* ***Mitigation Measure M-C-TR-4, Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay*** *was identified. This mitigation measure would require the project sponsor to monitor transit travel times and coordinate with the planning department and SFMTA to implement measures to keep transit travel times within four minutes of existing levels.*

> ***Mitigation Measure M-C-TR-4: Monitor Cumulative Transit Travel Times and Implement Measures to Reduce Transit Delay.*** *The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments of the K/T Third/Ingleside, 29 Sunset, 43 Masonic, and 49 Van Ness/Mission lines to determine if a route does not meet its performance standard. If applicable, the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*
>
> ***Transit Travel Time Performance Standard.*** *Existing transit travel times and performance standards for the routes subject to this measure, including study segment and time periods,are shown in Table M-C-TR-4. The routes and study segments shown in Table M-C-TR-4 represent routes and study segments most likely to have a cumulative impact to which the project would have a considerable cumulative contribution.*

What is the "transit travel time performance standard" that is to be met?

The SEIR presents Table M-C-TR-4 Transit Travel Time Performance Standard that, by appearance looks oh, so impressive and credible, and "quantitative"! The Table presents "Existing Transit Travel Time" and "Performance Standard." And it looks SOOO legitimate and objective!

But the key is literally in the fine print of Performance Standards' Footnote "b".

Footnote "b" states: b The performance standard is calculated as the existing transit travel time plus four minutes, or half the headway of a route with headways of less than eight minutes.

As presented in earlier submissions this Performance Standard of "existing travel time plus four minutes" is based on the misappropriation and misuse of the Charter Section 8A.103 (c)1. 4 (cont.)

Here I present some examples of the increase in travel time that results from the generous "plus four minutes" Performance Standard based on figures from Table M-C-TR-4:

| Transit Line | Study Segment | Existing Transit Travel Time--PM | Performance Standard--PM | Percent Increase in Travel Time |
|---|---|---|---|---|
| K/T | Jules Ave/Ocean Ave to Balboa Park BART | 8:42 | 12:42 | **46.0%** |
| 29 | Mission St/Persia Ave to Plymouth Ave/ Ocean Ave | 9:55 | 15:10 | **52.9%** |
| 43 | Gennessee St/Monterey Blvd to Frida Kahlo Way/CCSF South Entrance | 4:23 | 8:23 | **91.3%** |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission St/Persia Ave | 10:04 | 14:04 | **39.7%** |
| | | | | |

The Planning Dept-created threshold of significance of an additional 4 minutes results in **increases in Reservoir-related travel times of 46%, 52.9%, 91.3%, and 39.7% respectively for the K-T, 29, 43, and 49 line segments in the Table. By any objective measure, these would be extremely substantial contributions to transit delay.**

The only legitimate standard to be used to comply with the Transit First Policy is: four minutes late as measured against a MUNI time point…….Not a "plus 4" creatively designed qualitative threshold of significance.

Regarding Mitigation Measure M-C-TR-4's "*The project sponsor, under either project option, shall monitor cumulative transit travel times for the identified route segments…. the project sponsor shall implement feasible measures (as developed in consultation with SFMTA) to reduce transit delay and meet the transit travel time performance standard.*

ARE YOU KIDDING ME?!! Monitor and implement "**feasible"** measures?!!

Once the Project has been approved and built, monitoring will only confirm what people who have actual ground-level, real-life based experience in the area have been saying all along about traffic issues that would ultimately cause severe MUNI delay.

And at that point, there will be no **feasible** measures to implement because the damage will have already been done.

There will be no feasible measures because the Reservoir Project the project area is characterized by streets that cannot be widened. There will be no feasible way to effectively

reduce transit delay. A 2012 Haas School of Business study about a possible Reservoir Project recognized the difficulties of "*… limited access points and large influx of new residents".* for such a project.

To think that monitoring transit delay and implementing "feasible" measures such as TDM will be able to satisfactorily mitigate the impact of the Reservoir would be ludicrous.

**Thankfully, the SEIR arrives at a realistic determination (except for the undue blame given to a City College contribution to future transit delay) for C-TR-4:**

> *In consideration of the uncertainty surrounding the development at City College's Ocean Campus, the uncertainty of the Balboa Reservoir Project's TDM measure effectiveness, and the uncertainty of SFMTA approval of other measures under their jurisdiction, the impact of the proposed project options would remain* ***significant and unavoidable with mitigation,*** *even with implementation of Mitigation Measure M-C-TR-4****.***
>
> ***Significance after Mitigation:*** *Significant and Unavoidable.*

4 (cont.)

Submitted by:
Alvin Ja

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir; BRCAC (ECN)
**Subject:** Addendum: Geographic context
**Date:** Tuesday, September 10, 2019 3:05:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I had sent in a comment regarding the geographic context for analysis of transit delay yesterday, 9/9 /2019. 1

I said that the appropriate geographic context would be the the BPS Area Plan's "Project Area."

However, on closer examination, I realized that the BPS Project Area's northern boundary was Judson and Havelock, and did not even include Riordan.

The geographic context for analysis needs to extend beyond the BPS Area Plan's northern boundary of Judson to include Monterey Blvd.

Although not inside the BPS Area Plan's boundaries, the Reservoir Project will impact areas north of the Reservoir lot itself and north of Judson.

--aj

Sent from Yahoo Mail on Android

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir
**Cc:** BRCAC (ECN); Yee, Norman (BOS); Low, Jen (BOS); Maybaum, Erica (BOS)
**Subject:** Addendum to Comment on Initial Study: Land Use
**Date:** Wednesday, September 11, 2019 5:37:12 PM
**Attachments:** Comment 10.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I have added the following addition to "Comment on Initial Study: Land Use": 1

**The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review.**

Please enter into record.

Thanks,
aj

----- Forwarded Message -----
**From:** aj <ajahjah@att.net>
**To:** Poling Jeanie (CPC) <jeanie.poling@sfgov.org>; CPC.BalboaReservoir <cpc.balboareservoir@sfgov.org>; commissions.secretary@sfgov.org <commissions.secretary@sfgov.org>
**Cc:** BRCAC ECN <brcac@sfgov.org>
**Sent:** Tuesday, September 10, 2019, 11:23:25 PM PDT
**Subject:** Comment on Initial Study: Land Use

**COMMENT ON INITIAL STUDY:**

**LAND USE** 2

The Initial Study's B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*

Going to the referred Ch.2 Project Description produces this:

Project Description

## 2.A Project Overview

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood*

2 (cont.)

*Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

This fails to acknowledge that schools are central feature in the immediate vicinity of the Reservoir: City College, Riordan, Lick Wilmerding.

The Reservoir site has historically been used by City College for decades. The Initial Study/SEIR fail to acknowledge this fact.

City College is the main educational, economic, cultural feature of the immediate Reservoir vicinity. The Initial Study/SEIR fail to acknowledge this fact.

City College, Riordan, Lick Wilmerding are the main target destinations for the immediate Reservoir vicinity. The Initial Study/SEIR fail to acknowledge this fact.

I contend that these facts have been deliberately omitted from the description of the baseline existing condition because it is an inconvenient truth. These facts are inconvenient truths that would inhibit the privatization of public assets (though disguised misleadingly as an affordable housing project).

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

From the Association of Environmental Professional's (AEP) CEQA Portal:

*What Are Baseline and Environmental Setting?*

*Under CEQA, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a point in time referred to as the baseline. The changes in environmental conditions between those two scenarios represent the environmental impacts of the proposed project. The description of the environmental conditions in the project study area under baseline conditions is referred to as the environmental setting.*

*Why Is Baseline Important?*

*Establishing an appropriate baseline is essential, because an inappropriately defined baseline can cause the impacts of the project either to be under-reported or over-reported. A considerable number of CEQA documents have been litigated over the choice of a baseline for a given project, and many CEQA documents have been invalidated for the use of an inappropriate baseline (see Important Cases below).*

From 14 CCR 15125:

> ***(a)*** *An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

**The draft SEIR/Initial Study is fundamentally defective because it fails to recognize the baseline condition of City College's prominence and importance in the immediate vicinity of the Reservoir.**

2 (cont.)

**********

***Summary of Land Use Impacts in the PEIR*** (p. B-12)

> *The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR.*

3

For this to be accurate, the following question would have to be answered in the negative:

> *Would the project result in potentially significant effects not identified in the prior EIR?* This question examines whether or not the proposed project would result in new significant or potentially significant environmental effects that were not identified in the PEIR. This could include significant effects that are due to:
>
> Project-specific features of the proposed project.
>
> Substantial changes with respect to the circumstances under which the project would be undertaken, such as real estate development trends in the surrounding area or major projects that were previously unanticipated.

I contend that the answer to the question is YES, thus triggering Impact treatment in the SEIR.

The section acknowledges: *The project site was located within the Balboa Reservoir Subarea and was assumed to include up to 500 residential units.*

A later paragraph states: *The PEIR concluded that implementation of the area plan would not result in significant land use impacts and did not require any mitigation measures.*

SF Planning Dept professionals are aware that a program-level determination is not the same as a project-level determination. Otherwise, the BPS FEIR would not have necessitated project-level reviews of the Kragen Project and the Phelan Loop Project within the FEIR.

It is professionally dishonest for the Planning Dept to pretend that the BPS FEIR's program-level determination for an BPS Area Plan **area-wide** target of 1,780 units

could be legitimately used to insinuate that the Reservoir Project current numbers of 1,100-1,550 units had already gotten the thumbs-up from the PEIR.

Did you forget the earlier quote of the Reservoir sub-area "*assumed to include up to 500 residential units*" ?

In the context of "Project-specific features of the proposed project", by any objective measure, jumping from 500 units in the program-level PEIR to 1,100-1,550 units in the current two Reservoir options is a big increase of 120% and 210% respectively.

The area-wide target of 1,780 units is shown on the Area Plan Development Status Sept 2018 Update pdf. It consists of 790 Tier 1 (0-5 yrs) units and 990 Tier 2 ( 5-20 yrs) units. The pdf shows 482 units built or underway. This leaves an area-wide shortfall of 1,298 units.

Although I can understand the desire to achieve this area-wide target, forcing a square peg into a round hole out of desperation will not succeed without imposing adverse impacts onto the Reservoir vicinity. Trying to force the Reservoir Project--targeted for 500 units in the PEIR--in order to fulfill the 1,298 unit area-wide shortfall is an objectively significant Reservoir impact.

**The approval and certification of the program-level BPS Final EIR with an area-wide target of 1,780 units does not equate with a LTS determination for a project-level 1,100-1,550 Reservoir units. The Initial Study merely manipulates words and paragraphs to imply and assert, without evidence, that:**

*"The proposed project would not result in new or substantially more severe impacts than those identified in the PEIR."*

**The increase from 500 units contained in the program-level PEIR to 1,100 to 1,550 units of the current proposal constitutes "substantial unplanned growth." This increase should trigger SEIR review.**

3 (cont.)

**********

***Summary of Land Use Impacts in the PEIR*** (p. B-12)

This section omits the fact that a zoning change from P (Public) to a Special Use District is A BIG DEAL. Privatizing public land by a private developer is A BIG DEAL.

Since the certification of the BPS Final EIR, there has been a major change in the housing development environment for surplus public sites.

At the time of the PEIR, only non-profit agencies were able to buy and build on public surplus lands.

2015 Prop K Public Land for Housing ended the restriction that only non-profit builders could use public lands for housing. With the passage of Prop K, private for-profit developers were allowed to cash in on a bonanza to privatize public lands.

**The change of zoning from P to SUD to enable privatization of public land is a new**

4

**condition that did not exist at the time of the PEIR. A LTS determination based on conditions that did not exist at the time of the PEIR requires fresh treatment in SEIR.**

4 (cont.)

**********

***Impact LU-2: The proposed project would not conflict with any applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)***

5

The Initial Study fails to assess the PUC Land Use Policy. The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states: *"Use of the land sold is not to result in activities creating a nuisance."*

Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word "nuisance" understates the problem].

From earlier submission to the Reservoir CAC and City Team:

**PUC LAND USE POLICY**

1. The RFQ's section on Applicable Land Use Policies makes no reference to the PUC's own "Framework for Land Use and Management."

2. From the PUC website: By adoption of the Framework, the Commission is seeking to advance the analytical and decision-making process surrounding the administration of real estate assets under the SFPUC's exclusive jurisdiction.

**3.** PUC's Land Use Framework policy allows sale only if: "*Use of the land sold will not result in creating a nuisance."*

***4.*** Even though the PUC Land Use Framework was formulated to focus on "Land Management Guidance for…Disposition of SFPUC Lands," The City Team has dismissed the importance of this policy document: *"It is not necessary, or feasible, for an RFQ to name all of the City policies and procedures that apply to the project."* [ from Staff Response to *"Why doesn't the RFQ discuss the SFPUC Land Use Framework?"* ]

Importantly, Staff misstated the essence of the question. **The real question was whether or not the intended disposition of the PUC Reservoir property complies with PUC's policy on "Disposition of SFPUC Lands"; the question was not whether the Land Use Framework policy is "named."**

**The PUC Land Use Framework was adopted post-PEIR. Its requirement that use of the Reservoir not result in a nuisance should be enforced.**

**********

**The entire Reservoir Project process has avoided discussion or application of the State Surplus Property Statute:** 6

**STATE SURPLUS PROPERTY STATUTE**

The State Surplus Land Statute 54222 says:

*Any local agency disposing of surplus land shall send, prior to disposing of that property, a written offer to sell or lease the property as follows:*

*(c) A written offer to sell or lease land suitable for school facilities construction or use by a school district for open-space purposes shall be sent to any school district in whose jurisdiction the land is located.*

PUC's principle of market rate return is not absolute. SF Administrative Code 23 for Real Property Transactions calls for:

SF Administrative Code 23.20 states

*Transfers of Real Property pursuant to this Article shall be paid for no less than 100% of the appraised value, except where the Board of Supervisors determines by resolution that a lesser sum will further a proper public purpose, and provided that the Public Utilities Commission shall be paid at least the historical cost of such Real Property.*

SF Administrative Code 23.3 for Real Property Transactions calls for:

*"... sales price of at least 100% of the appraised value of such Real Property, except where the Board determines either that (a) a lesser sum will further a proper public purpose, or..."*

The Balboa Park Station Area Plan had called for developing the Reservoir to "best benefit the Neighborhood, City, Region as a whole." Yet any analysis of what constitutes "best benefit" has been bypassed. Instead, by fiat, the City declared that the Reservoir would be used for housing to be developed by private developers. And despite the teacher shortage, consideration for teacher housing by school has been minimized.

**The Reservoir Project has apparently ducked the State Surplus Property Statute's requirement that the property be offered for school facilities construction. This omission should trigger treatment in the SEIR.**

Submitted by:

Alvin Ja

**From:** aj
**To:** CPC-Commissions Secretary; Poling, Jeanie (CPC); CPC.BalboaReservoir
**Cc:** BRCAC (ECN)
**Subject:** INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING
**Date:** Saturday, September 14, 2019 7:28:57 AM
**Attachments:** Comment 11.docx
CAC-Comments-From-SaveCCSF final.doc

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Planning Commission:

## INADEQUACY OF DESCRIPTION OF BASELINE EXISTING SETTING

1

I had raised the issue of the inadequacy of the Initial Study/SEIR's description of the Reservoir Project's baseline existing condition at the 9/12/2019 Planning Commission meeting. Here, I wish to expand on my allegation.

In an earlier written comment, I had already written the following:

> The Initial Study's B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*
>
> Going to the referred Ch.2 Project Description produces this:

> The Initial Study's B. PROJECT SETTING states: *The project setting and existing site land use characteristics are provided in SEIR Chapter 2, Project Description.*
>
> Going to the referred Ch.2 Project Description produces this:

> Project Description
> **2.A Project Overview**
> *The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*
>
> This constitutes the entire description of the Project Setting's baseline existing condition for the Initial Study/SEIR.

Chapter 3 is entitled "Environmental Setting, Impacts, and Mitigation Measures." It states: "*Sections 3.B through 3.D each includes descriptions of the environmental setting and regulatory framework."*

In a careful search for descriptions of the environmental setting within Sections 3.B, 3.C, and 3.D, here are the descriptions provided:

1 (cont.)

3.B.4 Existing Conditions:

*The project site is a 17.6-acre rectangular parcel and encompasses Assessor's Block 3180/Lot 190 in San Francisco's West of Twin Peaks neighborhood. The project location and site characteristics are described in SEIR Section 2.A, Project Overview, p. 2-1, and Section 2.D.2, Project Site, p. 2-7. The existing land use setting is described in Appendix B, Initial Study, Section E.1, Land Use and Land*

*Use Planning, p. B-12.*

3.C.3: Summary of BPS Area Plan PEIR Noise Section:

**Balboa Park Station Area Plan PEIR Setting**

*The noise setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan [Program] Environmental Impact Report (PEIR) differs from the existing setting today primarily in terms of the increase in traffic volumes resulting from overall employment growth in the San Francisco area and number of noise sources that exist in the area. However, there was a decrease in annual enrollment at the adjacent City College Ocean Campus of nearly 25 percent between 2008–2009 and 2017–2018, the most recent year for which data are available.151 In addition, since the December 2008 certification of the PEIR, development has occurred adjacent to the project site. City College filled the east basin of the reservoir site and raised its grade to match*

*surrounding terrain to the east, and constructed the Multi-Use Building.*

3.C.4 Environmental Setting:

3.C.4 contains technical information regarding noise. There is no content describing the overall existing setting.

3.D.3 Summary of BPS Area Plan Quality Section:

**Balboa Park Station Area Plan PEIR Setting**

*The air quality setting for the Balboa Park Station Area Plan (area plan) discussed in the Balboa Park Station Area Plan Program EIR (area plan PEIR, or PEIR) differs from the existing setting today in terms of air quality conditions, the regulatory environment, and in the level of available information with respect to health risks and hazards. Specifically, at the time of the PEIR, localized concentrations of criteria air pollutants were higher than what are monitored today as many of the regulatory improvements implemented since then have improved air quality conditions. As an example, the PEIR reported that particulate emission standards were regularly exceeded in San Francisco. Since 2007, the effect of regulatory changes has resulted in a reduction in the number of violations of the particulate matter standard despite subsequent strengthening (i.e., more health protective) of the ambient particulate standards.*

3.D.4 Environmental Setting:

3.D.4 Environmental Setting contains information regarding climate and meteorology, and pollutants. There is no content describing the overall existing setting.

**California Code of Regulations Title 14 Section 15125**

California Code of Regulations Title 14 Section 15125 contains the requirements for a description of the existing Environmental Setting in an EIR:

*§ 15125 (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of*

*the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

1 (cont.)

The descriptions of the physical environmental setting in 3.B, 3.C, and 3.D are limited to descriptions involving transportation, noise, and air quality.

Thus, in order for the public and decision-makers to acquire the "most accurate and understandable picture possible of the project's impacts", we are left with the SEIR's 2.A Project Overview contained in Chapter 2, Project Description.

Contrary to § 15125's requirement for a description of the existing condition "in the vicinity of the project", SEIR 2.A only provides a description of the project site:

*The proposed Balboa Reservoir Project is located on a 17.6-acre site in the West of Twin Peaks area of south central San Francisco (see **Figure 2-1, Location Map**). The site is north of the Ocean Avenue commercial district, west of the City College of San Francisco Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is owned by the City and County of San Francisco (City) under the jurisdiction of the San Francisco Public Utilities Commission (SFPUC).*

**THIS FAILS § 15125's REQUIREMENT FOR A DESCRIPTION OF THE AFFECTED VICINITY.**

14 CCR 15125 also has another relevant requirement. It has a requirement that an EIR adequately investigate environmental resources that are unique and would be affected:

> *§ 15125 (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a universally recognized and unique treasure of the San Francisco Bay Area. It is an Appendix G CEQA Environmental Checklist Environmental Factor in the category of Public Services. And although having been repeatedly brought up by the public throughout the "public engagement process", the SEIR fails to adequately address impacts on CCSF and other schools in the "full environmental context."

I have attached a 2015 submission by the Save CCSF Coalition to the City Team (OEWD/Planning) and Reservoir CAC. Excerpt

> **Subject:** Input for planning – CCSF must be considered
>
> **Comments:**

CCSF is the central educational, economic, cultural focus of the neighborhood. Any planning and development at the PUC's west reservoir site cannot be allowed to impact CCSF negatively, whether it's in relation to the need for parking for students, faculty and staff; or the needs of PAEC.

Current Balboa Reservoir planning is focused on discouraging private auto use by making parking difficult and more expensive. This goal has the side effect of discouraging enrollment and attendance. Such a policy would only result in shifting car usage to other schools where parking is easier, or causing students to drop out!

Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!

1 (cont.)

**THE DSEIR FAILS TO ADEQUATELY EXAMINE IMPACTS ON CITY COLLEGE AND OTHER SCHOOLS, IN VIOLATION OF § 15125 (c).**

Submitted by:

Alvin Ja

# Save CCSF Coalition
# www.saveccsf.org

**Memo to:**

| | | |
|---|---|---|
| OEWD: | Michael Martin | michael.martin@sfgov.org |
| | Susan Exline | susan.exline@sfgov.org |
| | Emily Lesk | emily.lesk@sfgov.org |
| Planning: | Jeremy Shaw | jeremy.shaw@sfgov.org |
| Reservoir CAC: | | brcac@sfgov.org |

**From:** Save CCSF Coalition
**Date:** November 5, 2015
**Subject:** Input for planning – CCSF must be considered

**Comments:**
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Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!

On behalf of the Save CCSF Coalition,

Wendy Kaufmyn

Wendy Kaufmyn
Monica Collins, staff
Christine Hanson, student
Francine Podenski, retired Department Chair
Donna Hayes, Counselor
John Hayes
Richard Baum, Instructor
Tarik Farrar, Instructor
Harry Bernstein, Instructor
Steven Brown, Department Chair
Leslie Simon, Program Coordinator

**From:** aj
**To:** CPC-Commissions Secretary; Poling, Jeanie (CPC); CPC.BalboaReservoir
**Cc:** BRCAC (ECN)
**Subject:** CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY
**Date:** Saturday, September 14, 2019 9:03:56 PM
**Attachments:** Comment 12.docx
RESERVOIR-RELATED DELAY.docx

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# CONSEQUENCES OF THRESHOLD OF SIGNIFICANCE USED FOR TRANSIT DELAY

1

**The "less-than-significant" determination for Impact TR-4 is invalid. It is invalid because its 4-minute threshold of significance/Performance Standard is arbitrarily high and has been arrived at with neither proper authority nor substantial evidence.**

**Allowance of a 4-minute Reservoir-related Transit Delay threshold of significance would violate the Transit First Policy.**

**Although the SEIR finds potentially significant impact for C-TR- 4, the potential impact is unfairly attributed to City College's FMP.**

**The actual real-world impact will be from the Reservoir Project; not City College. As such, the Reservoir Project's true impact to Transit Delay has been covered up by an egregiously liberal 4-minute threshold of significance. As such, the LTS determination for Impact TR-4 should objectively be invalid.**

**City College's future plans are fundamentally renovation projects to replace worn-out facilities. These renovation projects will not, in and of themselves—unlike the Reservoir Project—induce substantially greater demand for education services and resultant travel demand.**

**The SEIR blames the victim in its discussion of Impact C-TR-4.**

I wish to reinforce my earlier analysis of the inappropriateness of using a 4-minute threshold of significance in reaching a "less-than-significant" determination for Impact TR-4.

I have already provided several critiques of various aspects of the SEIR's analyses contained in Section 3.B, Transportation & Circulation.

I have already compared the numbers for "Project-Related Increase in Delay" provided in Table 3.B-18, *Transit Delay Analysis*. I compared the Project-Related Delay to scheduled MUNI running times for the 43 line.

My analysis showed:

> *Option 1's " Project-Related Increase in Delay" of 115 seconds (1.9 minutes) represents a **27.4% increase in travel time** for the 7-minute running time segment*

*between Monterey/Gennessee and Balboa Park Station.*

*Option 2's contribution of 141 seconds (2.4 minutes) of Reservoir-related delay represents a **33.6% increase in travel time** over the scheduled 7 minute running time between Monterey/Gennessee to Balboa Park Station.*

1 (cont.)

I have analyzed the latest MUNI schedule information. I have attached a Table entitled "Reservoir-Related Delay in Relation to Reservoir Area MUNI Characteristics."

The Table compiles information gathered from official MUNI scheduling documents. The documents are "Rotations" and "Trains" that contain information on headways and timepoints.

The Table shows the percentage contribution of real-world Reservoir-related delay relative to current MUNI timepoint-to-timepoint running times, using the SEIR's 4-minute threshold of significance.

Percentage of increase in travel time over the existing MUNI running times are:

<!--[if !supportLists]-->• <!--[endif]-->K Ingleside (between Geneva/San Jose and St. Francis Circle): 23.5% to 30.8%

<!--[if !supportLists]-->• <!--[endif]-->8/ 8BX Bayshore/ Bayshore Express (Geneva/Mission-Unity Plaza) 50.0% to 66.7%

<!--[if !supportLists]-->• <!--[endif]-->29 Sunset (19th/Holloway – Ocean/BART) 25.0% to 33.3%

<!--[if !supportLists]-->• <!--[endif]-->43 Masonic (Monterey/Gennessee – Geneva BART) 44.4% to 57.1%

<!--[if !supportLists]-->• <!--[endif]-->49 Van Ness (Mission/Ocean – Unity Plaza) 50.0% to 57.1%

**The lowest end of the range of Reservoir-related delay "authorized" by the SEIR is 23.5% increase over the K segment between Balboa Park Station and St. Francis Circle.**

**A threshold of significance that would allow 23.5% to 66.7% increases over existing running times is an egregiously poor threshold. FAIL and FUBAR.**

Submitted by:

Alvin Ja

| LINE | WEEKDAY HEADWAY (minutes) | | | BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints) | RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes | | |
|---|---|---|---|---|---|---|---|
| **SOURCE OF MUNI DATA:**<br><br>**CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019** | | | | | Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!) | Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!) | |
| K Ingleside | AM PEAK | MID-DAY | PM PEAK | KT<br><br>Geneva/San Jose-<br><br>St. Francis Circle | 23.5% to 30.8% | 100% | |
| | IB:<br><br>9-12 | IB<br><br>& OB:<br><br>10 | IB:<br><br>9-10 | AM: 14<br><br>MID-DAY: 13<br><br>PM: 17 | | | |
| | OB:<br><br>8-10 | | OB:<br><br>8-10 | AM: 15<br><br>MID-DAY: 15<br><br>PM: 16 | | | |
| 8/8BX<br><br>Bayshore | AM PEAK | MID-DAY | PM PEAK | 8/8BX<br><br>Geneva/Mission–<br><br>Unity Plaza | (For Inbound only)<br><br>50% to 66.7% | 100% | |
| | IB: | IB: | IB: | AM: 8 | | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | 6-7 | 7 | 6-7 | MID-DAY: 6<br>PM: 8 | | | |
| | OB:<br>7 | OB:<br>7-8 | OB:<br>7 | (not available)<br>AM:<br>MID-DAY:<br>PM: | | | |
| | | | | | | | |
| LINE | WEEKDAY HEADWAY (minutes) | | | BPS AREA RUNNING TIME FOR ROUTE SEGMENT (between MUNI timepoints) | RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes | | |
| | | | | | Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!) | Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!) | |
| 29<br>Sunset | AM PEAK | MID-DAY | PM PEAK | 29<br>19TH/Holloway-<br>Ocean BART | 25% to 33.3% | 100% | |
| | IB:<br>9 | IB<br>&<br>OB:<br>12 | IB:<br>10-12 | AM: 12<br>MID-DAY: 14<br>PM: 15-17 | | | |
| | OB:<br>10 | | OB:<br>10 | AM: 15-16<br>MID-DAY: 15<br>PM: 16 | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| 43<br>Masonic | AM PEAK | MID-DAY | PM PEAK | 43<br>Monterey/ | 44.4% to 57.1% | 100% | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | Gennessee-Geneva BART | | | |
| | IB: 9<br>OB: 10 | IB & OB: 12 | IB: 10<br>OB: 10 | AM: 9<br>MID-DAY: 8<br>PM: 8<br>AM: 7-8<br>MID-DAY: 7<br>PM: 7 | | | |
| | | | | | | | |
| | | | | | | | |
| LINE | WEEKDAY HEADWAY (minutes) | | | BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints) | RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes | | |
| | | | | | Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!) | Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!) | |
| | | | | | | | |
| | | | | | | | |
| 49 Van Ness | AM PEAK | MID-DAY | PM PEAK | 49 Mission/Ocean-Unity Plaza | 50.0% to 57.1% | 100% | |
| | IB: 8<br>OB: 10 | IB & OB: 9 | IB: 8<br>OB: 7-8 | AM: 8-9<br>MID-DAY: 8<br>PM: 9<br>AM: 8<br>MID-DAY: 7<br>PM: 8 | | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 54<br><br>Felton | AM PEAK | MID-DAY | PM PEAK | 54<br><br>Geneva/Mission-<br><br>Geneva BART | | | |
| | IB & OB:<br><br>20 min | | | AM: 4<br><br>MID-DAY: 4<br><br>PM: 5 | | | |
| | | | | AM: 4-5<br><br>MID-DAY: 4<br><br>PM: 5 | | | |

**From:** aj
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir; BRCAC (ECN); Hood, Donna (PUC); Board of Supervisors, (BOS)
**Cc:** Yee, Norman (BOS); Maybaum, Erica (BOS); Low, Jen (BOS)
**Subject:** Balboa Reservoir: MISREPRESENTATION OF THE REQUIREMENTS OF 14CCR 15125(a)
**Date:** Monday, September 16, 2019 5:19:11 AM
**Attachments:** Comment 13-MISREPRESENTATION OF THE REQUIREMENTS OF 14CCR 15125.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Planning Commission, PUC, BOS:

From the very beginning, the Planning Dept/OEWD has consistently minimized and downplayed the Reservoir Project's impacts on City College.

The draft EIR for the Reservoir Project provides an example of the deliberate downplaying of City College's position in the vicinity of the Project. 1

The SEIR's description of the baseline environmental omits any mention of City College. In doing so, the SEIR violates the requirements of 14 CCR 15125 (a).

MISREPRESENTATION OF THE REQUIREMENTS OF 14CCR 15125(a)

**The Planning Dept has made what I can only interpret to be a deliberate misrepresentation of the requirements of Title 14, Division 6, Chapter 3, Article 9, Section 15125, "Environmental Setting."**

**The SEIR substitutes "project site" for "vicinity of the project" when it describes its proclaimed "consistency" with §15125(a).**

**A proclaimed consistency is not the same as compliance with a REQUIREMENT.**

**THE SEIR VIOLATES THE REQUIREMENTS OF §15125(a).**

The SEIR's 3.A.2, *Overall Approach to Impact Analysis* provides the following misrepresentation of §15125(a)**:**

> As described in SEIR Chapter 1, Introduction, this SEIR is a project-level EIR that is tiered from a previously certified program-level EIR, namely the PEIR. As a project-level EIR and consistent with CEQA Guidelines section 15125(a), the impact analysis is generally based on potential physical effects of the project compared to existing or baseline conditions of the physical environment at the project site at the time of publication of the NOP, which was in October 2018.

Comment:

<!--[if !supportLists]-->• <!--[endif]-->§15125(a) is not just a "CEQA Guideline"; it is the LAW.

<!--[if !supportLists]-->• <!--[endif]-->The language of the §15125(a) law uses the term "must", which is a REQUIREMENT.

<!--[if !supportLists]-->• <!--[endif]-->The law states: *(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project.*

<!--[if !supportLists]-->• <!--[endif]-->The SEIR's substitution of "project site" in place of the required "in the vicinity of the project" invalidates the Balboa Reservoir Impact Analysis.

1 (cont.)

Here is §15125(a):

> <!--[if !supportLists]-->*(a)* <!--[endif]-->*An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

**FAIL AND FUBAR.**

Submitted by:

Alvin Ja

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Comment:

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- The law states: *(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project.*
- The SEIR's substitution of "project site" in place of the required "in the vicinity of the project" invalidates the Balboa Reservoir Impact Analysis.

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**FAIL AND FUBAR.**

Submitted by:
Alvin Ja

| | |
|---|---|
| **From:** | aj |
| **To:** | Poling, Jeanie (CPC); CPC.BalboaReservoir; CPC-Commissions Secretary |
| **Cc:** | Yee, Norman (BOS); Low, Jen (BOS); Maybaum, Erica (BOS); Board of Supervisors, (BOS) |
| **Subject:** | REVISION--- Re: COMMENT ON "Summary of Impacts of Proposed Project—Disclosed in SEIR including Initial Study" Table s-2 |
| **Date:** | Sunday, September 22, 2019 1:26:13 PM |
| **Attachments:** | Comment 14--Summary of Impacts.docx<br>Comment 14a-SOUTHBOUND 43 MASONIC DELAY.docx<br>Comment 14b-SEIR Project Delay.docx<br>Comment 14c-Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics.docx<br>Comment 14d- TDM NON SEQUITUR.pdf |

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Here is a revision of my comment on "Summary of Impacts..." to correct for clarity below in **red**.

What I was trying to, but failed to get across in the original version was that the determinations for TR-4 and C-TR-4 were reversed.....That the C-TR-4 significant impact finding should have been for TR-4; and that the CCSF FMP cumulative contribution to transit delay was being blamed disproportionately for contributions to transit delay. 1

C-TR-4 obscures the reality that most of the transit delay will be generated by the Reservoir Project, as opposed the City College's FMP which is mainly a renovation and replacement program.

--aj

On Friday, September 20, 2019, 10:24:15 PM PDT, aj <ajahjah@att.net> wrote:

**COMMENT ON**

**"Summary of Impacts of Proposed Project—Disclosed in SEIR including Initial Study" Table s-2**

IMPACT TR-4 (Operation of proposed project would not substantially delay public transit)

Table S-2 shows for Impact TR-4 **Less-than-significant** Level of Significance.

I summarize how this determination is incorrect.

1. The threshold of significance that is used to come to the LTS determination is based on an inordinately low standard for the threshold. The establishment of a 4-minute late threshold before Reservoir-related transit delay "might" be considered significant is big enough for a tank to go through. By defining the transit delay threshold to be 4 minutes, the Reservoir Project is issued a "get out of jail free card".

2. The City Charter establishes performance criteria for MUNI. Section 8.A 103 (c) establishes that a MUNI bus/car that arrives over 4 minutes late to a timepoint is considered to be late, for the purposes of the City Charter mandate.

3. The SEIR/Reservoir Project threshold of significance gives the Project the privilege of independently adding 4 minutes of additional delay to MUNI before the Reservoir Project transit delay "might" be considered significant. This freedom and privilege to independently add 4 minutes Reservoir-related delay flies in the face of the intent of the Transit First Policy.

4. Attached for your convenience, I include 3 tables:
    a. SB 43 Masonic Delay: MUNI Standard v. Reservoir Standard
        - This Table relates to the 43 line between the Monterey/Gennessee timepoint and the Balboa Park Station timepoint:
            - o The running time between the two timepoints is 7 minutes;
            - o The MUNI late standard is 11 minutes;
            - o The SEIR/Project threshold of significance is 19 minutes: a **171% increase over the scheduled 7 minutes.**
    b. SEIR Table 3.B-18 Transit Delay Analysis
        - This Table presents SEIR's own numbers for "Project-Related Increase in Delay"
            - o The Table lowballs the actual delay for the 43 Masonic. The SEIR presents delays of 73 seconds and 83 seconds for Options 1 and 2, respectively. The numbers presented by the SEIR omit the 43 segment between City College Bookstore and Balboa Park Station.
            When the Bookstore-BPS segment (Geneva Ave EB) is factored in properly, the delays come out instead to 115 seconds (1.9 minutes) and 141 seconds (2.4 minutes) for Options 1 and 2, respectively. 115 seconds and 141 seconds of Project-related delay constitute **increases of 27.4% and 33.6% over the 7-minute Monterey/Gennessee-BP Station segment's running time.**
            - o Comparing the Reservoir-related delay for the 43's Monterey/Gennessee-BP Station segment to the City-

Charter-mandated 4-minute late allowance:

- Option 1's delay of 115 seconds **consumes 48.0% of the 4 minutes of lateness allowed to MUNI**;
- Option 2's delay of 141 seconds **consumes 58.8% of the 4 minutes of lateness allowed to MUNI**

- **These percentages of 171%, 27.4%, 33.6%, 48.0%, and 58.8% are objectively significant. These percentages can only be made "less than significant" by the establishment of a threshold of significance of 4 minutes, which is constructively a "get out of jail free card."**

c. Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics

- This Table is compiled from current (effective 9/5/2019) MUNI schedules for KT, 8/8BX, 29, 43, 49, 54 lines. For weekday AM Peak, Mid-day, and PM Peak, I have compiled headways and running times.
- Using the SEIR's 4-minute threshold of significance, the last two columns provide Reservoir Project-related contribution percentages to running time delay and to MUNI's 4-minute late allowance:
  - K Ingleside: **23.5% - 30.8% delay contribution** between BP Station-St. Francis Circle;
  - 8/8BX Bayshore (IB only): **50% - 66.7%** delay contribution between Unity Plaza-Geneva/Mission;
  - 29 Sunset: **25.0% - 33.3%** delay contribution between 19th/Holloway- Balboa Park Station;
  - 43 Masonic: **44.4% - 57.1%** delay contribution between Monterey/Gennessee- Balboa Park Station;
  - 49 Van Ness: **50.0% - 57.1%** delay contribution between Mission/Ocean- Unity Plaza

The LTS determination for Impact TR-4 cannot be objectively sustained. The LTS determination is a case of "intelligence and facts being fixed around policy."

**********

IMPACT C-TR-4 (The proposed project, in combination with reasonably foreseeable future projects, may result in a potentially significant cumulative impact related to public transit delay and the project could contribute considerably.)

C-TR-4 is founded on a distortion of reality. Via manipulation of the threshold of significance for evaluating transit delay, the impact of the Balboa Reservoir Project has been determined to be less-than-significant **for Impact TR-4**.

It is only with willful disregard for reality that the SEIR can come to a conclusion that a 1,110- 1,550 unit project will have less than significant impact on an area which the Nelson-Nygaard TDM Study described as having "limited roadway space, transit infrastructure, …" **in Impact TR-4**.

**But ,t**he SEIR **then** finds significant cumulative impact for C-TR-4. In the topsy-turvy Red Queen world of the Planning Dept, the 1,100- 1,550 unit Reservoir Project is determined to have LTS impact on transit delay. Yet, the SEIR portrays the CCSF Facilities Master Plan as being a big contributor to future cumulative transit delay despite the fact that the FMP is primarily a replacement and renovation program. A replacement and renovation program will have much less of an impact in increasing travel demand than an 1,100- 1,550 unit new development of mostly market-rate/unaffordable housing.

Mitigation Measure M-C-TR-4:

As discussed in earlier submissions, Table M-C-TR-4 "Transit Travel Time Performance Standard" provides the Reservoir Project an extremely generous allowance of 4 minutes of Reservoir-related transit delay. Merry Christmas!

The damage to transit delay by the Project itself will already have been done before M-C-TR-4's Monitoring and Implementing Feasible Measures for cumulative impacts even gets rolling.

Given the Nelson-Nygaard TDM Study's recognition of limited roadway space and transit infrastructure, there will be no feasible measures to implement, other than hoping for success of TDM measures.

Regarding the effectiveness of TDM as mitigation, please examine the attached "Balboa Reservoir's TDM Non Sequitur."

Submitted by:

Alvin Ja

9/20/2019

## SOUTHBOUND 43 MASONIC DELAY:

## MUNI STANDARD v. RESERVOIR PROJECT STANDARD

| SOUTHBOUND 43 MASONIC DELAY:<br>MUNI STANDARD v. RESERVOIR STANDARD | | | | | | |
|---|---|---|---|---|---|---|
| ROUTE SEGMENT | | TIME POINT | | ON-TIME | ADDITIONAL DELAY TIME | |
| | | | | MUNI on-time | MUNI late standard (4 min) | Reservoir Late standard (additional 4 min) |
| **ELAPSED TIME:** | | Monterey/Gennessee | | 0:00 | 0:00 | 0:00 |
| Monterey/Gennessee to Bookstore Running time (r.t.) | | **4 min running time** | | +4 r.t. | +4 r.t. + 4 late | +4 r.t. +4 MUNI +4 Reservoir |
| **ELAPSED TIME: Monterey/Genn to Bookstore** | | CCSF Bookstore (City College Terminal) | | **0:04** | **0:08** | **0:12** |
| Bookstore to BPS Running time | | **3 min running time** | | +3 r.t. | +3 r.t. (4 min standard NOT allowed to be cumulative) | +3 r.t. + 4 Reservoir (4 min standard construed to accumulate) |
| **ELAPSED TIME: Monterey/Gen to BPS** | | Balboa Park Station (Geneva/San Jose) | | **0:07** | **0:11** | **0:19** |

Transit Assessment Memorandum.

TABLE 3.B-18
TRANSIT DELAY ANALYSIS

| Corridor | Weekday a.m. Peak Hour (seconds of delay) | | Weekday p.m. Peak Hour (seconds of delay) | |
|---|---|---|---|---|
| | Northbound/ Eastbound | Southbound/ Westbound | Northbound/ Eastbound | Southbound/ Westbound |
| **Transit Delay** | | | | |
| **Existing Conditions** | | | | |
| Frida Kahlo Way | 5 | 15 | 5 | 28 |
| Ocean Avenue | 121 | 143 | 124 | 144 |
| Geneva Avenue | 79 | 53 | 75 | 46 |
| **Existing plus Developer's Proposed Option** | | | | |
| Frida Kahlo Way | 18 | 74 | 29 | 101 |
| Ocean Avenue | 187 | 182 | 182 | 244 |
| Geneva Avenue | 99 | 127 | 117 | 127 |
| **Existing plus Additional Housing Option** | | | | |
| Frida Kahlo Way | 21 | 87 | 46 | 111 |
| Ocean Avenue | 183 | 207 | 208 | 272 |
| Geneva Avenue | 109 | 137 | 133 | 137 |
| **Project-Related Increase in Delay** | | | | |
| **Developer's Proposed Option** | | | | |
| Frida Kahlo Way | 13 | 59 | 24 | 73 |
| Ocean Avenue | 66 | 39 | 58 | 100 |
| Geneva Avenue | 20 | 74 | 42 | 81 |
| **Additional Housing Option** | | | | |
| Frida Kahlo Way | 16 | 72 | 41 | 83 |
| Ocean Avenue | 62 | 64 | 84 | 128 |
| Geneva Avenue | 30 | 84 | 58 | 91 |

SOURCE: Kittelson & Associates, Inc. 2018.

NOTES:

Transit delay includes corridor delay, transit reentry delay, and passenger boarding delay.

*Developer's Proposed Option*

As shown in Table 3.B-18, vehicle and transit trips generated by the Developer's Proposed Option would increase transit delay by a maximum of 73 seconds along Frida Kahlo Way (southbound direction, weekday p.m. peak hour), a maximum of 100 seconds along Ocean Avenue (westbound

# Reservoir-Related Delay In Relation to Reservoir Area MUNI Characteristics

| LINE | WEEKDAY HEADWAY (minutes) | | | BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints) | RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes | | |
|---|---|---|---|---|---|---|---|
| **SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019** | | | | | Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!) | Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!) | |
| K Ingleside | AM PEAK | MID-DAY | PM PEAK | KT Geneva/San Jose-St. Francis Circle | 23.5% to 30.8% | 100% | |
| | IB: 9-12 | IB & OB: 10 | IB: 9-10 | AM: 14<br>MID-DAY: 13<br>PM: 17 | | | |
| | OB: 8-10 | | OB: 8-10 | AM: 15<br>MID-DAY: 15<br>PM: 16 | | | |
| 8/8BX Bayshore | AM PEAK | MID-DAY | PM PEAK | 8/8BX Geneva/Mission – Unity Plaza | (For Inbound only) 50% to 66.7% | 100% | |
| | IB: 6-7 | IB: 7 | IB: 6-7 | AM: 8<br>MID-DAY: 6<br>PM: 8 | | | |
| | OB: 7 | OB: 7-8 | OB: 7 | (not available)<br>AM:<br>MID-DAY:<br>PM: | | | |

| LINE | WEEKDAY HEADWAY (minutes) | | | BPS AREA RUNNING TIME FOR ROUTE SEGMENT (between MUNI timepoints) | RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes | | |
|---|---|---|---|---|---|---|---|
| **SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019** | | | | | Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!) | Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!) | |
| 29 Sunset | AM PEAK | MID-DAY | PM PEAK | 29 19TH/Holloway-Ocean BART | 25% to 33.3% | 100% | |
| | IB: 9 | IB & OB: 12 | IB: 10-12 | AM: 12<br>MID-DAY: 14<br>PM: 15-17 | | | |
| | OB: 10 | | OB: 10 | AM: 15-16<br>MID-DAY: 15<br>PM: 16 | | | |
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| 43 Masonic | AM PEAK | MID-DAY | PM PEAK | 43 Monterey/ Gennessee-Geneva BART | 44.4% to 57.1% | 100% | |
| | IB: 9 | IB & OB: 12 | IB: 10 | AM: 9<br>MID-DAY: 8<br>PM: 8 | | | |
| | OB: 10 | | OB: 10 | AM: 7-8<br>MID-DAY: 7<br>PM: 7 | | | |
| | | | | | | | |
| | | | | | | | |

| LINE | WEEKDAY HEADWAY (minutes) | | | BPS AREA RUNNING TIME ROUTE SEGMENT (between MUNI timepoints) | RESERVOIR-RELATED TRANSIT DELAY THRESHOLD OF SIGNIFICANCE = 4 minutes | | |
|---|---|---|---|---|---|---|---|
| **SOURCE OF MUNI DATA: CURRENT OFFICIAL MUNI RAILWAY ROTATIONS AND TRAINS, effective 9/5/2019** | | | | | Percentage of delay contribution to BPS Area route segment (deemed to be insignificant!) | Percentage of delay contribution to City Charter's MUNI 4-minute late criterion (deemed to be insignificant!) | |
| | | | | | | | |
| | | | | | | | |
| 49 Van Ness | AM PEAK | MID-DAY | PM PEAK | 49 Mission/Ocean-Unity Plaza | 50.0% to 57.1% | 100% | |
| | IB: 8 | IB & OB: 9 | IB: 8 | AM: 8-9<br>MID-DAY: 8<br>PM: 9 | | | |
| | OB: 10 | | OB: 7-8 | AM: 8<br>MID-DAY: 7<br>PM: 8 | | | |
| 54 Felton | AM PEAK | MID-DAY | PM PEAK | 54 Geneva/Mission-Geneva BART | | | |
| | IB & OB: 20 min | | | AM: 4<br>MID-DAY: 4<br>PM: 5 | | | |
| | | | | AM: 4-5<br>MID-DAY: 4<br>PM: 5 | | | |

**BALBOA RESERVOIR'S TDM NON SEQUITUR** (5/23/2017)

Nelson-Nygaard's "Balboa Area Transportation Demand Management (TDM) Plan: Existing Conditions" is available at http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/Nelson_Nygaard_Balboa_TDM-Existing_Conditions_Memo.pdf

IDENTIFYING TRANSPORTATION NEEDS FOR BALBOA PARK AREA

The Nelson-Nygaard TDM Report reports on existing conditions. Using a variety of resource materials and data, the Report, in the main, accurately describes the existing conditions.

This section of the Report correctly identifies "limited roadway space, transit infrastructure, and financial resources" as problems. Yet despite the obvious fact that the elimination of student parking and new Reservoir residents will increase demand placed on limited transportation resources, the Balboa Reservoir Project Team proposes no amelioration for adverse impacts other than TDM.

**The TDM Plan/solution is not a logical outcome of an objective analysis of fact, evidence and common sense. The proposed TDM Plan is a pre-ordained, ideologically-driven solution. It is based on hope, wishful thinking and generalities; not on fact and evidence.**

The 4/13/2016 TDM presentation to the Reservoir CAC followed the "logic" of the non sequitur.

The TDM Report's shortcomings are significant. Here is an attempt to point out such shortcomings and their negative implications and consequences.

LAND USE

The Report's very first paragraph in the "Land Use" section describes City College in one sentence: *"The CCSF Ocean Campus, zoned as public space, is located at the center of the study area and provides publically-accessible sports facilities."*

- **The Report's characterizes CCSF as only being a provider of "publicly-accessible sports facilities." This characterization undermines and ignores CCSF's primary importance as a critical provider of educational services to the broader Bay Area community.**

  **It leads to minimizing the need for the Reservoir Project to mitigate its adverse impacts on CCSF enrollment and attendance.**

  **The Report itself admits that the "***information presented herein …essentially "sets the stage" for what TDM strategies and supporting measures will be considered… "*

**MY CONCLUSION: The Land Use section of the Report sets the stage to downplay adverse impacts to CCSF's educational mission.**

MULTIMODAL CONDITIONS

"Multimodal conditions" is fancy jargon for various modes of transportation. The four modes of transportation examined in the Report are walking, biking, public transit, and driving.

Walking

Highest pedestrian activity during AM and PM peak (rush) hours were at:

- Balboa Park BART entrance on Geneva near San Jose Avenue (**over 500** pedestrians/peak hours counted or modeled)
- Ocean Avenue CCSF entrance (Wellness Center) at Howth (**over 500** pedestrians/peak hours counted or modeled)
- Ocean/Phelan (**201-500** pedestrians )

Biking

Highest bike activity during AM peak (rush) hours [PM Peak bike counts/modeling were substantially lower] were at:

- Geneva/San Jose (**over 40** bike riders)
- Monterey/Congo (**30-39** riders)
- Ocean/Phelan (**20-29** riders)
- Ocean/Howth (**20-29** riders)

Transit

MUNI passenger data from SFMTA was only modeled for the MUNI Metro K line with no boarding data for the rubber tire lines.

K-line Peak hour boardings:

- Ocean/Lee (**501-1000** riders)
- Ocean/Phelan (**251-500** riders)

Driving

Highest auto activity:

- Ocean Avenue east of Phelan ( **over 20,000** vehicles)
- Ocean Avenue west of Phelan (**17,500- 20,000** vehicles)
- Geneva Avenue west of Phelan (**12,500- 15,000** vehicles)
- Phelan Avenue south of CCSF entrance (**10,000- 12,500** vehicles)
- Phelan Avenue north of CCSF entrance and onto Judson (**less than 10,000** vehicles)

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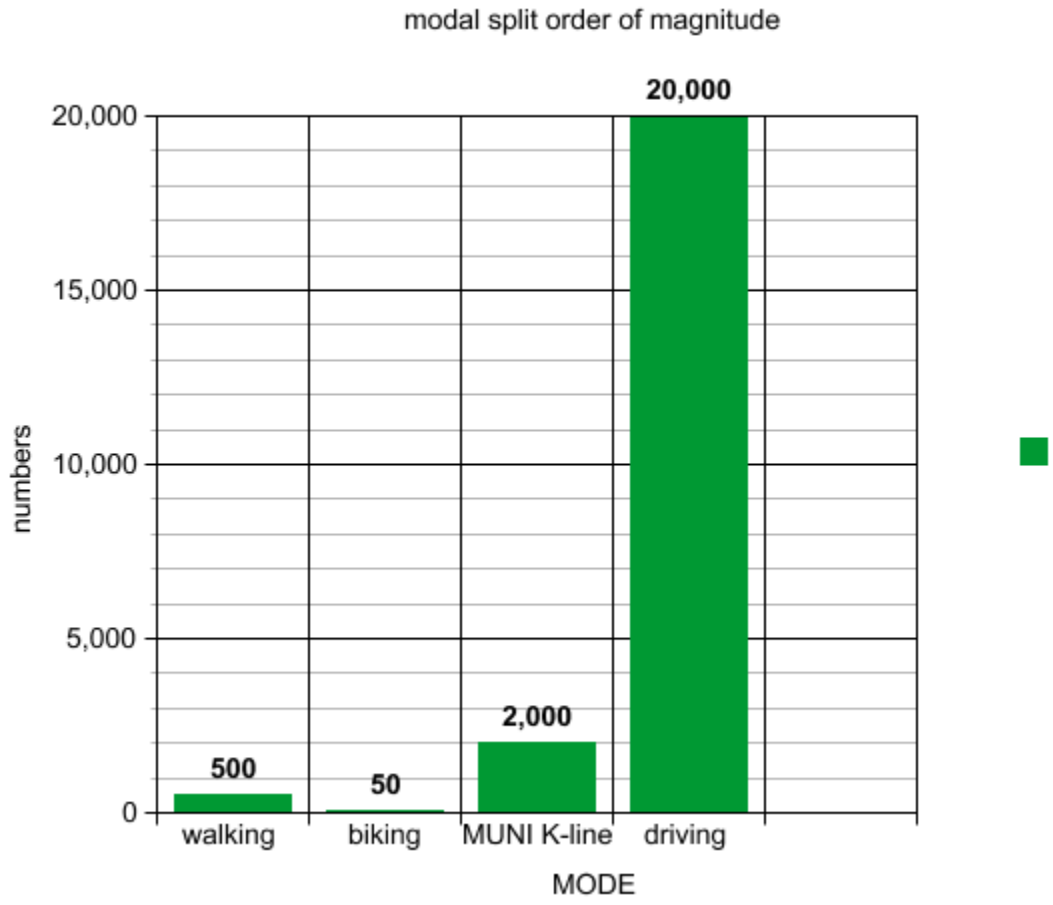
Modal split order of magnitude

Sensible use of the data contained in the TDM Report requires an understanding of the order of magnitude of the various modes:

- Walking is on the scale of 500 max (walkers also include transit users and drivers who have to walk to reach their final destinations)
- Biking is on the scale of 50 max
- MUNI Metro K line is on the scale of 2000
- Driving is on the scale of 20,000

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After providing a picture of the general traffic patterns for the Balboa Park Area, the Report continues on to address "CCSF Ocean Campus Vehicle Trip Generation." The Report accurately states that the Ocean Campus "is a major generator of person and auto traffic in the Balboa Area."

- **That the Ocean Campus is a major generator of traffic is an indisputable truth. However no context is provided regarding this truth. Without providing context, the implication Is that people who drive to CCSF harm society.**

  **What is the unstated appropriate context? The appropriate context is that the people who drive are going to a destination to learn, teach and support the educational needs of society.**

**The Balboa Reservoir has utterly failed to weigh the trade-offs involved between the educational needs and housing needs of the community.**

**More importantly, although this is an existing conditions report, the Report fails to mention the future trip generation that the Reservoir Project itself will add to the TDM Study Area.**

COMMUNITY ENGAGEMENT/SURVEYS

In the build-up to the Iraq War, the head of British Secret Intelligence Service (M16) recorded in the 'Downing Street Memo' how the war could be justified to the public: *"... the intelligence and facts were being fixed around the policy."*

The Balboa Reservoir Project does something similar. To its credit, the Nelson-Nygaard Report presents legitimate surveys of the neighboring community. But the survey data is not used to objectively formulate conclusions regarding transportation and parking. Rather, the solution/policy had already been fixed. To its credit, the Report admits:

> " the survey findings also assessed peak utilization rates. They indicated that, during the midday period, five off-street parking lots at CCSF Ocean Campus experience peak utilization that are above the average peak parking demand. For example, the survey findings indicated that Res. 1 and Lots A, H, S, U all experience peak parking occupancies between 98% and 100%. Therefore, on any given day, the majority of employee-only lots and the student lot (Res. 1) are completely full during the midday period. The weekday peak parking utilization for Res. 2 Lot was 9%."

**The policy of TDM had already been fixed, prior to, and regardless of the evidence contained in the surveys that were conducted subsequent to the TDM policy decision.**

THE TDM NON SEQUITUR

The City Team, instead of formulating the Development Parameters based on evidence and data, had *a priori* concluded that TDM is the solution to adverse impacts that would be generated by new Reservoir residents and by the eviction of student parking.

TDM is a legitimate part of an overall Transportation Sustainability Program for the City as a whole. However, TDM as applied to the proposed Balboa Reservoir Project is not a suitable or realistic solution. TDM in the context of Balboa Reservoir will not be able to solve the problem of student access to education created by the Development Parameters. Nor will TDM measures be able to meaningfully solve transportation and parking problems generated by the Project.

Based on the survey results, TDM is a non sequitur:

CCSF TRANSPORTATION SURVEY

The most telling question in the CCSF Transportation Survey was: "**When choosing how you typically travel to/from CCSF Ocean Campus, what are you most concerned about?**"

The question listed the valid concerns of cost, distance, travel time, arriving on time, and comfort/safety of trip for CCSF stakeholders.

· "Travel time" and "Arrival on time" were overwhelmingly most important concerns (90% and 73.2 % respectively)

Most of us want to be "green" and support the idea and practice of walking, biking and public transit. However the response to **"What would encourage you to use other transportation modes? (select all that apply")** is grounded in the real-world needs of CCSF stakeholders.

Overwhelmingly, the most important consideration for respondents was "reducing travel time." That efficient use of time is important should not be surprising to the City Team.

The CCSF Ocean Campus Transportation Survey results just confirm common sense. The survey confirms the common sense input that ordinary citizens have been trying to communicate to the Mayor's Office and Planning Department to little effect—because the City Team's "sustainable" Transportation Demand Management (TDM) "solution" had been pre-ordained in contradiction and opposition to the real world lives of CCSF and neighborhood stakeholders.

TDM is the City Team's solution for transportation and parking problems that will be generated by the Balboa Reservoir Project. According to Planning Department's Transportation Sustainability Program, "*TDM is the "Shift" component of the Transportation Sustainability Program. A series of development focused TDM measures incentivize on-site amenities intended to provide sustainable alternatives to driving – or "shifting" people's usual practice of driving alone in their cars – by providing residents, business tenants, and visitors with sustainable alternative travel options."*

However, instead of just applying TDM measures to the beneficiaries ("residents, business tenants, and visitors") of the Balboa Reservoir Project, the City Team has shifted the brunt of the application of TDM to the pre-existing stakeholders of CCSF, Riordan, Sunnyside Elementary, St. Finn Barr, Lick Wilmerding, and the Ingleside, Westwood Park and Sunnyside neighborhoods.

No matter how the City Team tries to convince the public that its TDM Study will be comprehensive in nature, the fact remains that TDM is self-defined within its own parameters. The Reservoir Project's TDM solution is straightforwardly documented: *"The Planning Department and SFMTA are proposing a Transportation Demand Management (TDM) study in coordination with CCSF Ocean Campus to reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents."*

One of the components of the City's Transportation Sustainability Program is "Shift." The idea is to shift car drivers onto other more sustainable modes of transportation. However, in the Balboa Reservoir context, "shift" has another more important meaning.

**The different and more important real-world meaning of "shift" is: shifting the burden of mitigation of CEQA-related adverse impacts onto school stakeholders and neighborhood residents. This is unacceptable.**

COMMUNITY SURVEY (Dept of Environment)

The section on the Community Survey conducted by the Dept of Environment highlighted two survey questions. The two questions pertained to the Existing Mode Split and to "Willingness to Try Different Modes of Transportation."

The main concept of TDM is to get car drivers to walk, bike and take public transit. However the Nelson-Nygaard Report failed to show survey results for a critical question that would show the likelihood of

respondents changing mode of travel. The Report does not show the survey results for Question #9-- ***What is most important to you when you choose how you get to work?***

Although the Report fails to provide survey results for this question, I bet it would be similar to the results for the CCSF Survey: that 'Travel Time' would be one of the most important. I would also guess that 'Reliability' would also be close to the top. If my guess about responses to this question is right, how effective would the Balboa Reservoir Project's TDM measures be able to resolve Travel Time and Reliability concerns?

- **Since the data for Question 9 of the survey has not been presented in the Nelson-Nygaard Report, I will venture this unsubstantiated (but probably correct) conclusion:**

**The TDM objective of shifting substantial numbers of car drivers onto public transit and biking will be unsuccessful because of the real-world importance of Travel Time, Reliability, and Convenience for people leading busy lives…….and who are not privileged to be members of the leisure class.**

--aj 1/3/2017, updated 5/23/17

**From:** Eric Johnson
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Support Balboa reservoir housing - support affordability
**Date:** Wednesday, September 11, 2019 7:22:29 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi - I understand you will be reviewing the Balboa reservoir project tomorrow. Please support this new housing.

I am a renter in Glen Park, struggling with astronomical rents and a total inability to buy housing like (almost) everyone else in this city. If I had to guess, I would say that the majority of those opposed to this project are already lucky enough to own a home. The fact that they would oppose building desperately needed homes on a vast parking lot is absurd and deeply unjust. Have they forgotten Joni Mitchell?

I know these opposition groups are now asking for 100% BMR units. But that request does not align with the arguments they originally put forth against this project. They are just shifting the goal posts to prevent this vital, humanitarian housing at any cost. The Planning Commission must see through these tactics. Look at what happened to the proposed affordable senior housing in Forest Hills. It's absolutely barbaric and self-interested. 1

Please give San Francisco a chance, and support this housing.

Thanks!

Eric Johnson

**From:** Wynd Kaufmyn
**To:** CPC.BalboaReservoir
**Subject:** Written Comment for DSEIR Balboa Reservoir Project
**Date:** Sunday, September 22, 2019 3:04:02 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

***The DRAFT SEIR for the Balboa Reservior Project is inadequate because it fails to consider the impacts of the project on the public service of CCSF*** 1

The Reservoir Project will have an adverse impact on higher public educational services offered by City College of San Francisco, a unique and treasured institution by all of San Francisco.

According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules."

Hence, the elimination of over 1,000 student parking spaces by the Reservoir development without first putting viable alternatives into place will limit students' access to higher education services offered by CCSF. 2

The impact on gig-working part-time Instructors who have to travel between multiple community college sites must also be considered as it will likely affect these workers' access to employment.

The Draft SEIR speculates that "likely, the shortfall in parking supply would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." The assumption that those students and contingent faculty will transition to public transportation services is not realistic as both MUNI and BART have capacity issues. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate the already unreliable service. 3

***The DSEIR irresponsibly avoids assessing the possibility that students/contingent faculty will likely not be able to continue attending/working at CCSF.*** 4

***Why is there no recommendation in the DSEIR to enhance public transit infrastructure?***

The DRAFT SEIR notes that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. This is a moot point. Just because the DSEIR does not conflict with the TDM/Sustainability Plan does not mean the project has no impact on the public service of CCSF. There is no evidence that TDM would resolve the effects of lost student parking on student access to higher education.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA 5

impact, it does not exempt the secondary impact on CCSF's ability to provide public higher educational services. It is erroneous to extend 21099's parking exemption onto the elimination of the public benefit of providing access to higher education. 5 (cont.)

The Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot without first ensuring viable alternatives will have the undesirable effect of limiting students' access to higher education services offered by CCSF.

Wynd Kaufmyn
City College of San Francisco
Engineering Instructor & Faculty Adviser to WISE
Vice President AFT 2121
email: wkaufmyn@ccsf.edu
Phone: (415) 239-3159
website: http://fog.ccsf.edu/~wkaufmyn

**From:** Quentin Kopp
**To:** CPC.BalboaReservoir
**Cc:** Board of Supervisors, (BOS); Breed, Mayor London (MYR); ivy@voteivylee.com
**Subject:** Balboa Reservoir EIR
**Date:** Monday, September 23, 2019 2:33:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Please deliver to Jeanie Poling, Senior Planner in the Planning Department, my heartfelt objection to the Balboa Reservoir Draft Subsequent Environmental Impact Report. As a San Francisco resident since December 20, 1955, a 15-year member of the Board of Supervisors, and a 12-year State Senator representing the area in which the City College of San Francisco campus is located, a commencement speaker at City College, a lecturer in various City College classes since 1985, and public user of City College facilities, including its wellness center, the proposed EIR minimizes the effect of a horrendous private development of the Balboa Reservoir acreage. I am informed of a proposed construction of 1,100 residential units and a different plan for 1,550 residential units by the City and County of San Francisco, with heights from 25 feet to 88 feet. The affect upon City College will be enormous in terms of parking loss, and the EIR is limited to just the reservoir acreage. Moreover, if either of those two projects is built, that will constitute the "baseline existing condition". Any future City College facilities must not violate with adverse effect on the so-called reservoir project.

City College is a cultural and economic factor to the neighborhood and the entire City and County of San Francisco. Revise the EIR accordingly to reflect all such adverse effects.

Yours truly,
Judge Quentin L. Kopp (Ret.)

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**From:** Vicki Legion
**To:** CPC.BalboaReservoir
**Cc:** Brigitte Davila; Thea Selby; John Rizzo; Shanell Williams; Alex Randolph; Tom Temprano; Ivy Lee; Fewer, Sandra (BOS); Yee, Norman (BOS)
**Subject:** DSEIR: Balboa Reservoir should NOT be developed for private, mainly luxury housing
**Date:** Sunday, September 22, 2019 10:17:10 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear SF Planning Comission,

I believe that the DSEIR on the Balboa Reservoir has many deficiencies. 1

Policy 4.5.1. in the BPSAP says the when offering public land for development, first consideration should be given to the development of housing affordable to individuals families making less than 120% of AMI. Instead, the privatization of the lower Bal Reservoir will remove one of the most important resources for building affordable housing—public land owned by the city—turning it over to a large national for-profit real estate corporation that owns eight entirely unaffordable rental housing developments.

The Draft SEIR does not consider the established pattern of market-rate housing driving up the cost of housing in nearby areas, and its impact on OMI and nearby Excelsior, two of the last remaining affordable neighborhoods on SF. 2

The Draft SEIR fails to address the fact that the Reservoir project will have a negative impact on public services, specifically City College of SF, which needs to re-grow enrollment. The proposed AvalonBay project will do this by reducing student access to education by eliminating over 1000 parking places on the lower reservoir, while hundreds of other parking places on the upper reservoir will be lost to new buildings. The DSEIR provides NO concrete plans for improving public transportation. The 43 and 29 buses and BART all have serious capacity issues already, but no concrete proposals are made to increase capacity. In this context, reducing transportation demand by 15% will only limit student and faculty/staff access and shrink City College. 3

The Draft SEIUR doe not consider the possibility of using this public land to build dedicated educator housing, taking the dominant but inaccurate point of view that 100% affordable housing is not realistic. There is already a 100% affordable building at 1100 Ocean, which was built on land previously owned by the MTA. There are many possible sources of funding for 100% affordable educator housing. 4

Public land is a sacred trust that must stay in public hands forever, and be used only for public good—not for the seven-million plus annual salary that goes to the AvalonBay CEO.

Watch for our book coming out in Fall 2020 from PM Press:

Free City!  The Fight for City College of San Francisco and Free College for  All

Vicki Legion
activistsf@gmail.com

**I-Lohr**

**From:** Janet Lohr
**To:** CPC.BalboaReservoir
**Subject:** Draft SEIR for Balboa Reservoir
**Date:** Saturday, August 10, 2019 12:22:55 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am shocked that the report does not take into account the need for parking at CCSF. There are no dorms at City College. Everyone needs transportation to get there. Muni service is inadequate, especially for night classes. Students and teachers need to be able to park. The loss of this much parking will be devastating to City College. 1

Janet Lohr
416 Holladay Ave.
San Francisco 94110

| | |
|---|---|
| **From:** | Ionin, Jonas (CPC) |
| **To:** | Richards, Dennis (CPC); Fung, Frank (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Melgar, Myrna (CPC); Rich Hillis |
| **Cc:** | Poling, Jeanie (CPC); Feliciano, Josephine (CPC) |
| **Subject:** | FW: Public Comment on Draft EIR Balboa Reservoir |
| **Date:** | Monday, September 23, 2019 8:55:00 AM |

*Jonas P. Ionin,*
*Director of Commission Affairs*

Planning Department¦City & County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-558-6309¦Fax: 415-558-6409

jonas.ionin@sfgov.org
www.sfplanning.org

**From:** Sally <chencho415@yahoo.com>
**Sent:** Sunday, September 22, 2019 10:33 PM
**To:** Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>
**Subject:** Public Comment on Draft EIR Balboa Reservoir

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I'm writing to you about the Draft Environmental Impact Report for the Balboa Reservoir Project. I had attended your 9/12 /19 meeting but was unable to give public comment because the time for public comment had gotten moved back and I had to get to my job.

What I had wanted to say was that I'm deeply disappointed in the Draft EIR . I feel it is tragic that it fails to consider City College of San Francisco and its viability, health and importance to the community as a critical and important element in any plans for development of the Balboa Reservoir. 1

CCSF is San Francisco's only community college and it is a precious and AMAZING place. It is a place where EVERYONE can come to learn. It's selection of class offerings each semester is unbelievable….. I personally have a HUGE list of classes that I'm hoping to get to take sometime in my lifetime. It is accessible to students of all income levels and to students of all ages and cultural backgrounds. This place is one of the main treasures of our city and that is why the Balboa Reservoir must not be sold off for private development ….and builder greed. The city is over run with this exploitive profiteering and it can't be allowed here.

CCSF has had use of this public PUC land for many decades and it is necessary for 2

2 (cont.)

the students of CCSF in order for them to be able to access this life changing education that CCSF offers. Students attending CCSF need easy comfortable access to their classes and if the Balboa Reservoir is sold off for private development it will kill CCSF as we know it.

As a low income working mom I needed to use the Balboa Reservoir all the time to be able to get to my child development classes. I could not take my kids to school on the bus and then bus to CCSF and arrive on time and then get to work. It would have been an impossible. I would have had to drop out of school and not pursue the career in education that I dreamt of.

Please let CCSF do the job it does best which is offering rich and valuable educations to the people of San Francisco. Let's take care of this precious College and not threaten it all the time with greed based land grabs just because it 's happening ALL over the city. This is a place for future generations also … Future generations that if they can have access to the education will be the ones able to envision and help create the changes humanity needs. Our future educators, social workers, artists musicians, political representatives, gardeners chefs, nurses, doctors, scientists , ambassadors and parents will be able to come from this place, if we keep it safe and accessible.

Please don't let these public lands be stolen from this community college that desperately t needs it. If CCSF were a Public Hospital would we consider selling off access to the hospital ... regarding it as frivolous and inconsequential and then provide no parking and thus no easy way to even BE at the hospital? Would we instead ask patients find their own way there on an erratic and congested public transit system?

CCSF offers a lifeline to at least 70,000 people per semester. It is a critical San Francisco resource and is part of the fabric of the city and it needs to be deeply considered FIRST in any type of "land grab" proposal that comes before you.

Thank you for your time and consideration.

Sincerely,

Sally Magnuson

**From:** Brian Marabello
**To:** CPC.BalboaReservoir; Poling, Jeanie (CPC)
**Subject:** Comment on Athletes and Air Quality - Balboa Reservoir Project SEIR
**Date:** Monday, September 23, 2019 1:10:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Planning Commission:

This comment is submitted in response to the Balboa Reservoir Project Draft SEIR.

**FAILURE TO INCLUDE A SIGNIFICANT SENSITIVE RECEPTOR — STUDENT-ATHLETES** 1

Both the PEIR (page 251) and BAAQMD guidelines (http://www.sparetheair.org/understanding-air-quality/air-pollutants-and-health-effects/whos-at-risk) include persons engaged in strenuous exercise as sensitive receptors.

The SEIR does not do so similarly for a sizable group that exercises routinely and strenuously adjacent to the project area — CCSF athletes. It does not designate them, many of whom train and compete outdoors within 1/4 mile of the BR, as sensitive receptors. It fails to mention this significant group altogether. Thus they were not included in any of the analyses, including the Health Risk Assessment.

This is a violation of San Francisco Administrative Code chapter 31.

There are hundreds of CCSF student-athletes exercising strenuously, outdoors and indoors, who need to be factored in to required air quality analyses.

Plus there are many more who are strenuously exercising in CCSF Ocean Campus physical eduction courses that should be accounted for.

Also, if health risk assumptions used in the SEIR's air quality analyses are different for athletes than they are for students, and they probably are, then the athletes among the student body at Archbishop Riordan should be their own receptor type in the analyses.

Submitted by:
Brian Marabello
bmarabello@yahoo.com
379 Staples Ave
SF, CA 94112

**From:** Brian Marabello
**To:** CPC.BalboaReservoir; Poling, Jeanie (CPC)
**Subject:** Comment on Work Day Estimates and Air Quality - Balboa Reservoir Project SEIR
**Date:** Monday, September 23, 2019 1:15:57 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Planning Commission:

This comment is submitted in response to the Balboa Reservoir Project Draft SEIR.

**INADEQUACY OF ESTIMATED NUMBER OF CONSTRUCTION WORKING DAYS PER YEAR** 1

To calculate Average Daily Emissions of ROG, NOx, PM10, and PM2.5, the SEIR's analyses use a multiplier of 260-262 days. This would grossly underestimate the emissions in the very likely scenario where construction happens on more than 262 days per year. Commercial construction sites all around the city are routinely working 6 or even 7 days a week.

And this project will be no different. As you know, the developer is allowed to construct seven days a week, which is consistent with San Francisco Police Code section 2908.

And to keep this project on schedule and keep costs in line, the developers will work many weekends.

Thus, the estimates for emissions and necessary mitigation offsets should account for more working days.

If construction happens on just an additional 27 Saturdays and/or Sundays, this will increase all emissions by 10%. If developers average 6 construction days a week, this will inflate emissions by 19.8%. That percentage doubles if construction averages 7 days a week.

Let's assume a very likely average of construction occurring 6 days a week. This would cause the NOx levels to cross the significance threshold for both the Developers Proposed Option and the Additional Housing Option under both the six-year and compressed three-year schedules. As well, PM10, and PM2.5 will increase significantly. Thus, all lifetime excess cancer risks should be adjusted.

All four of the proposed option-schedule scenarios would trigger the implementation of Mitigation Measure M-AQ-2d. Thus, mitigation offsets would need to increase dramatically.

It's deceptive to use an unrealistic construction working days per year. Why not use a

more realistic number so the developer and the public know the maximum or at least truer impacts? Should they come in under the number of estimated days, great. The monitoring will support them and they'll save money and lives. 1 (cont.)

Submitted by:
Brian Marabello
bmarabello@yahoo.com
379 Staples Ave
SF, CA 94112

**From:** Anita Martinez
**To:** Poling, Jeanie (CPC)
**Cc:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir Project DSEIR
**Date:** Monday, September 23, 2019 10:54:03 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

September 23, 2019

Dear Members of the San Francisco Planning Commission,

As San Francisco residents, my husband and I are committed to seeing housing stock increased in San Francisco. Early in the current process, we built ADUs in the two San Francisco homes we own, one occupied by the two of us, the other by my daughter and her family, and soon, new tenants in each new ADU. We are living by our values, a San Francisco value that says we are **committed to increasing housing**.

Our first home (daughter-occupied) is in Westwood Park. We have seen traffic congestion steadily increase near our property to the point where we are unable to find parking when we drive to visit our daughter's home on Keystone Way, probably due to all the Ocean Avenue development since we bought our first home in 1976. (We must drive our small all-electric vehicle to get around due to a walking limitations.) We are living **our value for clean air** by installing solar power in our home and using an electric car and a plug-in hybrid powered by the sun. We cannot imagine how the residential areas nearer to the proposed development will be impacted by increased traffic and vehicle pollution.

Has the Planning Department truly assessed the environmental impact, more cars and more pollution, on the neighbors around the Balboa Reservoir? I'm guessing that the people who could afford market rate housing on Frida Kahlo way could also afford cars to get back and forth to Silicon Valley, a phenomenon that we are all too familiar with in our Noe Valley neighborhood. People buy houses in Noe Valley because of its quick access to Highway 280. The Balboa Reservoir has even quicker access to Highway 280. 1

A third value that we hope we share with you is that **public lands must be used for the public good.** The Balboa Reservoir should not be turned over to for-profit developers to build market rate housing and maybe some affordable housing that perhaps in reality is not for low income, working class people. There is such scant open space available for new housing that the City of San Francisco focus on more housing for those who cannot buy market rate housing: teachers and other public servants who would likely use transit or walk or bike to work at nearby schools or at City College. 2

We encourage the Planning Commission to **live up to these San Francisco values**. **Build housing on public open space, but build it for those who would otherwise be shut out of the market and who would likely use transit or walk/bike to work (nonpolluting alternatives to cars).**

Sincerely,

Anita Martinez
4400 25th Street
San Francisco, CA 94114

**From:** Stephen Martinpinto
**To:** CPC.BalboaReservoir
**Subject:** EIR feedback
**Date:** Monday, September 23, 2019 3:01:55 PM
**Attachments:** BALBOA EIR 2.docx
BALBOA EIR commentary.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Please see following comments to EIR

--
Stephen Martinpinto
President
Sunnyside Neighborhood Association
(760) 271-1877

***Together, we can effect positive change in our neighborhood***

**Impact PS-1:** The proposed project would not be expected to increase demand for public services (in order to maintain acceptable service ratios, response times, or other performance objectives for public services) to the extent that it would require new or physically altered governmental facilities, the construction of which could result in significant environmental impacts.

This Statement is an erroneous assumption. Response times for emergency vehicles located at Fire Station 15 (address 1000 Ocean Avenue) will be adversely affected, as well as response times from the next nearest three fire stations (Fire Station 33 at 8 Capitol Avenue, Fire Station 39 at 1091 Portola Drive, and Fire Station 19 at 290 Buckingham Way). It is generally assumed that with new residences comes new traffic, which will undoubtedly slow response times. Although response priority 3 emergency calls (also known as code 3 calls) permit the use of emergency lights and sirens to safely bypass traffic signals and other traffic control devices, response priority 2 calls (code 2 calls) do not. Because code 2 calls require that emergency vehicles negotiate traffic at regular speeds, code 2 calls have the potential to become severely extended. Furthermore, upon arrival to the scene of a code 2 call, often times the situation is found to be more severe than previously thought, and calls are often upgraded to code 3. 1

With the addition of 500 – 1550 new units, an additional 1000 – 3000 or more residents will arrive. This will undoubtedly increase demand on the emergency response system, depending on the demographics of the new residents (statistically, senior citizens and low-income people are more frequent users of 911). Increased demand of the emergency response system combined with increased response times puts a strain on the ability of the SFFD to meet their 4 minute response time criteria (4 minutes from dispatch of call to patient contact).

Another significant impact to public services is in public transit, i.e. MUNI. Currently, according to city charter, if a MUNI vehicle is 4 or more minutes late to any timepoint, it is considered late. A timepoint is a MUNI passenger stop with a specific time of MUNI vehicle arrival tied to it. For example, if a bus is scheduled to arrive at the intersection of Market and Castro Sts. at 0700 hrs, it is not considered late until it arrives after 0704 hrs. 2

A 4 minute delay on a bus route such as the 43 Masonic, which is a 9 mile cross town bus route will have effects that resonate throughout the entire bus line. If the 43 northbound is delayed by 4 minutes arriving to Balboa Park BART station, it would be considered significantly late by city charter standards. However, the SEIR doesn't consider MUNI to be late through the Balboa Reservoir project zone unless it is delayed by 4 minutes, independent of the city charter. Thus, if the 43 Masonic was late to Balboa Park BART station by 3 minutes and further delayed through the BR Project zone by another 3 minutes, it would not be considered significant by SEIR standards, but it would be considered significant by city charter standards. Thus the allowable delay of 4 minutes through the BR project zone could be in violation of city charter standards.

3

What does the project propose to do to expedite bus service, and what does the project propose to do to improve emergency vehicle response times? 4

**Impact UT-1:** Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay Delta Plan Amendment is implemented; in that event the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years but this would occur with or without the proposed project. Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term; instead, the SFPUC would address supply shortfalls through increased rationing, which could result in significant cumulative effects, but the project would not make a considerable contribution to impacts from increased rationing.

The loss of the 17.6 acre reservoir space will present a lost opportunity to store drinking water during an emergency, as was originally intended in 1957 when it was constructed. In San Francisco, there are three terminal reservoirs; the Sunset Reservoir, the University Mound Reservoir, and the Merced Manor Reservoir. Together, they contain about 327 000 000 gallons of water, which represents 79% of all the water in San Francisco Reservoirs. According to the November 2018 issue of the *Westside* Observer, only 33% of this water belongs to San Francisco. State Water Code 73503 states that the water is jointly owned by San Francisco and the 27 wholesale water customers (cities on the Peninsula). This means when a disaster occurs, San Francisco is legally obligated to share the water equitably with Peninsula cities. According to the August 12, 2003 minutes of the SF Public Utilities Commission, after a major Earthquake, San Francisco could have as little as 86 000 000 gallons of water to serve a 900 000 population, or slightly less than 100 gallons of water per person.

It is important to remember that our water comes to San Francisco from Hetch Hetchy reservoir, approximately 170 miles away via transmission lines, which must cross four significant faults in the SF Bay Area alone (the Calaveras, Greenville, Hayward, and San Andreas). If a 9.0 earthquake were to occur, which is the theoretical maximum magnitude of Earthquake to occur in San Francisco, it would be about 10 times stronger than the 1906 earthquake and 100 times stronger than the 1989 earthquake. This has the potential to sever all transmission of water from Hetch Hetchy to San Francisco.

The Balboa Reservoir represents an opportunity to store an additional 110 000 000 gallons approximately (based on 17 acres x depth of 20 feet). This water storage capacity is not insignificant.

What does the project propose to do to increase our water storage when it comes to firefighting capacity?

5

**From:** jacqueline mauro
**To:** CPC.BalboaReservoir
**Subject:** Balboa reservoir
**Date:** Wednesday, September 11, 2019 6:51:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi, I'm a local resident and I want to express my support for the balboa reservoir project. 50/50 affordable and market rate seems like a great balance. Thank you! 1

Jacqueline Mauro

--
Jacqueline A. Mauro
Postdoctoral fellow
iSchool, UC Berkeley

**From:** Tomasita Medal
**To:** CPC.BalboaReservoir; Poling, Jeanie (CPC)
**Cc:** Tomasita Medál
**Subject:** "Balboa Reservoir" SDEIR
**Date:** Monday, September 23, 2019 10:16:59 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the Planning Department:

Your SDEIR does not consider what would be the impact of this massive project on the Native American students, the Pacific Islander students, the Latina and Latino students, the Black students, the Asian students, and the disabled students of City College of San Francisco. All of these students desperately need the education that City College offers. The SDEIR needs to consider what would be the impact of this project on the students of color, the working class students, and the disabled students of City College who need a place to park while they snatch a class among their many work and family obligations. **What will happen to them if they lose access to a parking lot that they need?** 1

The voters of San Francisco in 2001 and 2005 voted to approve and fund a Performing Arts Education Center on the upper parking lot, with the assumption that the lower parking lot, now being called "Balboa Reservoir", would always be a part of the City College of San Francisco campus, as it has been for a century, and leased from the Public Utilities Commission since the 1940's. The design that was vetted for many years, and put on hold by a hostile "Trustee with Extraordinary Powers", Robert Agrella, during the suspiciously timed bogus accreditation crisis based on lies, then revived under the current elected trustees once they were re-installed, used up most of the upper parking lot, and assumed the lower parking lot would be there for the use of the students during class times, as well as the audiences who came to attend performances at the Performing Arts Education Center.

This project would totally disrupt the plans for a CCSF Performing Arts Education Center, which was approved by San Francisco voters in 2001 and 2005. **The voters' approved PAEC should take precedence**. The "Balboa Reservoir" should remain available for the use of City College students and PAEC attendees. There are plenty of vacant lots throughout San Francisco that can be and should be used for housing, but there is only one City College that serves people from throughout the entire City and enables them to better their lives significantly. A for-profit development that crushes opportunities for the people of color of this entire City should not go forward. 2

Not having parking would make attending classes for working class students who have family and work obligations impossible. This project should be built in a different location. 3

4

Tomasita Medál
P.O. Box 22551
San Francisco, CA., 94122
tomasitamedal@gmail.com

**From:** Madeline Mueller
**To:** CPC.BalboaReservoir
**Subject:** Fwd: Balboa Reservoir Project, case # 2018 - 007883 ENV
**Date:** Monday, September 23, 2019 11:25:44 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Please include this with my response to the Balboa Reservoir DSEIR.
I tried to send it with my response, but it may not have remained attached. My email account returned both, but my gmail seems to be working.

Thanks,
Madeline Mueller
Music Department Chair
CCSF

---------- Forwarded message ---------
From: Madeline Mueller <madelinenmueller@gmail.com>
Date: Mon, Nov 12, 2018, 15:31
Subject: Balboa Reservoir Project, case # 2018 - 007883 ENV
To: <jeanie.poling@sfgov.org>

Jeanie Poling
San Francisco Planning Department

Dear Ms Poling

Please enter the following into the administrative record for Balboa Reservoir.

San Francisco is listed as a city with housing more dense than Tokyo and Hong Kong. In America, San Francisco is second in density only to New York City. The proposed housing project for the lower Balboa Reservoir would have housing five times more dense than the surrounding area.
Thirty years ago a similar proposal involving a smaller number of housing units on the Reservoir site was rejected by San Francisco voters. One of the major concerns for housing at the site came from the fire department. The Chief had many reasons to not recommend housing in the Balboa Reservoir, citing conditions which have become even more dangerous over the years.

Increasing drought and the extreme winds coming through the reservoir gulch make a perfect storm for the type of fires that we now see devastating entire towns in California. The situation was dire before and now it's impossible to overstate the fire danger involving that particular basin (and all surrounding neighborhoods ), a basin which is being proposed for impossibly dense housing. The lack of immediate water sources made and still makes the situation very bad. We've all seen what fires fed by strong horizontal winds, minus enough water, can do to houses and buildings.

1

The recent MUB building at City College and soon-to-be-built Performing Arts Education Center on the college portion of the reservoir use geothermal energy sources. Has there been research on the compatibility of the college's system with other projects ? 2

It should be obvious that proposing an unsafe density of housing units next to one of the largest and most successful Community Colleges in the State is not appropriate. It was wrong 30 years ago and it's wrong now. 3

The sheer noise factor of thousands of new residents warehoused next to a college with a daily enrollment the size of a small city makes the educational environment totally compromised. Plus, traffic gridlock in an area, already at the most negative level possible, would with a large additional population pose tremendous problems (and dangers!) to both the college and all of the surrounding neighborhoods. The area is not "transit rich", it is"'transit gridlocked". 4

Also, since over 1,000 units of affordable student parking ( available via PUC leases to CCSF since 1958) will be lost under the proposed development, doesn't it become inappropriate that in order for a commuter school like City College to survive, it must ask San Francisco taxpayers to fund parking structures on the college land. This land is already the site of one of the most densely populated campuses in the State when comparing the number of students per acre (and many of these CCSF acres are vertical) ? 5

The State Chancellor's office for Community Colleges will not fund parking structures. The cost must be borne by local residents. So in order to maintain a Community College that adult learners in San Francisco wish and need, citizens will nqeed to pay hundreds of millions of dollars via bond measures for parking structures !
In effect the PUC is being asked to transfer public land to private profit makers while at the same time charging the public millions of dollars to do so if they wish to maintain their college ------that truly does not make sense (!)

In reading through the Appendix B , CEQA Checklist, I have noted the following areas that at the very least must be addressed during a full environmental review. This includes: 6

Aesthetics, section d

Air Quality, all sections

Community Resources, sections a through h

Hydrology and Water Quality,
probably all sections, especially f

Land Use and Planning, section a

Noise, sections a through d

Population and Housing, section a

Public Services , entire section (with the definition of a community college as a governmental facility)

6 (cont.)

Recreation, all sections

Transportation/Traffic, all sections
(a through g)

Utilities and Service Systems, all sections (a through g)

Mandatory Findings of Significance,
sections b and c
---

Please include the language of all the above sections in the scoping requirements for CEQA.

Thank you,

Madeline Mueller
Faculty member and Music Department Chair, A-44, Room: Arts 209
415 239-3641
mmueller@ccsf.edu
City College of San Francisco
Freda Kahlo Way 94112

**From:** Madeline Mueller
**To:** CPC.BalboaReservoir
**Subject:** Fwd: Balboa Reservoir Project, case # 2018 - 007883 ENV plus DSEIR update
**Date:** Monday, September 23, 2019 11:17:48 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

---------- Forwarded message ---------
From: Madeline Mueller <mmueller@ccsf.edu>
Date: Mon, Sep 23, 2019, 11:03
Subject: Fwd: Balboa Reservoir Project, case # 2018 - 007883 ENV
To: Madeline Mueller <mmueller@ccsf.edu>, madelinenmueller@gmail.com <madelinenmueller@gmail.com>

Sent from my T-Mobile 4G LTE Device

-------- Original message --------
From: Madeline Mueller <mmueller@ccsf.edu>
Date: 9/23/19 10:55 (GMT-08:00)
To: CPC.BalboaResevoir@sfgov.org
Subject: Fwd: Balboa Reservoir Project, case # 2018 - 007883 ENV

The email below was sent during last year's CEQA process preceding the current Balboa Reservoir DSEIR. In it, I noted areas which should have been reviewed in this environmental impact report. Many were not; only a few were cherry-picked to be addressed. I do not believe that this is fully legal. In particular, the areas of water supply and safety have been largely ignored. 1

Appendix F: Water Supply Assessment contains the report given at a PUC hearing some months ago concerning the availability of water for the proposed development. I was at that hearing and clearly understood that such a supply was not actually assured except perhaps under the somewhat mythical consideration: "during normal years". However, it is pretty apparent that with climate change reality upon us, we cannot consider anything in the future to be 'normal years' (!) 2

At that hearing and in appendix F, it was also made clear that detailed research into water safety and the potential for urban fires was not addressed. Reports of lack of appropriate water supplies in the western half of San Francisco, should there be fires, has been reported as recently as a few days ago. 3

Also, the particular situation of the land under consideration for this extremely dense proposed 4

housing development was not fully researched in conjunction with the high wind velocity coming directly from the ocean to that property through what is commonly called The Gap. In this DSEIR, the only comments about wind concerned the effects that may be generated involving tall buildings. It did not describe the actual complex wind situation in this particular land area. 4 (cont.)

Please include these and my original concerns forwarded below into the DSEIR record.

Madeline Mueller
Music Department Chair
City College of San Francisco

Sent from my T-Mobile 4G LTE Device

**From:** Fred Muhlheim
**To:** CPC.BalboaReservoir
**Subject:** Public Comment on the draft SEIR
**Date:** Monday, September 23, 2019 4:49:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling:

I find the draft SEIR for the Balboa Reservoir deficient in many ways. He is my comment on some of them.

<!--[if !supportLists]-->1. <!--[endif]--> This is not a complete report. It does not re-study many areas of the original Balboa Station Area Plan that included a much smaller housing project. Much larger project = larger impact. 1

<!--[if !supportLists]-->2. <!--[endif]-->I find the report's statements regarding transportation and traffic greatly underestimate the impacts of the proposed project. As a transit first person, who has commuted to CCSF on MUNI from Castro and Market for several years, I have had experience with existing delays and trouble spots. Especially troubling are statements where mitigation is not found necessary. I disagree. 2

<!--[if !supportLists]-->3. <!--[endif]-->Here are some areas where I find mitigation will be necessary if based on the already overburdened streets and transit options. It is my fear that in many of these cases, satisfactory mitigation is not feasible. 3

- <!--[if !supportLists]--> <!--[endif]-->Over the last year my commute has frequently gone from 35 minutes to over an hour.

- <!--[if !supportLists]--> <!--[endif]-->Heading to CCSF I can take the Muni K directly from Castro and Market to Lee Avenue station or transfer at Forrest Hill to the 43. Unfortunately K cars frequently stop for up to 10 minutes at St Francis Circle to reconfigure and even during non peak times, the ride down Ocean Avenue is very slow. Also there are frequent delays in the tunnel. Busline 43 has its own set of issues. Scheduled busses frequently fall out. Much of the route is on curvy or very narrow streets and traffic on Frieda Kahlo way can pack up to the point that walking from the Judson/Kahlo stop to the Bookstore stop can be faster than staying on the bus.

<!--[if !supportLists]-->• <!--[endif]-->The central islands on Ocean Avenue are dangerous. Undergrounding the K line on Ocean would help in many areas, but is this a realistic possibility? 4

<!--[if !supportLists]-->• <!--[endif]-->When I walk past Lee Ave, it is clear to this non-professional eye that entry to the housing project via Lee Ave. extension will be a disaster. Traffic and loading in and out of the Parking lot off Lee is already problematic. Vehicular entry onto Ocean Ave. off neighboring side streets is also already difficult. 5

<!--[if !supportLists]-->• <!--[endif]-->Many residents in the proposed project will opt for ride sharing services. We are seen the negative effects of this on congestion in other parts of the city. 6

To date there is not a plan in place to provide mitigation for exacerbated traffic and transportation conditions that will be caused by construction of a project that is many times denser that the surrounding neighborhoods. 7

This monster sized project is inappropriate for this site. 8

Fred Muhlheim

Fred Muhlheim

fmuhlheim@yahoo.com

415-516-7425C

**From:** Ed Osawa
**To:** CPC.BalboaReservoir
**Subject:** Public Comment on draft SEIR for Balboa Reservoir development
**Date:** Sunday, September 22, 2019 9:53:00 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Committee –

I am a resident of the neighborhood adjacent to the proposed Balboa Reservoir development. The following are my comments in response to the recently released draft SEIR.

The SEIR acknowledges that for all options there will be "significant and unavoidable negative impact to traffic that cannot be mitigated". While this statement is diluted in the SEIR by other boilerplate environmental analyses, and while the CEQA guidelines have unfortunately replaced "automotive delay" with a less-meaningful "vehicular miles traveled" (VMT) metric, it is undoubtedly the greatest single impact to the environment and to the safety of the neighborhood of the proposed site. 1

Most critically, according to the proposal ***the only vehicular inlet into an 1100 unit housing development is a single lane northbound on Lee Avenue from Ocean Avenue*. This would seem to be wholly inadequate.** Additionally, that single lane on Lee will also be potentially occupied by truck loading activities for Whole Foods and neighboring businesses. 2 3

Ocean Avenue is already beset with heavy traffic at most hours of the day. Traffic is often down to a single lane due to Muni traffic, cars turning left, and double-parked vehicles. This will now become intolerably congested. The existence of several offset intersections (at Ocean/Geneva/Frida Kahlo, Ocean/Brighton, and Ocean/Plymouth) also contributes to poor traffic flow and to vehicular safety issues. 4

The analysis of an additional automotive access route (Alternative C, pages 6-29 to 6-44) focuses disproportionately on the impact on a short tab of a street that will access the project (San Ramon Way) rather than the broader impact on the narrow streets that would feed into that access. These feeder streets are two-way but *de facto* single lane roads due to parking, and even today cars routinely must leapfrog from driveway cutout to cutout as they pass in opposite directions. A somewhat comical argument is made in the Alternative C analysis that the increased congestion will result in safer driving conditions as traffic speed will be reduced; indeed, it is difficult to have an injurious accident in a gridlock situation. The analysis also fails to adequately account for the likely increase in bicycle traffic along Plymouth and other feeder streets, as San Ramon will become a useful shortcut for bicyclists to get to City College. 5

There will also be significant impact to freeway traffic. Even today, the off-ramp from NB280 to Geneva is frequently backed up well onto the main traffic of NB280, resulting in extremely hazardous traffic conditions. It is noted that most of the exiting cars are turning east onto Geneva away from the proposal site, as this ramp is the primary access to the Outer Mission and Cow Palace areas – with the project site added as a destination in the westbound direction from the ramp, one can expect a bad situation to grow much worse. The off-ramp from SB280 to Ocean is likewise backed up onto the freeway proper during most commute hours. 6

The proposed site is indeed closely situated to many public transit options. However, given the proximity to I-280, the uphill walk to BART, and the remoteness from many of the attractions of the city, it is highly optimistic to assume that there will be a mass influx of non-automotive households that would mitigate the traffic and parking burden. 7

I appreciate the need for more housing in San Francisco, but the current proposals are out of scale for the neighborhood and have not adequately addressed critical deficiencies in traffic flow and parking. I would urge the adoption of the lowest density alternative option for the development. By no means should the higher density option be considered. 8 9

Other suggestions and comments include the following:

- Widen the Lee Avenue access to two lanes (no parking zones, narrower sidewalk) with the construction of a truck loading zone off the street, and have dedicated turn lanes off of Ocean. 10

- Reconfigure the intersection of Ocean/Geneva/Frida Kahlo to remove the offset and improve traffic flow.

- The lanes in the Phelan Loop bus terminal are often vacant and underutilized and could be reconfigured to provide another vehicle access to and from the development.

- If the San Ramon access alternative must be implemented, perhaps Plymouth Ave can be configured as one way northbound from Ocean (not southbound, as the offset intersection at Ocean/Plymouth would get congested).

- There must be an increased frequency of mass transit options (Muni). Transit vehicles according to current schedules often are completely full.

- Take traffic pressure off of Ocean Avenue by improving the San Jose / Mission St off-ramp from SB280 and the Sagamore/Alemany/Brotherhood corridor to make that the primary westbound route off of 280.

10 (cont.)

- Consideration must be given to the impact of construction noise on the classrooms at Riordan High, as work will be done during school hours.

11

Respectfully,

Ed Osawa

40 Eastwood Drive

San Francisco, CA 94112

sfosawa@yahoo.com

**From:** Scott
**To:** CPC.BalboaReservoir
**Subject:** Balboa Park Reservoir Development
**Date:** Thursday, September 19, 2019 7:56:38 AM

---

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

As the homeowners at 1222 Plymouth Avenue, we are opposed to any proposal for more than the least amount of density, number of units possible and the highest percentage of parking spaces. 1

We are also opposed to the opening of San Ramon Avenue to traffic as this would directly impact parking and activity in front of our home. 2

Thank you.

G. Scott Osten
Ralph J. Torrez

Sent from my iPhone

**From:** Christopher Pederson
**To:** CPC.BalboaReservoir
**Cc:** Yee, Norman (BOS); Jones, Sarah (MTA)
**Subject:** Comments on Draft SEIR for Balboa Reservoir project
**Date:** Monday, September 23, 2019 10:31:22 AM

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Dear Ms. Poling:

Thank you for this opportunity to comment on the draft subsequent environmental impact report ("Draft") for the Balboa Reservoir project.

Although the Draft is sufficient in most respects, it is deficient in three different ways: it misidentifies the environmentally superior alternative, it fails to adequately evaluate the environmental impacts of the 750-space public parking garage included in the developer's proposed option, and it does not adequately address potential impacts to public transit. 1 2 3

A. The Additional Housing Option is the Environmentally Superior Alternative. 4

The Draft identifies the no project alternative as the environmentally superior alternative. Aside from the no project alternative, it identifies the alternative that requires a six-year construction period as environmentally superior. It also opines that a reduced density version of the project constructed over a six-year period, if feasible, would further reduce environmental impacts.

The Draft's evaluation of which alternative is environmentally superior is fundamentally flawed because it fails to address the adverse environmental consequences of providing less housing than proposed in the Additional Housing Option and of constructing the public parking garage component of the developer's proposed option.

The most urgent environmental problem that the world and the state face today is climate change. (IPCC, Climate Change 2014, Synthesis Report; Cal. Health & Safety Code, section 38501.) In 2017, transportation accounted for 41% of California's greenhouse gas ("GHG") emissions and 46% of San Francisco's GHG emissions. (California Air Resources Board (CARB), California Greenhouse Gas Emission Inventory: 2000-2017 (2019 Edition); sfenvironment.org/carbonfootprint.) The California Air Resources Board has concluded that California cannot meet its GHG reduction goals unless it substantially reduces vehicle miles travelled ("VMT"). (CARB, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target; CARB, 2018 Progress Report, California's Sustainable Communities and Climate Protection Act (Nov. 2018), pages 5, 27-28.) A primary strategy for reducing VMT is locating multi-family housing close to major employment centers, public transit, and other amenities such as neighborhood commercial districts. Unfortunately, restrictions on residential development within the major urban cores of the state present a major obstacle to accomplishing the state's GHG emissions reduction goals. (CARB, 2018 Progress Report, pages 46, 53, 63-64.)

The Balboa Reservoir is unusually well-suited to be the location of high-density residential development because it is (1) immediately adjacent to City College, a major employment

center and trip generator; (2) within easy walking distance of multiple transit lines, including BART and Muni lines KT, 8, 8BX, 29, 43, 49, 54, and 91 (and also the J, M, 28R, and 88 lines, which serve the Balboa Park BART station); and (3) adjacent to the Ocean Avenue neighborhood commercial district. To deny or reduce the amount of multi-family housing there would directly impede the state's efforts to reduce the most significant environmental impact of them all: climate change.

4 (cont.)

The potential adverse environmental impacts identified in the Draft all pale in comparison to the environmental impacts of climate change. To treat temporary construction-related noise and air quality impacts and traffic challenges associated with loading for the adjacent Whole Foods grocery store as more significant than climate change is self-evidently ludicrous. More importantly, the Draft's failure to provide a reasonable evaluation of the magnitude and significance of the very different kinds of environmental impacts that the City's action on this project might have means that it is not adequately informing decision-makers and the public about the potential environmental consequences of the City's action.

In addition, as discussed in more detail below, the Draft fails to address how the proposed public parking garage will undercut City College's efforts to reduce automobile commuting and thereby induce more GHG emissions and VMT than would occur if the public parking garage is not constructed.

The Draft's alternatives analysis should therefore be revised to address the environmental consequences of providing less housing than proposed in the Additional Housing Option and of providing the public parking garage. Once that analysis is provided, the SEIR should conclude that the Additional Housing Option is the environmentally superior alternative because it provides the most housing in a manner that is likely to result in the lowest per capita VMT and GHG emissions, thereby advancing the state's strategy for addressing the climate crisis.

B. The Draft fails to identify and evaluate the environmental impacts of the proposed public parking garage.

5

The Draft's assertion that the public parking garage included in the Developer's Proposed Option will not have any environmental impacts because it is replacing parking that already exists is fundamentally flawed.

According to the City College of San Francisco Transportation Demand Management (TDM) and Parking Plan (March 15, 2019), City College currently has excess parking even during the peak parking demand period of the first week of each semester. It has almost 1,000 excess parking spaces on typical semester days. It has an excess supply even though City College provides parking for free to its employees and at very low cost to its students ($40 per semester, $20 per semester for those receiving financial aid, or $3 for a daily pass).

In light of its glut of free or low-cost parking, it is unsurprising that City College has very high rates of commuting by solo drivers. 66 percent of City College employees drive alone to the Ocean campus. This is almost double the citywide average of 34% (Metropolitan Transportation Commission data for 2018). Similarly, only 5 percent of City College employees walk or bike to the Ocean campus in comparison to the citywide average of 10%, even though a substantial portion of City College employees and students live within three miles of the Ocean campus. A lower percentage of students drive alone to campus (33%), but the TDM and Parking Management Plan concludes that student drivers are especially likely to

switch modes of transportation if parking is restricted or becomes more expensive.

Projecting into the future, assuming 25% growth in student enrollment, the TDM and Parking Management Plan projects that a robust TDM program would be sufficient to avoid any parking shortfall on a typical semester day even if the Balboa Reservoir is developed without any replacement parking. If the Performing Arts and Education Center (PAEC) is constructed on an existing City College-owned parking lot, there might be unserved parking demand of up to 415 spaces on a typical semester day, but that assumes no shift in parking demand due to limited supply. According to surveys of employees and students, up to 60% of drivers are likely to shift modes if parking becomes more difficult to obtain. Adding that shift in demand, the unserved parking demand if the Balboa Reservoir is developed without replacement parking, the PAEC is constructed, and enrollment increases by 25% is only 166 spaces.

The Draft has no discussion whatsoever about how construction of a 750-space public parking garage would affect parking demand or the effectiveness of City College's TDM program. Given that the availability of parking encourages more people to drive, the Draft should be revised to address how the proposed public parking garage is likely to result in more VMT and GHG emissions than if it weren't included in the project.

The Draft is also entirely silent about the rationale for the size of the public parking garage. Even if both the Balboa Reservoir project and the PAEC are constructed and the student body increases by 25%, the unserved parking demand on a typical semester day (either 415 spaces or 166 spaces, depending on how supply constraints affect demand) would be far less than 750 spaces if City College implements a robust TDM program. Given that the peak parking demand during the first week of each semester occurs only about 20 hours each year, the peak parking demand hardly seems a plausible rationale for the size of the garage. The only remaining rationale would appear to be a desire to perpetuate current commute patterns and parking demands despite the VMT and GHG emissions that those generate. The Draft should be revised to explain the reason for the size of the proposed public parking garage, the environmental impacts of a garage of that size (e.g., increased VMT and GHG emissions), and whether those environmental impacts could be reduced by shrinking or eliminating the public parking garage.

5 (cont.)

The Draft is also silent about how the public parking garage will be financed. If the developer will fund the garage with proceeds from the residential development, that raises the question about why those proceeds couldn't instead be used to fund more below-market rate housing. If the public parking garage will be paid for with public funds (either the City's or City College's), that should be disclosed as well. The Draft should address how any subsidy (whether public or private) for the garage would reduce the parking fees and thereby generate additional parking demand, VMT, and GHG emissions.

If the public parking garage will be financed entirely by parking fees paid by users of the garage, the Draft should address whether the garage will be financially viable. Those who currently commute to City College either park for free or pay nominal fees. It is unlikely that they would be willing to pay the kind of substantial fees that would be necessary to pay for construction of a 750-space garage.

6

If the users of the parking garage are instead anticipated to be the residents of the Balboa Reservoir project, that would be an end run around the City's and the developer's agreement that the overall parking ratio for the residential component of the project would by 0.5 parking spaces per residence. Using the public parking garage as residential parking would also mean

7

that the project would exceed the zoning code's maximum 1:1 parking ratio for the site. 7 (cont.)

Finally, the Draft is entirely silent about how the parking rates for the garage would be structured. For example, would the daily rate be lower than 8 hours of the hourly rate? Would weekly, monthly, semester, or annual rates be allowed? If rates for periods longer than one day would be allowed, the Draft should address whether such rates would reduce incentives for commuters to take transit, walk, or bike on days during those periods when the commuter doesn't need to drive. Finally, would the rates and any leasing arrangements be structured so that any employer who pays for spaces within the garage on behalf of its employees would be subject to California's parking cash-out statute? (See Cal. Health & Safety Code, section 43845.) The Draft should address how the fee structure and the applicability of the parking cash-out statute would affect VMT and GHG emissions. 8

C. The Draft does not adequately address the impacts of the project on transit. 9

The Draft does not adequately explain how the City determined that an additional four minutes of delay for Muni routes in the vicinity of the project should be the threshold of significance for transit delays. Muni currently experiences significant delays related to traffic congestion when City College is in session and to congestion caused by drivers attempting to turn at the intersection of Ocean and Brighton, where the entrance to the Whole Foods parking garage is located. In light of already existing delays for Muni service, the threshold of significance for additional transit delays should be less than four minutes.

In addition, in order to minimize VMT and GHG emissions associated with the project and with reasonably foreseeable development and expansion at City College, the City should implement transit improvements prior to occupancy of the project. Appropriate prior-to-occupancy mitigation measures include: 10

<!--[if !supportLists]-->1. <!--[endif]-->Restrict left turns at the intersection of Ocean and Brighton.

<!--[if !supportLists]-->2. <!--[endif]-->Install transit signal preemption or priority at all traffic lights on Ocean between San Jose and Junipero Serra and on Geneva between San Jose and Ocean. (Preemption is preferable, though priority might be acceptable at intersections with major cross streets such as Frida Kahlo and Junipero Serra.)

<!--[if !supportLists]-->3. <!--[endif]-->Give Muni lines higher priority at St. Francis Circle and West Portal. (Although St. Francis Circle and West Portal are a fair distance away from the project, delays there significantly degrade the speed and reliability of the K.)

<!--[if !supportLists]-->4. <!--[endif]-->Modify Muni stops along Ocean so that they can all accommodate two-car boarding for the K line.

<!--[if !supportLists]-->5. <!--[endif]-->Require Whole Foods to install electronic signage on Ocean Avenue to indicate when its garage is full. (This could potentially be done as part of an enforcement action to address Whole Foods' violation of loading requirements.)

D. Miscellaneous

The Draft should address whether dedicating a substantial portion of the project to housing City College employees and/or students would minimize traffic-related impacts of the project and whether such dedication would be feasible. 11

The Draft should clarify why potential loading impacts caused by Whole Foods' failure to comply with permit requirements are treated as impacts caused by the Balboa Reservoir project. The City could resolve those impacts by simply requiring Whole Foods to comply with existing legal requirements. 12

Thank you for your consideration of these comments.

Sincerely,

Christopher Pederson

18 Dorado Terrace Apt. 28
San Francisco, CA 94112

**From:** Yonathan
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir EIR comments
**Date:** Monday, September 23, 2019 3:34:40 PM
**Attachments:** balboa PDA.png

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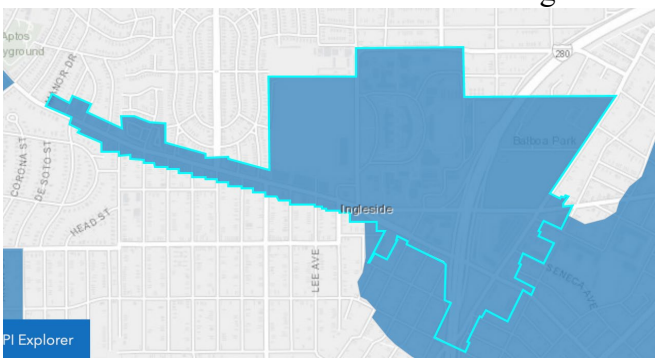
Thank you for this draft program EIR for the Balboa Reservoir Project. San Francisco and the Bay Area are in desperate need of more housing in order to reduce displacement, increase access to opportunity, and reduce wealth inequality. This SEIR is a necessary step in the development of the Balboa Reservoir.

However, I think it is deficient in its discussion of cumulative greenhouse gas emissions and traffic impacts. 1

In two tables (Table S-3, Table 6-6) and in the discussion of the alternatives in 6.C (p. 6-14), the EIR says that the No Project Alternative would have No Impact (NI) on greenhouse gas (GHG) emissions, whereas the proposed project would have a Less than Significant (LTS) impact on GHG emissions. Therefore, section 6.D concludes that "the No Project Alternative would be the environmentally superior alternative because it would result in no impacts to all resources".

I believe this is in direct conflict with the Plan Bay Area 2040 FEIR, which finds that the "No Project and Main Streets Alternatives would result in a greater number of significant and unavoidable impacts compared to the proposed Plan" of concentrating jobs and housing in Priority Development Areas (PDAs) (p. ES-8). Indeed, the whole purpose of SB 375 (2008) and Plan Bay Area was to reduce GHG emissions by concentrating jobs and housing near transit. The Plan Bay Area 2040 EIR may be used "as the basis for cumulative analysis of specific project impacts" (Section 1.1.6).

This is relevant because the Balboa Reservoir is the biggest single development in the Balboa Park PDA (see screenshot of PDA map, below). It is minutes away by foot from the Balboa Park BART station and numerous Muni light rail and bus lines.




If the project were not built, the people who would have lived there do not simply vanish. Instead, they move further away in the Bay Area or elsewhere in the United States with worse transit service. By excluding reasonable estimates of per capita GHG emissions under the No

Project Alternative, the Draft EIR makes it impossible to compare GHG impacts among the No Project, Reduced Density, Developer's Proposed Project, and Additional Housing alternatives.

1 (cont.)

The same reasoning applies to VMT, though to your credit Table 3.B-9 includes a comparison of local VMT to Bay Area VMT that shows that Balboa Park area residents are likely to drive less per capita.

In my opinion, developing the Balboa Reservoir to the highest density is likely to have lower cumulative 2040 impacts on greenhouse gas emissions and traffic than any of the alternatives, including the no project alternative.

Thank you.
Yonathan Randolph

**From:** Benjamin Schneider
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Support the Balboa Reservoir Plan
**Date:** Wednesday, September 11, 2019 7:27:03 PM

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Dear Members of the Planning Commission,

As a resident of Ingleside Terraces in District 7, and a frequent patron of the Ocean Avenue corridor, I'm writing to ask that you support the Balboa Reservoir plan at tomorrow's meeting. The 50-50 affordable and market rate housing mix is an excellent ratio, similar to what is seen in many other countries with more enlightened housing policies. The neighborhood will greatly benefit from more foot traffic, and more people to advocate for better transit and bike infrastructure. My only reservation is that there are not more units planned for this site. We should not be afraid to go up to 10 or more stories. Please do not let the naysayers "preserve" this parking lot. 1 2

Thank you,

Benjamin Schneider

**From:** Leslie Simon
**To:** CPC.BalboaReservoir; Poling, Jeanie (CPC)
**Subject:** Re: SDEIR Balboa Reservoir Project
**Date:** Tuesday, September 17, 2019 12:13:13 PM
**Attachments:** Bal REs Alternative 081118 copy.pdf

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Leslie Simon
117 Brewster Street
San Francisco, CA 94110
lsimon@ccsf.edu

September 17, 2019

Jeanie Poling
San Francisco Planning Department
1650 Mission Street,Suite 400
San Francisco, California 94103
Re: Balboa Reservoir Project
Case No: 2018-007883ENV

Dear Jeanie Poling:

This letter is to describe an adverse impact on City College of San Francisco (CCSF) of the development in the Balboa Reservoir, which has NOT been addressed by the Draft Subsequent Environmental Impact Report (DSEIR). The Balboa Reservoir Project DSEIR fails to place CCSF as being the main feature of the vicinity's "existing or baseline conditions." Since CCSF is not made the main feature of the baseline condition, the Reservoir's impact on CCSF is discounted and minimized as "less than significant." This is an unacceptable and justifiably illegal consequence of the DSEIR. 1

This letter also asserts that the DSEIR does not adequately address the alternative for 100% affordable housing on the Balboa Reservoir site. 2

## Impact on City College of San Francisco

### 1. Transportation 3

The DRAFT SEIR says: "... it would be speculative to conclude that the loss of parking would lead to substantial adverse impacts..." and concludes that loss of parking for City College would be "less than significant, and no mitigation measures are necessary." Yet the Draft SEIR itself relies on the speculation that "likely, the shortfall in parking supply

would cause some drivers to shift to another mode of travel, others to rearrange their schedule to travel at other times of day..." It avoids assessing the possibility that students might stop attending CCSF. The report must consider the true impact on student attendance and enrollment and also on gig-working part-time instructors who have to travel between multiple community college sites. 3 (cont.)

The DRAFT SEIR claims that CCSF TDM/Sustainability Plan has a performance objective to reduce automobile trips, with which the removal of parking at the project site would not conflict. But just because it doesn't conflict with the TDM/Sustainability Plan doesn't mean there is no impact on the public service of CCSF. The current use of the Reservoir serves a public benefit in providing physical access to education. 4

The description of the existing condition avoids identifying the project site as a student parking lot that furthers a public purpose and benefit by providing physical access to a commuter school's educational public service. 5

CEQA requires a baseline determination of existing conditions upon which environmental impact of a project will be assessed.

In reality it serves an important public purpose of providing student parking that enables community access to education. It also keeps students away from parking in the neighborhoods, blocking residential driveways. 6
From the beginning of the Reservoir Project's public engagement process, The City Team had already substantively disregarded community concern about parking and transportation. Disregard for community concerns regarding parking and circulation was due to the realignment in the assessment of Transportation from Level of Service (LOS) to Vehicle Miles Travelled (VMT). The City Team has relied on the interpretation of parking and circulation impacts to merely be social and/or economic effects not covered by CEQA.

There is no substantial evidence that the TDM would be able to resolve the effects of lost student parking on student enrollment.

Although New Public Resources Code Section 21099 exempts parking adequacy as a CEQA impact, it does not exempt the secondary impact of adequate parking on CCSF's public educational service. Student parking, being the existing condition and setting, cannot be bypassed by extending 21099's parking exemption onto the elimination of the public benefit of providing access to a commuter college. 7

**The DRAFT SEIR must consider the impact of reduced parking without first putting viable transportation options in place.**According to a CCSF Ocean Campus Survey of CCSF students and workers conducted in May 2016, 45.7% commuted by car. City College is a commuter school.

Inside Higher Ed reported on a survey that detailed Community College students' challenges. The researcher said, "The biggest surprise we had was parking [rated at #5]. This is a big issue for them because of personal schedules or work schedules." (February 12, 2019) 7 (cont.)

Although reducing car usage in general is a commendable goal, the Reservoir Project's elimination of the baseline environmental setting of the 1,000-space student parking lot will have the undesirable effect of discouraging enrollment at City College. 8

The Balboa Reservoir Project will bring in 2,200 adult residents and will supplant all 1,007 spaces from the Lower Lot decreasing capacity parking for City College students by 50%. This will further erode enrollment at the College. The Balboa Reservoir Project will succeed in permanently shrinking City College, a deeply adverse impact on the College.

FYI the proposed public parking by the Balboa Reservoir Project will be too expensive (estimated cost is $12-$20/day while students now pay $3/day or $40/semester) for City College students. Instead it will serve BART commuters with high paying jobs. 9

The proposed Reservoir development has forced City College to include in its Facilities Master Plan two to three new parking structures to make up for the loss of existing parking in the PUC Reservoir. This secondary impact must be addressed. 10

To alleviate this impact consider these proposals:
--establish a shuttle to BART from Frida Kahlo Way and offer free public transportation for college students (won for K-12 students in 2013);
--increase service on the lines serving the Reservoir area: K, 29, 43, 54, 15, and 8 Bayshore, and 49.

Only then can students with multiple responsibilities consider public transit as a means of getting to and from jobs and children's schools. Only then can they give up parking in the Balboa Reservoir allowing 100% affordable housing to be built on public land, leaving green space and enough parking for those students for whom even improved public transit will not alleviate their need to drive to school.

**2. Unfair Burden on CCSF's Facilities Master Plan**

The Balboa Reservoir Project is forcing City College to include new parking garages in its Facilities Master Plan (FMP). But where will the funding for the ambitious FMP come from? One of the proposed sources is a nearly billion-dollar bond measure not even on the ballot yet, let alone approved by the voters. Why force this added burden on one of the most treasured of San Francisco's institutions when it is struggling to regain its health?

The project has already cost the college. The original PAEC (Performing Arts Education Center) is going through a major re-design to accommodate the loss of parking.

When the Performing Arts and Education Center (approved by voters in bond measures in 2001 and 2005) is built on the Upper Reservoir, aka Upper Lot, at least 200 spaces will be lost, boosting usage to 80% of available space. When the 25% drop in enrollment is restored, then approximately 400 more parking spaces will be needed **pushing the combined lot's usage back to about 100% capacity.**

10 (cont.)

**3. Alternative Plan**

We refer you to an article by Joseph Smooke and Dyan Ruiz "Five Reasons Why San Francisco Must Not Give Up Public Land for Market Rate Development" (Truth-out, April 3, 2015). Smooke and Ruiz argue "You can't solve an affordable housing problem by building luxury housing." They further explain "…for every 100 market-rate units the city allows on public sites, there are another 43 affordable units that need to be built to compensate." This data comes from a 2007 study commissioned by the Planning Department. The people who serve folks in the market-rate housing will be forced to live far away from San Francisco contributing to further traffic congestion in the Bay Area region and seriously reducing their quality of life.

At most the Balboa Reservoir Project will offer 33% housing that is affordable to people with teachers salaries and below. That would provide about 350 units. An alternative plan would build **350 units only**, all of them affordable (100%) to people with teachers' salaries and below. A model for this plan exists adjacent to the Balboa Reservoir at 1100 Ocean, a development built on public land and 100% affordable. <u>The possibility of this model must be explored.</u>

I have attached a sketch that shows how these units would fit into the Lower Lot of the Reservoir. Alternative funding sources could include a proposed municipal bank and a reassessment of under-assessed commercial properties or a change in the Twitter tax. It is not necessary to use unneeded luxury housing, which create the need for a substantial number of additional affordable units, to fund affordable units.

11

<u>Until funding for 100% affordable housing for the number of units that could be established in the Lower Lot in a sequenced manner so as not to radically reduce parking before public transit has been improved, no housing should be built on the Balboa Reservoir because it will have an adverse impact on the enrollment and consequent health of City College of San Francisco.</u>

The attached alternative plan shows three structures, which could be built in phases, so that when the promised better transit services are established, some of the Lower Lot could be dedicated incrementally to affordable housing. I request that this alternative

12

12 (cont.)

plan be explored.

**4. DSEIR 6-58 100% Affordable Housing**

13

The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing. San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR simply dismisses the option of dedicating this publicly owned property to affordable housing only. It does not even consider the recommended option of its own PEIR of 500 housing units for the lower Balboa Reservoir dedicated to those earning less than 120 percent of median area income.

Instead it accepts the premise of creating market rate housing in order to obtain affordable housing without exploring possible funding for a greater number of affordable units, without the market rate housing—which would have a smaller environmental impact to the areas already identified: noise, air quality and transportation.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco already owns this parcel, so why is the City of San Francisco planning to sell public land that it already owns to a private developer that will build mostly market rate housing in a neighborhood where affordable housing makes more sense?

A development solely devoted to affordable housing would better blend with the residents of this working class neighborhood. The proposed development of mostly market rate units leaves these residents vulnerable to displacement due to gentrification. The adjacent neighborhood, Excelsior, is also a working class neighborhood vulnerable to displacement due to gentrification.

I again refer you to an article by Joseph Smooke and Dyan Ruiz “Five Reasons Why San Francisco Must Not Give Up Public Land for Market Rate Development” (Truth-out, April 3, 2015).

Policy 4.5.1 in the BPSAP says that when offering public land for development, first consideration should be given by these agencies to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

14

The DRAFT SEIR does not consider the impact of increasing the number of units from the original recommendation in the PEIR. The Reservoir Project’s two options are for 1,100 units and for 1,550 units. The Balboa Park Station PEIR’s Housing option for the Reservoir referred to 425-500 units.

From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. The increased number of units between the BPS Program EIR to the Reservoir Subsequent EIR constitutes "substantial unplanned growth." 14 (cont.)

**5. Educator Housing (Alternative Plan/100% Affordable)** 15

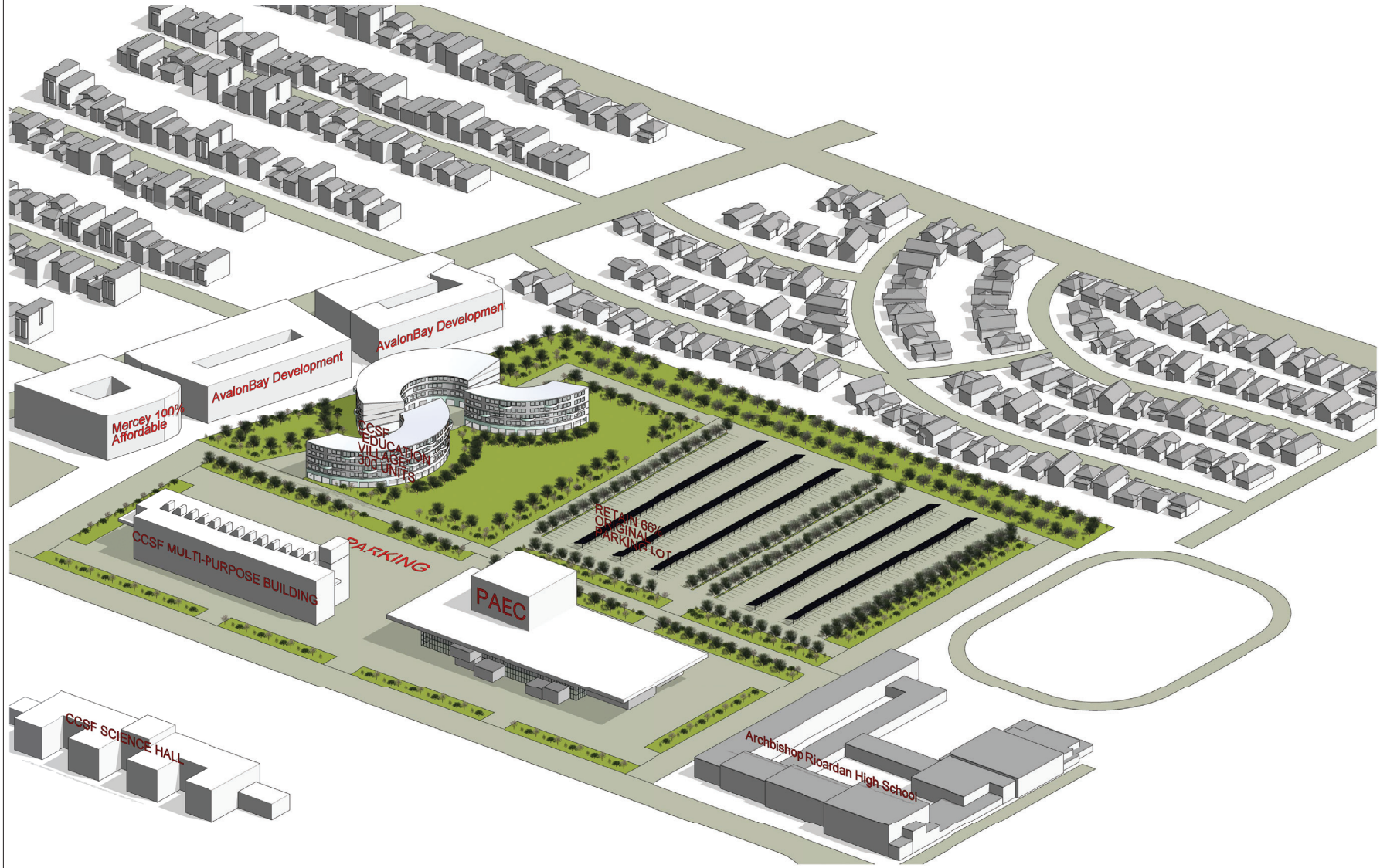
The DRAFT SEIR must consider the possibility of using this public land to build dedicated educator housing. Most recently, the City of San Francisco has committed current and future funding for educator housing. Since approval of the PEIR the City of San Francisco has also identified a great need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers would be able to walk to work if they lived there.

Thank you for addressing this complaint and alternative suggestion that was NOT taken into consideration in the DSEIR for Balbo Reservoir.

Sincerely,
Leslie Simon
Faculty, City College of San Francisco

Leslie Simon
Interdisciplinary Studies Instructor
City College of San Francisco
50 Frida Kahlo Way, SF 94112
Mailbox: Mission
Office: Mission 264
Voice: 415-920-6023
www.ccsf.edu/groundswell
fridakahloway.wordpress.com

Please sign up for "Introduction to Museum Studies," IDST 3, for Fall 2019
CRN: 78260 Thursdays, 2:10-5 p.m. at Downtown Campus and multiple museums




1 AERIAL 1

CCSF Expansion

I-Simon

SCHEMATIC

| | |
|---|---|
| DATE | 08/11/18 |
| SCALE | |
| DRAWN | |
| | Project Number |

1 AERIAL 2

CCSF Expansion

I-Simon

SCHEMATIC

| | |
|---|---|
| DATE | 08/11/18 |
| SCALE | |
| DRAWN | |
| | Project Number |

**From:** Aaron Smith
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Balboa Reservoir Project
**Date:** Thursday, September 12, 2019 11:50:48 AM

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Dear public servants,

As a member of your community I am thankful for the hard work you put in to improve our city and support our citizens. I am writing to register my viewpoint on the matter of the development of the Balboa Reservoir parking lot --which is up for public comment today.

Everyone in SF is shouldering the burden of an extreme lack of housing supply. This state of affairs puts enormous strain on those among us with the least means, and drives people to blame any number of important but ultimately tertiary reasons for the strain. I am writing this note to make clear that as a member of the community I wholeheartedly support attempts like this one to increase housing density while supplying (50%!! amazing) subsidized units. Unfortunately, I am afraid the folks in the community who speak the loudest will be the ones who oppose all development, not understanding that by restricting development of new housing they will only increase our peril. 1

Please do the right thing by your community and your city and forward this beneficial project.
Aaron Smith,
San Francisco, CA

| | |
|---|---|
| **From:** | Zack Subin |
| **To:** | Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC) |
| **Cc:** | CPC.BalboaReservoir; Poling, Jeanie (CPC) |
| **Subject:** | Please support more homes and less parking at the Balboa Reservoir! |
| **Date:** | Wednesday, September 11, 2019 9:59:53 PM |

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Dear Commission Members,

I recently moved to Ocean View with my husband in 2018 after my parents'-in-law helped us buy a house, after 2 years of living at their house. It is a small house (1000 square feet), and one of the few places we could afford in SF-- even with pretty good incomes. As an older Millennial, many of my peers and colleagues are not so lucky, and I keep seeing them move away or continue to live with parents because of the cost of housing-- not to mention the surge in homelessness and the new class of supercommuters.

Under these conditions, building new housing on a vast surface parking lot near a college and the biggest transit hub in the western half of the city, with 50% dedicated affordable housing, should be an absolute no-brainer. I would love to have seen more units than the 1,500 units considered, but we should absolutely have 1,500 rather than 1,100: we need homes for people, not cars! Reserving large amounts of off-street parking does not effectively reduce congestion and parking scarcity but rather facilitates continued car-dependence-- which is in direct contradiction to the city's recently published "Focus 2030" report that set a strong goal for getting people out of cars into healthier, more sustainable modes of transportation. I hope that the draft EIR appropriately considered this: the reductions in greenhouse gas emissions associated with allowing more dense urban infill in a transit-rich neighborhood, rather than seeing those same people housed in distant sprawl, have been well-documented and should be noted. 1

Finally, these new homes would be a great improvement to the neighborhood-- I would get access to new green space, new bike routes, and have more people on the street to make for safe, vibrant conditions on Ocean Ave. that will help local businesses thrive.

Sincerely,
Zack Subin
192 Caine Ave

---

Zack Subin
San Francisco, CA 94112

subin@post.harvard.edu | subin@berkeley.edu | zachary.subin@ethree.com
https://www.facebook.com/zsubin
https://twitter.com/zack_subin
https://www.linkedin.com/in/zachary-subin-9b6435bb/

**From:** esleve@yahoo.com
**To:** CPC.BalboaReservoir
**Subject:** NO to selling Balboa Resevoir to Private Developer
**Date:** Thursday, September 12, 2019 3:03:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I'm frankly terrified at the idea of having the reservoir sold to a Private developer. PLEASE don't. 1

**I live in Westwood Park. I'm a student and a former instructor of CCSF. As a former coordinator of a CCSF academic program, it is now very difficult to find instructors as there aren't affordable housing and many of the positions are part time. Even full time instructors find it difficult to live in S.F**. SO:

* The DRAFT SEIR must consider the option of using this public land to build 100% affordable housing 2
The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".
* The DRAFT SEIR must consider the possibility of using this public land to build dedicated educator housing

**The DRAFT SEIR is inadequate because it fails to recognize the baseline condition of the Reservoir's current use by City College to serve a public benefit for its students.** 3

* The DRAFT SEIR must consider the impacts on the public service of City College of San Francisco 4
educational services. The elimination of over 1,000 student parking spaces by the Reservoir development will limit students' access to CCSF-- a commuter school.

**The City already owns this land, why sell it to developers that will not use it for affordable housing? The City can build affordable housing and instructor housing so our city dwellers can be supported.** 5

2. I is already almost impossible to get home to Westwood Park, get into City College Ocean Campus as the traffic is already impacted by new growth. There is usually stopped traffic, sometimes backed up onto the 280 south bound freeway going to the Ocean Ave. exit. With any more than the original 425 -500 units, it will be a more dangerous and frustrating situation. 6

From the 425-500 units indicated in the PEIR to the 1,100-1,550 units indicated in the Draft SEIR constitutes an increase of 109.9% to 264.7% over and above the Balboa Park Station PEIR. 7
The increased number of units between the BPS Program EIR to the Reservoir Subsequent

EIR constitutes "substantial unplanned growth." 7 (cont.)

* The DRAFT SEIR must consider the impact of the change of zoning 8

**We Need affordable housing in our neighborhood, not MORE market-rate housing**! 9

* The DRAFT SEIR must consider the impact of market-rate units in working-class neighborhood 10

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE. This is being done under the aegis of "affordable housing" when, in reality, most of the units will be market-rate housing. 11

**And Finally...best said as it has been written:**

*** The DRAFT SEIR must consider the impact of creating a nuisance** 12

**The Land Use Framework adopted by the Public Utilities Commission in 2012 (PUC Resolution 12-0044) states that Land may be sold or transferred when.... Use of the land sold is not to result in activities creating a nuisance.**

**Given the limited street parking in the surrounding neighborhoods, and the fact that the main ingress/egress to the Reservoir Housing project will be Kahlo Way, the 1100-1550 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word "nuisance" understates the problem].**

**Please listen to the people of S.F. and this neighborhood.**

**Eve Tarquino**

**From:** Dan Tasse
**To:** Fung, Frank (CPC); Rich Hillis; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Please build the Balboa Reservoir project!
**Date:** Wednesday, September 11, 2019 7:22:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission,
I live in Noe Valley, pretty close to the planned Balboa reservoir project. Please build it! 1100 units of housing would be a huge help, and 50% of that being affordable is even better. And if it's on the site of a parking lot, we don't even lose much of anything. 1

I know some people are concerned that it's not *more* affordable. Well, I'd much rather see 550 units of affordable housing plus 550 market rate, than nothing. And I'd much rather see these 1100 units now than anything delayed. As they say, "justice delayed is justice denied" - the same is true for housing. Any units we build will eventually make all of our housing more affordable.

Thank you for your consideration.
Dan Tasse
201 27th St Apt 5, San Francisco

**From:** Priti Tripathi
**To:** Fung, Frank (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.BalboaReservoir
**Subject:** Balbao Reservoir
**Date:** Wednesday, September 11, 2019 7:40:35 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners,

I am writing to urge you to approve the market rate and subsidized affordable housing project that has been proposed on the Balboa Reservoir. 1

We are in desperate need for both types of housing and this project will add may needed units. Without additional housing our city can not grow. Please approve this project immediately.

Thank you,

Priti Tripathi

**From:** Hold Sall Vesselenyi
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir Buildings
**Date:** Monday, September 23, 2019 3:55:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello, my name is Hold Sall and I'm a student at CCSF.

I'm writing to you to express my concerns about the following plans. 1
The Draft Environmental Impact Report is not valid as it does not include City College as a primary feature of the neighborhood and does not consider the project's impact on student's access to City College. Plenty of students have no choice but to get to school by car and my peers who drive are already having a hard time finding parking on busy days. 2

Thank you for reading.

Hold S. V.
(he pronouns)

**From:** Christine Martinez Weibel
**To:** Poling, Jeanie (CPC); CPC.BalboaReservoir; Yee, Norman (BOS)
**Subject:** Balboa Reservoir SEIR: Natural Gas
**Date:** Thursday, September 19, 2019 2:40:42 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi, Ms Poling and Supervisor Yee.

I saw in the Balboa Reservoir Project Draft Environmental Impact Report that natural gas will be installed in the development for space heating, cooking, and gas fireplaces. 1

In light of the climate crisis, I would like to request that no natural gas be installed in the development.

Supervisor Yee, I was impressed by Berkeley's ordinance that bans natural gas in new developments, and I hope you will lead a similar resolution here in San Francisco -- not just for city buildings, as Supervisors Brown and Mandelman have proposed, but for all new construction and major renovation. What a show of leadership it would be to have an 1100+ unit development on all renewable resources, and what a step in the right direction it would be.

On the eve of the global climate strike,

Sincerely,

Christine Weibel
Sunnyside Resident
San Francisco District 7

**From:** Andy Weyer
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir DSEIR
**Date:** Friday, September 20, 2019 2:32:14 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi,

I have read about the Balboa Reservoir DSEIR and feel that I must formally express my opposition to the current draft. The Balboa Reservoir, as I understand it, is currently owned by the public. Given the high cost of living in this city, the number of people living on the streets or in their automobiles/campers, and the general difficulty the city has had in trying to encourage more developers to build affordable housing, it strikes me as absolutely ludicrous that the proposed project does not prioritize below-market rate housing options. We the public own this land, and this land should be used to benefit the public. While I acknowledge that it may be difficult to entice a for-profit developer to build an entirely market-rate complex, I think that at least 50% of the units should be market rate in order to serve the public good. Furthermore, why not give the land to a non-profit developer - work with them to build a complex that is entirely for the public good. Quit lining the pockets of the developers just because they are lining the pockets of our politicians. 1 2

Additionally, I am concerned about how the project might impact students at City College. I frequently see cars parked in the reservoir because the main parking lot is full. City College serves a huge number of students who are juggling full or part-time jobs and do not have the ability to depend on MUNI (which is notoriously unreliable) to get to campus. If all of this parking is removed, I fear that we will be limiting the types of students that we are trying to serve in our community. There is nothing more American than people putting in extra effort and working hard to better their situation in life, and I feel that this seemingly “minor” loss of parking could result in a significant negative impact on these individuals. 3

Sincerely,
Andy Weyer

**From:** Kathleen White
**To:** CPC.BalboaReservoir
**Subject:** Public Comment
**Date:** Thursday, September 19, 2019 9:58:32 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Homelessness and housing insecurity impacts some of my students every semester. It is commonplace for students to leave school due to housing loss or a housing crisis. Please help our community college students by creating short term housing options for CCSF students experiencing an emergency. Short term housing for students is needed in San Francisco and the Balboa Reservoir is the best location. Prevent homelessness while supporting individuals engaged in activities that will lead to wage increases and financial self sufficiency. Support students..provide a roof over their heads while they are in school! Help them to complete their education! Kathleen 1

Kathleen White
Teacher Prep Center Coordinator
Child Development & Family Studies Dept.
City College of San Francisco
50 Frida Kahlo Way - MUB 247
San Francisco, CA 94112
(415) 239-3891 or (415) 239-3172
www.ccsf.edu
FAX - (415) 239-3861

Consider becoming a teacher!!!! FREECCSF starts you on your journey!

**From:** Debra Sue Wilensky
**To:** CPC.BalboaReservoir
**Subject:** Public Comment regarding Balboa Reservoir and City College SEIR
**Date:** Monday, September 23, 2019 1:11:31 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling:

As a San Franciscan, I of course recognize the need for more housing, especially affordable housing. I am however very concerned about the housing project proposed for the Balboa Reservoir, especially its impact on City College and I am especially concerned that the Draft SEIR fails to recognize CCSF as the main feature of the vicinity's "existing or baseline conditions" 1

The Balboa Reservoir is currently used for student parking. This is clearly not the most efficient use of the space, but the need for parking is very real and is not going away any time soon. Students and faculty coming from work or other campuses cannot get to CCSF by public transportation in a timely fashion. Major improvements in public transportation need to occur before people can give up their cars. On public transit, it takes at least an hour to get to CCSF from my home, but only 20 minutes by car, and before I owned a car I avoided going to the Ocean Campus. Removing this parking without replacing it with a parking structure will severely limit student access to education. 2

Furthermore, In 2001 and again in 2005 San Francisco voters approved bond measures to build the Performing Arts Education Center (PAEC), which was already shovel ready in fall 2013, when it was put on hold. The college has already invested $30 million toward its construction, including the basement (which the PAEC shares with the Multi-Use Building), which is already finished. When this long-awaited and much needed building is finally built, CCSF will need additional parking to replace the parking that will be lost and provide additional parking for any performances that will occur in this building.

If the proposed housing is built with only .5 parking spaces per unit, the community will have to absorb the additional cars per unit as well as the current student needs, the future student needs arising from the loss of parking at MUB when the PAEC is built, and the needs of visitors to performances at the PAEC. Many households in San Francisco consist of several adults, either because even so-called affordable housing is only affordable when shared by several adults or by adult children living at home, all of whom might have cars. Even if the residents of the housing units take public transit to work, they are likely to have cars that they will leave parked all day, tying up parking spaces. At the meeting about this project that I attended at John Adams Campus, I was told, more or less, "we have to build with the future in mind and in the future we won't need cars and so won't need parking!" I am sorry, but that future is not here now and won't be here anytime soon, especially if public transit is not improved first. And as we age we are even more dependent on our cars. The need for parking will not go away just because we wish it too.

And none of this addresses future needs that CCSF might have for this land. Ideally, the SFPUC should transfer the 'reservoir' land once and for all to the College. Public land should 3

3 (cont.)

be preserved for the public and not sold to private developers.

4

Please remember the current and future needs of City College students and faculty and the needs of the current residents of the neighborhood in regard to this plan for housing. Don't allow crisis thinking regarding the obvious need for affordable housing to push ahead with this ill-conceived plan that will have harmful consequences long into the future.

Sincerely,

Debra Wilensky
1568 48th Avenue
San Francisco, CA 94122

retired ESL Instructor (1979-2017), ESL Coordinator (Spring 2016-Spring 2017), now retired
John Adams Campus
City College of San Francisco

**From:** Jenny Worley
**To:** CPC.BalboaReservoir
**Cc:** Alex Randolph; Tom Temprano; Ivy Lee; bdavila@ccsf.edu; tselby@ccsf.edu; Shanell Williams; John Rizzo; and
**Subject:** AFT 2121 PUBLIC COMMENT ON THE DRAFT SEIR OF THE BALBOA RESERVOIR PROJECT
**Date:** Monday, September 23, 2019 12:42:36 PM

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# AFT 2121 PUBLIC COMMENT ON THE DRAFT SEIR OF THE BALBOA RESERVOIR PROJECT

***The DRAFT SEIR is inadequate because it fails to place CCSF as the main feature of the vicinity's "existing or baseline conditions"*** 1

The DSEIR does not include CCSF as the main feature of the baseline conditions, despite the fact that CCSF abuts the parcel and has utilized it since 1946. CCSF is one of the most treasured institutions in San Francisco, offering higher public education to a wide range of communities, and a life line for many marginal and disenfranchised communities. Its value is incalculable. This omission means that, going forward, CCSF development priorities will become secondary to the interests of the Reservoir Project since the Reservoir Project will be considered the baseline condition.

***The DRAFT SEIR is inadequate because it fails to consider the option of building 100% affordable housing*** 2

The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".

San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR does not consider the option of dedicating this publicly owned property to 100% affordable housing. Nor does it even consider its own PEIR (Balboa Park Station Area Plan) which http://generalplan.sfplanning.org/Balboa_Park_Station.htm states that when offering public land for development, first consideration should be given to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco should not sell this public land to a private developer that will build mostly market rate housing.

The DSEIR accepts the unexamined premise that creating market rate housing in conjunction with some affordable housing is the only path forward. It does not explore the possibility of funding units which are 100% affordable.

***The DRAFT SEIR is inadequate because it fails to consider the possibility of using this public land to build dedicated educator housing***

Since approval of the PEIR, the City of San Francisco has identified an urgent need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools

whose teachers and students would be able to walk to work/school if they lived there. The DSEIR needs to examine this alternative. 2 (cont.)

***The DRAFT SEIR is inadequate because it fails to consider the impact of market-rate units in working-class neighborhoods*** 3

The Draft SEIR does not consider the impacts of the project on the nearby working-class neighborhoods of Ingleside and The Excelsior. The development of mostly market rate units puts the residents at risk of displacement due to gentrification. A development solely devoted to affordable housing would better blend with these working class neighborhoods.

***The DRAFT SEIR is inadequate because it fails to consider the impact of the zoning change*** 4

The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE with no analysis of the impact this would have. The change is justified by the fiction of offering "affordable housing" when, in reality, most of the units will be market-rate housing.

***The DRAFT SEIR is inadequate because it fails to consider the impact on public transit and recommend that public transit capacity be expanded*** 5

The Developer is counting on a 15% reduction in City College student parking in order to achieve a special project status under AB 900. Moreover, the Balboa Reservoir project will significantly increase population density of the neighborhood and hence significantly increase demand for public transit. This will only aggravate already unreliable and inadequate transit service. **However, the SEIR fails to mandate improvements in infrastructure for public transit, carpooling, cycling, walking, and other environmentally responsible modes of transportation.**

***The DRAFT SEIR is inadequate because it fails to consider the impact of monetary costs incurred to CCSF*** 6

The proposed Reservoir development has already cost the college money due to the major re-design of the original PAEC (Performing Arts Education Center).

***The DRAFT SEIR is inadequate because it fails to consider secondary environmental impacts*** 7

The significant secondary environmental impacts of potential new CCSF parking construction replacing spaces eliminated by the project must be addressed.

Jennifer Worley
President, AFT 2121
City College of San Francisco Federation of Teachers
311 Miramar Ave
San Francisco, CA 94102

415-585-2121

www.aft2121.org

**From:** Mike Zonta
**To:** CPC.BalboaReservoir
**Subject:** Support for Balboa Reservoir project
**Date:** Thursday, August 08, 2019 10:24:41 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Let's get moving on this.

1

Mike Zonta
ingleside

**From:** Mike Zonta
**To:** CPC.BalboaReservoir
**Subject:** Balboa Reservoir housing project
**Date:** Tuesday, September 03, 2019 3:11:46 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I think we ought to get on with this. As long as there are affordable units included, I'm good to go. 1

Mike Zonta
Ingleside
San Francisco, CA

**From:** Neighbors Against Flooding
**To:** CPC.BalboaReservoir
**Cc:** Jessica@Waterboards; solutionsnotsandbags@gmail.com
**Subject:** Public Comments to Balboa Reservoir EIR
**Date:** Tuesday, September 17, 2019 4:22:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling:

We would like to submit the following comments to the 2018-007883ENV: Balboa Reservoir Project (Assessors Block 3180, Lot 190) Environmental Impact Report:

San Francisco's sewer collection system and storm drain system are a combined sewer system (CSS). The vast majority of stormwater should be conveyed through the CSS, which includes the streets and their curbs, catch basins, and underground storm drain, which is then collected and treated. However, the sewers on Ocean Avenue between Frida Kahlo Way (formerly Phelan Avenue) and Miramar are undersized and unable to convey the combined sewage from the sewers uphill from them. Excess combined sewage flow is discharged from the sewers into the streets causing heavy overland flow along Ocean Avenue during moderate storm situations which has resulted in combined sewage, including human waste, flooding downstream of the Balboa Reservoir. 1

The following CCSF EIR report excerpt from the EIR report (Page 4.6-5 of https://www.ccsf.edu/MP/Docs/046Services_DEIR.pdf) documents that:

"The area west of Phelan Avenue is served by a 30-inch reinforced concrete sewer in Phelan Avenue that carries flow south to Ocean Avenue. Although the sewer's condition is unknown, it is severely undersized. According to the SFDPW, the sewers surrounding the Main Campus, while adequate for the dry weather flow from the campus, are inadequate for flows that occur in a 5-year storm event. Currently, the City does not have the funds to upgrade the under-sized sewers surrounding the campus. The SFPUC is in the process of revising its 1973 Wastewater Master Plan. Among other things, this Plan would include upgrading the City's hydraulically and structurally inadequate sewers."

In addition, low lying areas are already negatively impacted by flow from upstream projects like the 2011 Colon/Greenwood/Plymouth/Southwood/Wildwood/Miramar sewer system improvement project which resulted in a transfer of flood risk to Ingleside Terraces:

City and County of San Francisco 2030 Sewer System Master Plan TM505 (http://sfwater.org/modules/showdocument.aspx?documentid=592), Section 5.7.3.1, "Conveyance along Ocean Avenue (Upsizing and Auxiliary, page 107, "This alternative will lower the HGL and alleviate flooding in the upstream portions of the reach, along Ocean Avenue between Phelan and Miramar avenues. However, the extra conveyance capacity provided by the relief and auxiliary sewers serve to move larger peak flows downstream to the Legion Court area west of Ashton Avenue. Predictably, the higher arriving peak flows will cause elevated HGLs and effectively transfer the flooding problems to this area."

Even though the Balboa Reservoir project would not "substantially" alter the existing drainage pattern, **any** additional waste from additional residents would increase the quantity of human waste discharged during these events and increase the exposure to residents and businesses downstream in low lying areas. The Balboa Reservoir EIR fails to address this issue and fails to fully disclose the project's dry and wet-weather impact on the existing sewer system.
The constant expansion of lines upstream, continued development, and the failure to correct the defects in the existing sewer lines have created and continues to create a

nuisance and public health risk by subjecting those residents in low lying areas to the risk of exposure to hazardous waste.

The sewer lines downstream of the Balboa Reservoir project must be enlarged, and all known and foreseeable deficiencies corrected, prior to the start of this development.

1 (cont.)

Sincerely,

Ingleside Terraces Residents

Patricia Hechinger
Vanessa Quesada
Gina Buschiazzo
Jane Huey
Adrienne Sciutto
Irene Creps

cc: Jessica Watkins, P.E.
Senior Water Resource Control Engineer
San Francisco Bay Regional Water Quality Control Board

Sunnyside Neighborhood Association

From: Amy O'Hair
SNA Sunnyside Representative, Balboa Reservoir Community Advisory Committee
Secretary, Sunnyside Neighborhood Association

RECEIVED

SEP 12 2019

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
CPC/HPC

Date: Sept 12 2019

To: San Francisco Planning Commission

Dear Commissioners:

1

Please urge the Planning Dept to **open San Ramon Way to all traffic** at the Balboa Reservoir housing site, which was studied as Alternative C in the Balboa Reservoir SEIR. The current two plans include only two openings for vehicle traffic into and out of the site, at Lee Avenue and Ocean, and onto Frida Kahlo Way near Cloud Circle. By opening San Ramon Way, a third street access would be added to the building site, mitigating some of locked-in nature of the site.

When AECOM did the initial transportation analysis in March 2015, they concluded: "Extending San Ramon Way would **reduce local traffic** at bottlenecks into the neighborhood....The extension would likely attract a portion of the reservoir site traffic heading to or from the west end and could likely be accommodated **without resulting in substantial negative effects** on the existing Westwood Park neighborhood."[i]

The Balboa Reservoir draft SEIR states that opening San Ramon Way to vehicles would **redistribute traffic** from Ocean Avenue and Frida Kahlo Way, where it would **otherwise contribute to transit delay** (p.6-37). It would **provide emergency vehicles better access** to the western portions (p.6-36). Further, this alternative would **reduce project-generated traffic volumes** at the Lee Avenue-Ocean Avenue intersection (p.6-37), which is identified as a point of heavy traffic congestion (p.3.B-3).

In 1917, Westwood Park was laid out with the several stub-end streets, including San Ramon, abutting its periphery. The original planners naturally envisioned these stubs connecting up with new streets in future adjacent residential developments. Connecting San Ramon Way might seem an obvious part of effectively developing the site, but apparently the barrier to doing so lies far in the past.

[redacted]

Sunnyside Neighborhood Association

In 1950s the Westwood Park homeowners association decided that a completed street at this location was something they wanted to prevent forever.

On June 30, 1955* the City and County of San Francisco sold a ten-foot wide strip of the public street to the Westwood Park Homeowners Association (3178/018), for just $1.36.

1 (cont.)

Thus a HOA of 600-some households, owning a thin strip of previously public land, now stands against a better distribution of traffic, better emergency vehicle access, and the alleviation of transit delay.

**The Commission can and should correct this incomplete street.** Please urge the Planning Department to pursue Alternative C. Thank you for your consideration.

Sincerely,

Amy O'Hair



[i] Memorandum from AECOM to the SF Planning Dept about Balboa Reservoir existing conditions, dated March 17, 2015. http://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir/Balboa-Reservoir-Study_Existing-Conditions-Transportation.pdf

* See attached conveyance from the SF Assessor's

BOOK A141 PAGE 553

# CONVEYANCE OF REAL ESTATE

SOLD FOR NONPAYMENT OF PROPERTY TAXES FOR THE FISCAL YEAR 19 54 -19 55

Sale No. 1159

THIS DEED, made this 1st day of July 1960, between Louis J. Conti, Tax Collector of the City and County of San Francisco, State of California, first party, and the State of California, second party, witnesseth:

THAT WHEREAS, The real property hereinafter described was duly assessed for taxation in the year 19 54, to Residential Development Co.

and was thereafter on the 30th day of June, 19 55, duly sold to the State of California for nonpayment of delinquent taxes which had been legally levied and were a lien on said real property, the total amount for which the same was sold being $ 1.36;

AND WHEREAS, Five years or more have elapsed since said sale and no person has redeemed the property;

NOW THEREFORE, In accordance with law, the first party hereby grants to the second party that certain real property situated in the City and County of San Francisco, State of California, described as follows:

Lot 18, Block 3178 as delineated and designated in Assessor's Map Book filed on September 23, 1959, in the office of the Recorder of the City and County of San Francisco, State of California.

IN WITNESS WHEREOF, Said first party has hereunto set his hand the day and year first above written.

Louis J. Conti
Tax Collector of the City and County of San Francisco

STATE OF CALIFORNIA
City and County of San Francisco } ss.

On July 1st. 1960, before me, Martin Mongan, County Clerk and ex officio Clerk of the Superior Court of the State of California in and for the City and County of San Francisco, personally appeared Louis J. Conti known to me to be the Tax Collector of said City and County and the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same as such Tax Collector.

Martin Mongan (SEAL)
County Clerk and ex officio Clerk of the Superior Court

By _____ Deputy

J 428

BOOK A141 PAGE 553
RECORDED AT REQUEST OF
LOUIS J. CONTI
TAX COLLECTOR
JUL 1 3 54 P '60
SAN FRANCISCO, CALIF.
Alla A. Toomey
RECORDER
Official

For Use of Recorder

FOR USE OF STATE CONTROLLER

| | |
|---|---|
| No. Acres | Redeemed |
| No. Lots | Cancelled |
| Value Land | Postponed |
| Value Imp. | Az. P.A. |
| In City of | Agr. App. |
| Code Area | Sold |
| School Dist. | Election Filed |

0428 JUL 1 60

CONTROLLER'S FORM T.D.L. 1500E

| | |
|---|---|
| **From:** | Francine Lofrano |
| **To:** | CPC.BalboaReservoir; Poling, Jeanie (CPC) |
| **Cc:** | Michael Ahrens; Anita Theoharis; Anne Chen; Joe Koman; Ravi Krishnaswamy; Francine Lofrano; Yee, Norman (BOS); Low, Jen (BOS); Ivy Lee |
| **Subject:** | Written Comments of Westwood Park Association regarding Balboa Reservoir Project Draft Subsequent Environmental Impact Report (DSEIR). |
| **Date:** | Sunday, September 22, 2019 3:10:55 PM |
| **Attachments:** | Westwood Park Association Comment Letter.pdf<br>Exhibit 1 - Kittelson Study.pdf<br>Exhibit 3 - Related California Proposal.pdf<br>Exhibit 4 - Comments on Scope of Balboa Reservior EIR.pdf<br>Exhibit 5 - Jenney Perez Declaration.pdf<br>Exhibit 6- Anne Chen Declaration.pdf |

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To All Concerned:

Attached please find the written comments of Westwood Park Association regarding the Balboa Reservoir Project DSEIR along with exhibits. We look forward to reviewing your responses to our comments.

Thank you,

Francine Lofrano, Secretary
Westwood Park Association

WESTWOOD PARK

Via Electronic Mail

September 22, 2019

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

RE: Written Comments of Westwood Park Association regarding Balboa Reservoir Project Draft Subsequent Environmental Impact Report (DSEIR).

Dear Ms. Poling:

The Westwood Park Association ("WPA") represents the interests of the residents of the Westwood Park Community that was developed more than 100 years ago and directly adjoins the proposed Balboa Reservoir Project ("Project").

This letter constitutes the written comments of the WPA on the DSEIR prepared for the Project, which was published and made available for public review on August 7, 2019.

1. Cumulative Impacts and City College Parking 1

As will be discussed below, WPA believes the analysis of the cumulative transportation impacts is flawed in that the analysis does not properly consider the impacts of the City College's ("CCSF") pending Ocean Campus projects, as shown in the recently adopted CCSF "Facilities Master Plan."

Cumulative Secondary Parking Impacts

The most significant impact of the Project as it relates to CCSF's concurrent expansion plans is the loss of the Project site's parking for CCSF staff, students and visitors. Although parking impacts are not considered

environmental impacts under CEQA, the DSEIR still must include an analysis of secondary parking impacts caused by the loss of existing parking, including impacts on public transit and other private ride share arrangements. 1 (cont.)

As noted in the DSEIR, secondary impacts related to CCSF are analyzed only in the initial study as part of the discussion of impacts on Public Services (DSEIR Appendix B, p, B-91.) This analysis assumes that CCSF will be constructing a 1200 space parking garage on the East Basin, as shown in the CCSF Facilities master plan, adopted in March 2019. However, at the May 2019 CCSF Board of Trustee's meeting the CCSF staff presented an update on a potential bond measure to fund construction of the CCSF master plan projects which eliminated funding for the East Basin Parking Garage. (DSEIR, p. 3.A-14.) In addition, the Transportation background information in the DSEIR Appendix C are dated April 29, 2019 and June 25, 2019. Please explain where the secondary impact of the elimination of virtually all the existing available parking on the East and West Basins on public transit and local traffic is analyzed and why the impact on SFMTA ridership and capacity analysis are presented in the appendices as "for information" only. For these reasons, the secondary impacts related to CCSF on transit and transit delay are not based on the most recent information related to the foreseeable CCSF Master Plan projects available to the Planning Department prior to publication of the DSEIR.

Moreover, the DSEIR does not analyze the secondary impacts of the elimination of parking as part of the cumulative impacts on transportation. As noted in a non-CEQA parking study prepared by Kittelson & Associates dated August 1, 2019 for the Project, it anticipates that parking shortages caused by the project and the CCSF development will lead to both an increased reliance on public transportation and an increase in drivers looking for parking spaces in adjacent residential neighborhoods such as Westwood Park. A copy of the Kittelson non-CEQA study is attached hereto as Exhibit 1. 2

Many of the streets within Westwood Park provide on-street parking that results in narrowing the effective roadway width and making two-way vehicle traffic difficult. (DSEIR, p. 6-34) This potentially hazardous condition would be exacerbated by additional vehicles looking for parking due to the shortage created by cumulative development. This is a potentially significant secondary transportation impact that is not adequately addressed in the DSEIR. 3

The number of vehicles that currently use the East Basin and West Basin parking lots are not accurately described in the DSEIR. In fact, on the very cover of the DSEIR is a picture of only the lower West Basin with only a few cars present. Attached as Exhibit 2 is an accurate picture of both the East Basin and West Basin taken at a peak period when student classes are in session. As you can see, the parking lots are full, with numerous cars parked in the CCSF parking spaces as well as in the parking lot which is the Project site. 4

The developer has stated on its website that there will be a public garage on the site "sized to meet City College demand". The number and location of the replacement parking spaces should be discussed as should the elimination of the off-street parking spaces from the CCSF Master Plan development. 5

CCSF Enrollment Increase 6

CCSF has stated that the need for upgraded facilities is based on an approximately 55% increase in anticipated enrollment by 2026 but the cumulative transportation impact discussion is projected to year 2040. The additional enrollment between 2026 and 2040 for CCSF is not discussed. It can be assumed that the annual increase hence forth would be substantially greater than the annual percentage increase used by the Department based on a citywide average. The extraordinary growth in the student enrollment at CCSF as a consequence of free tuition mandates a cumulative analysis that accurately reflects the impacts of the cumulative growth of CCSF on transportation. We believe the DSEIR impact analysis is understated.

CCSF Student Housing Project 7

The DSEIR fails to mention in the cumulative analysis that CCSF will proceed with the construction of 500 units of student housing on the campus which was discussed at a Balboa Reservoir CAC meeting on June 10, 2019. Such a project would only exacerbate the lack of adequate parking, as well as creating additional secondary impacts on transportation, air quality and noise. The related impacts from this foreseeable Project should be included in the cumulative impact analysis.

2. Alternatives Analysis 8

CEQA requires that an EIR "consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public

participation" (CEQA Guidelines Section 15126.6(a). The Project DSEIR considers three alternatives, plus the required "No Project" alternative. This may be a "reasonable range" of alternatives, but as discussed below, the WPA believes the specific alternatives selected, and the discussion of those alternatives, fails to meet the CEQA alternative analysis requirement that the alternative analysis will "foster informed decision-making and public participation." 8 (cont.)

Alternative B: Financial Feasibility of Reduced Density Alternative 9

The WPA objects to the conclusion regarding the financial feasibility of Alternative B, the Reduced Density Alternative, that would reduce the number of housing units from either 1550 or 1100 units to 800 units. The DSEIR incorrectly states that "the financial feasibility of the reduced density alternative is unknown" (DSEIR, page 6-17). As noted on pages 2-5 in the Project Description/Background section of the DSEIR, the SFPUC issued a request for qualifications for development of the property in November 2016. From the submissions, SFPUC selected three developers to submit comprehensive proposals: Avalon, Emerald Fund and Related California. The proposal from Avalon and its development partners was selected by SFPUC to enter into exclusive negotiations for the development.

The Related California RFP proposal was to develop 680 units, of which 50.2% were proposed to be affordable and work force housing units, or 120 fewer units than the Alternative B project with 800 units. Therefore, there is no factual basis for the conclusion in the DSEIR that the financial feasibility of the Alternative B project is unknown as this is contrary to Related California's proposal with fewer units that they clearly considered to be financially feasible. A copy of the Related California's Response to the RFP proposal is attached to this letter as exhibit 3.

The WPA submitted a Scoping Letter on November 12, 2018, which is attached hereto as Exhibit 4. That Scoping Letter fully discussed the financial feasibility of a reduced density project. As WPA stated in that letter, the Related California proposal was for 680 units but in addition, Related California disclosed to WPA that a project with fewer units than 680 was feasible. Footnote 1 of the Scoping Letter, states that "In discussion with the Westwood Park Community, Related California acknowledged that a 500 unit development is financially feasible". Hence, the statements in the DSEIR that the "financial feasibility of the reduced density alternative is unknown" are simply incorrect, contrary to the evidence, and ignores the factual evidence that is readily available to the Planning Department.

Alternative B: Reduced Density Alternative Mitigates Construction Impacts on Riordan High School and the Childcare Center 10

A noise monitoring report was prepared to establish the existing noise levels within 900 feet of the project site as part of the DSEIR. This report included a long term (24 hr. or longer) and a short term (15 min.) study. The closest Noise-Sensitive Receptor is Archbishop Riordan High School ("Riordan High School") which is within 80' of the North Access Road which is the route to be used by construction haul trucks for 4 months, and approximately 50' from the standard construction activities for the Lee Avenue extension and the Block G building. The estimated duration of construction noise from the project is six years.

Table 3.C-7 provides a list of equipment that generates noise between 74 (Welder, Concrete Truck) and 90 dBA (Hoe Ram, Concrete Saw, Rock/concrete Crusher) at a distance of 50' and at 110' the noise is reduced to 68 dBA (a welder) to 84 dBA (Hoe ram, Concrete Saw, Rock/Concrete Crusher). After Phase 1 is complete, in addition to the construction noise there will be an increase in noise from project related traffic. The noise impact on the Riordan High School as well as other nearby sensitive receptors such as the Ingleside Library and the Shining Stars Family Childcare Center will be significant.

The project included multiple buildings and is proposed to be constructed in two phases. Therefore, construction haul trucks will use the North Access Road not just during the estimated 4 months of the excavation and grading phase of the Project but for the full six years of the proposed construction. Although the DSEIR describes the construction noise as intermittent, these noisy periods will be disruptive to students and teachers throughout the Riordan High School day. The most effective way to mitigate construction impacts is to decrease the density of the project so as to not prolong the construction schedule and require a noise buffer zone adjacent to Riordan High School. We request that the analysis of the lower density alternative be included as a variant. A noise buffer zone next to Riordan High School and the Childcare Center should also be included as a mitigation measure.

Alternative C: San Ramon Way Passenger Vehicle Alternative 11

It is WPA's opinion that Alternative C, the San Ramon Way Passenger Vehicle Alternative should be rejected as an alternative by the Planning Department. As described in the DSEIR, San Ramon Way currently terminates just west of the Project site and that the WPA owns the 10-foot

wide parcel that separates the end of the street and the Project site. Implementation of this alternative would require purchase of this parcel by the Developer or the City. 11 (cont.)

Allowing San Ramon Way to be used for vehicle access would create significant adverse consequences. Attached to this letter as exhibit 5 is the declaration of Jenny Perez, a resident who has lived on lower Plymouth Avenue near San Ramon Way for 37 years. Ms. Perez submitted a declaration commenting on the inaccuracies in the DSEIR relating to the alternative use of San Ramon Way for vehicle traffic and to the additional adverse consequences if San Ramon is opened to through vehicle traffic.

Also attached as exhibit 6 is the declaration of Anne Chen, a resident of lower Plymouth for 40 years. Ms. Chen's declaration comments on the inaccuracies in the DSEIR relating to the alternative of using San Ramon Way for Vehicle traffic. WPA could have solicited many more similar declarations from WPA residences, and is willing to do so if that would be helpful.

The residents residing in WPA believes that this alternative, if implemented, would have a negative traffic and noise impact on the Westwood Park neighborhood, especially on Plymouth Avenue and San Ramon Way. WPA objects to this alternative and will not sell the WPA owned parcel to allow access to the project site. Thus, this alternative is not reasonably feasible and should have been rejected by the Department as an Alternative.

Alternative D: Six Year Construction Alternative 12

Alternative D is the "Six-Year Construction Alternative". This Alternative does not meet the criteria of an alternative as it is clearly nothing more than a variant of the proposed Project with a two phase construction schedule. The discussion of Alternative D in the DSEIR does not provide any additional information or analysis of potential impacts that are not already provided in the impact analysis of the Project. A potential six year construction schedule is noted as realistic and possible in the Project description, which can be imposed as a condition of approval by the Planning Commission. For Alternative D to be a true alternative, it must also include a comparison the impacts of Alternative B that would be constructed in two phases over a six year period. This is necessary so that there will be an objective basis for determining which project variant or alternative will have the least impact on the environment. Thus, the analysis in Alternative D does not provide any meaningful comparison of potential impacts or the "comparative merits of the

alternatives", as required by CEQA Guidelines Section 15126.6(a). If the DSEIR is to include a two phase project as an alternative, then it should also include a two phase Alternative B in the Alternative D discussion. 12 (cont.)

Environmentally Superior Alternative 13

The DSEIR concludes that Alternative D is the "Environmentally Superior Alternative." (DSEIR, pp. 6-49 – 6-50.) This conclusion contradicts the evidence provided in the DSEIR which states that the combination of the reduced density alternative (Alternative B) and Alternative D "***would result in less environmental impacts than the Project options and variants.***" (DSEIR, p. 6-50.) Therefore, it is clear that the combination of alternatives B and D would result in fewer environmental impacts. The inescapable conclusion would be that the environmentally superior alternative is Alternative B constructed over six years in two phases. As written, the alternative section of the DSEIR is drafted to lead, or mislead, the public and decision-makers into approving the Project or the Additional Housing Option that has a higher density even though neither the Project or the Additional Housing Option is the environmentally superior alternative.

Additional Housing (1,550) Unit Project Option 14

A representative of the developer has informed the Chair of the BRCAC that the developer will not develop the 1,550 unit Additional Housing Option. The Planning Department should verify the accuracy of this representation to the BRCAC. If correct, the 1,550 Unit Project option should be added to the list of alternatives considered but rejected by the Planning Department since its development will not be undertaken by the developer.

Rejection of the Alternative to use Project Site for CCSF 15

Parties of interest in the Scoping Process submitted requests for Alternatives to be considered in the DSEIR. Various parties requested that one Alternative that the City should include in the DSEIR is the use of the Project Site solely for CCSF [DSEIR, page 6-60]. The Planning Department rejected this alternative on the basis that the significant impacts cannot be eliminated and that the Project Sponsor's objectives would not be implemented [DSEIR, page 6-60]. CCSF is a tuition free higher educational institution serving the educational needs of the residents of San Francisco, many of whom are immigrants. Since implementation of the free tuition policy, the student body of CCSF is estimated to increase by 55% by 2026. The new buildings in the CCSF Master Plan would occupy the current parking lot, which is the only

undeveloped portion of the CCSF Ocean Campus leaving this campus no additional room to expand. Public land should be used for public use and not private residential use. In this case, educational buildings and housing for CCSF students, staff, and teachers (both CCSF teachers and those in nearby public schools) should have been included and analyzed as an alternative use of the Project site. 15 (cont.)

3. Conclusion

The WPA looks forward to reviewing your responses to our comments. Please feel free to email the WPA at the email address: board@westwoodpark.com if you require additional information. We thank you for your consideration.

Very truly yours,

WESTWOOD PARK ASSOCIATION

BY _____

Michael Ahrens, President

cc: Anita Theoharis, Director of WPA
Anne Chen, Director of WPA
Joe Koman, Director of WPA
Francine Lofrano, Director of WPA
Ravi Krishnaswamy, Director of WPA
Norman Yee, Supervisor, District 7
Jen Low, Legislative Aide to Supervisor Norman Yee
Ivy Lee, Legislative Aide to Supervisor Norman Yee

Encls: Exhibit 1 – Kittelson Study
Exhibit 2 – Photo of East & West Basin Parking Lots
Exhibit 3 – Related California Proposal
Exhibit 4 – Comments on Scope of Balboa Reservoir EIR
Exhibit 5 – Jenny Perez Declaration
Exhibit 6 – Anne Chen Declaration

KITTELSON & ASSOCIATES
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# TECHNICAL MEMORANDUM

| | |
|---|---|
| Date: | August 1, 2019 |
| To: | Reservoir Community Partners, LLC |
| From: | Kittelson & Associates, Inc. |
| Subject: | Balboa Reservoir – Non-CEQA Analysis, Overview and Executive Summary |

## INTRODUCTION

This memorandum summarizes the supplemental transportation analyses for the Balboa Reservoir development (proposed project). The supplemental transportation analyses covers topics not analyzed under California Environmental Quality Act (CEQA) that were identified in the scoping and project development process to support project development efforts and address community concerns. The analysis was conducted for informational purposes and is not intended to identify or develop recommendations for implementation. The following topics were analyzed:

- **Parking supply and demand.** The purpose of this analysis is to present parking supply and occupancy counts, present a methodology and framework for ongoing monitoring and reporting of parking utilization rates, and assess the effect of the proposed development on existing off-street and on-street parking.
- **Vehicle operations.** The objective of the analysis is to evaluate existing and existing plus project corridor operations along Ocean Avenue and Ridgewood Avenue-Frida Kahlo Way and intersection operations at select study intersections to estimate the changes in travel time attributable to the project and to evaluate potential modifications to improve traffic flow and vehicle progression at intersections along Ocean Avenue. Data on existing transit operations is used to inform the evaluation.
- **Shuttle feasibility.** The purpose of this analysis is to assess the feasibility of a shuttle operating between the Balboa Reservoir site, the City College of San Francisco (CCSF) campus, and the Balboa Park BART/Muni station.

The key findings of the parking analysis, operations analysis, and shuttle study are presented in this memorandum. The technical memorandums are included as attachments.

## PARKING ANALYSIS

The key findings of the parking supply and utilization data collection and the parking demand analysis are summarized in this section.

## Off-Street Parking Supply and Utilization

The project site is located west of City College of San Francisco's (CCSF) Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is currently occupied by a 1,007-space surface parking lot ("Lower Lot" or west basin) accessed by two driveways on Frida Kahlo Way. The Lower Lot serves as overflow parking for the CCSF's 1,167-space Upper Lot (or east basin), which is accessed from the same two driveways on Frida Kahlo Way.

Parking inventory and occupancy data was collected at both the Upper and Lower Lots on Thursday, December 7, 2017, Wednesday, January 31, 2018, and Wednesday, April 18, 2018 when CCSF was in session. The peak hourly utilization of both the Lower Lot and Upper Lot was observed to occur between 10 a.m. and 1 p.m. The observed maximum combined occupancy rate of 73% (1,596 cars parked and 578 spaces available) occurred on Wednesday, January 31, 2018 between 11 a.m. and 12 p.m.

The Upper Lot can accommodate the existing combined parking demand (the total demand observed at both the Lower Lot and Upper Lot) during the a.m. and p.m. periods (7 to 9 a.m. and 5 to 7 p.m.) but would not meet the combined parking demand during the weekday midday period (10 a.m. to 12 p.m.). During the weekday midday peak hour of parking demand, assuming parking was available only at the Upper Lot, there would be a shortfall of up to 239 parking spaces.

## Neighborhood (On-Street) Parking Supply and Utilization

On-street parking utilization data were collected by IDAX Data Solutions[1] in the site vicinity on two weekdays in February 2019. Each block face within the neighborhood on-street parking study area was observed three times a day for two days: at 9:00 a.m. (a.m.), 2:00 p.m. (midday), and 8:00 p.m. (p.m.). Days with street cleaning or abnormal parking behavior were avoided. Parking supply data in the form of number of available parking spaces per block were provided by San Francisco Municipal Transportation Agency (SFMTA).

Based on this data, there are a total of 906 parking spaces within the parking study area and between approximately 200 and 300 on-street spaces are available on weekdays during any given time period (a.m., midday, and p.m.). The highest levels of occupancy were generally observed to occur during the weekday p.m. period.

## Parking Demand Analysis

Parking demand was calculated for residential, short-term retail and daycare visitors, and long-term employee parking for both the retail and childcare uses. This parking demand estimation focuses on the midday time period when the retail and childcare are active and existing CCSF parking demand would exceed capacity of the Upper Lot. While adjustments were made to account for the proposed

[1] IDAX Data Solutions is a multimodal data solutions company providing transportation data with an office in San Francisco, CA.

transportation demand management (TDM) plan and affordable housing on site, the estimated project-generated parking demand can be considered conservative and likely overstates demand based on the site context and travel characteristics, transit proximity and quality, and existing and expected travel characteristics.

The Developer's Proposed Option would generate a total midday parking demand for 455 vehicle parking spaces (426 residential, 29 retail and childcare visitor, 18 retail and childcare employee). The Additional Housing Option would generate a total midday parking demand for 631 vehicle parking spaces (602 residential, 29 retail and childcare visitor, 18 retail and childcare employee).

The vehicle parking supply proposed under each development scenario was evaluated against the estimated parking demand generated by the project and the existing CCSF overflow demand. Based on this analysis, the projected residential parking demand can be met on-site with the currently proposed 0.5:1 parking ratio under the Developer's Proposed Option during the midday and overnight periods and the Additional Housing Option during the midday period. There would be a 101 space residential parking space shortfall during the overnight period with the Additional House Option.

The parking demand associated with the retail and child care visitor and employee demand (29 spaces) and CCSF overflow demand (239 spaces) could be met by available on-street parking spaces within the neighborhood parking study area (316 spaces during the midday period, 217 spaces during the overnight period). The analysis of the Developer's Proposed Option does not include the 750-space parking garage that is analyzed in the EIR. Some or all of these parking spaces could be included in the final project to meet projected demand. Alternatively, the parking demand from the retail and daycare visitors and employees and overflow CCSF vehicles could be accommodated by a combination of reducing CCSF parking demand through planned TDM measures and/or a shared parking agreement with the Balboa Reservoir project.

The Balboa Reservoir development intends to monitor and manage its parking efficiently while working to encourage the use of transportation modes other than the single occupancy vehicle. Shared or flexible parking designations between residential, retail, and CCSF uses would help to minimize the total number of parking spaces needed to meet project-generated parking demand and overflow CCSF parking demand resulting from the redevelopment of the Lower Lot. Implementation of TDM measures and a shared parking agreement with CCSF would reduce any secondary effects of parking shortfalls on the neighborhood parking supply.

## OPERATIONS ANALYSIS

Analysis was conducted for existing and existing plus project conditions. Existing plus project conditions reflects the existing transportation network with the inclusion of vehicle trips generated by the Additional Housing Option. For the purposes of a more conservative analysis, the Additional Housing Option was evaluated, as it would generate more vehicle trips and would therefore have a greater effect on corridor delay and intersection operations. The Developer's Proposed Option would generate about 25 percent

fewer vehicle trips and as a result, would be expected to result in less delay compared to the Additional Housing Option.

## Corridor Analysis

The corridor delay analysis considers the change in vehicle delay with the addition of project-generated vehicle trips during the weekday a.m. and p.m. peak hours along the following two corridors:

- Ocean Avenue, from Plymouth Avenue to San Jose Avenue
- Ridgewood Avenue-Frida Kahlo Way, from Ridgewood Avenue/Monterey Boulevard to Frida Kahlo Way/Geneva Avenue/Ocean Avenue

The Additional Housing Option would increase delay along the Ocean Avenue study segment by one second in the eastbound direction during the weekday a.m. peak hour and by two seconds and eight seconds in the eastbound and westbound directions, respectively during the weekday p.m. peak hour.

The Additional Housing Option would increase delay along the Frida Kahlo Way study segment by one second in the northbound and southbound directions during the weekday a.m. peak hour and by three seconds in the southbound direction during the weekday p.m. peak hour.

## Intersection Operations Analysis

A detailed intersection operations analysis was conducted to identify more specifically how operations may change with the addition of project-generated vehicle trips from the Additional Housing Option during the weekday a.m. and p.m. peak hours at the following three study intersections:

- Brighton Avenue/Ocean Avenue
- Lee Avenue/Ocean Avenue
- Frida Kahlo Way/Geneva Avenue/Ocean Avenue

These three study intersections were selected for analysis to address concerns raised by the community regarding operations at these locations.

The analysis considers the delay, queue length, and level of service for each approach and for the intersection overall. Intersection volumes were adjusted to reflect the peak hour and lane utilization factors[2]. Overall, vehicle trips generated by the Additional Housing Option are not anticipated to substantially increase delays at study intersections during the weekday a.m. and p.m. peak hours. The

[2] Peak hour factor is defined as the hourly volume divided by the peak (fifteen) minute flow rate within that same hour. The lane utilization factor indicates the "uniform" use of available lanes. It is the ratio of the average volume per lane to the heaviest volume in one lane.

key findings of the intersection operations analysis comparing existing with existing plus project conditions are summarized in this section.

### *Brighton Avenue/Ocean Avenue*

- There would not be a substantial change to the delay, queue lengths, and level of service with the addition of project-generated vehicle trips.
- With the addition of project trips, the overall intersection delay may be slightly reduced (by less than one second per vehicle and by 1.3 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of trips travelling through the intersection are doing so on the coordinated phase, thereby increasing the efficiency of the signal and reducing average vehicle delay.

### *Lee Avenue/Ocean Avenue*

- With the addition of project-generated vehicle trips, the overall intersection delay is projected to slightly increase (by 2.0 and 4.2 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively).
- The southbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips. The delay is estimated to increase by 11.6 seconds per vehicle during the weekday a.m. and p.m. peak hours. The queue length is estimated to increase by 87 feet during the weekday a.m. peak hour and by 81 feet during the weekday p.m. peak hour. The level of service is estimated to change from LOS C to LOS D during the weekday a.m. and p.m. peak hours.

### *Frida Kahlo Way/Geneva Avenue/Ocean Avenue*

- The overall intersection delay is anticipated to increase by 18.4 seconds per vehicle during the weekday a.m. peak hour and by 37.2 seconds per vehicle during the weekday p.m. peak hour with the addition of project-generated vehicle trips.
- The westbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips during the weekday a.m. and p.m. peak hours. The delay is estimated to increase by 28.1 and 70.5 seconds per vehicle, respectively. The queue length is estimated to increase by 38.6 and 115 feet, respectively. The level of service is estimated to worsen from a LOS E to a LOS F during the weekday p.m. peak hour.

## Potential Intersection Modifications

Intersection modifications can be made to increase safety and capacity, improve vehicle progression, and reduce congestion on the road. The most common strategies include optimizing or modifying signal timing and implementing physical changes or turn movement restrictions at intersections to increase

efficiency of intersection or corridor operations. Potential intersection modifications were described and analyzed in the Operations Analysis technical memorandum. Key findings are presented in this section.

### *Signal Timing Modifications*

One of the major objectives of traffic signal optimization is to increase the capacity of at-grade intersections. For this analysis, at each study intersection, five seconds of green time was reallocated from the north/south approaches to the east/west approaches. In other words, green time on Ocean Avenue was increased by five seconds for each phase while the overall cycle length remained fixed. Increasing green time on Ocean Avenue would:

- Decrease overall intersection delays at Brighton Avenue/Ocean Avenue and Frida Kahlo Way/Geneva Avenue/Ocean Avenue by between 1 and 5 seconds and between 45 and 51 seconds, respectively. However, Synchro may overestimate the change in delay and queue lengths reported at Frida Kahlo Way/Geneva Avenue/Ocean Avenue, which operates at, or near, capacity.
- Increase overall intersection delay at Ocean Avenue/Lee Avenue by between 1 and 5 seconds.
- Reduce delay and queue lengths on the eastbound and westbound approaches and increase delay and queue lengths on the northbound and southbound movements at all study intersections.

Signalized intersections along Ocean Avenue operate as actuated-coordinated signals[3] with maximum recall[4] that operate on a fixed cycle length. Signal timing modifications implemented at these three intersections in isolation may adversely affect vehicle progression and have unintended consequences for operations along the corridor. Any adjustments to signal timing would need to be reviewed and approved by SFMTA.

### *Other Modifications*

In addition to signal timing modifications, other intersection modifications and treatments along the corridor may be implemented to increase efficiency of operations and reduce vehicle delay and queue lengths along the corridor. These include installation of left-turn lanes, installation of right-turn lanes, implementation of turn restrictions, and intersection redesign. These treatments can be costly if

[3] Actuated signals prioritize the through movement of the major street and use sensors to respond to the traffic present at actuated approach, so that the pattern of the signal (the length and order of each phase) depends on the traffic and can be different at every cycle. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

[4] Each phase in a signalized intersection is given a recall mode of either no call, minimum, maximum, or pedestrian. No recall implies that a phase can be skipped if no vehicles are present/detected. Minimum recall indicates that a phase is being called for its minimum green time, independent of a vehicle's presence. Maximum recall specifies that a phase is being called for its maximum green time. Pedestrian recall means that a phase will always service the pedestrian walk and clearance interval times independent of a pedestrian's presence.

additional right-of-way is needed and there may be other tradeoffs to consider, such as potential adverse effects on conditions for bicyclists and pedestrians. Modifications that would require roadway widening, additional right-of-way, rail reconfiguration, or signal relocation would be major infrastructure projects and may not be feasible or appropriate within the context of the corridor.

Planned projects that are intended to improve safety, access, and comfort for people traveling along Ocean Avenue include the Ocean Avenue Safety Project and I-280 Interchange Modifications at Balboa Park Project.

## SHUTTLE STUDY

A shuttle feasibility assessment was conducted to evaluate the potential for shuttle service operating between the Balboa Reservoir Site, CCSF Ocean Avenue campus, and the Balboa Park BART/Muni station. The analysis includes a ridership assessment, service concept, and feasibility analysis. Key findings from the assessment are summarized in this section.

The Balboa Reservoir development is expected to generate up to 2,700 transit trips[6] each day, many to/from the Balboa Park BART/Muni station, approximately 0.6 mile east of the project site. While the total travel demand between these destinations is high, and the shuttle would have convenient stop locations, the shuttle's indirect loop route would have to compete with the high frequency and direct travel of the existing transit service and the flexibility and speed of walking.

The conceptual shuttle route is approximately 2.25 miles long with an estimated peak hour travel time of approximately 31.5 minutes, with variability based on congestion, signal delay, passenger boarding/alighting, final routing, and layover scheduling. The shuttle system route would have stops within the Balboa Reservoir site, on CCSF campus, at City College Terminal, and at the Balboa Park BART/Muni station.

Muni currently offers convenient connections to the Balboa Park BART/Muni station. The K/T Third/Ingleside light rail and Muni bus routes 8, 29, 49, and 91 have stops on Ocean Avenue or the City College Terminal near the project site. Muni route 43 operates on Frida Kahlo Way adjacent to CCSF and on Geneva Avenue to the Balboa Park BART/Muni station. Typical wait times are under five minutes during the weekday a.m. and p.m. peak periods.

The Balboa Reservoir shuttle demand model is calibrated to high shuttle use estimates to serve as a proof of concept. The convenience of a free shuttle was estimated to be more appealing than, and capture the majority of, the BART riders that may otherwise walk, take other transit options, drive alone/carpool, or be dropped off in a taxi or transportation network company vehicle (e.g,. Uber, Lyft). With the shuttle

[6] Source: Balboa Reservoir Transit Assessment Memorandum, June 25, 2019.

operating with at least two vehicles in service, approximately half of the walk trips and the majority of transit, drive alone, and kiss and ride modes would be expected to switch modes and use the shuttle.

However, given that multiple Muni lines serve stops near Balboa Reservoir and CCSF operating on 8-10 minute headways during weekday a.m. and p.m. periods and typical waiting times are under five minutes, the shuttle would have to operate at high frequencies throughout the day to effectively compete with the existing transit service and walking trips. With three shuttle buses in operation, vehicle headways and average waiting time would match that of existing peak hour service. This level of shuttle service is forecast to have an estimated cost of $762,500 to over $1 million per year without considering factors, such as regulatory requirements and operator staffing and scheduling, which would increase costs and may present substantial hurdles to implementation. If a lower frequency and less costly service were provided as an alternative, it would not be competitive with the existing transit and walking alternatives and would see less use. Overall, the shuttle system route would be duplicative with existing transit connection to the Balboa Park BART/Muni station for passengers able to walk to nearby bus and light rail stops. The costs and convenience associated with providing shuttle service should be weighed against alternatives, such as subsidized first mile/last mile taxi or transportation network company rides for those with mobility needs.

## ATTACHMENTS

A. Parking Analysis Technical Memorandum
B. Operations Analysis Technical Memorandum
C. Shuttle Study Technical Memorandum

# ATTACHMENT A: PARKING ANALYSIS TECHNICAL MEMORANDUM

KITTELSON & ASSOCIATES
1161 MISSION STREET, OFFICE #563
SAN FRANCISCO, CA 94103
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# TECHNICAL MEMORANDUM

| | |
|---|---|
| Date: | August 1, 2019 |
| To: | Reservoir Community Partners, LLC |
| From: | Kittelson & Associates, Inc. |
| Subject: | Balboa Reservoir – Parking Analysis Memorandum |

This memorandum summarizes the results of a parking study conducted for the Balboa Reservoir development (proposed project). The project site is located west of City College of San Francisco's (CCSF) Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is currently occupied by a 1,007-space surface parking lot ("Lower Lot" or west basin) accessed by two driveways on Frida Kahlo Way. The Lower Lot serves as overflow parking for the CCSF's 1,167-space Upper Lot (or east basin), which is accessed from the same two driveways on Frida Kahlo Way.

The purpose of this analysis is to present parking supply and occupancy counts, present a methodology and framework for ongoing monitoring and reporting of parking utilization rates, and assess the impact of the proposed development on existing off-street and on-street parking under several development scenarios. The memorandum is organized as follows:

- Data collection summary
- Parking demand analysis
- Parking monitoring plan
- Conclusion

## DATA COLLECTION SUMMARY

### Off-Street Parking

Parking inventory and occupancy data was collected at both the Upper and Lower Lots on Thursday, December 7, 2017, Wednesday, January 31, 2018, and Wednesday, April 18, 2018 on a typical non-holiday, non-registration period day when CCSF was in session. Parking data was collected on an hourly basis between 7:00 a.m. and 9:00 p.m. The number of spaces in the Upper and Lower Lots were counted with the use of aerial photography and then verified in the field. Parking occupancy was collected manually by field technicians. The parking lots were divided into areas with a field technician responsible for collecting data in each. Technicians walked the lots every hour, manually counting the number of full and empty stalls in each area. Data was marked by hand in the field and transferred to spreadsheets. The spreadsheet data entries were then checked against the manual entries.

Parking supply and occupancy data are summarized in Exhibit 1 and Exhibit 2. Exhibit 3 illustrates the average utilization from all three dates.

**Exhibit 1: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy**

| Time | Lower Lot (1,007 Spaces) | | | Upper Lot (1,167 Spaces) | | | Combined (2,174 Spaces) | | |
|---|---|---|---|---|---|---|---|---|---|
| | Parked | Available | Utilization | Parked | Available | Utilization | Parked | Available | Utilization |
| **Thursday, December 7, 2017** | | | | | | | | | |
| 7 | 0 | 1007 | 0% | 39 | 1128 | 3% | 39 | 2135 | 2% |
| 8 | 3 | 1004 | 0% | 181 | 986 | 16% | 184 | 1990 | 8% |
| 9 | 11 | 996 | 1% | 614 | 553 | 53% | 625 | 1549 | 29% |
| 10 | 133 | 874 | 13% | 1078 | 89 | 92% | 1211 | 963 | 56% |
| 11 | 235 | 772 | 23% | 1071 | 96 | 92% | 1306 | 868 | 60% |
| 12 | 253 | 754 | 25% | 1083 | 84 | 93% | 1336 | 838 | 61% |
| 13 | 167 | 840 | 17% | 1058 | 109 | 91% | 1225 | 949 | 56% |
| 14 | 101 | 906 | 10% | 813 | 354 | 70% | 914 | 1260 | 42% |
| 15 | 87 | 920 | 9% | 693 | 474 | 59% | 780 | 1394 | 36% |
| 16 | 40 | 967 | 4% | 476 | 691 | 41% | 516 | 1658 | 24% |
| 17 | 26 | 981 | 3% | 361 | 806 | 31% | 387 | 1787 | 18% |
| 18 | 9 | 998 | 1% | 429 | 738 | 37% | 438 | 1736 | 20% |
| 19 | 6 | 1001 | 1% | 537 | 630 | 46% | 543 | 1631 | 25% |
| 20 | 2 | 1005 | 0% | 445 | 722 | 38% | 447 | 1727 | 21% |
| 21 | 1 | 1006 | 0% | 184 | 983 | 16% | 185 | 1989 | 9% |
| **Wednesday, January 31, 2017** | | | | | | | | | |
| 7 | 1 | 1006 | 0% | 79 | 1088 | 7% | 80 | 2094 | 4% |
| 8 | 4 | 1003 | 0% | 298 | 869 | 26% | 302 | 1872 | 14% |
| 9 | 139 | 868 | 14% | 958 | 209 | 82% | 1097 | 1077 | 50% |
| 10 | 407 | 600 | 40% | 1094 | 73 | 94% | 1501 | 673 | 69% |
| 11 | 533 | 474 | 53% | 1063 | 104 | 91% | 1596 | 578 | 73% |
| 12 | 483 | 524 | 48% | 1046 | 121 | 90% | 1529 | 645 | 70% |
| 13 | 297 | 710 | 29% | 963 | 204 | 83% | 1260 | 914 | 58% |
| 14 | 186 | 821 | 18% | 876 | 291 | 75% | 1062 | 1112 | 49% |
| 15 | 135 | 872 | 13% | 726 | 441 | 62% | 861 | 1313 | 40% |
| 16 | 76 | 931 | 8% | 555 | 612 | 48% | 631 | 1543 | 29% |
| 17 | 55 | 952 | 5% | 482 | 685 | 41% | 537 | 1637 | 25% |
| 18 | 17 | 990 | 2% | 621 | 546 | 53% | 638 | 1536 | 29% |
| 19 | 12 | 995 | 1% | 745 | 422 | 64% | 757 | 1417 | 35% |
| 20 | 8 | 999 | 1% | 612 | 555 | 52% | 620 | 1554 | 29% |
| 21 | 4 | 1003 | 0% | 251 | 916 | 22% | 255 | 1919 | 12% |
| **Wednesday, April 18, 2018** | | | | | | | | | |
| 7 | 3 | 1004 | 0% | 56 | 1111 | 5% | 59 | 2115 | 3% |
| 8 | 4 | 1003 | 0% | 265 | 902 | 23% | 269 | 1905 | 12% |
| 9 | 9 | 998 | 1% | 706 | 461 | 60% | 715 | 1459 | 33% |
| 10 | 126 | 881 | 13% | 847 | 320 | 73% | 973 | 1201 | 45% |
| 11 | 238 | 769 | 24% | 1078 | 89 | 92% | 1316 | 858 | 61% |
| 12 | 181 | 826 | 18% | 1009 | 158 | 86% | 1190 | 984 | 55% |
| 13 | 187 | 820 | 19% | 939 | 228 | 80% | 1126 | 1048 | 52% |
| 14 | 85 | 922 | 8% | 792 | 375 | 68% | 877 | 1297 | 40% |
| 15 | 67 | 940 | 7% | 633 | 534 | 54% | 700 | 1474 | 32% |
| 16 | 39 | 968 | 4% | 536 | 631 | 46% | 575 | 1599 | 26% |
| 17 | 22 | 985 | 2% | 449 | 718 | 38% | 471 | 1703 | 22% |
| 18 | 17 | 990 | 2% | 489 | 678 | 42% | 506 | 1668 | 23% |
| 19 | 10 | 997 | 1% | 563 | 604 | 48% | 573 | 1601 | 26% |
| 20 | 5 | 1002 | 0% | 510 | 657 | 44% | 515 | 1659 | 24% |
| 21 | 5 | 1002 | 0% | 141 | 1026 | 12% | 146 | 2028 | 7% |

Sources: Kittelson & Associates, Inc. 2019; Quality Counts, 2017 & 2018.
Note: Parking utilization was rounded.

**Exhibit 2: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy – Thursday, December 7, 2017**

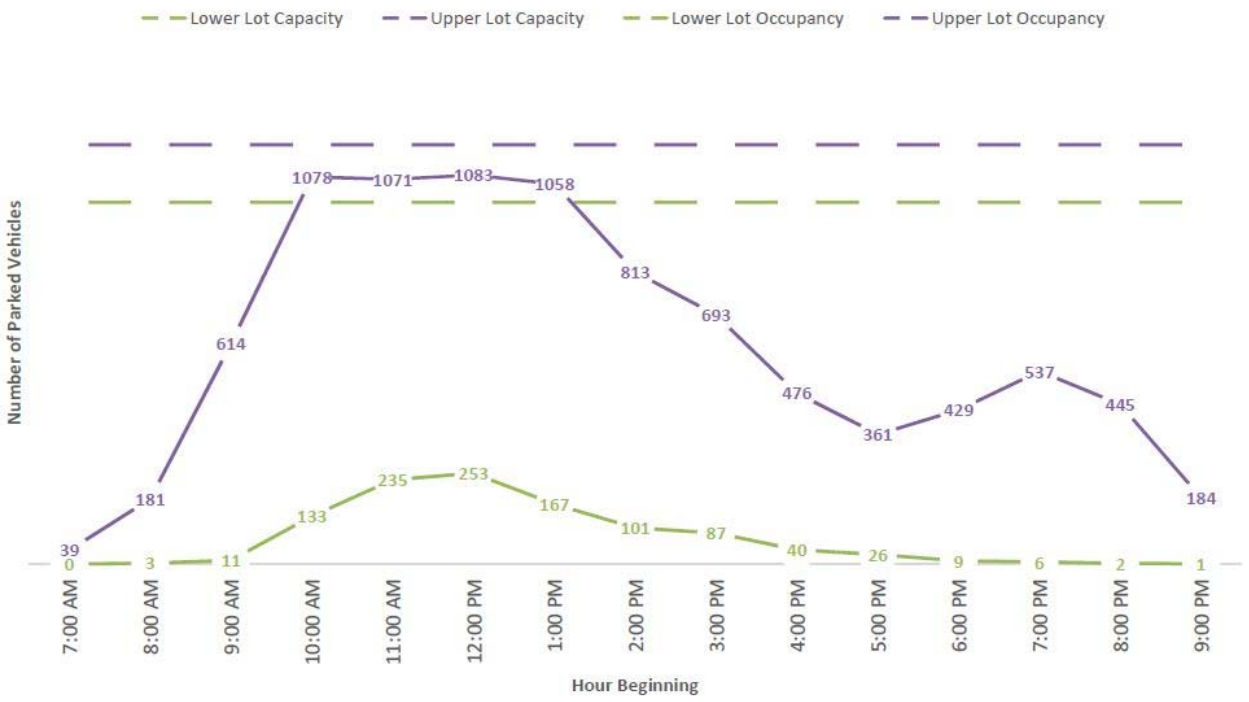



**Exhibit 3: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy – Wednesday, January 31, 2018**

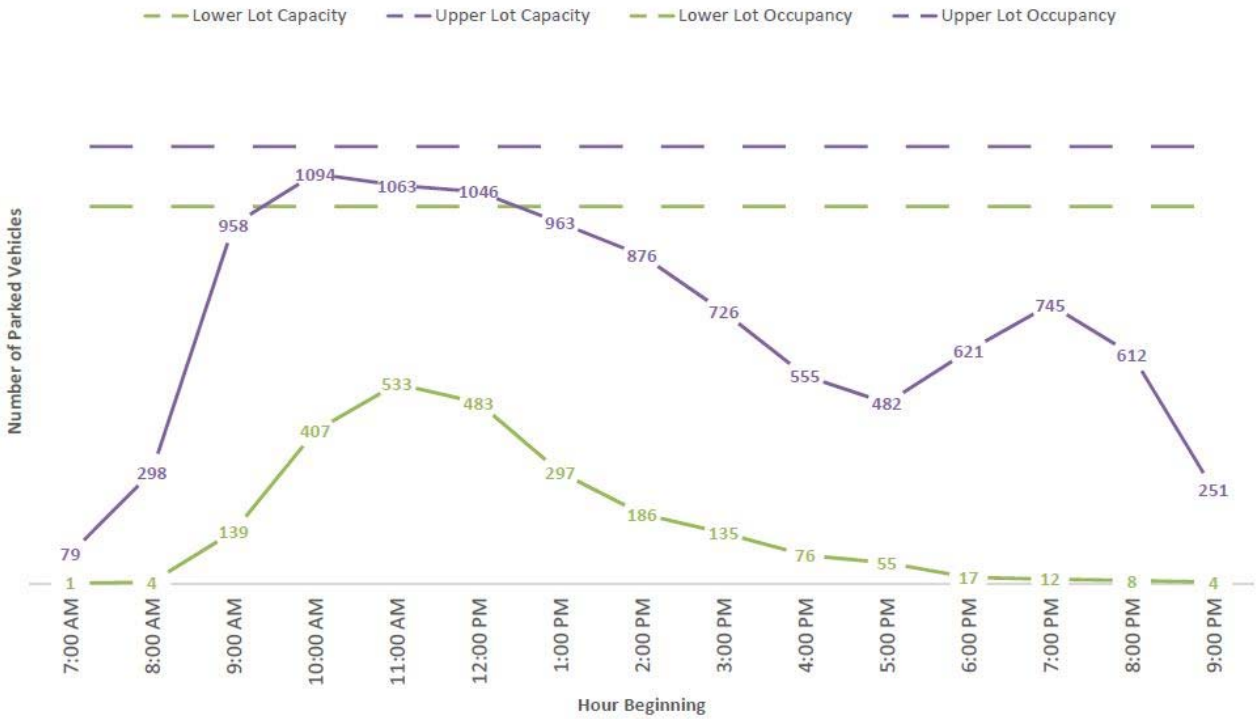
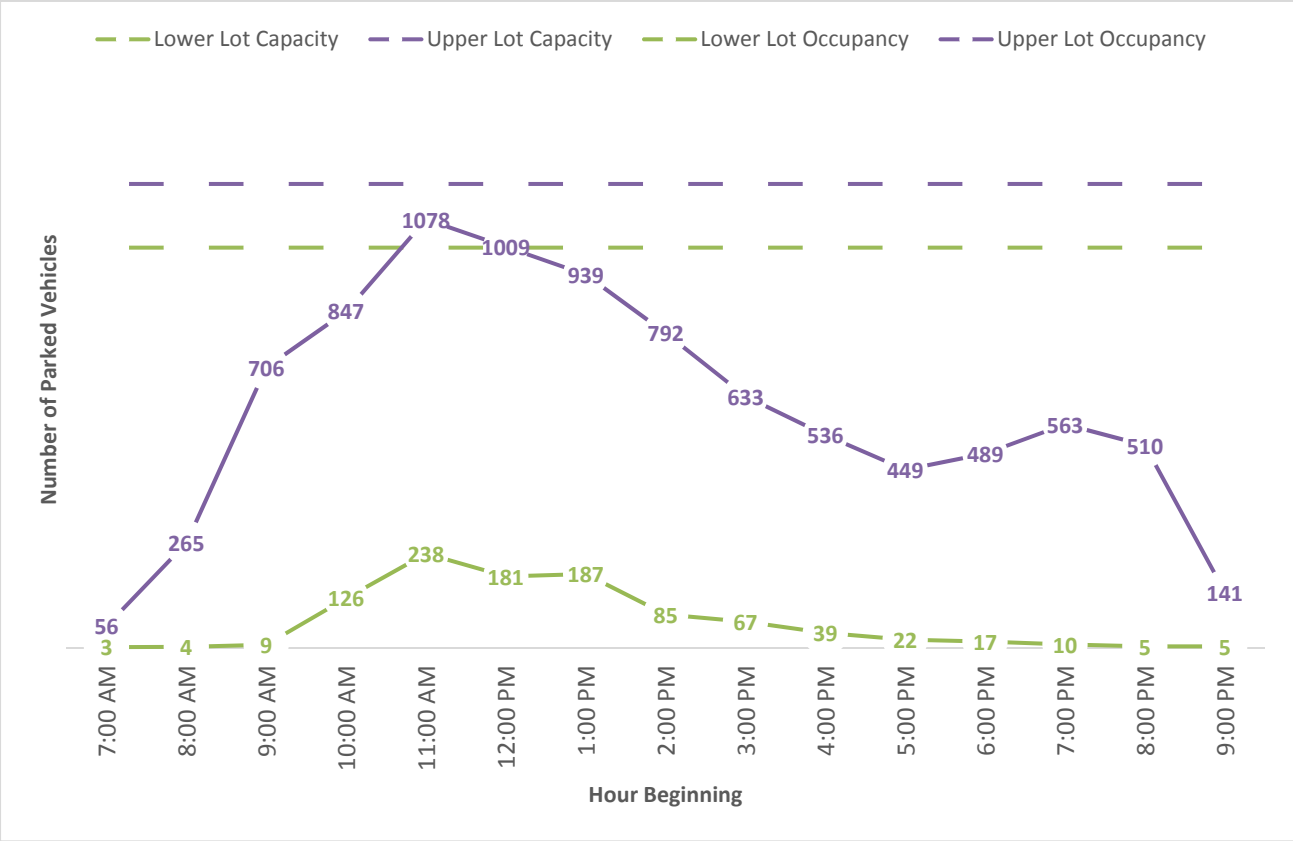


**Exhibit 4: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy – Wednesday, April 18, 2018**




As shown in Exhibit 1 through Exhibit 4, the peak hourly utilization of both the Lower Lot and Upper Lot occurs between 10:00 a.m. and 1:00 p.m. during all three days of observation.

- On Thursday, December 7, 2017, the peak hour of occupancy occurred between 12:00 p.m. and 1:00 p.m. in both the Lower Lot and Upper Lot; at this time, there were 253 cars parked (754 spaces available) in the Lower Lot and 1,083 cars parked (84 spaces available) in the Upper Lot. This represents a utilization rate of 25% in the Lower Lot and 93% in the Upper Lot and a combined occupancy rate of 61%.
- On Wednesday, January 31, 2018, the peak hour of occupancy occurred between 11:00 a.m. and 12:00 p.m. in the Lower Lot and between 10:00 a.m. and 11:00 a.m. in the Upper Lot; during these times, there were 533 cars parked (474 spaces available) in the Lower Lot and 1,094 cars parked (73 spaces available) in the Upper Lot during the peak hours. This represents a utilization rate of 53% in the Lower Lot and 94% in the Upper Lot.
- On Wednesday, April 18, 2018, the peak hour of occupancy occurred between 11:00 a.m. and 12:00 p.m. in both the Lower Lot and Upper Lot; at this time, there were 238 cars parked (769 spaces available) in the Lower Lot and 1,078 cars parked (89 spaces available) in the Upper Lot. This represents a utilization rate of 24% in the Lower Lot and 92% in the Upper Lot and a combined utilization rate of 61%.

- The maximum combined occupancy rate of 73% (1,596 cars parked and 578 spaces available overall) occurred on Wednesday, January 31, 2018 between 11:00 a.m. and 12:00 p.m.

## Neighborhood (On-Street) Parking

On-street parking utilization data were collected by IDAX Data Solutions[1] traffic data collection staff in the site vicinity on weekdays in February 2019 for the block faces shown in Exhibit 5. Each block face was observed three times a day for two days: at 9:00 a.m. (a.m.), 2:00 p.m. (midday), and 8:00 p.m. (p.m.). Days with street cleaning, holidays, events, or other abnormal parking behavior were avoided.

Each observation included the number of parked cars and for each vehicle:

- License plate numbers
- Parking regulation for parking space
- If legally parked
- If parked in a curb cut

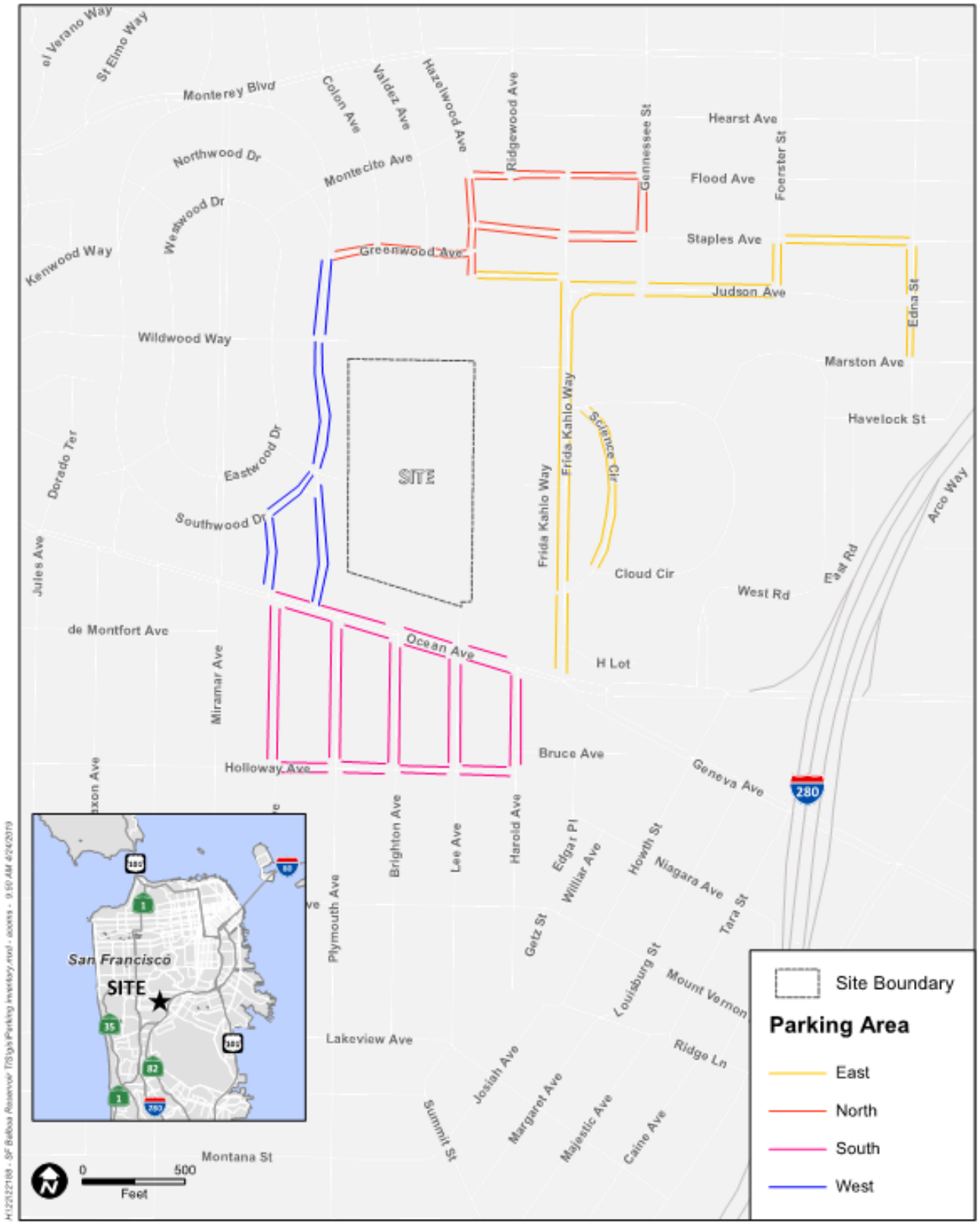
Vehicles parked illegally or across driveways/curb cuts were disregarded as the parking supply consists of only legal parking spaces. While these vehicles constitute parking demand, the spaces these vehicles occupy are not included in the parking supply, so they have no impact on the total available spaces, defined by remaining legal spaces. Each observation period averaged 4.8 illegally parked vehicles and 28.3 vehicles parked in curb cuts, primarily in residential blocks south of Ocean Avenue and north of CCSF.

Parking supply data in the form of number of remaining legal parking spaces per block were provided by San Francisco Municipal Transportation Agency (SFMTA). For blocks where the number of observed legally parked vehicles exceed the SFMTA provided supply, the maximum observed occupancy count was used as the parking supply.

### *Existing Parking Utilization*

The parking utilization and supply data was grouped into four parking areas (north, east, south, and west) shown in Exhibit 5. Percent occupancy and number of available spaces were determined for each observation period for each area as shown in Exhibits 6 and 7. The parking supply and availability by area is presented in Exhibit 8.

[1] IDAX Data Solutions is a multimodal data solutions company providing transportation data with an office in San Francisco, CA.




Source: Kittelson & Associates, Inc., 2019

Case No.2018-007883ENV: Balboa Reservoir Project

**Exhibit 5: Neighborhood (On-Street) Parking Study Area**

**Exhibit 6: Parking Occupancy by Area**

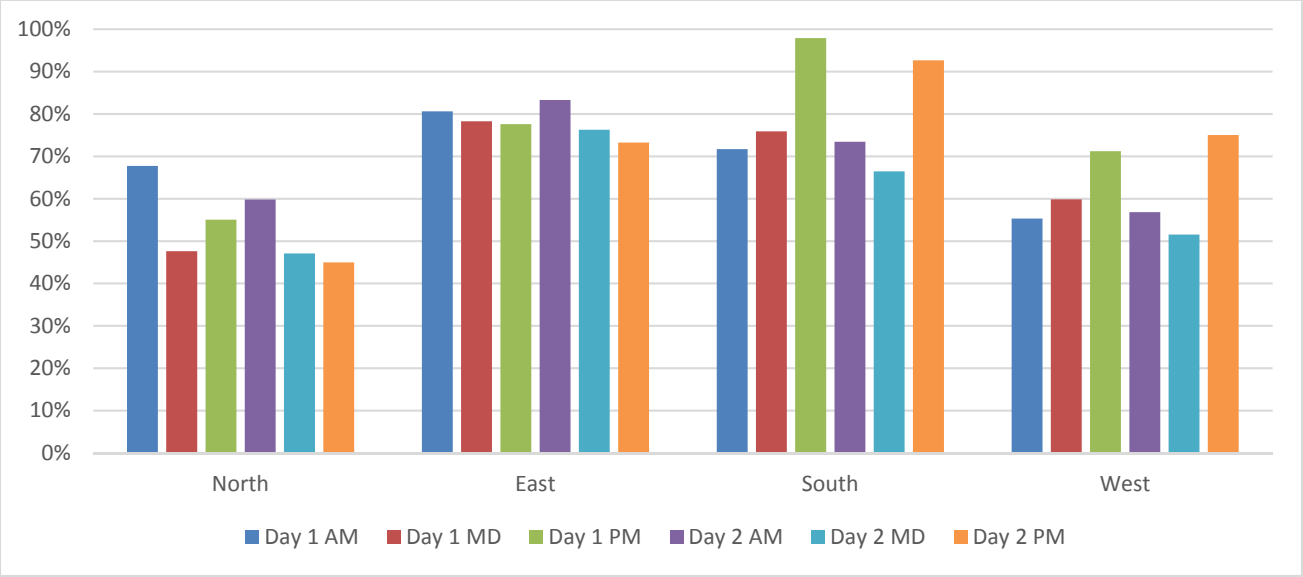



**Exhibit 7: Parking Availability by Area**

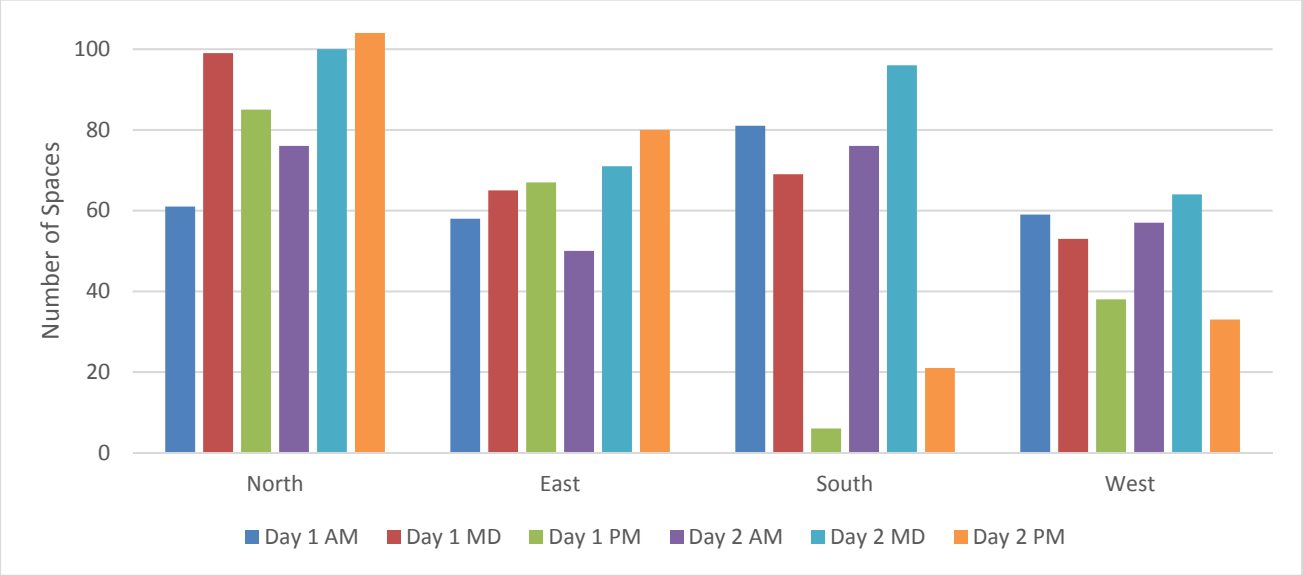



**Exhibit 8: Available Street Parking Spaces by Area and Time Period**

| Parking Area | Supply | Available Street Parking Spaces by Time Period | | | | | | Average |
|---|---|---|---|---|---|---|---|---|
| | | Day 1 AM | Day 1 MD | Day 1 PM | Day 2 AM | Day 2 MD | Day 2 PM | |
| North | 189 | 61 | 99 | 85 | 76 | 100 | 104 | **88** |
| East | 299 | 58 | 65 | 67 | 50 | 71 | 80 | **65** |
| South | 286 | 81 | 69 | 6 | 76 | 96 | 21 | **58** |
| West | 132 | 59 | 53 | 38 | 57 | 64 | 33 | **51** |
| **Total** | **906** | **259** | **286** | **196** | **259** | **331** | **238** | **262** |

Sources: Kittelson & Associates, Inc. 2019; IDAX 2019; SFMTA 2019.
Notes: AM = weekday a.m. (9 a.m.); MD = weekday midday (2 p.m.); PM = weekday p.m. (8 p.m.)
Data presented represents the total available parking spaces by area and time period for each parking area as calculated by subtracting the observed legally parked vehicles from the maximum of the SFMTA parking supply and greatest legally parked vehicle observation.

Exhibit 8 indicates that there are a total of 906 parking spaces within the parking study area and between approximately 200 and 300 on-street spaces are available on streets within the parking study area on weekdays during any given time period. The North and West parking areas have the highest proportion of available street parking with average occupancy of less than 60% (equivalent to 88 and 51 available spaces, respectively). The South area has the highest average occupancy at 80% (equivalent to about 58 available spaces) with the weekday p.m. period approaching 100% utilization. The weekday p.m. period was generally observed to have the highest occupancy.

Parking in the site vicinity is controlled by a combination of the following types of regulation:

- Parking meters
- Residential Permit Parking (RPP): 2-hour time-limited parking between 8:00 a.m. and 6 p.m. weekdays, except with residential permit
- Time Limit: 2-hour time-limited parking without exception
- Unregulated: no apparent parking regulations outside of street sweeping hours

The supply and average number of available parking spaces distributed by parking regulation type is presented in Exhibit 9. As shown in Exhibit 8, over 300 on-street parking spaces are available in the on-street parking study area during the midday period (2 p.m.). As shown in Exhibit 9, the parking demand from overflow CCSF vehicles can be accommodated by the available on-street parking supply, though parking regulations may hinder use.

Exhibits 1 through 4 summarize the parking utilization in the Upper Lot and Lower Lot (project site). Exhibit 10 presents the combined occupancy for the Upper Lot and Lower Lot and assumes that no parking spaces would be provided on the Lower Lot. The number of parked vehicles is calculated as the sum of the number of vehicles parked in the Lower Lot and the number of vehicles parked in the Upper Lot. The available spaces and utilization rate are calculated based on the Upper Lot supply of 1,167 parking spaces assuming the Lower Lot has a parking supply of zero spaces. A utilization rate less than 100% indicates that the Upper Lot could accommodate the existing combined parking demand.

As shown in Exhibit 10, the Upper Lot can accommodate the existing combined parking demand during the a.m. and p.m. periods (7 to 9 a.m. and 5 to 7 p.m.) but would not meet the combined parking demand during the weekday midday period (10 a.m. to 12 p.m.). During the weekday midday peak hour of parking demand there would be a shortfall of up to 239 spaces. A similar analysis in the March 2019 CCSF Ocean Campus TDM Plan and Parking Analysis reported a shortfall of 91 spaces without the Lower Lot. The CCSF Ocean Campus TDM Plan and Parking Analysis was prepared by Fehr & Peers and commissioned by CCSF.

**Exhibit 9: Average Available Street Parking Spaces by Area and Parking Regulation**

| Parking Area | Parking Count Type | Parking Regulation | | | | Total |
|---|---|---|---|---|---|---|
| | | Parking Meters | Residential Parking Permit | Time Limit | Unregulated | |
| North | Supply | 0 | 0 | 70 | 119 | **189** |
| | Available | 0 | 0 | 53 | 35 | **88** |
| East | Supply | 0 | 0 | 45 | 254 | **299** |
| | Available | 0 | 0 | 9 | 56 | **65** |
| South | Supply | 42 | 244 | 0 | 0 | **286** |
| | Available | 16 | 42 | 0 | 0 | **58** |
| West | Supply | 0 | 79 | 0 | 53 | **132** |
| | Available | 0 | 35 | 0 | 16 | **51** |
| **Total** | **Supply** | **42** | **323** | **115** | **426** | **906** |
| | **Available** | **16** | **77** | **62** | **107** | **262** |

Sources: Kittelson & Associates, Inc. 2019; IDAX 2019; SFMTA 2019.
Notes: Data presented represents average available parking spaces by block attributed to the predominate parking regulation for that block.

**Exhibit 10: Existing City College Upper/Lower Lot Parking Occupancy and Upper Lot Supply**

| Time Period | Time (Hour Beginning) | Combined Occupancy[1] | | |
|---|---|---|---|---|
| | | Parked Vehicles | Available Spaces, Upper Lot | % Utilization, Upper Lot |
| Weekday a.m. Peak Period | 7 a.m. | 59 | 1,108 | 5% |
| | 8 a.m. | 252 | 915 | 22% |
| Weekday Midday Peak Period | 10 a.m. | 1,228 | -61 | 105% |
| | 11 a.m. | 1,406 | -239 | 120% |
| | 12 p.m. | 1,352 | -185 | 116% |
| Weekday p.m. Peak Period | 5 p.m. | 465 | 702 | 40% |
| | 6 p.m. | 527 | 640 | 45% |

Sources: Kittelson & Associates, Inc. 2019; Quality Counts, 2017 & 2018.
Notes: Data presented represents the average across three days of data collection: Thursday, December 7, 2017, Wednesday, January 31, 2018, and Wednesday, April 18, 2018.
[1] Parked vehicles calculated as the sum of the number of vehicles parked in both the Lower Lot and Upper Lot. Available spaces and utilization rate calculated based on the Upper Lot supply of 1,167 parking spaces, assuming zero parking spaces provided in the Lower Lot.

The City College of San Francisco March 2019 Facilities Master Plan Final Draft recommends a new West Parking Garage with up to 1,200 spaces to be constructed on the Upper Lot in conjunction with additional buildings. However, the plan states "the size of the structure does not include specific consideration for the potential loss of parking in the lower Balboa Reservoir." The plan also calls for transportation demand management measures to reduce vehicle and parking demand on campus.

## PARKING DEMAND ANALYSIS

The project site is the 17.4-acre parcel located across Frida Kahlo Way from the City College of San Francisco campus and adjacent to a City College parking lot that fronts onto Frida Kahlo Way. The project

site is currently used as an approximately 1,000-space surface parking lot (known as the "Lower Lot") for City College, supplementing the 1,167 vehicle parking spaces in the Upper Lot.

Proposed development scenarios are shown in Exhibit 11 including 0.5:1 residential unit parking ratio. The proposed development, both options, is assumed to be comprised of 40% one-bedroom, 30% two-bedroom, 30% three-bedroom units with 50% of the units being affordable housing. The unit mix is a conservative estimate used for analysis purposes. The actual unit mix may differ.

**Exhibit 11: Proposed Land Use Program**

| Land Use | Unit of measurement | Options | |
|---|---|---|---|
| | | Developer's Proposed Option | Additional Housing Option |
| Residential[1] | Total Dwelling Units | 1,100 | 1,550 |
| | Total Square Feet | 1,283,000 | 1,547,000 |
| General Retail | Gross Square Feet | 7,500 | 7,500 |
| Childcare & Community Room | Gross Square Feet | 10,000 | 10,000 |
| Residential Vehicle Parking[2] | Spaces | Up to 550 | Up to 650 |

Source: Reservoir Community Partners, LLC
[1] Based on information provided by Reservoir Partners LLC, the analysis assumes the following bedroom unit mix: 40% one-bedroom, 30% two-bedroom, 30% three-bedroom units. The unit mix is a conservative estimate used for analysis purposes and the actual unit mix may differ.
[2] Under the Developer's Proposed Option, up to 750 additional public parking spaces are being considered.

Parking demand for the proposed development, both options, was estimated based on the methodology in Appendix G of the *2002 Transportation Impact Analysis Guidelines*[2] (2002 Guidelines) with adjustments to account for the proposed affordable housing and transportation demand management (TDM) measures. The parking demand formulas and parameters from the 2002 Guidelines were used directly to estimate the parking demand associated with the residential units and the retail and daycare space. Affordable housing units were assumed to have a reduced parking demand relative to market rate units to reflect the lower rates of auto ownership, price of unbundled parking, and quality of transit service near the project site.

## Transportation Demand Management

The development will implement transportation demand management (TDM) measures to encourage the use of non-auto modes and reduce vehicle trips. Proposed TDM measures are identified in Exhibit 12, along with the estimated vehicle trip reduction rate associated with implementation.

[2] An update to the 2002 Guidelines was published in February 2019. However, the parking demand methodology presented in the 2019 Guidelines is based on the neighborhood parking rate for non-residential uses only. The 2002 Guidelines methodology was determined to be more appropriate for the proposed development.

**Exhibit 12: TDM Measures and Estimated Vehicle Trip Reduction**

| TDM Measure | Range of Vehicle Trip Reduction Rate | Estimated Vehicle Trip Reduction Rate for Developer's Proposed Option and Additional Housing Option[1] |
|---|---|---|
| Improve Biking/Walking Network | 0% to 2% | 1.0% |
| Provide Bicycle Parking | 0.625% | 0.6% |
| Implement Car Share Program | 5% to 15% | 5.0% |
| Unbundle Parking | 2.6% to 13% | 4.3% |
| Limit On-Site Parking Supply | 5% to 12.5% | 8.8% |
| Improved Design of Development[2] | 3% to 21.3% | 10.7% |
| **TDM Program Total** | | **30.4%** |

Source: California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010.
Notes:
[1] Vehicle trip reduction rate estimated based on the estimated level of adoption and aggressiveness of implementation of a given strategy and account for the implementation of other TDM program elements so as not to overestimate vehicle trip reduction for the overall program.
[2] Design elements include: multimodal wayfinding, real-time information displays, on-site bikeshare, bicycle repair station, showers and lockers, delivery supportive amenities, and tailored transportation marketing.

The range of effectiveness for vehicle trip reductions (VTR) identified for each measure is based on information included in the California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010 (CAPCOA Report). The quantification methods provided in the CAPCOA Report are based on an extensive literature review and are appropriate for use in this project-level analysis. The estimated vehicle trip reduction rate is based on the anticipated level of adoption and aggressiveness of implementation of a given strategy. Vehicle trip reduction is estimated by applying the vehicle trip reduction rate to the vehicle trips generated by the target user group, which would include residents, employees, and visitors to the site.

As shown in Exhibit 12, the selected TDM measures would reduce vehicle trips generated by the project. Similar to how these treatments would facilitate non-auto trips, these amenities would reduce parking demand. Reduced auto demand reduces parking demand for visitors and employees. Actions such as unbundling parking from residential units and limiting parking supply directly impact residential parking demand. Therefore, the TDM measures were estimated to reduce residential parking demand by 30.4%.

## Project Parking Demand

Parking demand was calculated for residential, short-term retail and daycare visitors, and long-term employee parking for both the retail and childcare uses, as shown in Exhibit 13. This parking demand estimation focuses on the midday time period when the retail and childcare are active and existing CCSF parking demand would exceed capacity of the Upper Lot. While adjustments were made to account for the TDM plan and affordable housing, this parking estimate is conservative and likely overstates demand based on the site context and travel characteristics, transit proximity and quality, and existing and expected travel characteristics. Additionally, this parking analysis reflects 2019 parking costs and regulations; future parking policies may influence parking demand for CCSF and the Balboa Reservior.

**Exhibit 13: Estimated Midday Site Parking Demand with Travel Demand Management**

| Land Use | Project Options | |
|---|---|---|
| | Developer's Proposed Option | Additional Housing Option |
| Residential (Midday 80% of Overnight)[1] | 426 | 602 |
| Retail & Childcare Short-Term | 11 | 11 |
| Retail Employee[2] | 9 | 9 |
| Childcare Employee[3] | 9 | 9 |
| **Total Development Midday Parking Demand** | **455** | **631** |

Notes:
[1] Based on distribution of unit sizes and affordable housing; 20% midday reduction based on page G-2 of 2002 Transportation Analysis Guidelines. Overnight parking demand is 514 vehicles for the Developer's Proposed Option and 724 for the Additional Housing Option.
[2] Daily non-work automobile trips calculated by adjusting Table 6 of the Travel Demand Memorandum trips by Table C-2 values of 2002 Transportation Analysis Guidelines; vehicle occupancy based on SD-3 retail trips per 2002 Transportation Analysis Guidelines.
[3] Number of employees based on Table C-1 of 2002 Transportation Analysis Guidelines; Mode split per Table 4 of Travel Demand Memorandum.

As shown in Exhibit 13, the Developer's Proposed Option would generate a total midday parking demand for 455 vehicle parking spaces (426 residential, 29 retail and childcare visitor, 18 retail and childcare employee). The Additional Housing Option would generate a total midday parking demand for 631 vehicle parking spaces (602 residential, 29 retail and childcare visitor, 18 retail and childcare employee).

The vehicle parking supply proposed under each development scenario was evaluated against the estimated parking demand generated by the project and the existing CCSF overflow demand. The summary results are shown in Exhibit 14.

**Exhibit 14: Total Parking Analysis Summary (0.5:1 Parking Ratio [currently proposed])**

| Time Period | Parking Scenario | Developer's Proposed Option (0.5:1) | | | | Additional Housing Option (0.5:1) | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Supply | | | | Supply | | |
| | | Dem-and | On-Site [1] | Neighbor-hood[2] | Total | Dem-and | On-Site | Neighbor-hood[2] | Total |
| Midday | Residential | 426 | 550 | 0 | 550 | 602 | 650 | 0 | 650 |
| | Public/CCSF[3] | 268 | 0 | 316 | 316 | 268 | 0 | 316 | 316 |
| | Total | 694 | 550 | 316 | 866 | 870 | 650 | 316 | 966 |
| Overnight | Residential | 533 | 550 | 0 | 550 | 751 | 650 | 0 | 650 |
| | Public/CCSF[3] | 0 | 0 | 217 | 217 | 0 | 0 | 217 | 217 |
| | Total | 533 | 550 | 217 | 767 | 751 | 650 | 217 | 867 |

Notes: (0.5:1) denotes a parking ratio of 0.5 residential parking spaces for 1 residential unit; green-shaded cells have excess parking supply while red-shaded cells have parking deficits
[1] Developer's Proposed Option supply does not include the 750-space parking garage that is analyzed in the EIR. Some or all of these parking spaces could be included in the final project to meet projected demand.
[2] Neighborhood supply includes available street parking spaces within the parking study area during the given time period (Midday and Evening/Overnight).
[3] Includes 29 retail and child care visitor and employee demand and 239 overflow CCSF vehicles.

As shown in Exhibit 14, the currently proposed 0.5:1 parking ratio meets residential parking demand under the Developer's Proposed Option during the midday and overnight periods and the Additional

Housing Option during the midday period. There would be a 101 space residential parking space shortfall during the overnight period with the Additional House Option. The parking demand associated with the retail and child care visitor and employee demand (29 spaces) and CCSF overflow demand (239 spaces) could be met by available on-street parking spaces within the study area (316 spaces during the midday period, 217 spaces during the overnight period).

Alternatively, the parking demand from the retail and daycare visitors and employees and overflow CCSF vehicles could be accommodated by a combination of reducing CCSF parking demand through planned TDM measures and/or a shared parking agreement with the Balboa Reservoir project. Additionally, under the Developer's Proposed Option, the supply shown in Exhibit 14 does not include the 750-space parking garage that is analyzed in the EIR. Some or all of these parking spaces could be included in the final project to meet projected demand.

# PARKING MONITORING PLAN

## Goal of the Monitoring Plan

The goal of the monitoring plan is to conduct ongoing monitoring and evaluation of vehicle parking supply and utilization on the Balboa Reservoir project site and nearby City College of San Francisco parking facility. Data will be collected and reviewed to help inform the construction of parking facilities and to determine if parking and transportation demand management strategies are needed.

## Background

The Balboa Reservoir Parking Utilization Study (2017-2018) presented above, is an analysis of the parking conditions on the proposed project site ("Lower Lot") and the adjacent Upper Lot. Data was collected at three time periods when school was in session to gauge when parking utilization would be at its highest levels of the year.

The Parking Utilization Study (2017-2018) was intended to monitor and evaluate parking supply and usage to understand the potential effects of the proposed Balboa Reservoir development on the Lower Lot and the resulting loss of parking on City College of San Francisco staff and students. This initial study will be used to develop the framework and methodology for ongoing monitoring and evaluation of parking supply and utilization on the Balboa Reservoir site and the Upper Lot to guide management of Balboa Reservoir and City College of San Francisco parking facilities. Proposed methodology and implementation of the parking monitoring plan is discussed in the following sections.

# Methodology

### *Balboa Reservoir Parking Utilization Study (2017-2018) Methodology*

For the Balboa Reservoir Parking Utilization Study (2017-2018), parking data was collected on an hourly basis over a 14-hour time period, between 7:00 a.m. and 9:00 p.m. Data was collected on three separate mid-week days (Tuesday, Wednesday, or Thursday) when CCSF was in session. The number of spaces in the Upper and Lower Lots were counted with the use of aerial photography and then verified in the field. Parking occupancy was collected manually by field technicians. The parking lots were divided into areas with a field technician responsible for collecting data in each area. Technicians walked the lots every hour, manually counting the number of full and empty stalls in each area. Data was marked by hand in the field and transferred to spreadsheets. The spreadsheet data entries were then checked against the manual entries. The cost of data collection was $560 for each of the Upper Lot and Lower Lot, or $1,120 total, for each 14-hour observation period.

### *Ongoing Monitoring and Evaluation*

The following methodology for ongoing monitoring is recommended to provide efficient and accurate data collection, to align reported space types with parking management categories, and to make the utilization report simple and accessible to all audiences.

- **Survey Study Area.** Collect data within the Lower Lot and Upper Lot. When construction of the Balboa Reservoir project begins, collect data within the Upper Lot only. After construction of the Balboa Reservoir project, if public parking is provided on the Balboa Reservoir site, collect data at the public parking facility and the Upper Lot.
- **Survey Time Period.** Conduct the survey over a four-week period, during the third, fourth, fifth, and sixth weeks of the fall academic term, alternating weekly between Wednesday and Thursday in order to capture daily variations in class schedules and allow for two surveys on each day to get a broader representation of parking demand. This survey period is intended to be inclusive of the period of peak CCSF enrollment.
- **Survey Duration.** Conduct data collection between the hours of 7 a.m. and 9 p.m. to capture hourly variation and peak periods of parking demand.
- **Parking Space Classification.** Classify vehicle parking spaces into the following categories to align with existing parking types provided by CCSF[3] and the Balboa Reservoir project: student; faculty/staff; Americans with Disabilities Act (ADA); reserved; short-term/metered; public (free); public (paid); and private (residents only). Additional categories that could be considered depending on applicability, include electric vehicle charging spaces and dedicated carpool spaces. The Balboa Reservoir Parking Utilization Study (2017-2018) collected and reported

[3] City College of San Francisco 2019 Facilities Master Plan, March 2019. P. 2-32. https://www.ccsf.edu/en/about-city-college/administration/vcfa/facilities_planning/facilities-master-plan.html, accessed April 5, 2019.

utilization data for each facility but did not classify the parking spaces into categories. This approach made data collection and reporting simple and easy to understand, however, it offers limited utility to match space types with parking management categories and patterns of parking demand.

- **Parking Capacity.** Parking capacity is a measure of the number of parking spaces available within the surveyed locations at the time of the survey. Year-to-year changes in capacity are influenced by the physical addition or removal of parking lots and spaces as well as by changes in the management of individual spaces and lots.
- **Parking Utilization.** The overall parking utilization rate is calculated as the ratio of occupied spaces to the total number of parking spaces in the surveyed lots. The percent utilization reported would be an average of the four survey days. Parking utilization should be reported overall (for both facilities combined), by location (for each individual facility), and by parking space category.
- **Reporting.** The parking utilization study should be conducted on an annual basis and build on prior year's data to allow for a longitudinal/historical evaluation.

## Future Management of Parking Facilities

Balboa Reservoir development intends to manage its parking efficiently while working to encourage the use of transportation modes other than the single occupancy vehicle. These efforts are being pursued concurrently and in partnership with City College of San Francisco, Public Utilities Commission, and the City of San Francisco to address the future parking needs for CCSF Ocean Campus.

City College of San Francisco approved its Facilities Master Plan in March 2019. The document outlines a vision for the future of the campus that directs cars to routes at the perimeter of campus, emphasizes a more pedestrian atmosphere on Frida Kahlo Way, and limits on-campus circulation to ADA and service vehicles. City College of San Francisco is developing a transportation demand management program aimed at actively reducing single occupancy vehicle trips to the campus through strategies including designated carpool and carshare vehicle parking and provision of passenger loading and short-term parking spaces. According to information included in the Facilities Master Plan, the West Parking Structure could replace surface parking in the Upper Lot due to the construction of the Performing Arts Education Center. The structure may include up to 1,200 vehicle parking spaces on six floors. Additional vehicle parking would be provided in the East Surface Parking lot located on the east side of the east campus.

With regular monitoring of parking utilization and careful management, Balboa Reservoir and CCSF can support efficient use of the facilities by implementing transportation demand management measures and parking strategies that could include, but are not limited to:

- **Private parking partnerships**. Shared parking arrangement between Balboa Reservoir and City College of San Francisco.

- **Parking policies**. Implement changes to policies and practices that optimize parking occupancy and turnover, such as adding time limits or paid parking, including variable demand-based pricing.
- **Physical improvements**. Make physical improvements, including sidewalk widening, installation of bike facilities and amenities, and wayfinding to increase use of non-auto modes.
- **Shuttle service**. Provide fixed-route or on-demand shuttle service between the project site and key destinations to increase use of non-auto modes.
- **Valet parking**. Implement centralized valet service, thereby increasing capacity of existing parking facilities by enabling tandem parking.
- **Increase parking supply**. Construct a new garage or expand the existing facility.

## SUMMARY OF FINDINGS

The key findings of the parking supply and utilization data collection and the parking demand analysis are summarized below:

- The peak hourly utilization of both the Lower Lot and Upper Lot occurs between 10 a.m. and 1 p.m. The observed maximum combined occupancy rate of 73% (1,596 cars parked and 578 spaces available) occurred between 11 a.m. and 12 p.m.
- Under existing parking pricing policy, the Upper Lot can accommodate the existing combined parking demand (the total demand observed at both the Lower Lot and Upper Lot) during the a.m. and p.m. periods (7 to 9 a.m. and 5 to 7 p.m.) but would not meet the combined parking demand during the weekday midday period (10 a.m. to 12 p.m.). During the weekday midday peak hour of parking demand, assuming parking was available only at the Upper Lot, there would be a shortfall of up to 239 parking spaces.
- There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces are available on weekdays during any given time period (a.m., midday, and p.m.).
- Projected residential parking demand can be met at a 0.5:1 parking ratio except during the overnight period for the Additional Housing Option, which would have a 101 space shortfall.
- Projected parking demand from the retail and daycare visitors and employees and overflow CCSF vehicles could be accommodated by available on-street parking spaces, reduced Balboa Reservoir and CCSF parking demand through planned TDM measures, and/or a shared parking agreement with the Balboa Reservoir project.
- The Balboa Reservoir development intends to monitor and manage its parking efficiently while working to encourage the use of transportation modes other than the single occupancy vehicle. Shared or flexible parking designations between residential, retail, and CCSF uses would help to minimize the total number of parking spaces needed to meet project-generated parking demand and overflow CCSF parking demand resulting from the redevelopment of the Lower Lot. Implementation of TDM measures and a shared parking agreement with CCSF would reduce the impacts of parking shortfalls on the neighborhood parking supply.

# ATTACHMENT B: OPERATIONS ANALYSIS TECHNICAL MEMORANDUM

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# TECHNICAL MEMORANDUM

| | |
|---|---|
| Date: | August 1, 2019 |
| To: | Reservoir Community Partners, LLC |
| From: | Kittelson & Associates, Inc. |
| Project: | Balboa Reservoir – Operations Analysis Memorandum |

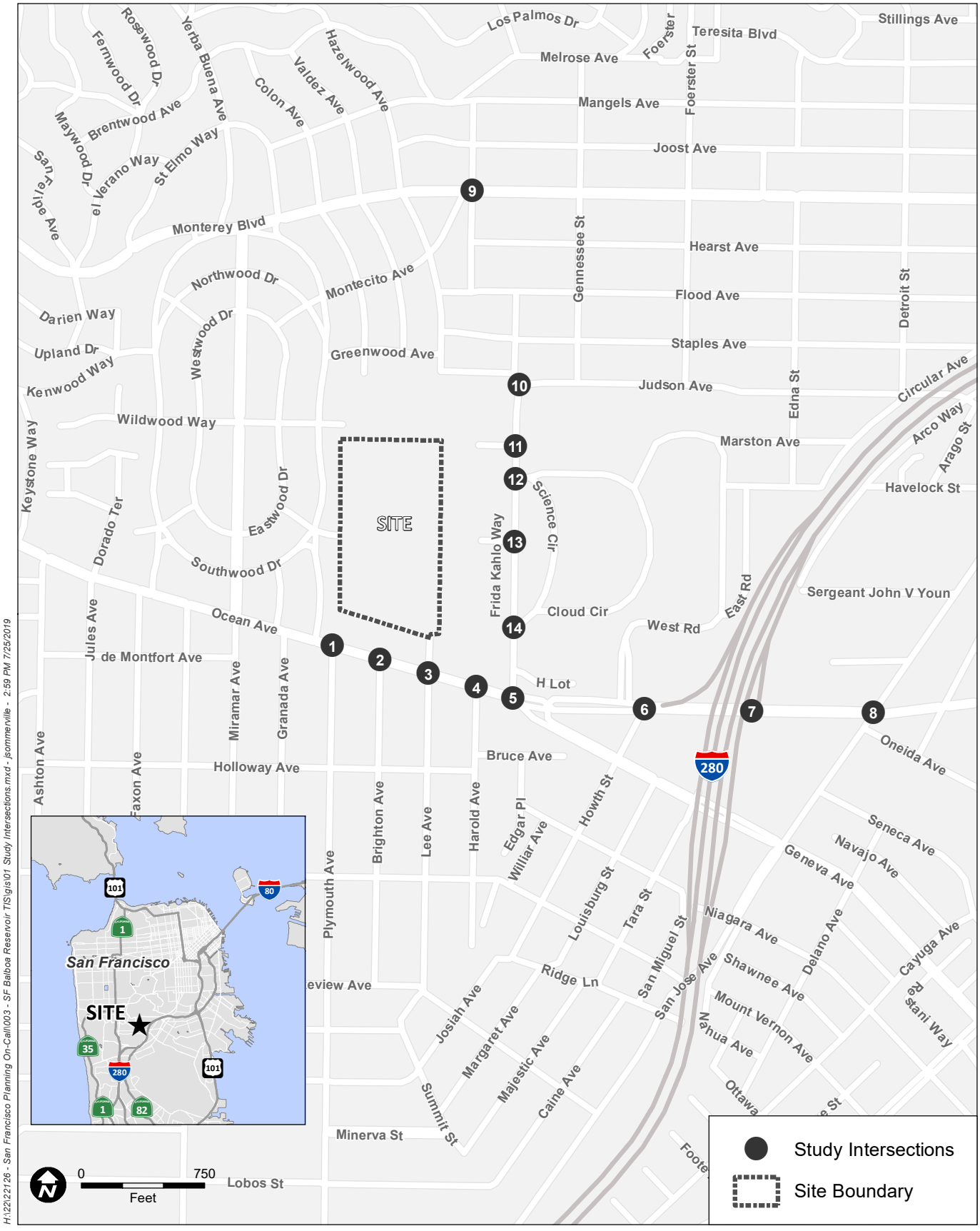
This memorandum summarizes the corridor delay and intersection operations analyses conducted for the Balboa Reservoir development (proposed project). The objective of the analysis is to evaluate existing and existing plus project corridor operations along Ocean Avenue and Ridgewood Avenue-Frida Kahlo Way and intersection operations at select study intersections to estimate the changes in travel time attributable to the project and to evaluate potential modifications to improve traffic flow and vehicle progression at intersections along Ocean Avenue. Data on existing transit operations is used to inform the evaluation. This memorandum is organized as follows:

- Data collection summary
- Analysis methodology
- Corridor delay analysis
- Intersection operations analysis
- Potential intersection modifications
- Summary of findings

## DATA COLLECTION SUMMARY

### Intersection Turning Movement Counts

Weekday a.m. (7 to 9 a.m.) and p.m. (4 to 6 p.m.) period multimodal turning movement counts were collected at 14 locations along Ocean Avenue, Ridgewood Avenue, and Frida Kahlo Way. Turning movement counts were collected on a weekday (Tuesday, Wednesday, or Thursday) when City College of San Francisco was in session. The study intersection locations are shown in Figure 1 and listed in Table 1.




H:\22\22126 - San Francisco Planning On-Call\003 - SF Balboa Reservoir TIS\gis\01 Study Intersections.mxd - jsommerville - 2:59 PM 7/25/2019

Source: Kittelson & Associates, Inc., 2019

Balboa Reservoir Project

**Figure 1**
**Study Intersections**

**Table 1: Study Intersections**

| # | Intersection |
|---|---|
| 1 | Plymouth Avenue/Ocean Avenue |
| 2 | Brighton Avenue/Ocean Avenue |
| 3 | Lee Avenue/Ocean Avenue |
| 4 | Harold Avenue/Ocean Avenue |
| 5 | Frida Kahlo Way/Geneva Avenue/Ocean Avenue |
| 6 | I-280 SB Off-Ramp/Ocean Avenue |
| 7 | I-280 NB On-Ramp/Ocean Avenue |
| 8 | San Jose Avenue/Ocean Avenue |
| 9 | Ridgewood Avenue/Monterey Boulevard |
| 10 | Frida Kahlo Way/Judson Avenue |
| 11 | Frida Kahlo Way/City College Upper Reservoir Lot (N) |
| 12 | Frida Kahlo Way/Cloud Circle (N) |
| 13 | Frida Kahlo Way/City College Upper Reservoir Lot (S) |
| 14 | Frida Kahlo Way/Cloud Circle (S) |

## SFMTA General Transit Feed Specification (GTFS) Data

The SFMTA provided General Transit Feed Specification data for two inbound/outbound routes operating on streets adjacent to the project, 29 Sunset and 43 Masonic, for the weekday a.m. and p.m. peak periods (7 to 9 a.m. and 4. to 6 p.m.). SFMTA provided GTFS data for the segment of line 29 on Ocean Avenue between Mission Street/Persia Avenue and Plymouth Avenue and for the segment of line 43 extending from Gennessee Street/Monterey Boulevard to the City College Bookstore for inbound (southbound) operations and from the City College Bookstore to Foerster Street/Monterey Boulevard for outbound (northbound) operations. Historical travel time data was provided for dates between August 27, 2018 and March 8, 2019. Table 2 displays an average of the data for weekday a.m. and p.m. peak periods.

**Table 2: SFMTA Transit Data**

| Transit Line | Study Segment | Transit Travel Time (minutes:seconds) | |
|---|---|---|---|
| | | a.m. | p.m. |
| 29 | Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue | 10:55 | 12:00 |
| | Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue | 9:53 | 10:10 |
| 43 | Gennessee Street/Monterey Boulevard to City College Bookstore | 4:25 | 4:05 |
| | City College Bookstore to Foerster Street/Monterey Boulevard | 4:37 | 4:35 |

Sources: SFMTA, 2019.
Notes: a.m. refers to 7 to 9 a.m. and p.m. refers to 4 to 6 p.m. Travel time is reported in minutes and seconds.

## Transit Travel Time Runs

Supplemental transit time data was collected along study segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Two staff boarded each transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Data was gathered for the following Muni lines and study segments:

- K/T Third/Ingleside – from Jules Avenue/Ocean Avenue to the Balboa Park BART Station (eastbound) and from San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (westbound)
- 29 Sunset – from Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (westbound) and from Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (eastbound)
- 43 Masonic – from Frida Kahlo Way/CCSF South Entrance to Foerster Street/Monterey Boulevard (northbound) and from Gennessee Street/Monterey Boulevard to Frida Kahlo Way/CCSF South Entrance (southbound)
- 49 Van Ness/Mission – from Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (eastbound) and from Mission Street/Ocean Avenue to Frida Kahlo Way/CCSF South Entrance (westbound)

Table 3 shows observed transit travel times for each study segment. Multiple travel time runs were conducted on each segment in each direction. The value in the table reflects the average of those runs.

**Table 3: Supplemental Transit Travel Time Runs**

| Transit Line | Transit Route | Transit Travel Time (minutes:seconds) | |
|---|---|---|---|
| | | a.m. | p.m. |
| K | Jules Avenue/Ocean Avenue to Balboa Park BART Station | 3:30 | 8:42 |
| | San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue | 3:28 | 10:03 |
| 29 | Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue | 7:10 | 9:55 |
| | Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue | 8:01 | 12:09 |
| 43 | Frida Kahlo Way/CCSF South Entrance to Foerster Street/Monterey Boulevard | 4:20 | 4:37 |
| | Gennessee Street/Monterey Boulevard to Frida Kahlo Way/CCSF South Entrance | 4:16 | 4:23 |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue | 5:39 | 10:04 |
| | Mission Street/Ocean Avenue to Frida Kahlo Way/CCSF South Entrance | 7:18 | 11:25 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: CCSF stands for Community College of San Francisco. a.m. refers to 7 to 9 a.m. and p.m. refers to 4 to 6 p.m. Travel time is reported in minutes and seconds. Multiple transit runs were recorded, and the value in the table reflects an average of those runs.

The supplemental transit travel time data displayed in Table 3 is relatively consistent with the average historical travel time data for both peak periods on 43 Masonic and the evening peak period on 29 Sunset. While the transit travel time runs collected for 29 Sunset during the weekday a.m. peak hour were within the overall range of historic travel time data provided by SFMTA, they were about 3 minutes less than the average historic travel times reported by SFMTA during the weekday a.m. peak period (7-8 minutes as compared to 10-11 minutes). Variation between the average transit travel times observed on Tuesday, April 2, 2019 and the average of historic transit travel time data collected between August 27, 2018 and March 8, 2019 could be related to differences in the volume of vehicles traveling along the corridor and differences in dwell time and the number of passengers boarding/alighting along the corridor, among other factors. Additionally, the supplemental transit travel time data relies on two to three data points on a single day of observation compared to multiple data points collected over a 193 day period.

## ANALYSIS METHODOLOGY

All corridor delay analyses described in this memorandum were performed using Trafficware's Synchro modeling software. This software helps provide a macroscopic evaluation of traffic conditions. The transportation network, consisting of the study intersections outlined in Table 1, was constructed utilizing San Francisco (SF) Planning Department's *Guidelines for Synchro Intersection LOS Analysis* (2012),

as well as signal timing information provided by the San Francisco Municipal Transportation Agency (SFMTA).

## Corridor Delay Analysis

Corridor delay analysis was conducted along the following two corridors:

- Ocean Avenue, from Plymouth Avenue to San Jose Avenue
- Ridgewood Avenue-Frida Kahlo Way, from Ridgewood Avenue/Monterey Boulevard to Frida Kahlo Way/Geneva Avenue/Ocean Avenue

Synchro summarizes corridor delay for approaches along the arterial and includes through and turning lane groups[1]. The specific performance measure that is documented is total delay along the corridor by direction[2]. This performance measure is used to provide information about existing travel times through the study corridors and evaluate travel time increases associated with vehicle traffic generated by the proposed project options.

## Intersection Operations Analysis

Detailed intersection operations analysis was conducted at the following three locations:

- Brighton Avenue/Ocean Avenue
- Lee Avenue/Ocean Avenue
- Frida Kahlo Way/Geneva Avenue/Ocean Avenue

These three study intersections were selected for analysis to address concerns raised by the community regarding operations at these locations.

Intersection level of service (LOS) analyses were performed in accordance with the procedures stated in the 2000 *Highway Capacity Manual*. Intersection level of service is dependent on control delay[3] and is analogous to letter grades in a school report card, ranging from LOS A to LOS F. Motorists using an intersection that operates at a LOS A experience very little delay and usually do not stop, while those using an intersection that operates at a LOS F will experience long delays typically greater than 80 seconds per vehicle.

[1] The corridor delay is calculated by utilizing weighted volumes for approaches on the arterial. These volumes are not adjusted for the peak hour factor (PHF) or lane utilization factor. Peak hour factor is defined as the hourly volume divided by the peak (fifteen) minute flow rate within that same hour. The lane utilization factor indicates the "uniform" use of available lanes. It is the ratio of the average volume per lane to the heaviest volume in one lane.
[2] Total corridor delay is calculated by summing the control delay and queue delay and is presented in seconds per vehicle.
[3] Control delay is defined to include initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. This variable is measured in seconds per vehicle during a specific time period (for example, the p.m. peak hour).

All queue length analyses were performed in accordance with Synchro methodologies and represent the 95th percentile maximum queue lengths. The 95th percentile queue is the queue length that would not be exceeded 95 percent of the time.

All three signalized intersections operate as actuated-coordinated[4] signals with maximum recall[5] on the coordinated phase. This control type is defined as having the major movements (i.e., Ocean Avenue) as coordinated and set to a maximum recall, while the minor streets (Brighton Avenue, Lee Avenue, and Frida Kahlo Way/Geneva Avenue) are actuated and typically have no recall. The signals also operate on a fixed cycle length, so if there is any unused time in a cycle, it is added to the designated coordinated phases.

## Analysis Scenarios

Analysis was conducted for existing and existing plus project conditions. Existing plus project conditions reflects the existing transportation network with the inclusion of vehicle trips generated by the Additional Housing Option.

The Balboa Reservoir development has two proposed project options:

- Developer's Proposed Option. 1,100 dwelling units, 10,000 square feet of childcare use and 7,500 square feet of retail and is estimated to add 249 vehicle trips and 318 vehicle trips during the a.m. and p.m. peak hours, respectively.
- Additional Housing Option. 1,550 dwelling units, 10,000 square feet of childcare use and 7,500 square feet of retail and is forecasted to add 329 vehicle trips and 423 vehicle trips during the a.m. and p.m. peak hours, respectively.

For the purposes of a more conservative analysis, the Additional Housing Option was evaluated, as it would generate more vehicle trips and would therefore have a greater effect on corridor delay and intersection operations. The Developer's Proposed Option would generate about 25 percent fewer vehicle trips and as a result, would be expected to result in less delay compared to the Additional Housing Option.

[4] Actuated signals prioritize the through movement of the major street and use sensors to respond to the traffic present on the actuated approach, so that the pattern of the signal (the length and order of each phase) depends on the traffic and can be different at every cycle. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

[5] Each phase in a signalized intersection is given a recall mode of either no call, minimum, maximum, or pedestrian. No recall implies that a phase can be skipped if no vehicles are present/detected. Minimum recall indicates that a phase is being called for its minimum green time, independent of a vehicle's presence. Maximum recall specifies that a phase is being called for its maximum green time. Pedestrian recall means that a phase will always service the pedestrian walk and clearance interval times independent of a pedestrian's presence.

## CORRIDOR DELAY ANALYSIS

The corridor delay analysis considers the change in vehicle delay with the addition of project-generated vehicle trips along Ocean Avenue, from Plymouth Avenue to San Jose Avenue, and along Ridgewood and Frida Kahlo Way, from Ridgewood Avenue/Monterey Boulevard to Frida Kahlo Way/Geneva Avenue/Ocean Avenue. Table 4 and Table 5 display the total corridor delay for existing conditions and existing plus project conditions for the weekday a.m. and p.m. peak hours.

**Table 4: Corridor Delay – Ocean Avenue**

| Scenario | Weekday a.m. Peak Hour (seconds/vehicle) | | Weekday p.m. Peak Hour (seconds/vehicle) | |
|---|---|---|---|---|
| | Eastbound | Westbound | Eastbound | Westbound |
| Existing Conditions | 11 | 32 | 13 | 33 |
| Existing Plus Additional Housing Option Conditions | 12 | 32 | 15 | 41 |
| **Project-Related Change** | **+1** | **0** | **+2** | **+8** |

Sources: Kittelson & Associates, Inc. 2019.

**Table 5: Corridor Delay – Frida Kahlo Way**

| Scenario | Weekday a.m. Peak Hour (seconds/vehicle) | | Weekday p.m. Peak Hour (seconds/vehicle) | |
|---|---|---|---|---|
| | Northbound | Southbound | Northbound | Southbound |
| Existing Conditions | 3 | 11 | 4 | 19 |
| Existing Plus Additional Housing Option Conditions | 4 | 12 | 4 | 22 |
| **Project-Related Change** | **+1** | **+1** | **0** | **+3** |

Sources: Kittelson & Associates, Inc. 2019.

As shown in Table 4, the Additional Housing Option would increase delay along the Ocean Avenue study segment by one second in the eastbound direction during the weekday a.m. peak hour and by two seconds and eight seconds in the eastbound and westbound directions, respectively during the weekday p.m. peak hour. As shown in Table 5, the Additional Housing Option would increase delay along the Frida Kahlo Way study segment by one second in the northbound and southbound directions during the weekday a.m. peak hour and by three seconds in the southbound direction during the weekday p.m. peak hour.

## INTERSECTION OPERATIONS ANALYSIS

A detailed intersection operations analysis was conducted to identify more specifically how operations at the three study intersections (Brighton Avenue/Ocean Avenue, Lee Avenue/Ocean Avenue, and Frida Kahlo Way/Geneva Avenue/Ocean Avenue) may change with the addition of project-generated vehicle trips from the Additional Housing Option during the weekday a.m. and p.m. peak hours.

The analysis considers the delay, queue length, and LOS for each approach and for the intersection overall. Intersection volumes were adjusted to reflect the peak hour and lane utilization factors. Based on observations along Ocean Avenue, there were twice as many vehicles in the outside lanes, compared to the center lanes, as to avoid the light rail tracks and to avoid being delayed behind transit. Therefore, a lane utilization factor[6] of 0.75 was applied to eastbound and westbound through movements at each study intersection. Table 6 summarizes the weekday a.m. peak hour results, and Table 7 displays the weekday p.m. peak hour results.

**Table 6: Intersection Operations – Weekday a.m. Peak Hour**

| Intersection/ Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | |
| **Existing Conditions** | | | | | | | | | | | | | |
| Brighton Avenue | 7.9 | 136.0 | A | 6.4 | 374.0 | A | 36.2 | 52.0 | D | 64.4 | 25.0 | E | 9.2 |
| Lee Avenue | 8.6 | 55.0 | A | 16.6 | 263.0 | B | 31.6 | 94.0 | C | 23.6 | 30.0 | C | 14.3 |
| Frida Kahlo Way/Geneva Avenue | 39.0 | 427.0 | D | **136.4** | **485.0** | **F** | 30.4 | 210.0 | C | 21.4 | 87.0 | C | 84.3 |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 7.9 | 136.0 | A | 6.2 | 398.0 | A | 36.2 | 52.0 | D | 64.4 | 25.0 | E | 9.0 |
| Lee Avenue | 8.6 | 55.0 | A | 17.4 | 265.0 | B | 33.4 | 107.0 | C | 35.2 | 117.0 | D | 16.3 |
| Frida Kahlo Way/Geneva Avenue | 51.9 | 487.0 | D | **164.5** | **521.0** | **F** | 31.3 | 218.0 | C | 21.4 | 87.0 | C | 102.7 |
| **Project Change** | | | | | | | | | | | | | |
| Brighton Avenue | - | - | - | -0.2 | +24.0 | - | - | - | - | - | - | - | -0.2 |
| Lee Avenue | - | - | - | +0.8 | +2.0 | - | +1.8 | +13.0 | - | +11.6 | +87.0 | C to D | +2.0 |
| Frida Kahlo Way/Geneva Avenue | +12.9 | +60.0 | - | +28.1 | +36.0 | - | +0.9 | +8.0 | - | - | - | - | +18.4 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = Level of Service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a volume-to-capacity ratio greater than 1.0[7]. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

[6] A lane utilization factor can be applied in Synchro as to indicate a specific distribution across lanes. The factor is estimated by dividing the total approach volume by the number of lanes and the highest lane volume.
[7] According to the *Highway Capacity Manual*, capacity is defined as the maximum flow rate for a roadway under specific geometric, traffic, environmental, and control conditions. When a volume-to-capacity ratio (v/c) is greater than one, then there is typically high delay and long queues.

**Table 7: Intersection Operations – Weekday p.m. Peak Hour**

| Intersection/ Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | |
| **Existing Conditions** | | | | | | | | | | | | | |
| Brighton Avenue | 9.6 | 140.0 | A | **78.2** | **570.0** | **E** | 36.8 | 62.0 | D | 42.5 | 16.0 | D | **45.6** |
| Lee Avenue | 9.4 | 64.0 | A | 18.0 | 314.0 | B | 32.5 | 98.0 | C | 27.7 | 70.0 | C | 15.7 |
| Frida Kahlo Way/Geneva Avenue | 46.9 | 471.0 | D | **75.1** | **393.0** | **E** | 29.6 | 203.0 | C | 23.3 | 141.0 | C | 53.7 |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 9.6 | 142.0 | A | **75.1** | **492.0** | **E** | 36.8 | 62.0 | D | 42.5 | 16.0 | D | **44.3** |
| Lee Avenue | 9.4 | 64.0 | A | 22.2 | 323.0 | C | 35.4 | 130.0 | D | 39.3 | 151.0 | D | 19.9 |
| Frida Kahlo Way/Geneva Avenue | **60.4** | **516.0** | **E** | **145.6** | **508.0** | **F** | 31.9 | 223.0 | C | 23.3 | 141.0 | C | 90.9 |
| **Project Change** | | | | | | | | | | | | | |
| Brighton Avenue | - | +2.0 | - | -3.1 | -78.0 | - | - | - | - | - | - | - | -1.3 |
| Lee Avenue | - | - | - | +4.2 | +9.0 | B to C | +2.9 | +32.0 | C to D | +11.6 | +81.0 | C to D | +4.2 |
| Frida Kahlo Way/Geneva Avenue | +13.5 | +45.0 | D to E | +70.5 | +115.0 | E to F | +2.3 | +20.0 | - | - | - | - | 37.2 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = Level of Service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a volume-to-capacity ratio greater than 1.0. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

## Brighton Avenue/Ocean Avenue

The intersection of Brighton Avenue/Ocean Avenue is a four-legged, offset, signalized intersection. The eastbound and westbound approaches have two through lanes each, where the inside lanes serve transit buses and light rail and general vehicles. Left-turns onto Brighton Avenue are permitted for these approaches. The northbound and southbound approaches consist of one lane in each direction that serves through, right, and left-turn movements.

Traffic signals along Ocean Avenue, west of Geneva Avenue, are coordinated to provide east-west progression during the weekday a.m. and p.m. peak periods. Traffic signal control at Brighton Avenue/Ocean Avenue operates with three phases. The cycle length during both peak periods is 80 seconds. Phases on Ocean Avenue are always being called to their maximum green time, whereas any green time not utilized on Brighton Avenue is added to the through movements on Ocean Avenue. Brighton Avenue operates with split phasing, with southbound movements following northbound movements

As shown in Table 6 and Table 7, there would not be a substantial change to the delay, queue lengths, and level of service for all approaches at the intersection of Brighton Avenue/Ocean Avenue with the addition of project-generated vehicle trips. The following is a summary of the analysis results:

- The westbound approach would operate above capacity, with a volume-to-capacity ratio greater than 1, during the weekday p.m. peak hour for existing and existing plus project conditions.
- With the addition of project trips, the overall intersection delay may be slightly reduced (by less than one second per vehicle and by 1.3 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of trips travelling through the intersection are doing so on the coordinated phase, thereby increasing the efficiency of the signal and reducing average vehicle delay.
- The westbound approach is projected to experience the greatest amounts of change with the buildout of the Additional Housing Option.
    - With the project, delays on this approach may be slightly reduced (by 0.2 and 3.1 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of intersection traffic is on the coordinated phase.
    - With the project, the queue length may increase slightly (by 24 feet) during the weekday a.m. peak hour and decrease slightly (by 78 feet) during the weekday p.m. peak hour. This decrease is due to better utilization of the coordinated phase.
    - The level of service is estimated to remain the same during the weekday a.m. and p.m. peak hours.
- The project would not add trips to Brighton Avenue and the delay, queue length, and level of service on the northbound and southbound approaches are forecast to remain the same during the weekday a.m. and p.m. peak periods.

## Lee Avenue/Ocean Avenue

The intersection of Lee Avenue/Ocean Avenue is a four-legged signalized intersection. The eastbound and westbound approaches have two through lanes each, where the inside lanes serve transit and vehicles. Left-turns onto Lee Avenue are prohibited for these approaches. The northbound and southbound approaches consist of one lane in each direction that serves through, right, and left-turn movements. Lee Avenue is anticipated to be an access route to the project, and to accommodate additional traffic entering and exiting the project, Lee Avenue will be restriped to include an additional lane on the southbound approach. Therefore, for the purposes of this memorandum, the southbound approach was analyzed using a different lane configuration than what is existing. The lane configuration analyzed for existing and existing plus project conditions is comprised of a southbound left-turn lane and a southbound through/right-turn lane.

Traffic signals along Ocean Avenue, west of Geneva Avenue, are coordinated to provide east-west progression during the weekday a.m. and p.m. peak periods. Traffic signal control at Lee Avenue operates with two phases. The cycle length during both peak periods is 80 seconds. Phases on Ocean Avenue are

always being called to their maximum green time, whereas any green time not utilized on Lee Avenue is added to through movements on Ocean Avenue. For pedestrians utilizing the eastbound and westbound crosswalks, there is a four second leading pedestrian interval. This means that pedestrians are given a head start when entering an intersection before vehicles are given a green indication.

The data in Table 6 and Table 7 summarizes the quantitative measures for the quality of traffic at the intersection. The following outlines the results of the intersection operations analysis comparing existing traffic conditions and existing plus project traffic conditions:

- With the addition of project-generated vehicle trips, the overall intersection delay may slightly increase (by 2.0 and 4.2 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively).
- The southbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips.
    - The delay is estimated to increase by 11.6 seconds per vehicle during the weekday a.m. and p.m. peak hours.
    - The queue length is estimated to increase by 87 feet during the weekday a.m. peak hour and by 81 feet during the weekday p.m. peak hour.
    - The level of service is estimated to change from LOS C to LOS D during the weekday a.m. and p.m. peak hours.
- There would be a slight increase in delay on the northbound approach (1.8 and 2.9 seconds during the weekday a.m. and p.m. peak hours, respectively) with the addition of project-generated vehicle trips. Queue lengths would increase by less than two vehicle lengths.
- There would be a slight increase in delay on the westbound approach (0.8 and 4.2 seconds during the weekday a.m. and p.m. peak hours, respectively) with the addition of project-generated vehicle trips. Queue lengths would increase by less than one vehicle length.
- The eastbound approach is projected to experience little to no change in delay, queues, or level of service during the weekday a.m. and p.m. peak hours with the addition of project-generated vehicle trips.

## Frida Kahlo Way/Geneva Avenue/Ocean Avenue

The intersection of Frida Kahlo Way/Geneva Avenue/Ocean Avenue is a four-legged signalized intersection. The eastbound approach has one left-turn lane, one through lane, and a through/right-turn lane. The westbound approach has two through lanes and one through/right-turn lane. The northbound approach has one left-turn lane and one shared left/right-turn lane. The southbound approach has one right-turn lane, one through lane, and one through/left-turn lane. Both general vehicles and transit vehicles utilize the eastbound left-turn lane and westbound inside through lane.

Traffic signals along Ocean Avenue, west of Geneva Avenue, are coordinated to provide east-west progression during the weekday a.m. and p.m. peak periods. The cycle length during both peak periods is 80 seconds. Northbound/southbound approaches and eastbound/westbound approaches run

concurrently. Left-turning movements on the eastbound approach and the westbound approach are protected and are given a left-turn green arrow.

Referencing the data outlined in Table 6 and Table 7 project generated trips are predicted to result in changes to delay, queues, and level of service at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The following describes the changes between existing conditions and existing plus project conditions:

- The eastbound approach is estimated to operate over capacity with the addition of project-generated trips during the weekday p.m. peak hour. The westbound approach is estimated to operate over capacity during the weekday a.m. and p.m. peak hours for existing and existing plus project conditions.
- The overall intersection delay is anticipated to increase by 18.4 seconds per vehicle during the weekday a.m. peak hour and by 37.2 seconds per vehicle during the weekday p.m. peak hour with the addition of project-generated vehicle trips.
- The addition of project-generated vehicle trips is forecast to result in changes to delay and queue length on the eastbound approach during the weekday a.m. and p.m. peak hours, as follows:
    - The delay is estimated to increase by 12.9 and 13.5 seconds per vehicle, respectively.
    - The queue length is estimated to increase by 60 and 45 feet, respectively.
- The addition of project-generated vehicle trips is forecast result in changes to delay, queue length, and level of service on the westbound approach during the weekday a.m. and p.m. peak hour, as follows:
    - The delay is estimated to increase by 28.1 and 70.5 seconds per vehicle, respectively.
    - The queue length is estimated to increase by 38.6 and 115 feet, respectively.
    - The level of service is estimated to worsen from a LOS E to a LOS F during the weekday p.m. peak hour.
- The addition of project-generated vehicle trips are estimated to result in minimal changes to the delay, queue length on the northbound and southbound approaches during the weekday a.m. and p.m. peak hours.

## Corridor Travel Times

To assess the effect of project-generated vehicle traffic on transit travel time on Muni lines K/T, 29, 43 and 49, the total change in delay across the three intersections for various movements is presented in Table 8.

**Table 8: Transit Travel Time Changes**

| Transit Line | Transit Route | Ocean Avenue Corridor Transit Travel Time (minutes:seconds) | | | | | |
|---|---|---|---|---|---|---|---|
| | | Existing Conditions | | Project-Related Change | | Existing Plus Project Conditions | |
| | | a.m. | p.m. | a.m. | p.m. | a.m. | p.m. |
| K | Jules Avenue/Ocean Avenue to Balboa Park BART Station | 3:30 | 8:42 | 0:29 | 1:12 | 3:59 | 9:54 |
| | San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue | 3:28 | 10:03 | 0:13 | 0:14 | 3:41 | 10:17 |
| 29 | Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue | 10:55 | 12:00 | 0:29 | 1:12 | 11:24 | 13:12 |
| | Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue | 9:53 | 10:10 | 0:13 | 0:14 | 10:06 | 10:23 |
| 43 | Gennessee Street/Monterey Boulevard to City College Bookstore | 4:25 | 4:05 | - | - | 4:25 | 4:05 |
| | City College Bookstore to Foerster Street/Monterey Boulevard | 4:37 | 4:35 | 0:01 | 0:05 | 4:38 | 4:40 |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue | 5:39 | 10:04 | 0:01 | 0:05 | 5:40 | 10:09 |
| | Mission Street/Ocean Avenue to Frida Kahlo Way/CCSF South Entrance | 7:18 | 11:25 | 0:01 | 0:05 | 7:19 | 11:30 |

Sources: SFMTA, 2019 (Existing Conditions). Kittelson & Associates, Inc. 2019 (Project-Related Change).
Notes: Delay is measured in seconds per vehicle. Transit times are presented in minutes and seconds. "-" indicates data not available.

As shown in Table 8, project-related change in transit travel time could not be calculated for the 43 Gennessee Street/Monterey Boulevard to City College Bookstore study segment as no study intersections are located along that segment. The greatest project-related increase in transit travel times of 29 seconds and 1 minute 12 seconds are estimated to affect the westbound operations for Muni lines K and 29 during the weekday a.m. and p.m. peak hours, respectively. This refined and detailed analysis considers the effect of imbalanced lane utilization along Ocean Avenue. As a result, the analysis results presented herein may differ from those presented within the corridor delay analysis and transit assessment memorandums.

## POTENTIAL INTERSECTION MODIFICATIONS

Intersection modifications can be made to increase safety and capacity, improve vehicle progression, and reduce congestion on the road. The most common strategies include optimizing or modifying signal timing and implementing physical changes or turn movement restrictions at intersections to increase efficiency of intersection or corridor operations. This section presents a discussion and quantitative analysis of potential signal timing modifications and a discussion and qualitative assessment of other potential modifications.

### Signal Timing Modifications

One of the major objectives of traffic signal optimization is to increase the capacity of at-grade intersections. This section discusses increasing green time on Ocean Avenue and evaluates the potential of this modification to reduce vehicle delay at study intersections along Ocean Avenue. For this analysis, at each study intersection, five seconds of green time was reallocated from the north/south approaches to the east/west approaches. In other words, green time on Ocean Avenue was increased by five seconds for each phase while the overall cycle length remained fixed. Table 9 and Table 10 summarize the delay, queue length, and level of service for each approach comparing existing plus project conditions and existing plus project conditions with the green time modifications for weekday a.m. and p.m. peak hours.

As shown in Table 9 and Table 10, the green time extension would reduce delay on eastbound and westbound movements and increase delay on northbound and southbound movements at study intersections along Ocean Avenue. Increasing, or reallocating, green time to Ocean Avenue would result in longer wait times for people crossing Ocean Avenue.

**Table 9: Intersection Operations – Weekday a.m. Peak Hour with Green Time Reallocation to Ocean Avenue**

| Intersection/Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 7.9 | 136.0 | A | 6.2 | 398.0 | A | 36.2 | 52.0 | D | 64.4 | 25.0 | E | 9.0 |
| Lee Avenue | 8.6 | 55.0 | A | 17.4 | 265.0 | B | 33.4 | 107.0 | C | 35.2 | 117.0 | D | 16.3 |
| Frida Kahlo Way/Geneva Avenue | 51.9 | 487.0 | D | **164.5** | **521.0** | **F** | 31.3 | 218.0 | C | 21.4 | 87.0 | C | 102.7 |
| **Existing Plus Additional Housing Option with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | 6.5 | 80.0 | A | 5.1 | 44.0 | A | 37.6 | 67.0 | D | 73.8 | 25.0 | E | 8.1 |
| Lee Avenue | 5.4 | 54.0 | A | 15.6 | 301.0 | B | 42.3 | 129.0 | D | 68.0 | 150.0 | E | 17.4 |
| Frida Kahlo Way/Geneva Avenue | 32.2 | 426.0 | C | **73.7** | **390.0** | **E** | 54.9 | 280.0 | D | 25.9 | 95.0 | C | 51.6 |
| **Change with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | -1.4 | -56.0 | - | -1.1 | -354.0 | - | +1.4 | +15.0 | - | +9.4 | - | - | -0.9 |
| Lee Avenue | -3.2 | -1.0 | - | -1.8 | +36.0 | - | +8.9 | +22.0 | C to D | +32.8 | +33.0 | D to E | +1.1 |
| Frida Kahlo Way/Geneva Avenue | -19.7 | -61.0 | D to C | -90.8 | -131.0 | F to E | +23.6 | +62.0 | C to D | +4.5 | +8.0 | - | -51.1 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = level of service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a v/c>1.0. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

**Table 10: Intersection Operations – Weekday p.m. Peak Hour with Green Time Reallocation to Ocean Avenue**

| Intersection/ Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Delay** | **Queue** | **LOS** | **Delay** | **Queue** | **LOS** | **Delay** | **Queue** | **LOS** | **Delay** | **Queue** | **LOS** | |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 9.6 | 142.0 | A | **75.1** | **492.0** | **E** | 36.8 | 62.0 | D | 42.5 | 16.0 | D | **44.3** |
| Lee Avenue | 9.4 | 64.0 | A | 22.2 | 323.0 | C | 35.4 | 130.0 | D | 39.3 | 151.0 | D | 19.9 |
| Frida Kahlo Way/Geneva Avenue | **60.4** | **516.0** | **E** | **145.6** | **508.0** | **F** | 31.9 | 223.0 | C | 23.3 | 141.0 | C | 90.9 |
| **Existing Plus Additional Housing Option with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | 8.5 | 115.0 | A | **66.4** | **542.0** | **E** | 38.2 | 85.0 | D | 42.5 | 16.0 | D | **39.5** |
| Lee Avenue | 5.9 | 58.0 | A | 20.2 | 368.0 | C | 56.9 | 175.0 | E | **90.3** | **184.0** | **F** | 24.1 |
| Frida Kahlo Way/Geneva Avenue | 33.2 | 442.0 | C | **63.3** | **362.0** | **E** | 28.7 | 288.0 | E | 28.9 | 155.0 | C | 45.7 |
| **Change with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | -1.1 | -27.0 | - | -8.7 | +50.0 | - | +1.4 | +23.0 | - | - | - | - | -4.8 |
| Lee Avenue | -3.5 | -6.0 | - | -2.0 | +45.0 | - | +21.5 | +45.0 | D to E | +51.0 | +33.0 | D to F | +4.2 |
| Frida Kahlo Way/Geneva Avenue | -27.2 | -74.0 | E to C | -82.3 | -146.0 | F to E | -3.2 | +65.0 | C to E | +5.6 | +14.0 | - | -45.2 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = level of service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a v/c>1.0. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

The following section describes the changes between existing plus project conditions with and without the signal timing adjustment at each study intersection:

- Brighton Avenue/Ocean Avenue
    - The overall average intersection delay would decrease by 0.9 seconds per vehicle during the weekday a.m. peak hour and by 4.8 seconds per vehicle during the weekday p.m. peak hour, with the green time adjustment.
    - The greatest reductions in delay and queue lengths are estimated to occur on the westbound movements on Ocean Avenue. During the weekday a.m. peak hour, the delay is estimated to decrease by 1.1 seconds per vehicle, while the queue length is estimated to decrease by 354 feet, with the green time adjustment. During the weekday p.m. peak hour, the delay is estimated to decrease by 8.7 seconds per vehicle, though the queue length is estimated to increase by 50 feet, with the green time adjustment.
- Lee Avenue/Ocean Avenue
    - The overall average intersection delay is projected to increase by 1.1 seconds per vehicle during the weekday a.m. peak hour and by 4.2 seconds per vehicle during the weekday p.m. peak hour, with the green time adjustment.
    - During the weekday a.m. peak hour, the delay on the southbound approach is estimated to increase by 32.8 seconds per vehicle, the queue length is estimated to increase by 33 feet, and the level of service is estimated to worsen from a LOS D to LOS E, with the adjustment to the green time. During the weekday p.m. peak hour, the delay is estimated to increase by 51 seconds per vehicle, the queue length is estimated to increase by 33 feet, and the level of service is estimated to worsen from a LOS D to LOS F, with the green time adjustment.
    - The delay on the eastbound approach is estimated to decrease by 3.2 and 3.5 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively, with the adjustment to the green time.
- Frida Kahlo Way/Geneva Avenue/Ocean Avenue
    - During the weekday a.m. and p.m. peak periods, the delays on the eastbound and westbound movements are anticipated to decrease with the green time adjustment.
    - The overall average intersection delay is forecast to decrease by 45.2 seconds per vehicle during the weekday a.m. peak hour and by 51.1 seconds per vehicle during the weekday p.m. peak hour, with the green time adjustment. Synchro may overestimate delay and queue lengths reported at intersections and approaches operating at, or near, capacity.
    - With the addition of the green time adjustment, the westbound approach is anticipated to experience the greatest changes. During the weekday a.m. peak hour, the delay would decrease by 90.8 seconds per vehicle, the queue length would decrease by 131 feet, and the level of service would improve from LOS F to LOS E. During the weekday p.m. peak hour, the delay would decrease by 82.3 seconds per vehicle, the queue

length would decrease by 146 feet, and the level of service would improve from LOS F to LOS E.

Overall, the intersection delay is anticipated to decrease at Brighton Avenue/Ocean Avenue (by between 1 and 5 seconds) and Frida Kahlo Way/Geneva Avenue/Ocean Avenue (by between 45 and 51 seconds)[8] and is anticipated to increase at Ocean Avenue/Lee Avenue (by between 1 and 5 seconds) with the green time adjustments. Generally, the reallocation of green time to Ocean Avenue would reduce delay and queues on the eastbound and westbound approaches and increase delay and queue lengths on the northbound and southbound movements.

As previously discussed, signalized intersections along Ocean Avenue operate as actuated-coordinated signals with maximum recall[9] that operate on a fixed cycle length. Signal timing modifications implemented at these three intersections in isolation may adversely affect vehicle progression and have unintended consequences for operations along the corridor. Any adjustments to signal timing would need to be reviewed and approved by SFMTA.

## Other Modifications

In addition to signal timing modifications, other intersection modifications and treatments along the corridor may be implemented to increase efficiency of operations and reduce vehicle delay and queue lengths along the corridor. The following types of modifications may be considered:

- **Install left-turn lanes**. Left-turn lanes remove stopped or slow-moving left-turning motor vehicles from the stream of through traffic and reduce the potential for rear-end crashes at intersections. The safety and capacity benefits of left-turn lanes apply to all vehicular traffic, motorized as well as non-motorized. However, left-turn lanes add to the pedestrian crossing distance and pedestrian crossing time. The additional street width needed for left-turn lanes may require land taking or removal of on-street parking. These treatments can be costly if additional right-of-way is needed. Intersection reconfiguration that would require roadway widening or additional right-of-way may not be feasible or appropriate within the context of the corridor.
- **Install right-turn lanes.** Right turn lanes are used to remove decelerating right-turning motor vehicles from the traffic stream, and also to provide an additional lane for the storage of right-turning motor vehicles. Where the right-turn volume is heavy, this removal of the turning motor vehicle from the traffic stream can also reduce a primary cause of rear-end crashes at

[8] Synchro may overestimate delay and queue lengths reported at intersections and approaches operating at, or near, capacity.
[9] Actuated signals prioritize the through movement of the major street and use sensors to respond to the traffic present at actuated approach, so that the pattern of the signal (the length and order of each phase) depends on the traffic and can be different at every cycle. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

intersections. The safety and capacity benefits of right-turn lanes apply to all vehicular traffic, motorized as well as non-motorized. However, right-turn lanes add to the pedestrian crossing distance and pedestrian crossing time. The additional street width needed for right-turn lanes may require land taking or removal of on-street parking. These treatments can be costly if additional right-of-way is needed. Intersection reconfiguration that would require roadway widening or additional right-of-way may not be feasible or appropriate within the context of the corridor.

- **Implement turn restrictions**. Left turns take a large amount of space and signal time and right turns can be problematic for transit and through vehicle operations in the right lane. Prohibiting turns and shifting turn volume to intersections where they can be best accommodated – with signal phases and turn lanes – can improve general traffic and transit performance, and walking and bicycling safety at the same time. On two-way streets, left-turn restrictions can substantially increase the capacity of general traffic lanes.
- **Redesign intersections**. Unconventional intersection designs can be used to increase the capacity of intersections at high volume locations. Examples of unconventional designs include median U-turns, jug handles, superstreets, quadrant roadway intersections, continuous flow intersections, and synchronized-split phasing intersections. In these designs, one or more traffic movements are prohibited and re-routed at the intersection, so that fewer signal phases are needed at the intersection signal, thereby increasing the capacity of the intersection. These designs typically require extra land space and re-routed traffic movements often need to go through the intersection multiple times, which limits travel time and congestion reduction benefits. Other examples of unconventional designs include tandem intersections with separate left-turn phases and intersections with dynamic use of exit lanes for left-turns. These designs can increase the utilization of the intersection cross-section without removing or re-routing turning movements. These designs are not intuitive for drivers and can be challenging to navigate. Intersection reconfiguration that would require roadway widening, additional right-of-way, rail reconfiguration, or signal relocation would be major infrastructure projects and may not be feasible or appropriate within the context of the corridor.

Other planned projects that are intended to enhance safety and may reduce vehicle delay along the corridor include the Ocean Avenue Safety Project[10] and the I-280 Interchange Modifications at Balboa Park Project[11].

The Ocean Avenue Safety Project is aimed at improving safety, accessibility, and comfort for people traveling on Ocean Avenue and Geneva Avenue between Ocean Avenue/Geneva Avenue/Frida Kahlo Way and San Jose Avenue. The goals of this project are to develop of a set of near-term improvements, cost-effective measures that can be installed quickly (near-term project construction planned for

[10] SFMTA, Ocean Avenue Safety Project website, https://www.sfmta.com/projects/ocean-avenue-safety-project
[11] SFCTA, I-280 Interchange Modifications at Balboa Park Project website, https://www.sfcta.org/I-280-interchange-modifications-balboa-park-project

Summer 2020) to improve safety on Ocean Avenue and to create a long-term vision for the Ocean Avenue corridor that can be coordinated with other on-going projects or a future Muni re-rail project.

The I-280 Interchange Modifications at Balboa Park Project is aimed at reducing multimodal conflicts at the I-280 freeway ramps while maintaining vehicle operations in the area, providing safe, accessible, and convenient connections, and developing cost-effective solutions that can be implemented within the next decade. The recommended modifications include I-280/Geneva Avenue northbound on-ramp closure and southbound I-280/Ocean Avenue off-ramp realignment and construction of a new signalized intersection.

City College of San Francisco Facilities Master Plan[12] identifies several recommendations that would enhance transportation in the area, including developing site improvements to provide direct access between transit stops and campus gateways and coordinating efforts to support local "Transit First" policies, encourage use of non-auto modes, and implement transportation demand management measures to reduce driving to the campus.

## SUMMARY OF FINDINGS

For the purposes of a more conservative analysis, the Additional Housing Option was evaluated, as it would generate more vehicle trips and would have a greater effect on corridor delay and intersection operations. The Developer's Proposed Option would generate about 25 percent fewer vehicle trips and as a result, would be expected to result in less delay compared to the Additional Housing Option.

### Corridor Delay Analysis

Overall, vehicle trips generated by the Additional Housing Option are not anticipated to substantially increase delays along Ocean Avenue and Ridgewood Avenue/Frida Kahlo Way during the weekday a.m. and p.m. peak hours. The results of the corridor delay analysis comparing existing with existing plus project conditions are summarized in this section.

#### *Ocean Avenue*

- Under existing and existing plus project conditions, vehicles travelling westbound experience greater delay compared to vehicles travelling eastbound, during the weekday a.m. and p.m. peak hours. Specifically, westbound vehicles experience 32 and 33 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, while eastbound vehicles experience 11 and 13 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, respectively.
- Vehicle trips generated by the Additional Housing Option increase the delay by one second per vehicle for eastbound movements, while westbound movements experience no change in delay

[12] City College of San Francisco, City College Facilities Master Plan, approved by the Board of Trustees in March 2019, https://www.ccsf.edu/en/about-city-college/administration/vcfa/facilities_planning/facilities-master-plan.html

during the weekday a.m. peak hour. Vehicle trips generated by the Additional Housing Option increase the delay by two seconds per vehicle for eastbound movements and eight seconds per vehicle for westbound movements during the weekday p.m. peak hour.

### *Ridgewood Avenue-Frida Kahlo Way*

- Under existing and existing plus project conditions, vehicles travelling southbound experience greater delay compared to vehicles travelling northbound, during the weekday a.m. and p.m. peak hours. Specifically, southbound movements endure 11 and 19 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, while northbound movements experience 3 and 4 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, respectively.
- Vehicle trips generated by the Additional Housing Option increase the delay by one second per vehicle for northbound and southbound movements during the weekday a.m. peak hour. Vehicle trips generated by the Additional Housing Option do not affect the delay for northbound movements, though southbound movements experience and increase in delay by three seconds per vehicle during the weekday p.m. peak hour.

## Intersection Operations Analysis

Overall, vehicle trips generated by the Additional Housing Option are not anticipated to substantially increase delays at study intersections during the weekday a.m. and p.m. peak hours. The results of the intersection operations analysis comparing existing with existing plus project conditions are summarized in this section.

### *Brighton Avenue/Ocean Avenue*

- There would not be a substantial change to the delay, queue lengths, and level of service with the addition of project-generated vehicle trips.
- With the addition of project trips, the overall intersection delay may be slightly reduced (by less than one second per vehicle and by 1.3 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of trips travelling through the intersection are doing so on the coordinated phase, thereby increasing the efficiency of the signal and reducing average vehicle delay.
- The westbound approach is projected to experience the greatest amounts of change with the addition of project-generated vehicle trips:
    - Delays on this approach may be slightly reduced (by 0.2 and 3.1 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of intersection traffic is on the coordinated phase.
    - Queue length may increase slightly (by 24 feet) during the weekday a.m. peak hour and decrease slightly (by 78 feet) during the weekday p.m. peak hour. This decrease is due to better utilization of the coordinated phase.

- The level of service is estimated to remain the same during the weekday a.m. and p.m. peak hours.

### *Lee Avenue/Ocean Avenue*

- With the addition of project-generated vehicle trips, the overall intersection delay is projected to slightly increase (by 2.0 and 4.2 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively).
- The southbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips.
  - The delay is estimated to increase by 11.6 seconds per vehicle during the weekday a.m. and p.m. peak hours.
  - The queue length is estimated to increase by 87 feet during the weekday a.m. peak hour and by 81 feet during the weekday p.m. peak hour.
  - The level of service is estimated to change from LOS C to LOS D during the weekday a.m. and p.m. peak hours.

### *Frida Kahlo Way/Geneva Avenue/Ocean Avenue*

- The overall intersection delay is anticipated to increase by 18.4 seconds per vehicle during the weekday a.m. peak hour and by 37.2 seconds per vehicle during the weekday p.m. peak hour with the addition of project-generated vehicle trips.
- The addition of project-generated vehicle trips is forecast to result in changes to delay and queue length on the eastbound approach during the weekday a.m. and p.m. peak hours, as follows:
  - The delay is estimated to increase by 12.9 and 13.5 seconds per vehicle, respectively.
  - The queue length is estimated to increase by 60 and 45 feet, respectively.
- The addition of project-generated vehicle trips is forecast to result in changes to delay, queue length, and level of service on the westbound approach during the weekday a.m. and p.m. peak hour, as follows:
  - The delay is estimated to increase by 28.1 and 70.5 seconds per vehicle, respectively.
  - The queue length is estimated to increase by 38.6 and 115 feet, respectively.
  - The level of service is estimated to worsen from a LOS E to a LOS F during the weekday p.m. peak hour.

## Corridor Transit Travel Times

Overall, vehicle trips generated by the Additional Housing Option are anticipated to increase transit travel times by a maximum of 1 minute 12 seconds on Muni lines K and 29 in the eastbound direction during the weekday p.m. peak hour. The addition of project-generated vehicle trips is projected to increase delays by a maximum of 15 seconds for other lines/directions.

## Signal Timing Modifications

Reallocating five seconds of green time from north/south phases to east/west phases on Ocean Avenue would have the following effect on study intersections during the weekday a.m. and p.m. peak hours:

- Decrease overall intersection delays at Brighton Avenue/Ocean Avenue and Frida Kahlo Way/Geneva Avenue/Ocean Avenue by between 1 and 5 seconds and between 45 and 51 seconds, respectively. However, Synchro may overestimate the change in delay and queue lengths reported at Frida Kahlo Way/Geneva Avenue/Ocean Avenue, which operates at, or near, capacity.
- Increase overall intersection delays at Ocean Avenue/Lee Avenue by between 1 and 5 seconds.
- Generally, signal timing modifications would reduce delay and queues on the eastbound and westbound approaches and increase delay and queue lengths on the northbound and southbound movements.

Signalized intersections along Ocean Avenue operate as actuated-coordinated signals with maximum recall[13] that operate on a fixed cycle length. Signal timing modifications implemented at these three intersections in isolation may adversely affect vehicle progression and have unintended consequences for operations along the corridor. Any adjustments to signal timing would need to be reviewed and approved by SFMTA.

## Other Modifications

In addition to signal timing modifications, other intersection modifications and treatments along the corridor may be implemented to increase efficiency of operations and reduce vehicle delay and queue lengths along the corridor. These include installation of left-turn lanes, installation of right-turn lanes, implementation of turn restrictions, and intersection redesign. These treatments can be costly if additional right-of-way is needed and there may be other tradeoffs to consider, such as potential adverse effects on conditions for bicyclists and pedestrians. Intersection reconfiguration that would require roadway widening, additional right-of-way, rail reconfiguration, or signal relocation would be major infrastructure projects and may not be feasible or appropriate within the context of the corridor.

Planned projects that are intended to improve safety, access, and comfort for people traveling along Ocean Avenue include the Ocean Avenue Safety Project and I-280 Interchange Modifications at Balboa Park Project.

[13] Actuated signals with maximum recall prioritize the through movement of the major street and use sensors to respond to the traffic present at actuated approach. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

# ATTACHMENT C: SHUTTLE STUDY TECHNICAL MEMORANDUM

KITTELSON & ASSOCIATES
1161 MISSION STREET, OFFICE #563
SAN FRANCISCO, CA 94103
P 415.579.1778

# TECHNICAL MEMORANDUM

Date: August 1, 2019

To: Reservoir Community Partners, LLC

From: Kittelson & Associates, Inc.

Subject: Balboa Reservoir – Shuttle Study Memorandum

Kittelson & Associates, Inc. (Kittelson) has prepared this memorandum to present the results of a shuttle assessment analysis for the proposed Balboa Reservoir project (Case No. 2018-007883ENV) in San Francisco, California. The purpose of this analysis is to assess the feasibility of a shuttle operating between the Balboa Reservoir site, the City College of San Francisco (CCSF) campus, and the Balboa Park BART/Muni station. The memorandum is organized as follows:

- Ridership Assessment
- Service Concept
- Feasibility Analysis
- Conclusion

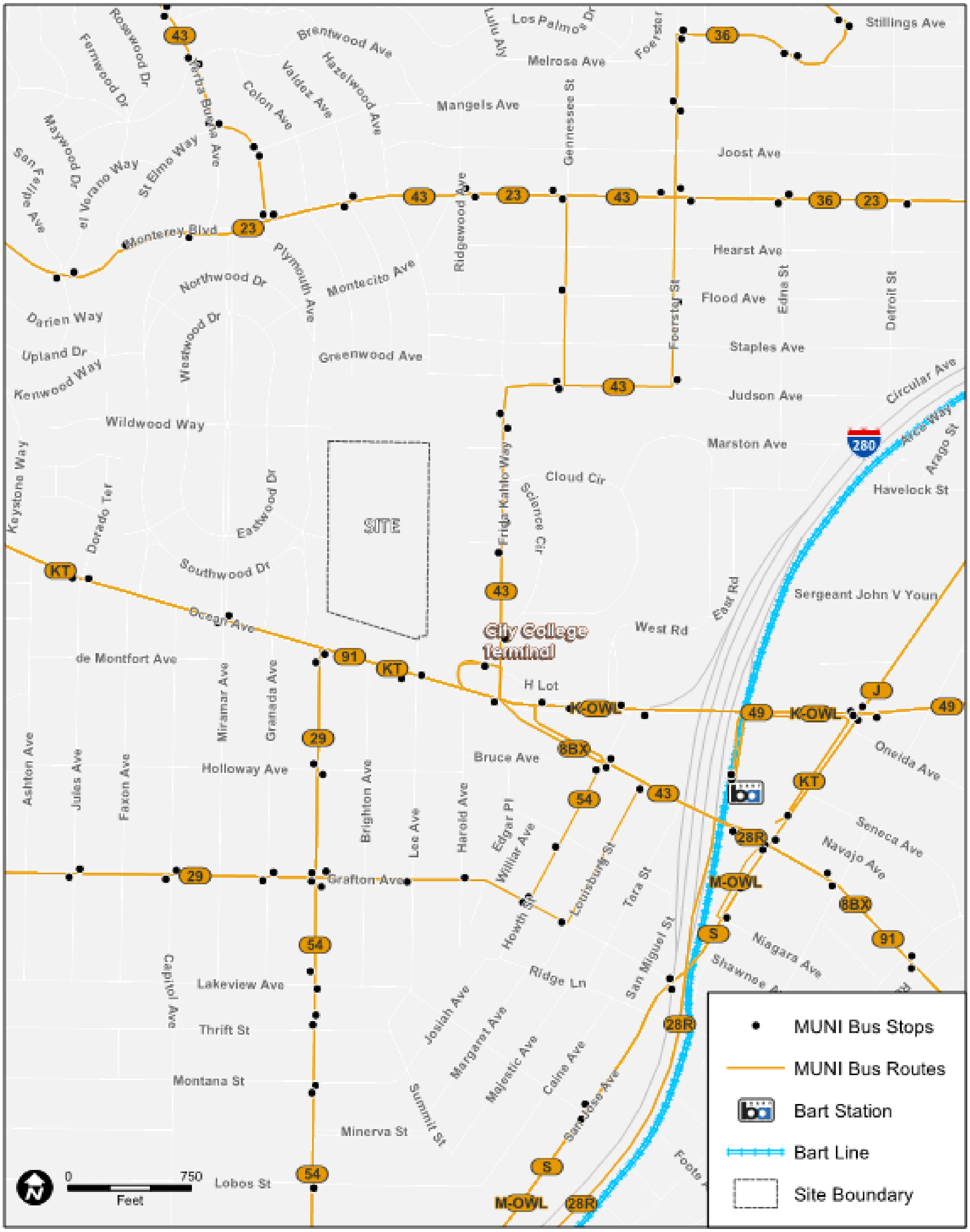
## EXECUTIVE SUMMARY

The Balboa Reservoir development is expected to generate up to 2,700 transit trips[1] each day, many to/from the Balboa Park BART/Muni station, approximately 0.6 miles east of the project site. While a direct shuttle connecting the site to transit hubs and CCSF would potentially attract a high ridership, the shuttle must operate at high frequencies to effectively compete with the existing transit service and walking trips. A free, high-frequency shuttle service is forecast to be well-utilized with an estimated cost well over $750,000 per year. If a lower frequency and less costly service were provided as an alternative, it would not be competitive with the existing transit and walking alternatives and would see less use.

## RIDERSHIP ASSESSMENT

The proposed Balboa Reservoir development is well served by existing transit, as documented by the April 19, 2019 *Transit Assessment Memorandum*, which projects a 38% transit mode share for project-generated trips and up to 2,700 daily transit trips. Existing transit routes and stops are presented in Figure 1.

[1] Source: Balboa Reservoir Transit Assessment Memorandum, January 14, 2019




Source: Kittelson & Associates, Inc., 2019

Case No.2018-007883ENV: Balboa Reservoir Project

**Figure 1**
**Existing Transit Service**

A shuttle service to connect the Balboa Reservoir development with the City College Terminal, the Balboa Park BART/Muni Station, and CCSF is under consideration. While the total travel demand between these destinations is high, the forecast shuttle demand would take into consideration walking times versus shuttle wait and travel times when considering the desirability of shuttle use. This ridership choice is based heavily on the quality of proposed shuttle service, which is described in greater detail in the next section. This shuttle analysis assumes the shuttle service would be more appealing than existing transit service when the travel times are similar.

## Existing Transit Service

Muni currently offers convenient connections to the Balboa Park BART/Muni station as shown in Figure 1. The K Ingleside light rail and Muni bus routes 8, 29, 49, and 91 have stops on Ocean Avenue or the City College Terminal near the project site. Muni route 43 operates on Frida Kahlo Way adjacent to CCSF and on Geneva Avenue to the Balboa Park BART/Muni station. Each line operates on 8- to 10-minute headways during daytime periods and 15- to 20- minute headways after 7 p.m[2]. Given that multiple lines serve most nearby stops, typical waiting times are under five minutes during the weekday a.m. and p.m. peak periods. The shuttle system route would be duplicative with existing transit connection to the Balboa Park BART/Muni station for passengers able to walk to nearby bus and light rail stops.

## Walking Travel Time

The Balboa Park BART/Muni station is approximately 0.6 mile from the Balboa Reservoir development, a trip of 14 minutes at a typical walking pace of 4 feet per second[3]. A similar walking trip to the City College Terminal and the adjacent K Ingleside light rail is less than 0.3 miles, or about a 6 minute walk. To be appealing to passengers, the shuttle must offer time savings and convenience on par or better than these walking trips.

Kittelson prepared a spreadsheet model to estimate weekday a.m. and p.m. peak hour shuttle demand between the four shuttle stops based on walking versus shuttle waiting time plus travel time. This iterative process, illustrated in Exhibit 1, results in the needed number and size of shuttles to serve the corresponding demand.

[2] Source: San Francisco Municipal Transit Agency, 2019. *https://www.sfmta.com/getting-around/muni/routes-stops*

[3] This walking pace is similar to estimated walk times from Google Maps.

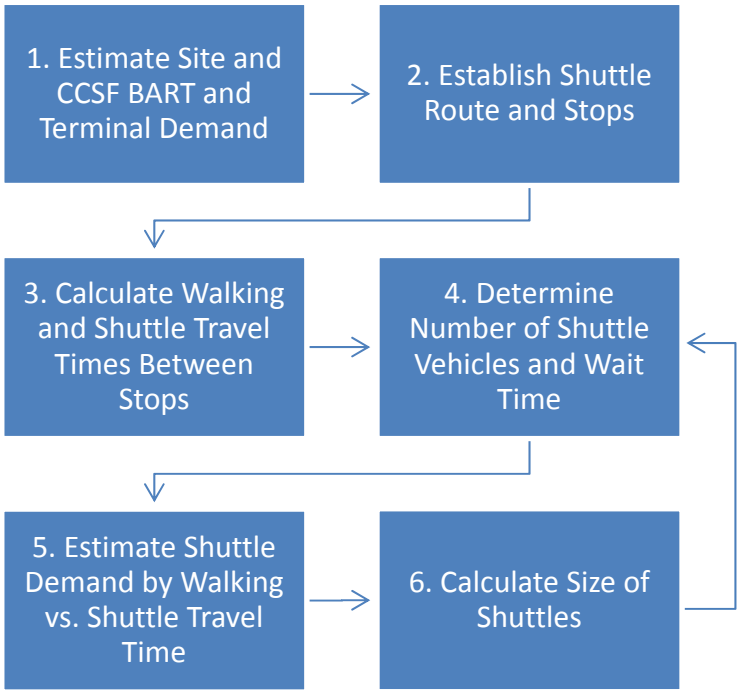



**Exhibit 1 Peak Hour Shuttle Demand Estimation Process**

The steps in the spreadsheet model are as follows:

1. **Estimate Site and CCSF BART and Terminal Demand**[4]
    a. Peak hour transit demand between the project site and the Balboa Park BART/Muni Station and the City College Terminal were calculated from the *Transit Assessment Memorandum*
    b. CCSF demand to/from BART was calculated from:
        i. Estimate of the percentage of peak hour Balboa Park BART/Muni station riders to/from CCSF
        ii. Estimate of CCSF students and faculty using BART during peak hours
    c. CCSF demand to/from the City College Terminal was assumed to equal the CCSF demand to/from BART
2. **Establish Shuttle Route and Stops**
    a. Stops established at Balboa Reservoir, City College Terminal, Balboa Park BART/Muni Station, and CCSF
3. **Calculate Walking and Shuttle Travel Times Between Stops**

[4] CCSF transit ridership data is not available. In lieu of specific CCSF transit ridership data, BART Station Survey data and CCSF enrollment data were used as they represent the best/most relevant data available for this analysis. The analysis relies on informed assumptions regarding mode share to determine CCSF transit ridership. Actual CCSF transit ridership may vary. However, it is expected to be within a reasonable range of the assumed ridership and would not substantially affect the analysis.

a. Walking time between stops calculated by distance and intersection crossings
b. Shuttle travel times estimated from distance, route, and Google Maps peak hour travel time estimates

4. **Determine Number of Shuttle Vehicles and Wait Time**
    a. Total shuttle route travel time determines the number of trips per hour per shuttle
    b. Number of shuttles determines headway (time between shuttles at a given stop)
    c. Average wait time is one-half the headway
5. **Estimate Shuttle Demand by Walking vs. Shuttle Travel Time**
    a. Calculate ratio of shuttle waiting plus travel time and walking travel time between each stop
    b. Assign proportion of demand between each stop pair to the shuttle: if the shuttle is comparable to walking, shuttle usage is high; if the shuttle travel time is several times that of walking, shuttle usage is low.
6. **Calculate Size of Shuttles**
    a. Determine the size of shuttles needed to serve the maximum number of riders on any link of the shuttle route.

Step 5 includes estimating the proportion of trips between stops that would use the shuttle. As the number of shuttles operating the peak hour increase, the headway and associated average wait time decrease, which increase the attractiveness of the shuttle compared to walking, increasing projected ridership. Kittelson developed a shuttle demand model informed by BART mode access research shown in Table 1 and Exhibit 2. Walking travel times compared to shuttle travel times determine the proportion of total demand uses the shuttle for each stop pair.

**Table 1 Balboa Park BART Station Access Mode from Home to BART**

| Station | Walk | Bicycle | Bus, Train, or Other Transit | Motorcycle / Motorized Scooter | Drive Alone / Carpool | Drop Off / Taxi / Other |
|---|---|---|---|---|---|---|
| Balboa Park | 56% | 6% | 13% | 0% | 6% | 20% |

Sources: 2015 BART Station Profile Study
Notes: Drop Off/Taxi/Other category does not include TNCs given the data is from 2015, before TNCs were available.

Per the 2015 Station Profile Study, 56% of current Balboa Park riders walk to the station, with a median walking distance of 0.52 miles. Additionally, 13% of existing Balboa Park BART Station riders use transit (median distance of 1.15 miles) and 20% are dropped off; likely due to a lack of vehicle parking at the station, there are only 6% drive alone/carpool trips to the station. Combining the Balboa Park BART Station specific data in Table 1 with the general distance-based data in Exhibit 2, walking is expected to comprise about 30% of the 0.6-mile trips between the Balboa Reservoir development and the Balboa Park BART Station, depending on the frequency of the shuttle. The Balboa Reservoir shuttle demand model is calibrated to high shuttle use estimates to serve as a proof of concept. The convenience of a free shuttle was estimated to be more appealing than and capture the majority of the BART riders that may otherwise walk, take other transit options, drive alone/carpool, or be dropped off in a taxi or TNC. Given the Balboa Reservoir development is proposed to include limited, unbundled parking; residents

are expected to have low rates of auto ownership; and given that the Balboa Park BART Station does not include station parking, driving the 0.6 miles to the station is expected to be particularly unappealing compared to the distribution of travel mode shown in Table 1 and Exhibit 2.

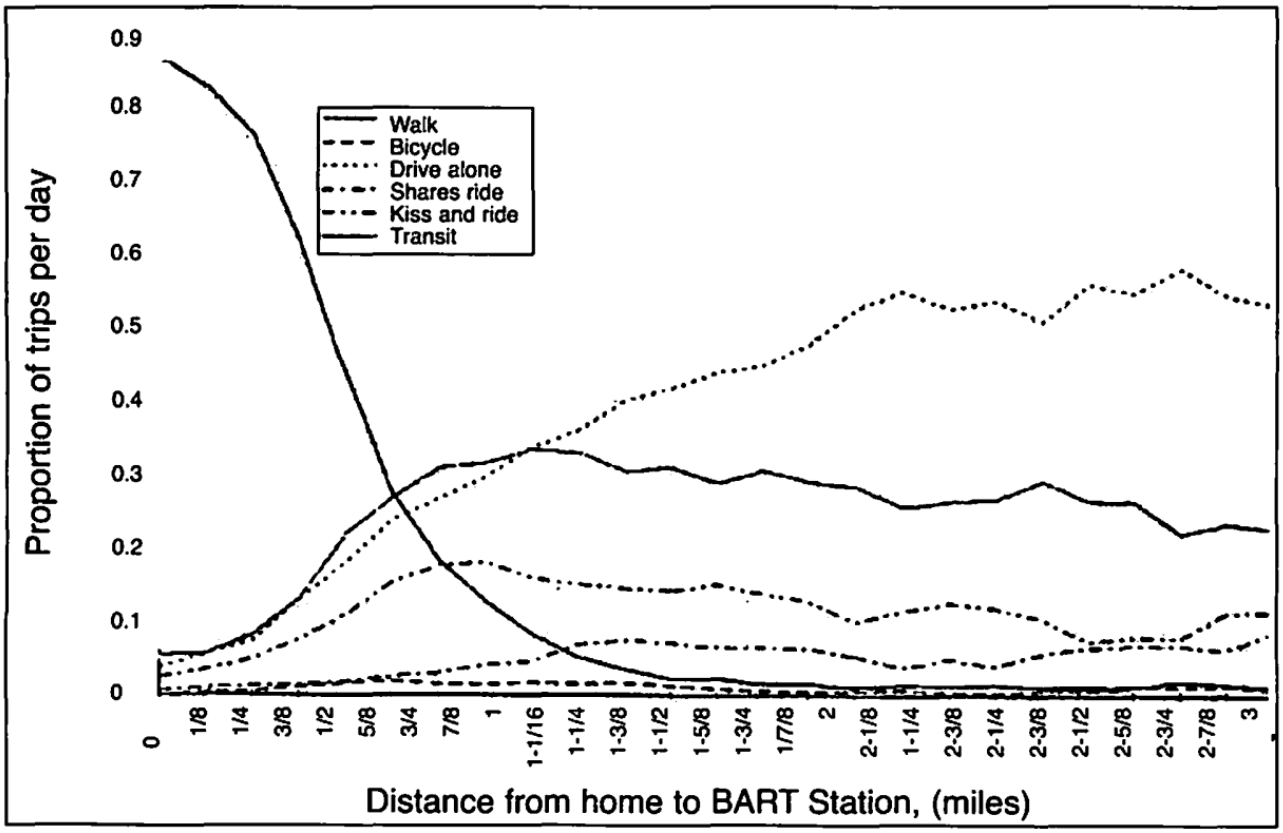



**Exhibit 2 Distribution of Travel Mode to BART Stations by Distance**[5]

The model is flexible to be responsive to a range of projections and assumptions and can be used as tool to forecast a range of demand scenarios. Key assumptions include the shuttle would be free for Balboa Reservoir residents and visitors and CCSF students, staff, and faculty and the shuttle would use Muni bus stops. An example of the model results is shown in Table 2 for the one-way site trips to the Balboa Park BART/Muni station. Table 2 presents the results of the shuttle model for one to four shuttles operating in the peak hour.

[5] Source: Cervero, R. *Walk-and-Ride: Factors Influencing Pedestrian Access to Transit, 2001.*

**Table 2: Weekday Peak Hour Ridership Estimate: Site to BART**

| Shuttle Operations | | | | | Average Walking Time (minutes) | Average Transit Time (minutes)[1] | Percent Use Shuttle |
|---|---|---|---|---|---|---|---|
| Number of Shuttles | Headway (minutes) | Average Wait Time (minutes) | Travel Time (minutes) | Average Total Shuttle Time (minutes) | | | |
| 1 | 31.5 | 15.8 | 7.5 | 23.3 | 14 | 15 | 53% |
| 2 | 15.8 | 7.9 | | 15.4 | | | 73% |
| 3 | 10.5 | 5.3 | | 12.8 | | | 82% |
| 4 | 7.9 | 3.9 | | 11.4 | | | 87% |

Sources: Kittelson & Associates, Inc. 2019; Google Maps 2019.
Notes: [1] Consists of typical walking time, average wait time, and transit travel time.
All times rounded to nearest tenth.

As shown in Table 2, for this 0.6-mile walking route, the average walking time and transit travel time are approximately equal to the average total shuttle time (average wait plus travel time) when two shuttles are operating. With the shuttle in operation, approximately half of the walk trips and the majority of transit, drive alone, and kiss and ride modes shown in Exhibit 2 would be expected to switch modes and use the shuttle. The shuttle use is estimated to range from 53 to 87 percent of BART riders traveling to/from Balboa Reservoir and CCSF.

Table 3 demonstrates the shuttle vehicles can be smaller when more shuttles are in operation, even as total demand increases. The forecast shuttle ridership roughly doubles as service improves from one to four shuttles in peak hour operation.

**Table 3: Weekday Peak Hour Ridership Estimate and Shuttle Needs**

| | | Peak Hour Ridership | | | |
|---|---|---|---|---|---|
| Number of Shuttles | Headway (minutes) | AM | PM | Peak Passenger Load | Shuttle Vehicle |
| 1 | 31.5 | 142 | 87 | 41 | 40-Foot Bus |
| 2 | 15.8 | 236 | 169 | 35 | 35-Foot Bus |
| 3 | 10.5 | 281 | 203 | 27 | Cutaway Minibus |
| 4 | 7.9 | 304 | 222 | 22 | Cutaway Minibus |

Sources: Kittelson & Associates, Inc. 2019; BART 2019; CCSF 2019.
Notes: AM = weekday a.m.; PM = weekday p.m.

# SERVICE CONCEPT

## Shuttle Route

The conceptual shuttle route and stop location concept is presented in Figure 2. This route would operate in one direction, clockwise, to allow loading/unloading on the most convenient side of the street at each stop to minimize the need for street crossings. The route is approximately 2.25 miles long with an estimated peak hour one-way travel time of approximately 20 minutes, not including loading/unloading and dwell time.

Source: Kittelson & Associates, Inc., 2019

Case No.2018-007883ENV: Balboa Reservoir Project

**Figure 2**
**Proposed Shuttle Service**

This concept represents one potential route and additional analysis would be needed in later stages of the shuttle planning process to further refine the alignment and ensure feasibility, including stops and facilities to serve shuttle vehicles within and outside of the Balboa Reservoir site.

## Shuttle Stops

The proposed stops are:

- Balboa Reservoir: one or two stops pending final street layout and locations suitable for shuttle stops
- City College Terminal: served by the existing Muni bus stop on Frida Kahlo Way, or via the alternate Lee Avenue route to the Ocean Avenue Muni bus stop.
- Balboa Park BART/Muni Station: the assumed stop is at the Ocean Avenue Muni bus stop but could be served alternatively or in addition at the Geneva Avenue Muni bus stop. The Geneva Avenue Muni bus stop location is currently constrained and shuttle of this stop may not be feasible. An alternative stop location would need to be found.
- CCSF: the assumed stop is a central and convenient location on Cloud Circle.

Shuttle buses loading and unloading passengers in Muni bus stops at Balboa Park BART/Muni Station and near the City College Terminal is essential to the feasibility of the service. This access would require SFMTA approval. SFMTA regulations would not currently permit shuttle service at these bus stops.

## Service Headways

The proposed route is expected to be approximately 31.5 minutes long during peak hours, with variability based on congestion, signal delay, passenger boarding/alighting, final stops/routing, layover scheduling, and the site circulation network. The associated headways based on the number of shuttles in operation and the corresponding vehicle needs are shown in Table 3.

Vehicle dwell times while loading/unloading vary by ridership and vehicle type, such as if two-door boarding is feasible. For this analysis, dwell time was assumed to be 30 seconds for the City College Terminal, CCSF stops, and the Balboa Park BART/Muni station stop, and 10 minutes at the site to account for up to two stops, a timepoint, and a 10 minute layover once per hour. Shuttle dwell times in this study are intended to be conservative and are estimated based on several factors specific to the shuttle service including time points and/or coordination with BART arrival and potential higher proportion of riders needing assistance.

## Hours of Operation

Hourly demand projections are beyond the scope of this study. Midday and evening shuttle demand is expected to be less than peak hour demand for the primarily residential Balboa Reservoir development while CCSF demand is forecast to respond to class schedule, remaining steady throughout much of the

weekday. Suggested initial service span for scheduled service is 6 a.m. to 8 p.m. on weekdays and 10 a.m. to 6 p.m. on weekends. More shuttles should be in operation during the weekday a.m. and p.m. peaks and during midday. The shuttles can run either on a fixed schedule (where buses may wait to keep on schedule) or run continuously.

During periods of lower demand, such as early morning, late evening, and weekends, the shuttle can be run as demand responsive service instead of fixed route/schedule. This would require a request and dispatching mechanism. Alternatively, a reduced schedule could be provided to serve CCSF night classes or late-night BART train arrivals. As is typical with transit service, the shuttle's initial hours, schedule, and frequency should be revised based on actual ridership needs.

### Vehicle Requirements

As shown in Table 3, vehicle capacity varies with the number of vehicles in operation. A fleet of three accessible "cutaway" minibuses with 24-28 passenger capacity would be optimal for high-frequency peak hour service and flexible off-peak service.

## SHUTTLE COST ANALYSIS

Shuttle costs primarily comprise of two main elements:

- Shuttle vehicles (rolling stock)
- Operational costs
    - Driver's wages and benefits
    - Insurance
    - Vehicle maintenance
    - Fuel

"Cutaway" minibuses cost between $42,000 and $58,000[6] and have an average lifespan of 5.6 years[7]. Operational costs for shuttles operating in San Mateo county indicate typical shuttle operations costs of $60 to $80 per hour. The weekday peak period shuttles typically cost between $150,000 and $200,000 annually[8]. Based on San Francisco Consumer Price Index data, there has been an annual average escalation of about three percent over the last nine years. This escalation would be expected to continue in the future.

The shuttle concept analyzed in this memorandum assumes three "cutaway" minibus shuttles operating during weekday a.m. and p.m. peak period with reduced service during off peak and weekend periods. This analysis assumes a weekday service of five hours with three buses, eight hours with two buses, and two hours

[6] Source: Colorado Department of Transportation, *Overview of Transit Vehicles*

[7] Source: Federal Transit Administration, *Useful Life of Buses and Vans, 2007*

[8] Source: San Mateo County Transportation Authority, *San Mateo County Shuttle Inventory and Analysis*, 2010. San Mateo County data assumed to be similar to San Francisco.

with one bus. Weekend service is assumed to be nine hours with one bus in operation. Based on this operational profile, low and high estimates of the vehicle and operational costs of the shuttle concept is shown in Table 4.

**Table 4: Shuttle Concept Estimated Annual Costs (2019 $)[9]**

| Estimate | Number of Vehicles | Annualized Vehicle Costs[1] | Weekday Service Shuttle-Hours[2] | Weekend Service Shuttle-Hours[2] | Annual Operations Cost[3] | Total Annual Cost |
|---|---|---|---|---|---|---|
| Low | 3 | $22,500 | 33 | 9 | $740,000 | $762,500 |
| High | | $31,000 | | | $980,000 | $1,011,00 |

Sources: Kittelson & Associates, Inc. 2019; CODOT, FTA 2007, San Mateo CTA, 2010
Notes:
[1] Based on three shuttle vehicles to be replaced every 5.6 years.
[2] Sum of number of hours each shuttle is assumed to operate
[3] Annual hours of shuttle service times hourly operational cost; escalated to 2019 costs and rounded.

The vehicle and operations costs can be reduced by owning and operating fewer vehicles and/or reducing service hours, which in turn would reduce the usefulness and appeal of the shuttle and result in fewer riders, as shown in Table 3.

## ADDITIONAL CONSIDERATIONS

This feasibility analysis focuses on the attractiveness and potential ridership of a potential shuttle based on various levels of service. The feasibility analysis does not consider regulatory, facility, or operational concerns, such as:

- Shuttle operator labor requirements
- Operator rest facility locations
- Balboa Reservoir shuttle stop locations or supporting amenities
- SFMTA regulatory provisions and permitting requirements
- Muni bus stop operations and feasibility of shared bus zones
- Operator staffing and scheduling
- Dispatch and operations management
- Shuttle maintenance facilities and staffing

These items require further study and are likely to increase the cost of shuttle operations.

[9] Year 2010 costs escalated by 29% based on San Francisco CPI growth per Bureau of Labor Statistics, to reflect Year 2019 costs.

# CONCLUSION

The high level of transit ridership forecast for Balboa Reservoir residents, employees, and visitors and CCSF students, staff, and faculty indicate a high frequency shuttle service with buses every nine minutes may be well utilized during peak periods to reduce travel time, provide convenience, enhance mobility particularly for seniors and people with disabilities, and/or increase personal security/sense of safety. The shuttle provides an opportunity for collaboration between Balboa Reservoir and CCSF for mutual benefit as approximately 40 percent of peak hour demand is associated with CCSF.

However, the Balboa Reservoir site and CCSF are within walking distance of high frequency transit with service to/from the Balboa Park BART/Muni station. The costs associated with operating a shuttle must be weighed against alternatives, such as subsidized first mile/last mile taxi or TNC rides for those with mobility needs. While the shuttle, as presented, would connect several destinations, the shuttle's indirect one-way loop route would have to compete with the high frequency and direct travel of the existing transit service and the flexibility and speed of walking. With three shuttle buses in operation, vehicle headways and average waiting time would match that of existing peak hour service. However, with one operating shuttle, off-peak periods would have headways of up to 31.5 minutes, making taking the shuttle slower than walking or using existing transit. Given the estimated cost of high-quality service of $762,500 to over $1 million per year (see Table 4), the shuttle concept would not be competitive with existing transit service and walking at a reasonable level of service. Additional considerations, including regulatory requirements and operator staffing and scheduling would increase costs and may present substantial hurdles to implementation.

# BALBOA RESERVOIR

**PRESENTED TO:**
THE CITY AND COUNTY OF SAN FRANCISCO

**RELATED CALIFORNIA**

**SARES REGIS GROUP OF NORTHERN CALIFORNIA**

**CURTIS DEVELOPMENT**

**TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORP**

**BAR ARCHITECTS**

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FLETCHER STUDIO
Y.A. STUDIO
LEVY DESIGN PARTNERS
MONICA WILSON / COMMUNITY + REAL ESTATE DEVELOPMENT

RELATED

June 2, 2017

Office of Economic & Workforce Development
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place
Room 448
San Francisco, CA 94102

**ATTN: TOM SHANAHAN**

RE: Response To Balboa Reservoir RFP

Dear Mr. Shanahan:

Related California ("Related") and its development partners Sares Regis Group of Northern California ("SRGNC"), Curtis Development Company., and Tenderloin Neighborhood Development Corp. ("TNDC") are pleased to submit our response to the above referenced Request for Proposals for the development of the Balboa Reservoir site. We have assembled a locally based, best-in-class design team, including BAR Architects, Y.A. Studio, Levy Design Partners, and landscape architect Fletcher Studio. All have considerable experience in working successfully at the neighborhood scale, on projects large and small, throughout San Francisco.

We appreciate the challenge in achieving a consensus vision for the site among different interests and constituencies, and commend the Balboa Reservoir Community Advisory Committee that put forward the principles and parameters upon which the RFP was based. Our response is intended to address those issues, including compatibility with the adjacent Westwood Park neighborhood and City College, while also achieving the worthy public policy goals including affordable housing, energy efficiency and transportation diversity.

Our goal is to create a family friendly community, not simply a series of buildings, that complement and integrates with its neighbors; many amenities would be open to the entire community, and affordable housing units would be distributed across the site, not sequestered in separate buildings. In addition, we are suggesting a means by which the project can pay for new parking for City College to replace the temporary parking arrangement that currently exists. In recognition of one of the increasingly pressing needs of both the College and the larger community of public educators, we have also suggested a preference in renting and buying a percentage of the workforce housing for faculty of City College and teachers from the San Francisco Unified School District.

Our team is particularly well suited to these tasks. Related is a fully integrated real estate firm with a 27 year track record delivering top quality, affordable and mixed income housing and mixed use developments in California, and is backed by The Related Companies, L.P., one of the largest and most honored privately held real estate firms in the country. This gives us a unique capacity and flexibility to finance large and complicated developments. Related has completed over 10,000 multifamily housing units in California, with another 5,000 under development. Of particular relevance to this endeavor, Related is the State's and San Francisco's largest developer of mixed income housing, and is one of the few companies in the country that has successfully executed a development with a mix of incomes from low- to middle-income. We are co-developers of the recently awarded Balboa Park/Upper Yard affordable housing site, and the redevelopment of the 50-acre Sunnydale public housing site, both of which are in close proximity to Balboa Reservoir. Related is also a long-term owner and manager of its developments, with a focus on sustainability and fostering long term relationships with the other stakeholders in its communities.

SRGNC is a privately owned, San Mateo-based developer of high quality rental and ownership residential communities throughout the Bay Area, active for 25 years. From its inception, SRGNC's development efforts have focused on in-fill opportunities, close to transportation, jobs, services and recreation. These developments have often served as a catalyst for positive change in their communities. To date, SRGNC has acquired or developed approximately 19,000 multifamily and residential housing units and 14 million square feet of commercial and civic properties, with a current pipeline of 2,500 units, of both for sale and rental properties. SRGNC and Related are currently working together on two other developments in the Bay Area, and the firms' principals have known each other for years.

Charmaine Curtis, principal of Curtis Development, has been active in both market-rate and affordable development in San Francisco for over 20 years, most recently overseeing coordination on behalf of BRIDGE Housing, the master planning nd entitlement process for the redevelopment of the Potrero Terrace/Potrero Annex public housing project, which will ultimately include 1,600 units of mixed income housing. In addition, until very recently, she was a resident of the nearby Sunnyside neighborhood.

TNDC is one of the most established and successful nonprofit developers of affordable housing in San Francisco, with a citywide portfolio. TNDC is involved in partnerships with Related on three other mixed income developments in the City.

While we have endeavored to respond to each of the objectives outlined in the RFP in as much detail as possible, it is important to recognize that our response is a preliminary concept. It also has built in flexibility, so the basic concepts can readily be modified to respond to input from the community. It is our practice, if selected, to engage in a robust community engagement process, in which we start out by doing as much listening as talking. Our proposed community engagement process is outlined in more detail in our proposal, but we are accustomed to spending as much time as necessary to build on the work already done by the Community Advisory Committee.

All on our team are very excited about working with the community, City College, and the City to plan and develop a new mixed income neighborhood that will become a positive addition to the surrounding neighborhoods. I am happy to respond to any questions and look forward to the public presentation on June 10.

Sincerely,

**William A. Witte**
Chairman & CEO
Related California

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# PART 1

## GENERAL INFORMATION

# DEVELOPMENT PROGRAM

*OVERVIEW*

ATTACHMENT D

DEVELOPMENT PROGRAM OVERVIEW FORM

***Instructions:*** *Please complete this form and submit within Part 1 of RFP response. The program proposed by the selected development team will constitute the starting point for that team's planning and design, outreach, and other predevelopment work.*

*The requested figures may be provided as ranges and/or approximations, so long as the ranges given are narrow enough to clearly indicate the specific character of the project (e.g., approaches to density and open space, prioritization of public benefits, etc.) relative to that of other proposals.*

**Housing**

1. Gross square feet: Approx. 800,000 GSF + Approx. 150,000 GSF parking
2. Corresponding unit count: 680
3. Baseline affordable housing program:
   *Check boxes to confirm that proposed development program includes:*

   X 18% low-income units  X 15% moderate-income units

4. Additional affordable units:
   a. Number of units in excess of 33% baseline: 116 units
   b. Corresponding percentage of total units: 50.1%
   c. Target income(s) (% of AMI): 80%, 120%, 150% AMI

**Open Space**

5. Total open space: 5.8 ac.
6. Size of each proposed open space:
   Reservoir Sq/Mt. Davidson Walk 1.7 ac.
   Westwood Green – 2.6 ac.;
   Additional Courtyard and Mews – 1.5 ac.

**Parking:**

7. Number of Spaces: 370
8. Configurations: In Podium, Structured

**Childcare**

9. Does proposed development include at least one childcare facility? Yes

**Additional Proposed Uses:**

10. Uses and corresponding sizes: Retail – 2,000 gsf; Community Room – 1,500 gsf; Childcare – 2,400 gsf

# CERTIFICATE OF GOOD STANDING

*RELATED*

## State of California
Secretary of State

CERTIFICATE OF STATUS

ENTITY NAME: THE RELATED COMPANIES OF CALIFORNIA, LLC

| | |
|---|---|
| FILE NUMBER: | 199832310068 |
| FORMATION DATE: | 11/19/1998 |
| TYPE: | DOMESTIC LIMITED LIABILITY COMPANY |
| JURISDICTION: | CALIFORNIA |
| STATUS: | ACTIVE (GOOD STANDING) |

I, ALEX PADILLA, Secretary of State of the State of California, hereby certify:

The records of this office indicate the entity is authorized to exercise all of its powers, rights and privileges in the State of California.

No information is available from this office regarding the financial condition, business activities or practices of the entity.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of April 12, 2017.

**ALEX PADILLA**
**Secretary of State**

JTN

*NP-25 (REV 01/2015)*

# CERTIFICATE OF GOOD STANDING

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

## State of California
Secretary of State

CERTIFICATE OF STATUS

ENTITY NAME: SARES REGIS GROUP OF NORTHERN CALIFORNIA, LLC

REGISTERED IN CALIFORNIA AS: SARES REGIS GROUP OF NORTHERN CALIFORNIA, LLC

| | |
|---|---|
| FILE NUMBER: | 201102110030 |
| REGISTRATION DATE: | 01/05/2011 |
| TYPE: | FOREIGN LIMITED LIABILITY COMPANY |
| JURISDICTION: | DELAWARE |
| STATUS: | ACTIVE (GOOD STANDING) |

I, ALEX PADILLA, Secretary of State of the State of California, hereby certify:

The records of this office indicate the entity is qualified to transact intrastate business in the State of California.

No information is available from this office regarding the financial condition, business activities or practices of the entity.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of May 26, 2017.

**ALEX PADILLA**
**Secretary of State**

RKS

*NP-25 (REV 01/2015)*

# CERTIFICATE OF GOOD STANDING

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

# Delaware

The First State



*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "SARES REGIS GROUP OF NORTHERN CALIFORNIA, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-SIXTH DAY OF MAY, A.D. 2017.*

*AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "SARES REGIS GROUP OF NORTHERN CALIFORNIA, LLC" WAS FORMED ON THE FIRST DAY OF JANUARY, A.D. 2011.*

*AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.*

Jeffrey W. Bullock, Secretary of State

4920331 8300

SR# 20174173098

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 202611736

Date: 05-26-17

# CERTIFICATE OF GOOD STANDING

*CURTIS DEVELOPMENT*

Not applicable—Curtis Development is not a corporation.

# CERTIFICATE OF GOOD STANDING

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

## State of California
Secretary of State

CERTIFICATE OF STATUS

ENTITY NAME:

TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION

| | |
|---|---|
| FILE NUMBER: | C1079721 |
| FORMATION DATE: | 06/16/1981 |
| TYPE: | DOMESTIC NONPROFIT CORPORATION |
| JURISDICTION: | CALIFORNIA |
| STATUS: | ACTIVE (GOOD STANDING) |

I, ALEX PADILLA, Secretary of State of the State of California, hereby certify:

The records of this office indicate the entity is authorized to exercise all of its powers, rights and privileges in the State of California.

No information is available from this office regarding the financial condition, business activities or practices of the entity.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of May 24, 2017.

**ALEX PADILLA**
**Secretary of State**

NP-25 (REV 01/2015)

PAM

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

ATTACHMENT C

DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

***Instructions:*** *This form must be completed and executed by the respondent organization's president, executive officer, or equivalent responsible party, such as the managing member of an LLC or the general partner of a limited partnership.*

*Any material misstatement of the information provided in this questionnaire and certification may be grounds for rejection of a proposal or avoidance of a land transaction.*

**GENERAL INFORMATION**

RESPONDENT NAME: Related California Residential, LLC
*(Print name as it would appear on contractual agreements with the City.)*

LEGAL FORM (e.g. corporation, partnership, LLC, joint venture): LLC

MEMBER ENTITIES: The Related Companies L.P.

ADDRESS: 44 Montgomery Street, Suite 1300

| San Francisco | CA | 94104 |
|---|---|---|
| CITY | STATE | ZIP |

PHONE: (415) 677-9000 EMAIL: wwitte@related.com

KEY PERSONNEL INFORMATION: Provide the full name, title, address, phone number, and email address of all key personnel.

NAME: William Witte

ADDRESS: 44 Montgomery Street, Suite 1300

| San Francisco | CA | 94104 |
|---|---|---|
| CITY | STATE | ZIP |

PHONE: (415) 677-9000 EMAIL: wwitte@related.com

NAME: Greg Vilkin

ADDRESS: 44 Montgomery Street, Suite 1300

| San Francisco | CA | 94104 |
|---|---|---|
| CITY | STATE | ZIP |

PHONE: (415) 677-9000 EMAIL: gvilkin@related.com

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

NAME: Susan Smartt

ADDRESS: 44 Montgomery Street, Suite 1300

San Francisco | CA | 94104

CITY | STATE | ZIP

PHONE: (415) 677-9000 EMAIL: susan.smartt@related.com

NAME: _____

ADDRESS: _____

CITY | STATE | ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

CITY | STATE | ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

CITY | STATE | ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

CITY | STATE | ZIP

PHONE: _____ EMAIL: _____

*Please attach additional sheets as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

**DISCLOSURE QUESTIONS**

**RESPONDENT NAME:** Related California Residential, LLC
*(Print name as it would appear on contractual agreements with the City.)*

*If the answer to any of the disclosure questions requires additional space for explanation, please attach additional sheets as necessary.*

1. Have you or any of your principals ever been a party to an agreement with a public entity that was terminated for cause (e.g. breach)? □ **Yes** ■ **No**
   If yes, identify the public entity, state the nature of the agreement, the date of termination, and the specific reasons for the termination.

   _____

   _____

   _____

2. Have you or any of your principals ever been a party to an agreement with a public entity that was cancelled without cause? □ **Yes** ■ **No**
   If yes, identify the party to the contract, the date of cancellation, and the specific reason for the cancellation.

   _____

   _____

   _____

3. Have you or any of your principals ever been in arrears on taxes or fees due to any business or operation? □ **Yes** ■ **No**
   If yes, identify the jurisdiction and explain.

   _____

   _____

   _____

4. Have you or any of your principals ever been the subject of an enforcement action taken by any governmental body relating to unfair and/or fraudulent business practices, non-payment of taxes, or violations of any city, county state, or federal regulation, ordinance, or statute?
   □ **Yes** ■ **No**
   If yes, identify the governmental body and explain.

   _____

   _____

   _____

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

**Disclosure Questions, Cont'd**

**RESPONDENT NAME:** Related California Residential, LLC

5. Have you or any of our principals ever been a party to any regulatory action, including any notice of violation, order, or fine, taken by a regulatory agency, including any local, regional, state, or federal agency with purview over air or water quality (including storm water management), or the handling, storage, or disposal of hazardous or solid waste?
   □ **Yes** ■ **No**
   If yes, identify the regulatory agency and explain.

   _____

   _____

   _____

6. Have you or any of your principals ever been a party to any legal proceedings, actions, convictions, judgements, arbitrations, or mediations? □ **Yes** ■ **No**
   If yes, provide: (a) the date each matter was initiated; (b) the present status of each matter; (c) if a judgement was entered against you, whether the judgement has been satisfied in full, and if not, the current status.

   _____

   _____

   _____

7. Have you or any of your management staff ever been a party to any administrative complaints/hearings filed or any debarments or suspensions or other administrative actions commenced by any federal, state, or local government entity? □ **Yes** ■ **No**
   If yes, provide: (a) the date each matter was initiated and (b) the present status of each matter.

   _____

   _____

   _____

8. Have you or any of your principals ever filed for bankruptcy? □ **Yes** ■ **No**
   If yes, provide: (a) date and jurisdiction of each filing; (b) reason for filing; (c) case numbers and types of cases (e.g., Chapter 7 liquidation or Chapter or 11 or Chapter 13 reorganization); and (d) current status of each case.

   _____

   _____

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

**Disclosure Questions, Cont'd.**

**RESPONDENT NAME:** Related California Residential, LLC

9. Describe any business, property, gifts, loans, investments or other financial relationships between you and any member of the SFPUC Commission or the Board of Supervisors (or members of their immediate families), which are financial interests as defined by Section 897103 of the California Fair Political Practices Act.

   N/A

10. Have you or any of your principals ever violated the Campaign Reform Ordinance and/or Conduct code (Section 1.126 of the S.F. Campaign and Governmental Conduct Code, referenced in RFP Section 12.8)? □ **Yes** ■ **No**
    If yes, describe (a) the date of each violation and (b) the nature of each violation.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

**RESPONDENT CERTIFICATION**

**RESPONDENT NAME:** Related California Residential, LLC

On behalf of the party named above, the undersigned certify under penalty of perjury under the laws of the State of California that:

1. The responses (including any required additional responses of related parties) to this Disclosure Questionnaire ("Questionnaire") and Respondent Certificate ("Certificate") (including any attached sheets) consist of 1 total pages.

2. The undersigned understands and agrees that the San Francisco Public Utilities Commission ("SFPUC") and the City and County of San Francisco ("City") makes no representations or warranties with respect to the offering described in the Request for Proposals ("RFP"), and that everything relevant to this proposal has been based on either the undersigned's own knowledge or the information provided by the SFPUC and the City in the RFP and on the web page for the RFP.

3. The undersigned certifies that the Respondent named above has not agreed to pay now or in the future, and has not in fact paid, directly or indirectly, any fee, commission, or other things of value to any City or SFPUC employee, agent, representative, commissioner, or contractor in an effort to influence the SFPUC Commission's decisions regarding the Balboa Reservoir development opportunity.

4. The undersigned represents that the Respondent has no conflict of interest that could interfere with the development and operations described in the proposal to which this Questionnaire and Certificate are attached.

5. The undersigned states that the Respondent is familiar with the conflict of interest provisions of Section 15.103 of the San Francisco Charter, certifies that it knows no facts that would constitute a violation of these provisions, and agrees to notify the City immediately upon becoming aware of any facts that would constitute a violation of these provisions. The undersigned further certifies that it has made a complete disclosure to the City of all facts bearing on any possible interests, direct or indirect, which the undersigned believes any officer or employee of the City presently has or will have in the land transaction by the proposal to which this Questionnaire and Certificate are attached or in the performance thereof or in any portion of the profits thereof.

6. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent has read and understands the key terms and conditions of the RFP and, if selected: (1) will satisfy all of the requirements for exclusive negotiations and for any extension thereof and (2) is ready, willing, and able to comply with all City requirements and other terms and conditions of the RFP as they apply to the attached proposal.

7. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent agrees that it will have no claim against the SFPUC or the City by reason of, and waives any and all rights with respect to, the following:

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*RELATED*

**RESPONDENT NAME:** Related California Residential, LLC

any aspect of the proposal to which this Questionnaire and Certificate are attached; any informalities or defects in the selection process, the rejection of any proposal, the acceptance of any proposal, the execution of any land transaction, the failure to complete any land transaction, and any statement, representation, act, or omission of the City or its agents in connection with the proposal to which this Questionnaire and Certificate are attached or the RFP.

8. The individuals signing on behalf of the undersigned is/are authorized representatives of the Respondent with full and complete rights to make the certifications above and to bind the Respondent to the proposal to which this Questionnaire and Certificate are attached.

9. The responses provided to this Questionnaire and Certificate were formulated after investigation of the Respondent's operations by myself personally or are based on information provided to me by another responsible person with unlimited authority to obtain the required information. The undersigned represents that each decision-making principal or authorized representative of the Respondent has reviewed and understands the terms and conditions that are the subject of this Questionnaire and Certificate and approved the execution of this Questionnaire and Certificate.

10. I believe all information provided in response to this Questionnaire and Certificate is true and correct.

*If the Respondent is a joint venture or other form of undertaking by more than one individual or entity, an authorized representative of each principal must sign and date this Certificate below.*

Name of principal: William A. Witte

Signature: _____ Date: 5/30/17

Title: Chairman and CEO

Name of principal: _____

Signature: _____ Date: _____

Title: _____

Name of principal: _____

Signature: _____ Date: _____

Title: _____

*Please attach any additional signature pages as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

ATTACHMENT C

DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

***Instructions:*** *This form must be completed and executed by the respondent organization's president, executive officer, or equivalent responsible party, such as the managing member of an LLC or the general partner of a limited partnership.*

*Any material misstatement of the information provided in this questionnaire and certification may be grounds for rejection of a proposal or avoidance of a land transaction.*

**GENERAL INFORMATION**

RESPONDENT NAME: Sares Regis Group of Northern California, LLC
*(Print name as it would appear on contractual agreements with the City.)*

LEGAL FORM (e.g. corporation, partnership, LLC, joint venture): Delaware limited liability company

MEMBER ENTITIES:
W-K Associates, LLC, a Delaware limited liability company &
Sares Regis Operating Company, L.P a Delaware limited partnership

ADDRESS: 901 Mariners Island Blvd #700
San Mateo, CA 94404
CITY STATE ZIP

PHONE: 650-378-2800 EMAIL: jsmith@srgnc.com

KEY PERSONNEL INFORMATION: Provide the full name, title, address, phone number, and email address of all key personnel.

NAME: Rob Wagner
ADDRESS: 901 Mariners Island Blvd #700
San Mateo, CA 94404
CITY STATE ZIP
PHONE: 650-378-2800 EMAIL: rwagner@srgnc.com

NAME: Mark Kroll
ADDRESS: 901 Mariners Island Blvd #700
San Mateo, CA 94404
CITY STATE ZIP
PHONE: 650-378-2800 EMAIL: mkroll@srgnc.com

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

NAME: Andrew Hudacek
ADDRESS: 901 Mariners Island Blvd #700
San Mateo, CA 94404
CITY STATE ZIP
PHONE: 650-378-2800 EMAIL: ahudacek@srgnc.com

NAME: Todd Regonini
ADDRESS: 901 Mariners Island Blvd #700
San Mateo, CA 94404
CITY STATE ZIP
PHONE: 650-378-2800 EMAIL: tregonini@srgnc.com

NAME: Ginger Bryant
ADDRESS: 901 Mariners Island Blvd #700
San Mateo, CA 94404
CITY STATE ZIP
PHONE: 650-378-2800 EMAIL: gbryant@srgnc.com

NAME:
ADDRESS:
CITY STATE ZIP
PHONE: EMAIL:

NAME:
ADDRESS:
CITY STATE ZIP
PHONE: EMAIL:

*Please attach additional sheets as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

**DISCLOSURE QUESTIONS**

**RESPONDENT NAME:** Sares Regis Group of Northern California, LLC
*(Print name as it would appear on contractual agreements with the City.)*

*If the answer to any of the disclosure questions requires additional space for explanation, please attach additional sheets as necessary.*

1. Have you or any of your principals ever been a party to an agreement with a public entity that was terminated for cause (e.g. breach)? ☐ **Yes** ☒ **No**
   If yes, identify the public entity, state the nature of the agreement, the date of termination, and the specific reasons for the termination.

2. Have you or any of your principals ever been a party to an agreement with a public entity that was cancelled without cause? ☐ **Yes** ☒ **No**
   If yes, identify the party to the contract, the date of cancellation, and the specific reason for the cancellation.

3. Have you or any of your principals ever been in arrears on taxes or fees due to any business or operation? ☐ **Yes** ☒ **No**
   If yes, identify the jurisdiction and explain.

4. Have you or any of your principals ever been the subject of an enforcement action taken by any governmental body relating to unfair and/or fraudulent business practices, non-payment of taxes, or violations of any city, county state, or federal regulation, ordinance, or statute?
   ☐ **Yes** ☒ **No**
   If yes, identify the governmental body and explain.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

**Disclosure Questions, Cont'd**

**RESPONDENT NAME:** Sares Regis Group of Northern California, LLC

5. Have you or any of our principals ever been a party to any regulatory action, including any notice of violation, order, or fine, taken by a regulatory agency, including any local, regional, state, or federal agency with purview over air or water quality (including storm water management), or the handling, storage, or disposal of hazardous or solid waste?
   ☐ **Yes** ☒ **No**
   If yes, identify the regulatory agency and explain.

6. Have you or any of your principals ever been a party to any legal proceedings, actions, convictions, judgements, arbitrations, or mediations? ☒ **Yes** ☐ **No**
   If yes, provide: (a) the date each matter was initiated; (b) the present status of each matter; (c) if a judgement was entered against you, whether the judgement has been satisfied in full, and if not, the current status.

   See attached list

7. Have you or any of your management staff ever been a party to any administrative complaints/hearings filed or any debarments or suspensions or other administrative actions commenced by any federal, state, or local government entity? ☐ **Yes** ☒ **No**
   If yes, provide: (a) the date each matter was initiated and (b) the present status of each matter.

8. Have you or any of your principals ever filed for bankruptcy? ☐ **Yes** ☒ **No**
   If yes, provide: (a) date and jurisdiction of each filing; (b) reason for filing; (c) case numbers and types of cases (e.g., Chapter 7 liquidation or Chapter or 11 or Chapter 13 reorganization); and (d) current status of each case.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

**Disclosure Questions, Cont'd.**

**RESPONDENT NAME:** Sares Regis Group of Northern California, LLC

9. Describe any business, property, gifts, loans, investments or other financial relationships between you and any member of the SFPUC Commission or the Board of Supervisors (or members of their immediate families), which are financial interests as defined by Section 897103 of the California Fair Political Practices Act.

   NA

10. Have you or any of your principals ever violated the Campaign Reform Ordinance and/or Conduct code (Section 1.126 of the S.F. Campaign and Governmental Conduct Code, referenced in RFP Section 12.8)? ☐ **Yes** ☒ **No**
    If yes, describe (a) the date of each violation and (b) the nature of each violation.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

**RESPONDENT CERTIFICATION**

**RESPONDENT NAME:** Sares Regis Group of Northern California, LLC

On behalf of the party named above, the undersigned certify under penalty of perjury under the laws of the State of California that:

1. The responses (including any required additional responses of related parties) to this Disclosure Questionnaire ("Questionnaire") and Respondent Certificate ("Certificate") (including any attached sheets) consist of 1 total pages.

2. The undersigned understands and agrees that the San Francisco Public Utilities Commission ("SFPUC") and the City and County of San Francisco ("City") makes no representations or warranties with respect to the offering described in the Request for Proposals ("RFP"), and that everything relevant to this proposal has been based on either the undersigned's own knowledge or the information provided by the SFPUC and the City in the RFP and on the web page for the RFP.

3. The undersigned certifies that the Respondent named above has not agreed to pay now or in the future, and has not in fact paid, directly or indirectly, any fee, commission, or other things of value to any City or SFPUC employee, agent, representative, commissioner, or contractor in an effort to influence the SFPUC Commission's decisions regarding the Balboa Reservoir development opportunity.

4. The undersigned represents that the Respondent has no conflict of interest that could interfere with the development and operations described in the proposal to which this Questionnaire and Certificate are attached.

5. The undersigned states that the Respondent is familiar with the conflict of interest provisions of Section 15.103 of the San Francisco Charter, certifies that it knows no facts that would constitute a violation of these provisions, and agrees to notify the City immediately upon becoming aware of any facts that would constitute a violation of these provisions. The undersigned further certifies that it has made a complete disclosure to the City of all facts bearing on any possible interests, direct or indirect, which the undersigned believes any officer or employee of the City presently has or will have in the land transaction by the proposal to which this Questionnaire and Certificate are attached or in the performance thereof or in any portion of the profits thereof.

6. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent has read and understands the key terms and conditions of the RFP and, if selected: (1) will satisfy all of the requirements for exclusive negotiations and for any extension thereof and (2) is ready, willing, and able to comply with all City requirements and other terms and conditions of the RFP as they apply to the attached proposal.

7. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent agrees that it will have no claim against the SFPUC or the City by reason of, and waives any and all rights with respect to, the following:

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

**RESPONDENT NAME:** Sares Regis Group of Northern California, LLC

any aspect of the proposal to which this Questionnaire and Certificate are attached; any informalities or defects in the selection process, the rejection of any proposal, the acceptance of any proposal, the execution of any land transaction, the failure to complete any land transaction, and any statement, representation, act, or omission of the City or its agents in connection with the proposal to which this Questionnaire and Certificate are attached or the RFP.

8. The individuals signing on behalf of the undersigned is/are authorized representatives of the Respondent with full and complete rights to make the certifications above and to bind the Respondent to the proposal to which this Questionnaire and Certificate are attached.

9. The responses provided to this Questionnaire and Certificate were formulated after investigation of the Respondent's operations by myself personally or are based on information provided to me by another responsible person with unlimited authority to obtain the required information. The undersigned represents that each decision-making principal or authorized representative of the Respondent has reviewed and understands the terms and conditions that are the subject of this Questionnaire and Certificate and approved the execution of this Questionnaire and Certificate.

10. I believe all information provided in response to this Questionnaire and Certificate is true and correct.

*If the Respondent is a joint venture or other form of undertaking by more than one individual or entity, an authorized representative of each principal must sign and date this Certificate below.*

Name of principal: Andrew Fludaoek

Signature: _____ Date: 5/31/17

Title: Chief Investment Officer

Name of principal: _____

Signature: _____ Date: _____

Title: _____

Name of principal: _____

Signature: _____ Date: _____

Title: _____

*Please attach any additional signature pages as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*SARES REGIS GROUP OF NORTHERN CALIFORNIA*

| Date Initiated | Title | Type of Matter | Resolution | Notes |
|---|---|---|---|---|
| 5/5/2011 | Sohi v. Kirker Creek Apartments | Property Management/Personal Injury | Settled | Sares Regis Group of Northern California, LLC was a participant |
| 1/23/12 | Michael Martino v. Sares Regis Group of Northern California, LLC, The Regis Group, Sares Regis Management Company, et al. | Property Management | Settled | |
| 10/3/2013 | Jung v. Sares Regis Group | Employment | Settled | Sares Regis Group of Northern California, LLC was a participant |

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

ATTACHMENT C

DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

***Instructions:*** *This form must be completed and executed by the respondent organization's president, executive officer, or equivalent responsible party, such as the managing member of an LLC or the general partner of a limited partnership.*

*Any material misstatement of the information provided in this questionnaire and certification may be grounds for rejection of a proposal or avoidance of a land transaction.*

**GENERAL INFORMATION**

RESPONDENT NAME: ***Curtis Development***
*(Print name as it would appear on contractual agreements with the City.)*

LEGAL FORM (e.g. corporation, partnership, LLC, joint venture): ***Sole proprietorship***

MEMBER ENTITIES: ***NA***

ADDRESS: ***3743 23rd Street***

***San Francisco*** CITY ***California*** STATE ***94114*** ZIP

PHONE: ***415-609-4996*** EMAIL: ***charmaine@curtis-development.com***

KEY PERSONNEL INFORMATION: Provide the full name, title, address, phone number, and email address of all key personnel.

NAME: ***Charmaine Curtis***

ADDRESS: ***Same as above***

CITY STATE ZIP

PHONE: EMAIL:

NAME:

ADDRESS:

CITY STATE ZIP

PHONE: EMAIL:

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

*Please attach additional sheets as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

**DISCLOSURE QUESTIONS**

**RESPONDENT NAME:** *Curtis Development*
*(Print name as it would appear on contractual agreements with the City.)*

*If the answer to any of the disclosure questions requires additional space for explanation, please attach additional sheets as necessary.*

1. Have you or any of your principals ever been a party to an agreement with a public entity that was terminated for cause (e.g. breach)? □ **Yes** □ **No**
   If yes, identify the public entity, state the nature of the agreement, the date of termination, and the specific reasons for the termination.

   _____

   _____

   _____

2. Have you or any of your principals ever been a party to an agreement with a public entity that was cancelled without cause? □ **Yes** □ **No**
   If yes, identify the party to the contract, the date of cancellation, and the specific reason for the cancellation.

   _____

   _____

   _____

3. Have you or any of your principals ever been in arrears on taxes or fees due to any business or operation? □ **Yes** □ **No**
   If yes, identify the jurisdiction and explain.

   _____

   _____

   _____

4. Have you or any of your principals ever been the subject of an enforcement action taken by any governmental body relating to unfair and/or fraudulent business practices, non-payment of taxes, or violations of any city, county state, or federal regulation, ordinance, or statute?
   □ **Yes** □ **No**
   If yes, identify the governmental body and explain.

   _____

   _____

   _____

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

**Disclosure Questions, Cont'd**

**RESPONDENT NAME:** *Curtis Development*

5. Have you or any of our principals ever been a party to any regulatory action, including any notice of violation, order, or fine, taken by a regulatory agency, including any local, regional, state, or federal agency with purview over air or water quality (including storm water management), or the handling, storage, or disposal of hazardous or solid waste?
   □ Yes (□) No
   If yes, identify the regulatory agency and explain.

   _____

   _____

   _____

6. Have you or any of your principals ever been a party to any legal proceedings, actions, convictions, judgements, arbitrations, or mediations? □ Yes (□) No
   If yes, provide: (a) the date each matter was initiated; (b) the present status of each matter; (c) if a judgement was entered against you, whether the judgement has been satisfied in full, and if not, the current status.

   _____

   _____

   _____

7. Have you or any of your management staff ever been a party to any administrative complaints/hearings filed or any debarments or suspensions or other administrative actions commenced by any federal, state, or local government entity? □ Yes (□) No
   If yes, provide: (a) the date each matter was initiated and (b) the present status of each matter.

   _____

   _____

   _____

8. Have you or any of your principals ever filed for bankruptcy? □ Yes (□) No
   If yes, provide: (a) date and jurisdiction of each filing; (b) reason for filing; (c) case numbers and types of cases (e.g., Chapter 7 liquidation or Chapter or 11 or Chapter 13 reorganization); and (d) current status of each case.

   _____

   _____

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

**Disclosure Questions, Cont'd.**

**RESPONDENT NAME:** *Curtis Development*

9. Describe any business, property, gifts, loans, investments or other financial relationships between you and any member of the SFPUC Commission or the Board of Supervisors (or members of their immediate families), which are financial interests as defined by Section 897103 of the California Fair Political Practices Act.

*None*

10. Have you or any of your principals ever violated the Campaign Reform Ordinance and/or Conduct code (Section 1.126 of the S.F. Campaign and Governmental Conduct Code, referenced in RFP Section 12.8)? □ **Yes** □ **No**
If yes, describe (a) the date of each violation and (b) the nature of each violation.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

**RESPONDENT CERTIFICATION**

**RESPONDENT NAME:** *Curtis Development*

On behalf of the party named above, the undersigned certify under penalty of perjury under the laws of the State of California that:

1. The responses (including any required additional responses of related parties) to this Disclosure Questionnaire ("Questionnaire") and Respondent Certificate ("Certificate") (including any attached sheets) consist of 7 total pages.

2. The undersigned understands and agrees that the San Francisco Public Utilities Commission ("SFPUC") and the City and County of San Francisco ("City") makes no representations or warranties with respect to the offering described in the Request for Proposals ("RFP"), and that everything relevant to this proposal has been based on either the undersigned's own knowledge or the information provided by the SFPUC and the City in the RFP and on the web page for the RFP.

3. The undersigned certifies that the Respondent named above has not agreed to pay now or in the future, and has not in fact paid, directly or indirectly, any fee, commission, or other things of value to any City or SFPUC employee, agent, representative, commissioner, or contractor in an effort to influence the SFPUC Commission's decisions regarding the Balboa Reservoir development opportunity.

4. The undersigned represents that the Respondent has no conflict of interest that could interfere with the development and operations described in the proposal to which this Questionnaire and Certificate are attached.

5. The undersigned states that the Respondent is familiar with the conflict of interest provisions of Section 15.103 of the San Francisco Charter, certifies that it knows no facts that would constitute a violation of these provisions, and agrees to notify the City immediately upon becoming aware of any facts that would constitute a violation of these provisions. The undersigned further certifies that it has made a complete disclosure to the City of all facts bearing on any possible interests, direct or indirect, which the undersigned believes any officer or employee of the City presently has or will have in the land transaction by the proposal to which this Questionnaire and Certificate are attached or in the performance thereof or in any portion of the profits thereof.

6. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent has read and understands the key terms and conditions of the RFP and, if selected: (1) will satisfy all of the requirements for exclusive negotiations and for any extension thereof and (2) is ready, willing, and able to comply with all City requirements and other terms and conditions of the RFP as they apply to the attached proposal.

7. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent agrees that it will have no claim against the SFPUC or the City by reason of, and waives any and all rights with respect to, the following:

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*CURTIS DEVELOPMENT*

**RESPONDENT NAME:** *Curtis Development*

any aspect of the proposal to which this Questionnaire and Certificate are attached; any informalities or defects in the selection process, the rejection of any proposal, the acceptance of any proposal, the execution of any land transaction, the failure to complete any land transaction, and any statement, representation, act, or omission of the City or its agents in connection with the proposal to which this Questionnaire and Certificate are attached or the RFP.

8. The individuals signing on behalf of the undersigned is/are authorized representatives of the Respondent with full and complete rights to make the certifications above and to bind the Respondent to the proposal to which this Questionnaire and Certificate are attached.

9. The responses provided to this Questionnaire and Certificate were formulated after investigation of the Respondent's operations by myself personally or are based on information provided to me by another responsible person with unlimited authority to obtain the required information. The undersigned represents that each decision-making principal or authorized representative of the Respondent has reviewed and understands the terms and conditions that are the subject of this Questionnaire and Certificate and approved the execution of this Questionnaire and Certificate.

10. I believe all information provided in response to this Questionnaire and Certificate is true and correct.

*If the Respondent is a joint venture or other form of undertaking by more than one individual or entity, an authorized representative of each principal must sign and date this Certificate below.*

Name of principal: *Charmaine Curtis*

Signature: _____ Date: *May 31, 2017*

Title: *Owner/Principal*

Name of principal: _____

Signature: _____ Date: _____

Title: _____

Name of principal: _____

Signature: _____ Date: _____

Title: _____

*Please attach any additional signature pages as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

ATTACHMENT C

DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

***Instructions:*** *This form must be completed and executed by the respondent organization's president, executive officer, or equivalent responsible party, such as the managing member of an LLC or the general partner of a limited partnership.*

*Any material misstatement of the information provided in this questionnaire and certification may be grounds for rejection of a proposal or avoidance of a land transaction.*

**GENERAL INFORMATION**

RESPONDENT NAME: Tenderloin Neighborhood Development Corporation
*(Print name as it would appear on contractual agreements with the City.)*

LEGAL FORM (e.g. corporation, partnership, LLC, joint venture): nonprofit corporation

MEMBER ENTITIES: N/A

ADDRESS: 201 Eddy Street

San Francisco CA 94102
CITY STATE ZIP

PHONE: 415 358-3921 EMAIL: klamont@tndc.org

KEY PERSONNEL INFORMATION: Provide the full name, title, address, phone number, and email address of all key personnel.

NAME: Donald S. Falk, Chief Executive Officer

ADDRESS: 201 Eddy Street

San Francisco CA 94102
CITY STATE ZIP

PHONE: 415 358-3923 EMAIL: dfalk@tndc.org

NAME: Elizabeth Orlin, Chief Operating Officer

ADDRESS: 201 Eddy Street

San Francisco CA 94102
CITY STATE ZIP

PHONE: 415 358-2936 EMAIL: lorlin@tndc.org

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

NAME: Cynthia Alvarez, Chief Portfolio Officer

ADDRESS: 201 Eddy Street

San Francisco CA 94102

CITY STATE ZIP

PHONE: 415 358-3974 EMAIL: calvarez@tndc.org

NAME: Katherine Lamont, Director of Housing Development

ADDRESS: 201 Eddy Street

San Francisco CA 94102

CITY STATE ZIP

PHONE: 415 358-3921 EMAIL: klamont@tndc.org

NAME: Yvette Robinson, Director of Tenant and Community Services

ADDRESS: 201 Eddy Street

San Francisco CA 94102

CITY STATE ZIP

PHONE: 415 358-3924 EMAIL: yrobinson@tndc.org

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

NAME: _____

ADDRESS: _____

_____

CITY STATE ZIP

PHONE: _____ EMAIL: _____

*Please attach additional sheets as necessary.*

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

**DISCLOSURE QUESTIONS**

**RESPONDENT NAME:** Tenderloin Neighborhood Development Corporation
*(Print name as it would appear on contractual agreements with the City.)*

*If the answer to any of the disclosure questions requires additional space for explanation, please attach additional sheets as necessary.*

1. Have you or any of your principals ever been a party to an agreement with a public entity that was terminated for cause (e.g. breach)? ☐ **Yes** ☒ **No**
   If yes, identify the public entity, state the nature of the agreement, the date of termination, and the specific reasons for the termination.

   _____
   _____
   _____

2. Have you or any of your principals ever been a party to an agreement with a public entity that was cancelled without cause? ☐ **Yes** ☒ **No**
   If yes, identify the party to the contract, the date of cancellation, and the specific reason for the cancellation.

   _____
   _____
   _____

3. Have you or any of your principals ever been in arrears on taxes or fees due to any business or operation? ☐ **Yes** ☒ **No**
   If yes, identify the jurisdiction and explain.

   _____
   _____
   _____

4. Have you or any of your principals ever been the subject of an enforcement action taken by any governmental body relating to unfair and/or fraudulent business practices, non-payment of taxes, or violations of any city, county state, or federal regulation, ordinance, or statute? ☐ **Yes** ☒ **No**
   If yes, identify the governmental body and explain.

   _____
   _____
   _____

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

**Disclosure Questions, Cont'd**

**RESPONDENT NAME:** Tenderloin Neighborhood Development Corporation

5. Have you or any of our principals ever been a party to any regulatory action, including any notice of violation, order, or fine, taken by a regulatory agency, including any local, regional, state, or federal agency with purview over air or water quality (including storm water management), or the handling, storage, or disposal of hazardous or solid waste?
   ☐ **Yes** ☒ **No**
   If yes, identify the regulatory agency and explain.

6. Have you or any of your principals ever been a party to any legal proceedings, actions, convictions, judgements, arbitrations, or mediations? ☐ **Yes** ☒ **No**
   If yes, provide: (a) the date each matter was initiated; (b) the present status of each matter; (c) if a judgement was entered against you, whether the judgement has been satisfied in full, and if not, the current status.

7. Have you or any of your management staff ever been a party to any administrative complaints/hearings filed or any debarments or suspensions or other administrative actions commenced by any federal, state, or local government entity? ☐ **Yes** ☒ **No**
   If yes, provide: (a) the date each matter was initiated and (b) the present status of each matter.

8. Have you or any of your principals ever filed for bankruptcy? ☐ **Yes** ☒ **No**
   If yes, provide: (a) date and jurisdiction of each filing; (b) reason for filing; (c) case numbers and types of cases (e.g., Chapter 7 liquidation or Chapter or 11 or Chapter 13 reorganization); and (d) current status of each case.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

**Disclosure Questions, Cont'd.**

**RESPONDENT NAME:** Tenderloin Neighborhood Development Corporation

9. Describe any business, property, gifts, loans, investments or other financial relationships between you and any member of the SFPUC Commission or the Board of Supervisors (or members of their immediate families), which are financial interests as defined by Section 897103 of the California Fair Political Practices Act.

   None

10. Have you or any of your principals ever violated the Campaign Reform Ordinance and/or Conduct code (Section 1.126 of the S.F. Campaign and Governmental Conduct Code, referenced in RFP Section 12.8)? □ **Yes** ☝ **No**
    If yes, describe (a) the date of each violation and (b) the nature of each violation.

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

**RESPONDENT CERTIFICATION**

**RESPONDENT NAME:** Tenderloin Neighborhood Development Corporation

On behalf of the party named above, the undersigned certify under penalty of perjury under the laws of the State of California that:

1. The responses (including any required additional responses of related parties) to this Disclosure Questionnaire ("Questionnaire") and Respondent Certificate ("Certificate") (including any attached sheets) consist of 7 total pages.

2. The undersigned understands and agrees that the San Francisco Public Utilities Commission ("SFPUC") and the City and County of San Francisco ("City") makes no representations or warranties with respect to the offering described in the Request for Proposals ("RFP"), and that everything relevant to this proposal has been based on either the undersigned's own knowledge or the information provided by the SFPUC and the City in the RFP and on the web page for the RFP.

3. The undersigned certifies that the Respondent named above has not agreed to pay now or in the future, and has not in fact paid, directly or indirectly, any fee, commission, or other things of value to any City or SFPUC employee, agent, representative, commissioner, or contractor in an effort to influence the SFPUC Commission's decisions regarding the Balboa Reservoir development opportunity.

4. The undersigned represents that the Respondent has no conflict of interest that could interfere with the development and operations described in the proposal to which this Questionnaire and Certificate are attached.

5. The undersigned states that the Respondent is familiar with the conflict of interest provisions of Section 15.103 of the San Francisco Charter, certifies that it knows no facts that would constitute a violation of these provisions, and agrees to notify the City immediately upon becoming aware of any facts that would constitute a violation of these provisions. The undersigned further certifies that it has made a complete disclosure to the City of all facts bearing on any possible interests, direct or indirect, which the undersigned believes any officer or employee of the City presently has or will have in the land transaction by the proposal to which this Questionnaire and Certificate are attached or in the performance thereof or in any portion of the profits thereof.

6. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent has read and understands the key terms and conditions of the RFP and, if selected: (1) will satisfy all of the requirements for exclusive negotiations and for any extension thereof and (2) is ready, willing, and able to comply with all City requirements and other terms and conditions of the RFP as they apply to the attached proposal.

7. By submitting the proposal to which this Questionnaire and Certificate are attached, the undersigned certifies that the Respondent agrees that it will have no claim against the SFPUC or the City by reason of, and waives any and all rights with respect to, the following:

# DISCLOSURE QUESTIONNAIRE & RESPONDENT CERTIFICATION FORM

*TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION*

**RESPONDENT NAME:** Tenderloin Neighborhood Development Corporation

any aspect of the proposal to which this Questionnaire and Certificate are attached; any informalities or defects in the selection process, the rejection of any proposal, the acceptance of any proposal, the execution of any land transaction, the failure to complete any land transaction, and any statement, representation, act, or omission of the City or its agents in connection with the proposal to which this Questionnaire and Certificate are attached or the RFP.

8. The individuals signing on behalf of the undersigned is/are authorized representatives of the Respondent with full and complete rights to make the certifications above and to bind the Respondent to the proposal to which this Questionnaire and Certificate are attached.

9. The responses provided to this Questionnaire and Certificate were formulated after investigation of the Respondent's operations by myself personally or are based on information provided to me by another responsible person with unlimited authority to obtain the required information. The undersigned represents that each decision-making principal or authorized representative of the Respondent has reviewed and understands the terms and conditions that are the subject of this Questionnaire and Certificate and approved the execution of this Questionnaire and Certificate.

10. I believe all information provided in response to this Questionnaire and Certificate is true and correct.

*If the Respondent is a joint venture or other form of undertaking by more than one individual or entity, an authorized representative of each principal must sign and date this Certificate below.*

Name of principal: Paul Sussman

Signature: _____ Date: May 31, 2017

Title: Chief Financial Officer

Name of principal: _____

Signature: _____ Date: _____

Title: _____

Name of principal: _____

Signature: _____ Date: _____

Title: _____

*Please attach any additional signature pages as necessary.*

# DEVELOPMENT TEAM REFERENCES

## Related

**TIFFANY GRIEGO**
DIRECTOR, ASSET MANAGEMENT
STANFORD UNIVERSITY
660-724-4784
tgriego@stanford.edu
Stanford Real Estate
3160 Porter Drive, Suite 200
Palo Alto, California 94304

**ANDY AGLE**
DIRECTOR OF HOUSING AND ECONOMIC DEVELOPMENT
CITY OF SANTA CLARA
andy.agle@smgov.net
310-458 2251
1901 Main Street, Suite C
Santa Monica, CA 90405

**MALIA COHEN**
SUPERVISOR CITY AND COUNTY OF SAN FRANCISCO
Malia.Cohen@sfgov.org
415-554-7670
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, Ca 94102-4689

**LISA GILLMOR**
MAYOR, CITY OF SANTA CLARA
lgillmor@santaclaraca.gov
408-615-2250
1500 Warburton Avenue
Santa Clara, CA 95050

## Sares Regis Group of Northern California

**GREG SCHARFF**
MAYOR, CITY OF PALO ALTO
greg.scharff@cityofpaloalto.org
650-868-9303
445 Seale Avenue
Palo Alto, CA 94301

**SAM LICCARDO**
MAYOR, CITY OF SAN JOSE
Sam.Liccardo@sanjoseca.gov
408-535-4903
200 East Santa Clara Street, 18th Floor
San Jose, CA 95113

**JESSICA VON BORCK**
ASSISTANT CITY MANAGER, CITY OF FREMONT
JvBorck@fremont.gov
510-284-4008
3300 Capitol Ave.
Fremont, CA 94538

# DEVELOPMENT TEAM REFERENCES

## Curtis Development

**ARTHUR EVANS**
FORMER CEO A. F. EVANS COMPANY
aevans@afevans.com
510-708-1438
*Worked for Art for 6 years as President of multi-family subsidiary*

**RON NAHAS**
RAFANELLI & NAHAS
RNahas@rafnah.com
925-254-8800
*Co-developer and partner on 162 unit building currently under construction in Oakland*

**JOSEPH BOSS**
ljosephboss@gmail.com
415-647-7677
*Potrero Hill community member*

## Tenderloin Neighborhood Development Corp.

**CARL SHANNON**
MANAGING DIRECTOR, TISHMAN SPEYER
415-344-6630
cshannon@tishmanspeyer.com

**SCOTT FALCONE**
CITIZENS HOUSING CORPORATION
*(now dissolved)*
415-218-0411
scott@falconedevelopment.com

**GAIL GILMAN**
EXECUTIVE DIRECTOR,
COMMUNITY HOUSING PARTNERSHIP
415-929-2470
GGilman@chp-sf.org

# LETTERS OF INTEREST

STATE TEACHERS
RETIREMENT SYSTEM
OF OHIO

Western Office
1 California Street
Suite 2700
San Francisco, CA 94111-5428
415-352-3280
415-352-3293 (fax)
re.strsoh.org

RETIREMENT BOARD CHAIR
ROBERT STEIN

RETIREMENT BOARD VICE CHAIR
MARK HILL

EXECUTIVE DIRECTOR
MICHAEL J. NEHF

May 31, 2017

Ms. Susan Smartt
Executive Vice President
Related California Residential, LLC
44 Montgomery St #1300
San Francisco, CA 94104

Re: Balboa Reservoir Property
San Francisco, California

Dear Susan:

Please accept this letter as an expression of strong interest by the State Teachers Retirement System of Ohio (STRS Ohio) to provide equity capital for Related's proposed mixed income development known as the Balboa Reservoir Property in San Francisco. Based on our experience in partnership with Related at The Paramount, our knowledge of the San Francisco market, our tour of the site, and a review of the preliminary project economics, we agree that the proposed project would be very desirable particularly through its targeting of affordability for people of all ranges of income.

We understand that the proposed project will consist of approximately 680 residential units, including 120 market rate for-sale units, 444 mixed-income rental units, and 116 below market rate condominiums Of the 680 units total, we understand that 50% of these will be affordable.

STRS Ohio has provided equity to Related on nine similar transactions (including the Paramount and The Emerson in California) totaling over two thousand apartment units, so we are very comfortable with this structure. This opportunity follows our investment criteria, which includes core multifamily properties in high density urban locations in markets with high barriers to entry. The anticipated equity investment of approximately $70 million (of which Related would contribute 10%) is within our capital resources.

We would look forward to continuing our long and successful relationship with Related. All financing decisions would be subject to approval of our investment committee, the review and approval of business terms, required due diligence, and site assessment reports.

Sincerely,

William A. Shurman
Director-West Region
State Teachers Retirement System of Ohio

WELLS FARGO

**David Martin**
**Executive Vice President**

**Commercial Real Estate – New York**
150 E. 42nd Street, 37th floor
New York, NY 10017

Tel: 212.214.7490
Fax 917.260.1386
davidmm@wellsfargo.com

May 25, 2017

Mr. Gregory Vilkin
President
Related California Residential
44 Montgomery Street, Suite 1300
San Francisco, CA 94104

RE: Balboa Reservoir Financing Interest

Dear Mr. Vilkin:

Wells Fargo Bank, N.A. ("Wells Fargo") would like to express its possible interest in providing financing to Related in connection with the Balboa Reservoir Site in San Francisco, California. We welcome the opportunity to further discuss this new and exciting project with you and value the relationship we've cultivated with Related over the past 19+ years.

We consider Related to be a core client and our relationship with your firm continues to grow and be strong. Over the years, we've financed numerous projects on both a secured and unsecured basis, through multiple product lines, and in various geographies. Additionally, Wells Fargo and Related have deep relationships at the senior level of both firms dating 30+ years. As of April 2017, Wells Fargo has over $1 billion of loan commitments to Related and is in varying stages of committing and closing several upcoming transactions.

Wells Fargo is headquartered in San Francisco and has over $130Bn in real estate financing throughout the nation. We continue to be committed to real estate lending in the San Francisco market and look forward to discussing the Balboa Reservoir financing with you in more detail.

Please note that this letter is a preliminary expression of interest only and is not a commitment to lend.

Sincerely,
Wells Fargo Bank, National Association

By: _____
Name: David Martin
Title: Executive Vice President

Together we'll go far

# LETTERS OF INTEREST

The Resmark® Companies

May 30, 2017

Re: Balboa Reservoir RFP

To Whom It May Concern,

The Related Companies ("Related") and Sares Regis Group Of Northern California ("SRGNC") have presented us with the opportunity to potentially invest with them in the for-sale component of the Balboa Reservoir property, if they are selected to purchase and develop Balboa Reservoir by The City and County of San Francisco.

SRGNC is a long-time valued partner of The Resmark Companies – we have successfully invested with them in both for-sale and for-rent development projects across the Bay Area for over 10 years. They would be the excellent choice to execute the for-sale homes portion of the development.

In addition, The Resmark Companies partnered with Related on their very successful Ocean Avenue South project in Santa Monica, CA (featured in the group's RFQ). We believe Bill Witte and his team are premiere master developers.

If this team is selected to acquire the property, The Resmark Companies is interested in proceeding in assisting them in their development. Our involvement would be as an equity partner, subject to our full evaluation, review and due diligence.

Founded in 1995, The Resmark Companies is an institutional investment advisor with offices located in Los Angeles, Irvine, San Diego, California and McLean, Virginia. To date, Resmark has invested over $3B of equity in more than 200 investments. For more information about us please visit our website: http://www.resmark.com.

Sincerely,

Mitchell Goodman
Senior Vice President
The Resmark Companies

*Land and Housing* *Apartment Living* *Impact Ventures*
10880 Wilshire Boulevard Suite 1420 Los Angeles California 90024 PHONE (310) 474-8400 FAX (310) 474-8440
Resmark.com

# LETTERS OF INTEREST

Comerica Bank

May 24, 2017

Mr. Andrew Hudacek
Chief Investment Officer
**Sares Regis Group of Northern California**
901 Mariners Island Boulevard, Suite 700
San Mateo, CA 94404

Re: Balboa Reservoir Property, Lender Interest

To Whom It May Concern,

Comerica Bank is a regional bank with a long history of construction lending in the Bay Area. We have been fortunate to know Sares Regis Group of Northern California ("SRGNC") as a developer, borrower and client for over 20 years now and have closed over $300,000,000 of construction loans with them on both multi-family rental and for sale housing projects. In 2016, we closed a $33,000,000 construction loan for a 90 unit multi-family project in Redwood City, California , and a $38,000,000 construction loan for 73 for sale housing units in Belmont, California. As further evidence of our comfort with SRGNC, the principals and founders of the company have been through many up and down cycles with Comerica, and their relationship with the bank is valued all the way to the top executives of the bank.

Balboa Reservoir Property is the type of for sale housing community that we are comfortable lending on and a preliminary review of the proforma allows us to conclude that this type and size of construction project on which we would be happy to lend.

Please feel free to contact me directly with any questions or comments. I can be reached at my office at 408.556.5325 or on my cell at 408.348.1759.

Sincerely,

Candice Eggleston
Vice President-Western Division
Commercial Real Estate, Comerica Bank

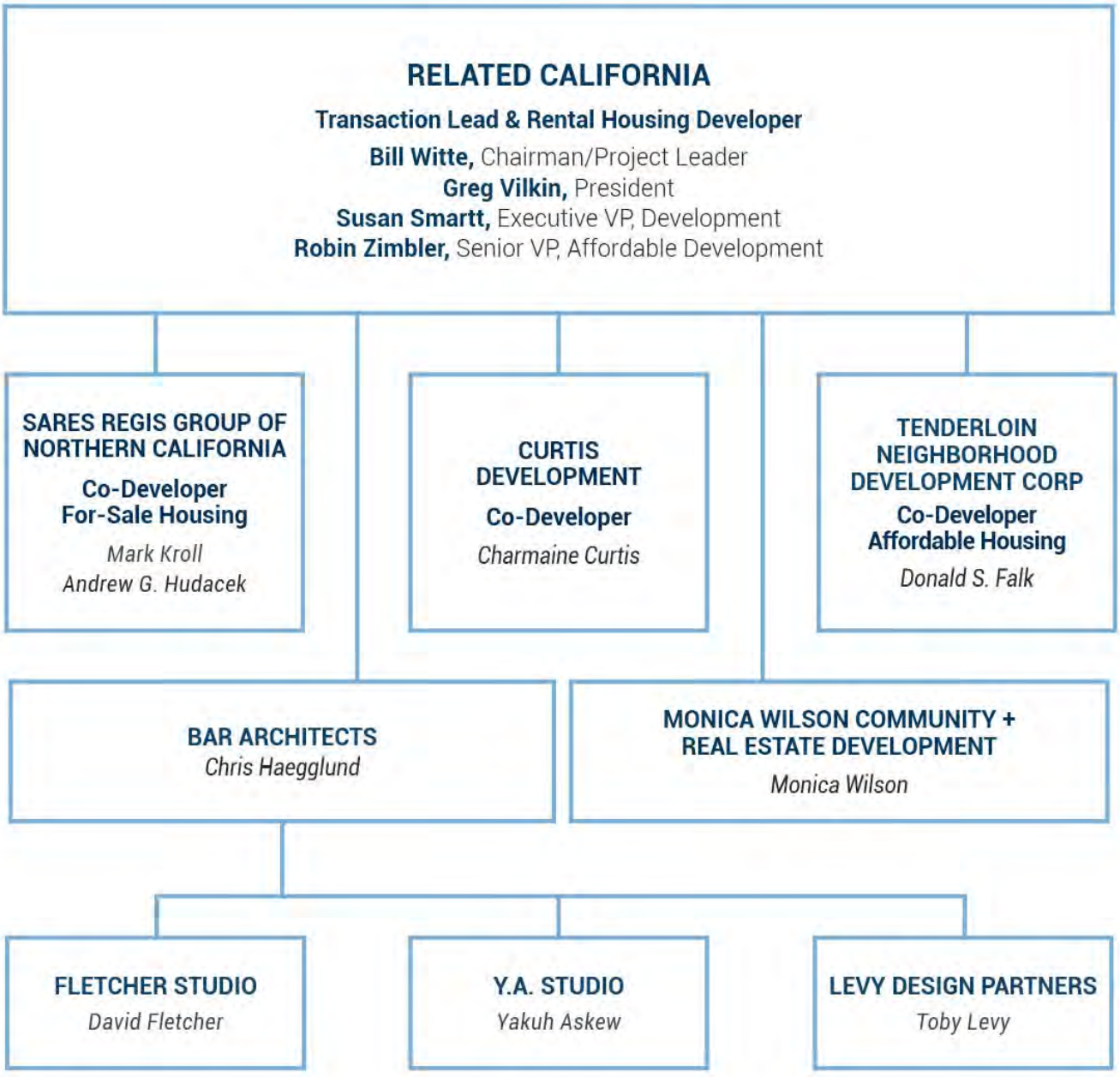
# PART 2

## DEVELOPER PARTNERSHIP

# DEVELOPER PARTNERSHIP

Related Companies of California and Sares Regis Group of Northern California, along with our development team partners, are pleased to submit our response to the Request for Proposal to design, entitle, purchase, and develop 17-acre SF PUC-owned property located in San Francisco, known as Balboa Reservoir. The general roles of the team members are as follows:

## ORGANIZATIONAL CHART



# NEW TEAM MEMBERS

## *TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORP*

The Tenderloin Neighborhood Development Corporation (TNDC) provides affordable housing and services for over 4,100 low-income residents in 6 San Francisco neighborhoods, building community and promoting equitable access to opportunity and resources. Founded in 1981 by a few people in the Tenderloin District of San Francisco, TNDC now has 39 properties in its property portfolio and employs 319 people, some who live in TNDC affordable housing buildings. In addition to housing development, TNDC focuses on community organizing, urban food growth and land use, and its after-school program with the idea that everyone should have good quality housing and good quality of life in the city they love. This year, TNDC celebrates its 35th birthday!

At TDNC, we believe opportunity knocks only when you have a door. In San Francisco, TNDC envisions diverse communities where people with low incomes can fulfill their potential and meet their basic needs. Their housing is affordable and near amenities and services enhance the quality of their lives. People feel safe and supported by their community. All are invited to offer their voice in the issues that shape their lives.

In San Francisco, California, TNDC stands as a catalyst for advancing community interests and a force for expanding the choices that enhance livability, including housing, employment, education, food, cultural activities, and open spaces.

As a healthy organization, TNDC is viewed as a trusted and well-organized community ally locally and is a practice leader nationally. We contribute throughout San Francisco by providing affordable housing and other resources partly by partnering effectively with many other organizations and by supporting resident leadership.

# NEW TEAM MEMBERS

## *TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORP*

### Donald S. Falk

*Chief Executive Officer*

As Chief Executive Officer of Tenderloin Neighborhood Development Corporation (TNDC), Donald S. Falk leads the community-based, nonprofit housing development, management and social services agency in San Francisco with nearly 325 employees and 33 properties containing about 3000 homes housing nearly 3600 people, nearly 25% of whom came to the organization out of homelessness. From 1982-1994, Falk held a variety of positions with Jubilee West, a neighborhood based nonprofit that provides services and housing in West Oakland. He chairs the Community Leadership Council and serves on the Boards of Directors of Enterprise Community Partners and the Corporation for Supportive Housing. He serves on advisory boards of NeighborWorks America, St. Francis Memorial Hospital Foundation, and the Federal Home Loan Bank of San Francisco. He is the past president of the Nonprofit Housing Association of Northern California, on whose board he served for seven years. Falk has a master's degree in Public Policy from the University of California, Berkeley, and a bachelor's degree with honors in Economics and Urban Studies from Oberlin College.

### Elizabeth Orlin

*Chief Operating Officer*

Elizabeth Orlin joined TNDC in June of 2006 as Chief Operating Officer. Prior, she served as Associate Director for the Corporation for Supportive Housing in Oakland. She also served as Program Officer and Assistant Program Officer from 1998 through early 2003. Before CSH, Orlin worked for the Trustees of Columbia University's CSS Program in New York where she was a program director and program supervisor, as well as a senior case manager. Orlin has completed social work internships from the CSS Program and the Sunset Park Mental Health Clinic in Brooklyn and began her career in social work at the Women Against Abuse Legal Center in Philadelphia in 1988. Orlin has a master's degree in Public Health from Columbia University, a master's degree of Social Work from New York University, and a bachelor's degree in Sociology and Anthropology from Haverford College.

# NEW TEAM MEMBERS

## *FLETCHER STUDIO*

Fletcher Studio is an innovative and award winning collaborative practice providing comprehensive professional services in Landscape Architecture, Urban Design, and Environmental Planning. The firm is committed to a collaborative and contextual approach to spatial design practice and to the planning of unique and sustainable landscapes, urban spaces, and living infrastructures. Design and planning solutions are proposed based on interaction with diverse stakeholders, and respond to the processes, histories, policies, economies and ecologies that are specific to a place. The firm is based in San Francisco, with projects throughout the Western Region.

Founding Principal of Fletcher Studio, David Fletcher is a Landscape Architect with 20 years of project experience. He has had significant experience in the design and project management of a variety of green infrastructure, public space, open space planning, housing, and streetscape projects. This experience has given David the design ability and technical experience to complete the conceptual, schematic and permanent portions of the project scope.

From their extensive work in projects and master planning in San Francisco, Fletcher Studio has gained experience in collaborating with multiple public agencies to maintain design quality and cost control. In addition, the firm has led community outreach efforts on strategic planning studies requiring the analysis of geographic site feasibility, site specific usage and programming, workshop leadership, and design review. The office is fully staffed, with the most current hardware and software resources to meet project goals. Fletcher Studio is presently working on construction administration for South Park, a beloved 1.1 acre public space in San Francisco. The firm is also working on the Dogpatch Central Waterfront Public Realm Plan and the Dogpatch Stairs, and recently completed their work on Summit Park. The studio was awarded 2015 and 2016 ASLA Honors Awards in the Residential Design category for their work on 300 Ivy and Rivermark.

# NEW TEAM MEMBERS

*FLETCHER STUDIO*

**David Fletcher, ASLA RLA**

*Principal*

David Fletcher is an urban designer and landscape architect, professor, and writer. His work addresses process, urbanized watersheds, green infrastructure, and post-industrial urbanism. David was recently an Artist in Residence at the Headlands Center for the Arts, in the category of Architecture and the Environment. He also received an Honor Award from the Boston Society of Landscape Architects for environmental planning work in Beirut, Lebanon. Fletcher Studio's work was recently featured in "La Ville Fertile", a survey of contemporary spatial practices at La Cité, Paris. The office's work has also been exhibited at La Gaîté Lyrique (Paris), the Cooper Union, Acadia 2012, the San Francisco Museum of Craft and Design. The Studio for Urban Projects, the Institute for Contemporary Art (Boston), the University of Toronto, UC Berkeley, MAK Center Vienna, the San Jose Biennial, the Toronto Free Gallery, and at sci_Arc.

**SUMMIT PARK** | SAN FRANCISCO, CA

# NEW TEAM MEMBERS

*Y.A. STUDIO*

HUNTERS PARK BLOCK 48
SAN FRANCISCO, CA

POTRERO HILL BLOCK X
SAN FRANCISCO, CA

Y.A. studio is an architectural design studio committed to bringing an innovative and modern approach to design. Our practice is collaborative, supportive, and committed to developing skilled professionals who continue to improve our built environment and elevate our social discourse. We strive to understand the client's needs and nurture a vision that integrates sustainable practices, well-crafted details, and holistic designs. We engage the community, support the environment, respect budgets and schedules, enjoy challenges, and craft solutions that often exceed client expectations. We embrace a diverse portfolio that includes custom single family homes, affordable housing, large multi-family developments, restaurants, office and retail. We are thoughtful, creative, experienced, engaging, socially responsibility and environmental stewards. Y.A. studio is registered as a Certified Minority-Owned, San Francisco Local Business Enterprise (LBE), and Micro Business Enterprise (MBE).

The firm has played an active role in some 200 units of new housing in San Francisco's Mission District—a flash point for issues surrounding gentrification, the lack of new affordable housing developments, and the demolition of older San Francisco housing stock. In doing so, Y.A. studio has a record of being an effective bridge between the client's programmatic needs, larger neighborhood concerns and the overall landscape of the city.

# NEW TEAM MEMBERS

*Y.A. STUDIO*

### Yakuh Askew, AIA, NOMA, LEED AP

*Principal*

Since establishing Y.A. studio in 2004, Yakuh Askew, AIA, NOMA, LEED AP, has fostered a collaborative and creative studio that is versatile, efficient and effective. A native of San Francisco, he is passionate about socially responsible growth and has fought to balance the needs of the community, the environment and individual clients. Yakuh is a graduate of Cal Poly, San Luis Obispo, CA and has traveled extensively. Prior to Y.A. studio his portfolio included large corporate offices, restaurant design, and single-family residential work. Yakuh is a member of the Nation Organization of Minority Architects (NOMA), Citizen's Bond Oversight Committee (CBOC), SPUR, AIA, and an avid ice hockey player.

# NEW TEAM MEMBERS

## *LEVY DESIGN PARTNERS*

5100 EL CAMINO
SAN FRANCISCO, CA

LOS ALTOS, CA

Founded in 1979, Levy Design Partners is a woman-owned architecture firm based in San Francisco providing complete architectural services from programming and conceptual design to construction administration.

LDP has successfully completed a wide variety of market-rate and affordable multi-family housing projects in San Francisco, the Peninsula and the East Bay.

Our 35-year firm history and portfolio of many long term clients include private developers, large corporations, government agencies, public and private educational facilities, and non-profit organizations. These clients can attest to our ability to maintain design and production quality on complex projects and to our commitment to meeting the functional, financial and schedule constraints critical to a project's success.

35 DOLORES
SAN FRANCISCO, CA

# NEW TEAM MEMBERS

*LEVY DESIGN PARTNERS*

**Toby S. Levy, FAIA**

*Principal & Founder*

As founding principal of Levy Design Partners in 1979, Toby S. Levy brings almost forty years of highly-engaged leadership in the design profession and community. She oversees and participates in all aspects of the firm's work from programming to design, design production, and construction. Her work has been widely recognized, and the American Institute of Architects honored her with the title of Fellow (FAIA) in recognition of her contribution to advancing the standards of architectural practice, education and training. Throughout her years of professional practice, she has regularly taught architecture at institutions including the University of California at Berkeley, Columbia University and the California College of the Arts and Crafts. As a result of her participation on the University of California at Berkeley Design Review Team and the AIA Design Review Committee, she has developed a broad perspective on the successful resolution of design problems. Toby has long been committed to positive community input in the design process. As vice chair of the Western SOMA Citizen Planning Taskforce she helped guide rezoning and as the leader of the South Park Improvement Association she spearheaded the funding and design of the recent revision of South Park in San Francisco.

# NEW TEAM MEMBERS

## *MONICA WILSON/COMMUNITY + REAL ESTATE DEVELOPMENT*

With offices in San Francisco's Bayview district, Monica Wilson/Community + Real Estate Development, is a woman-owned, small and emerging consulting firm (LBE/WBE) specializing in developing, implementing, and monitoring comprehensive Economic and Community Development services including the following:

- SBE Procurement: Professional Services and Construction
- Small and Emerging Contractor Development Services (Professional Services and Construction firms)
- Workforce: Construction
- Internship/Trainee: CIWI (Construction Industry Workforce Initiatives)
- Community Benefits Strategic Planning and Implementation
- Extensive Community Outreach and Engagement

# NEW TEAM MEMBERS

## *MONICA WILSON/COMMUNITY + REAL ESTATE DEVELOPMENT*

### Monica Wilson

*Principal & Founder*

Monica Wilson has over 25 years of consulting and real estate development experience in the Bay Area implementing complex, large scale, public/private projects. She has worked extensively in the following Bay Area urban markets: San Francisco (including Bayview, Mission District, and Western Addition), Richmond, Oakland, and Berkeley. Community-based outreach includes engaging with the following core groups: small and emerging community-based businesses and associations, community-based organizations, residents, neighborhood access point systems, faith-based entities.

Over the last several years, Monica has completed numerous LBE/SBE Professional Services procurement assignments all achieving or exceeding LBE and/or SBE percent participation goals. In addition, extensive community-based outreach and engagement, including local professional services/trade organizations, community organizations, local chambers of commerce, and community newspapers, is conducted within the larger LBE/SBE community to maximize project awareness and exposure. In total, she has provided targeted economic and community development services to ensure that over $25 million in SBE/LBE contracting opportunities were awarded to local small and emerging businesses, including MBEs and WBEs.

Monica is also the Program Director (and a founding member) of Construction Industry and Workforce Initiative (CIWI), is a young adult program targeted to students (18-21 +/- years) enrolled in a two- to four year- college program. CIWI goals are to provide direct construction industry work experience, a comprehensive leadership and mentor component, personal, and educational and career development opportunities for young adults with an interest in construction and/or related fields (such as Real Estate Development, Architecture, Urban Design, and Civic Engagement) so that they may gain a greater awareness of the construction industry, which may ultimately lead to pursuing education and career opportunities within the field.

For over five years, Ms. Wilson worked for Sedway Consulting, a San Francisco-based economics consulting firm, on numerous community-based economic and community development assignments such as early stage market feasibility studies/due diligence for Hunters Point Shipyard, the Clinton Administration's Empowerment Zone/Enterprise Community initiatives, and several HOPE VI/HOPE SF projects.

# PART 3

## PROJECT PROPOSAL

# NARRATIVE OVERVIEW

## *DEVELOPMENT PROGRAM*

| PROGRAM | TYPE | TARGET AMI | % MIX | % MIX | UNITS | AVE NSF | Total NSF | Total GSF |
|---|---|---|---|---|---|---|---|---|
| Developer Subsidized Affordable Units Up To 33% | | | | | | | | |
| Studio | Rental | 50% | 22.8% | 4.1% | 28 | 450 | 12,600 | 15,750 |
| 1 Bedroom | Rental | 50% | 30.9% | 5.6% | 38 | 650 | 24,700 | 30,875 |
| 2 Bedroom | Rental | 50% | 39.0% | 7.1% | 48 | 850 | 40,800 | 51,000 |
| 3 Bedroom | Rental | 50% | 7.3% | 1.3% | 9 | 1,100 | 9,900 | 12,375 |
| **SUBTOTAL / WEIGHTED AVE** | | **50%** | **100.0%** | **18.1%** | **123** | **715** | **88,000** | **110,000** |
| Studio | Rental | 120% | 22.5% | 3.4% | 23 | 500 | 11,500 | 14,375 |
| 1 Bedroom | Rental | 120% | 31.4% | 4.7% | 32 | 675 | 21,600 | 27,000 |
| 2 Bedroom | Rental | 120% | 39.2% | 5.9% | 40 | 900 | 36,000 | 45,000 |
| 3 Bedroom | Rental | 120% | 6.9% | 1.0% | 7 | 1,100 | 7,700 | 9,625 |
| **SUBTOTAL / WEIGHTED AVE** | | **120%** | **100.0%** | **15.0%** | **102** | **753** | **76,800** | **96,000** |
| City Subsidized Affordable from 33% to 50% | | | | | | | | |
| 1 Bedroom | BMR For Sale | 80% | 20.6% | 1.0% | 7 | 675 | 4,725 | 5,906 |
| 2 Bedroom | BMR For Sale | 80% | 58.8% | 2.9% | 20 | 900 | 18,000 | 22,500 |
| 3 Bedroom | BMR For Sale | 80% | 14.7% | 0.7% | 5 | 1,100 | 5,500 | 6,875 |
| 4 Bedroom | BMR For Sale | 80% | 5.9% | 0.3% | 2 | 1,400 | 2,800 | 3,500 |
| **SUBTOTAL / WEIGHTED AVE** | | **80%** | **100.0%** | **5.0%** | **34** | **913** | **31,025** | **38,781** |
| 1 Bedroom | BMR For Sale | 120% | 20.6% | 1.0% | 7 | 675 | 4,725 | 5,906 |
| 2 Bedroom | BMR For Sale | 120% | 58.8% | 2.9% | 20 | 900 | 18,000 | 22,500 |
| 3 Bedroom | BMR For Sale | 120% | 14.7% | 0.7% | 5 | 1,100 | 5,500 | 6,875 |
| 4 Bedroom | BMR For Sale | 120% | 5.9% | 0.3% | 2 | 1,400 | 2,800 | 3,500 |
| **SUBTOTAL / WEIGHTED AVE** | | **120%** | **100.0%** | **5.0%** | **34** | **913** | **31,025** | **38,781** |
| 1 Bedroom | BMR For Sale | 150% | 9.8% | 1.5% | 10 | 675 | 6,750 | 8,438 |
| 2 Bedroom | BMR For Sale | 150% | 28.4% | 4.3% | 29 | 900 | 26,100 | 32,625 |
| 3 Bedroom | BMR For Sale | 150% | 6.9% | 1.0% | 7 | 1,100 | 7,700 | 9,625 |
| 4 Bedroom | BMR For Sale | 150% | 2.0% | 0.3% | 2 | 1,400 | 2,800 | 3,500 |
| **SUBTOTAL / WEIGHTED AVE** | | **150%** | **47.1%** | **7.1%** | **48** | **903** | **43,350** | **54,188** |
| Market Rate Rentals | | | | | | | | |
| Studio | Rental | N/A | 22.8% | 7.4% | 50 | 560 | 28,000 | 35,000 |
| 1 Bedroom | Rental | N/A | 31.1% | 10.0% | 68 | 700 | 47,600 | 59,500 |
| 2 Bedroom | Rental | N/A | 39.3% | 12.6% | 86 | 1,000 | 86,000 | 107,500 |
| 3 Bedroom | Rental | N/A | 6.8% | 2.2% | 15 | 1,300 | 19,500 | 24,375 |
| **SUBTOTAL / WEIGHTED AVE** | | **N/A** | **100.0%** | **32.2%** | **219** | **827** | **181,100** | **226,375** |
| Market Rate For Sale Townhomes | | | | | | | | |
| 1 Bedroom | For Sale | N/A | 5.0% | 0.9% | 6 | 800 | 4,800 | 5,647 |
| 2 Bedroom | For Sale | N/A | 10.0% | 1.8% | 12 | 1,250 | 15,000 | 17,647 |
| 3 Bedroom | For Sale | N/A | 60.0% | 10.6% | 72 | 1,500 | 108,000 | 127,059 |
| 4 Bedroom | For Sale | N/A | 25.0% | 4.4% | 30 | 2,000 | 60,000 | 70,588 |
| **SUBTOTAL / WEIGHTED AVE** | | | **100.0%** | **17.6%** | **120** | **1,565** | **187,800** | **220,941** |
| **TOTAL / WEIGHTED AVERAGE** | | | **100.0%** | **100.0%** | **680** | **940** | **639,100** | **785,066** |

# NARRATIVE OVERVIEW

*DESIGN APPROACH & CONCEPT*

Dynamic, evolving environments

Community-oriented open space

## Leveraging the Site's Natural Context

**Reimagining the reservoir**: a site once intended for water collection is repurposed and designed to gather San Franciscans. The site connects to the existing neighborhood fabric through an armature of uniquely designed open spaces, which encourage the flow of people, native species and water systems to create a central sense of place for the community at large.

San Francisco's neighborhoods are defined by their built fabric, topographical constraints, cultural history, public open spaces and connection to adjoining neighborhoods. The Balboa Reservoir site provides opportunity to stitch and connect. Analogous to the flow of watersheds, the proposed master plan includes meandering routes which ebb, flow and eddy through the project. These pathways are located within three primary open spaces and provide safe and walkable connections through the site.

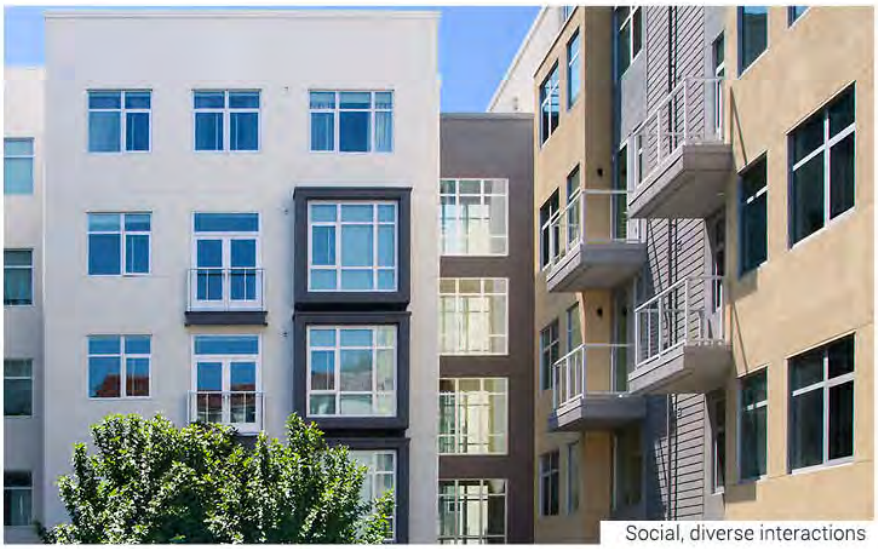
The site will be regraded to create a gently sloping plane which seamlessly connects what was a void with its surrounding topographical context, allowing for easy pedestrian, stroller and bike circulation. The site's slope provides opportunity for buildings to step in relation to street slopes, similar to buildings throughout San Francisco, to create a more active pedestrian experience.

## Establishing a Cohesive Public Realm

The site's three open spaces combine into one unified network, creating a varied pedestrian experience. Westwood Green and Mt. Davidson Walk are oriented north-south, and Reservoir Square is oriented east-west, connecting all three open spaces with CCSF and San Ramon Way. The open spaces act as an armature, around which buildings are arranged based on strengthening site connectivity, forming the scale of the outdoor room, reinforcing the urban pattern of the surrounding neighborhood and responding to natural systems. The network of pedestrian paths, parks, bikeways

# NARRATIVE OVERVIEW

Connection to natural senses



Social, diverse interactions

Warming, personal realms

Interactive, educative play areas

Relaxing ambience

Safe play areas for children

and streets interconnect the spaces and buildings on the site. These interconnections are carefully aligned with important nodes at the perimeter of the site, strengthening and defining access to the site and the neighborhood beyond.

Westwood Green is part of a nearly half mile shared use pedestrian/bicycle path, which extends along the perimeter at the north, west and south. The greenspace provides an area for runners, walkers, dog-walkers and bicyclists to meander through landscape. The second primary open space, Mt. Davidson Walk, runs north/south and is lined with building forms held well back to provide a main view corridor to the eponymous Mt. Davidson to the north. This open space is adjacent to Brighton Avenue, a woonerf, designed as a hybrid vehicular and pedestrian zone.

# NARRATIVE OVERVIEW

Inviting, charming lifestyles

Welcoming courtyards

Warm, personal living areas

Connecting Mt. Davidson Walk and Westwood green is the Reservoir Square Axis. At the west this axis acts as a pedestrian continuation of San Ramon Way, which is continuous across the site until it meets with CCSF to the east. While Westwood Green and Mt. Davidson Walk are spaces to meander, Reservoir Square, and its axis, represent an eddy in the pedestrian circulation – a place to rest, meet neighbors and gather. The west side of the site is mostly landscaped. To the east of Mt. Davidson Walk the space broadens and further eddys as it becomes Reservoir Square, which is the main community gathering space surrounded by active uses. Near the square at ground level are programmed activities, Leasing Office, a retail space, and public Community Room. The Reservoir Square visually links CCSF to Westwood Park and beyond. San Bruno Mountain is visible from Lee Avenue and the residences on the east side of the site.

**Sustainability and the Natural Environment**

At the experiential core of Mt. Davidson Walk is a landscape amenity that functions as the site water management system. A series of bioswales capture the site's storm water, and cascade naturally down stepping terraces towards Reservoir Square. Running parallel to the bioswales are pathways and Brighton Avenue, which is designed as a curbless street, to encourage the slowing of vehicles and allow the public space to continue uninterrupted from building to building. Both the street, a woonerf and the stormwater bioswales become a singular environment routed in the site's lore while projecting current and future San Francisco neighborhood values.

**Interconnectivity with the Community at Large**

The open spaces provide for a direct connection to established neighborhood vehicular, pedestrian and bicycle circulation routes.

Symbolic connections are made through establishing clear view corridors to Mt. Davidson and San Bruno Mountain as well as through organizing the housing on the site to relate to neighborhood growth patterns. Low, two-story townhomes follow the edge of the Westwood Green and relate to the scale and massing of the adjacent Westwood Park neighborhood. Each townhouse has a stoop with direct access to Westwood Green and creates a place for homeowners to see neighbors walking home. Taller buildings are placed next to the two existing midrise apartments on the southern edge and along Lee Avenue with direct proximity to the Ocean Avenue transit core and CCSF. These buildings are shaped to present narrow facades to the existing Avalon buildings along Ocean Avenue and Westwood Park homes. The façade of the building facing the Westwood Park neighborhood is stepped back, lowering it by a floor, presenting the same height as the Townhomes to the north.

# NARRATIVE OVERVIEW

Outdoor dining areas

Unique home-making

Places for social gathering

**Creating a Diversity of Living Options**

The richness and integrity of residential neighborhoods in San Francisco is due, in part, to the variety of buildings. To this end, the development team will leverage a variety of architects to create buildings with unique architectural expression. A unifying design principle for the architecture is an approach to crafting a scale and proportion appropriate for residential buildings. This is achieved in part through changes in parapet and roof height, balconies and breaks in the facades to reduce the overall scale and provide visual interest.

Townhouse units are mainly two stories in height with some three-story units to provide variety of massing and roof line. All the townhouses sit on a parking podium that is concealed on Brighton Avenue by units at street level. The parking structure is covered by the earth berm on its south, east and north edges.

There are four midrise residential buildings along Lee Street, anchoring the more urban eastern edge. These residential buildings, providing flat style apartment living, are four or five stories tall and are "C" shaped in plan, with their open end facing south to allow the sun to penetrate the outdoor spaces. The landscaped courts of these buildings seamlessly flow into the more public landscaped zones and park. These building have stoops facing both Lee and Mt. Davidson Walk to provide easy access to residents.

Like other neighborhoods along the Ocean Avenue, Ingleside Terrace and the Westwood Park, whose urban form recall their histories, the design is also about its place. The clear and simple major north/south and east/west axes strengthen connections to the surrounding neighborhoods and institutions. The pattern of adjacent blocks is continued through the site through both vehicular and pedestrian/bike only axis. New streets are treated as extensions of the existing network. Neighboring residents will be able to access the site on foot or bicycle from the west through the existing connection of San Ramon Way. New site grading allows easy access to the center of the site, through Reservoir Square to CCSF. From Ocean Avenue one can enter the site on foot or by bike through the Plymouth Ave alleyway and at Brighton Avenue. Pedestrian walkways create mid-block passages for pedestrian and bicycle movement. With the additions proposed in the CCSF campus masterplan, a main axial east/west pedestrian connector is described that is aligned with the main circulation pathway through our central open space. The retail space and the community room are both located on the eastern edge of the central open space are

# NARRATIVE OVERVIEW

accessible to the CCSF community.

Vehicles enter at Lee Avenue. Visitors to residents arriving in cars access the site via Lee Avenue connecting to Brighton Avenue by two east/west streets. All Parking is in a structure below the townhouses. A modest amount of on street parking is available. There are drop-off zones for the Community Room and the Childcare facility, car share and car pools.

Bike friendly neighborhoods

Connections to street

Convenient public realm

## Transportation Approach

"The thoughtful Transportation Principles outlined in the "Balboa Reservoir Development Principles & Parameters" (Balboa Vision) are a bold look at a number of transportation opportunities.

A common thread throughout our commitment to the Balboa Vision will be a custom mobile application available 24/7 to residents and neighbors as well as City College facility and students preliminarily called Commons Connect. One touch on your mobile device will provide you instant information on available Balboa Area transportation options, strengthening the effectiveness of the Balboa Vision goals.

Responding to each Transportation Principle:

### Principle 1 – Parking

Our goal is to minimize the impact on the parking in the neighborhoods surrounding the site. This can only be accomplished by offering our new residents a broad range of transportation alternatives.

Unbundled Parking: All parking in both the rental and for-sale residences will be "unbundled" with only those residents who opt to utilize on-site parking will pay for it.

Parking Ratios: As suggested in the Balboa Vision, while the overall site parking ratio will be determined once the development and type and number of units are finalized, our goal is to not exceed the suggested 0.5 parking spaces per unit. The combination of our commitment to unbundling as well as the additional transportation options that follow will make this minimized parking goal a reality.

TDM Plan: Our full participation in the Balboa Area TDM Plan is essential if we are to appropriately address the transportation challenges of the neighborhood and our new community. In order that the Plan's goals and objectives can be continually addressed in a timely manner, we are suggesting that the Manager of the Balboa Area TDM Plan's office be located in Related's on site management offices allowing for constant communication with the community managers as well as the surrounding neighborhoods and

# NARRATIVE OVERVIEW

Connection to surrounding context

City College. The feasibility of shared, daily on-site parking will be thoroughly explored.

On Street Parking: Working with the SFMTA, our on site staff will have full enforcement authority over all newly created street parking within the development

**Principle 2 – Incentivize Transportation Choices**

AMS Targets: With our commitment above to staff the TDM Plan, monitoring and positively impacting the automobile mode share to a level below 60% in the development's first phase can be easily facilitated. Communication of the TDM strategies and goals is imperative. Commons Connect will provide TDM Plan performance goal information 24/7 to all those interested.

Car Share and Ride Share Availability: Our initial proposal calls for 1.5 times the number of car share spaces required by SF ordinance. Spaces will be located on Lee Avenue and car seat storage lockers adjacent to these car share spaces will be available. We will work with local car and ride sharing organizations to provide the best discounted membership pricing and will provide a 50% credit on the first year of membership to those residents who choose obtain a car or ride share membership. Working with the car and ride share companies, we envision Commons Connect will be able to offer 24/7 direct connections, availability and location information on shared cars and available ride shares.

Local Shuttle Service: During the pre-development stages, we will work with the community, the college and our shuttle consultant to review the feasibility and costs of a shuttle service.

Prioritize Pedestrian Safety and Access: The proposed site design provides multiple pedestrian and bicycle routes both through the site as well as to the adjoining transit options and neighborhood retail as well as community amenities. New lighting and street amenities will improve the experiences of residents and neighbors alike. All proposed streets, sidewalks and pedestrian facility designs will be consistent with Better Streets Plan and all improvements will be coordinated with SFMTA pedestrian and bicycle improvement beyond the site.

Encourage Transit Use: The Commons residents have a wide variety of transportation options available to them including public transit, car and ride sharing, bike sharing and the like. Related and our partners will encourage use of these transportation options, making ticket information and real time transit schedules readily available via Commons Connect as well as on monitors in the Commons Square area.

Encourage Bicycling: Class 1 bicycle storage rooms will be available throughout the community with a capacity of 1.5 bicycle spaces per residential unit. Dedicated bike lanes within the new development will connect to bike lanes beyond the community. Full conformance with the San Francisco Bicycle Plan is anticipated. We will work with bike sharing organizations to offer share bicycle opportunities on-site. We will share in the first year annual cost of a bike share membership with each new household in our community. Regular classes and instruction on Safe Bicycling will be provided at the new Community Center as well as 24/7 on Commons Connect.

Electric car charging stations in the garages throughout the community will be plentiful and electric capacity will be upsized to adequately handle the increasing needs for additional stations.

# NARRATIVE OVERVIEW

Privacy through landscaping

Timeless homes and parks

Welcoming open spaces

**Principle 3 – Site Design**

Street and Circulation Patterns: Acknowledging the lower density neighborhoods to the west of the site and the high school to the north, all vehicular access will be from Phelan Avenue to the east and Lee Ave to Ocean Avenue to the south. No vehicular access is anticipated to the west or north. Numerous pedestrian and bicycle access points are planned around and through the site to connect the new community with the surrounding neighborhoods. With the parking garages planned for the west side of the site, vehicular cueing will take place within the new community. All access points have been designed in coordination with the City College Master Plan.

**Principle 4 – Encourage Sustainable Modes of Transportation**

More than any other of the Transportation Principles, the development of the Commons Connect mobile application will facilitate all that is envisioned in Principle 4 and more. Instant 24/7 transportation options will be available to all residents, neighbors and members of the City College community. Availability of transit, ride sharing, car- pooling, bike and car sharing and much more will be at the fingertips of all residents and neighbors. Coordinated events, community clubs, and contests centered around biking, walking, hiking or traveling will be simple to organize and promote. A sense of community will develop as residents and neighbors alike with mutual interests can convene in the new Commons Community Center.

## Phasing of Project Build-Out

The project will be built as an integrated development. We envision, however, individual project schedules for the Townhomes, 80/20 Rentals, and BMR Ownership Units that fall within the context of the broader development timeline. The Townhomes will be phased in 2 phases - approximately 50 homes and then 70 homes in accordance with the podium garages below the homes. The phasing allows a more consistent and manageable sales and delivery process, ensuring that standing inventory does not impair the project. It is envisioned that the phases would be built one after the other without any significant delay. The remainder of the project (the 80/20 Rentals and the BMR Ownership Units) will not be phased but will be built as a single integrated development, commencing with Phase 1 of the Townhomes and proceeding through Phase 2. Landscaping and amenity areas will be completed toward the latter half of the project but will be available when the project is delivered along with Final Certificates of Occupancy. The intent of the Sponsor is to delivery all components of the project within the detailed project schedule contained in Part 5B.

# CONCEPT DRAWINGS - "THE COMMONS" SITE PLAN

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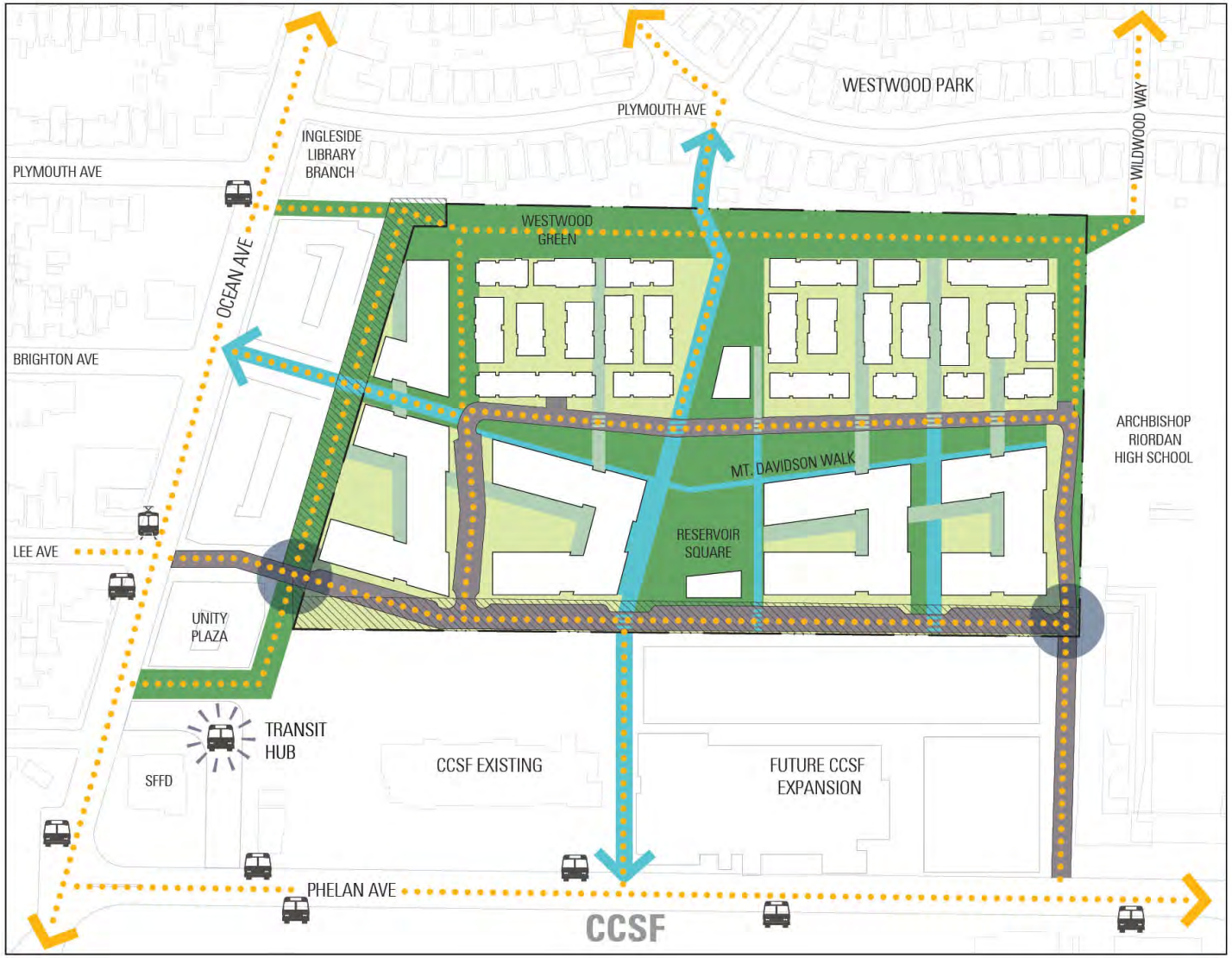
# CONCEPT DRAWINGS - "THE COMMONS" PUBLIC REALM CONCEPT PLAN




**LEGEND**

- Public Open Space
- Public Circulation
- Semi-public Circulation
- Vehicular Circulation
- Easements
- Bicycle Routes
- Vehicular Entry Points

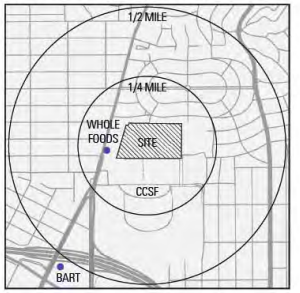
The diagram shows the location of major and minor public spaces and their relationships to the existing urban fabric. The main pedestrian, bicycle, vehicular circulation and main entries to the site are part of a network that seamlessly knits Balboa Reservoir into the surrounding neighborhood.

Reservoir Square is a centrally located, 1.7 acre park and open space contiguous with Mount Davidson Walk. Active uses such as the Community Room, a Retail Venue, Bicycle Repair, and Child Care are located around and within this central open space. Along Mount Davidson Walk, the rainwater management system of bio-swales is a critical component of the overall landscape concept and will transport, filter, and store all of the rainwater on-site.

A number of other smaller scale, more intimate outdoor spaces and parklets are to be found within and adjacent to the central open space. Each residential building has its own landscaped courtyard.

Westwood Green is a shared use pedestrian / bicycle pathway more than a half mile long that is integrated into the overall site circulation system providing opportunities for exercise and recreation as well as an effcient way to move about the site.

Area Plan with Walking Distances




NOT TO SCALE



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# CONCEPT DRAWINGS - “THE COMMONS” AERIAL VIEW

AERIAL VIEW LOOKING SOUTHWEST, FUTURE CITY COLLEGE OF SAN FRANCISCO BUILDINGS IN THE FOREGROUND



O-WPA3

# CONCEPT DRAWINGS - "THE COMMONS" AERIAL VIEW

AERIAL VIEW LOOKING NORTHEAST, WESTWOOD PARK NEIGHBORHOOD AND OCEAN AVENUE IN THE FOREGROUND



O-WPA3

## CONCEPT DRAWINGS - “THE COMMONS” PERSPECTIVE

LOOKING NORTH FROM RESERVOIR SQUARE, MOUNT DAVIDSON IN THE DISTANCE



O-WPA3

# CONCEPT DRAWINGS - "THE COMMONS" PERSPECTIVE

LOOKING WEST TOWARD WESTWOOD PARK NEIGHBORHOOD, CLUB BUILDING IN CENTER OF VIEW



O-WPA3

# CONCEPT DRAWINGS - "THE COMMONS" PERSPECTIVE

LOOKING NORTHWEST INTO RESERVOIR SQUARE, COMMUNITY ROOM IN CENTER OF VIEW



O-WPA3

# NARRATIVE & DEVELOPMENT PRINCIPLES

**We have fully complied with all Parameters set forth in the RFP. Listed below is a reference to specific sections where compliance is demonstrated. In some cases we have added information, as appropriate, to further expand on our project's intent and compliance. Please note that the project plan represents our first attempt to respond to the intent of the RFP, but as is our practice on all projects, we expect it to be modified and refined as part of a broad community outreach.**

## Housing

*PLEASE REFER TO DEVELOPMENT PROGRAM IN PART 3, SECTION A*

**Principle 1** – Building new housing for people at a range of income levels

**Principle 2** – Create housing that can serve a diverse group of household types Help to alleviate City's undersupply of housing.

Our proposal contemplates a 5-tier approach to reach a very wide range of incomes and make available units as both rentals and for-sale townhomes and condominiums. The area surrounding Balboa Reservoir is rich in diversity and our project aims to maintain and add to this character. By providing housing to a broad range of incomes, we hope to encourage an environment of mutual respect, inclusion and sense of neighborhood. To this end, we believe it crucial to build a community where the residents interact, co-mingle and cohabitate, sharing elevators, corridors, amenity areas and eventually conversations and experiences. The rental housing in particular, will be intermixed and interspersed without isolating any particular group of residents. The ownership units will also be interspersed and will be home to people of wide ranging incomes, serving both market rate residents and those earning up to 80%, 120% and 150% of AMI. The specific AMI bands and target residents are as follows:

- **50% AMI Rentals:** The 50% AMI units will address the shortage of affordable housing available to the very low income residents who are critical for the City to function and thrive; bus drivers, non-profit workers, and restaurant and retail employees. This will represent 18% of the units delivered on site or approximately 123 units.
- **120% AMI Rentals:** The 120% AMI rentals will provide relief for moderate income households, those who earn above the median income levels but still can't afford market rate housing within the City. It is proposed that 25% of these units will also carry a preference for educators; this concept is further explained below. This will represent 15% of the units delivered on site or approximately 102 units.
- **80%, 120%, and 150% AMI Condominiums:** These below market ownership units will target those within the City who provide an essential service to our community but are unable to afford the rising cost of buying a home. These homes would target teachers, policeman, firemen, and others who are currently underserved in the City. The availability of ownership units within these AMI bands provides prospective residents the ability to choose a unit which meets their specific needs, goals and financial capability. This will represent 17% of the total housing units delivered on site, or approximately 116 units. Finally, it is proposed that 25% of these units will carry a preference for educators, a concept further explained below.
- **Market Rate Rentals and Townhomes:** Lastly, the project will comprise 50% market rate housing, both rentals and ownership units. The inclusion of market rate units provides the land value which helps subsidize the affordable units.

# NARRATIVE & DEVELOPMENT PRINCIPLES

## Flexibility of Design

The programming outlined within this proposal was carefully considered to ensure the project was financially feasible while providing a solution to an increasing problem in the City; affordable housing. In particular, there was much discussion on the affordability mix of the units that take the project from 33% to 50% of affordable housing. The current proposal provides 116 ownership units at a mix of income levels which we feel represents the needs across the City as well as the Balboa Park neighborhood. One of the key components of this proposal is the ability to be flexible in selecting the desired mix of affordable units; both from a financial perspective as well as a mission oriented one.

We have prepared an analysis which describes the amount of subsidy required per unit within the AMI bands under consideration for this proposal (50% to 150% AMI) [see Page 2 of Financial Pro Forma – "Subsidy Analysis"]. The subsidy is calculated based on a 5.5% yield on cost for the rentals and an 8% profit margin for the BMR ownership units.

Though we have selected a particular scenario within our programming as described in the narrative, the City can conduct its own analysis of the subsidy calculations within the context of the community's need and make a determination of the desired AMI mix for these 116 units. Based upon that desire, the subsidy required will either increase or decrease depending on the AMI mix chosen. We believe this flexibility provides the City a greater level of input and the ability to inform the programming based on its knowledge of the local community's needs.

## A Preference for our City's Educators

The development proposes that 25% of the 116 affordable for-sale units (at 80%, 120% and 150% of AMI) and 25% of the moderate income rental units (at 120%) will carry a preference for faculty of City College SF (CCSF) and/or teachers and licensed aides employed by the San Francisco Unified School District (SFUSD). Thus, roughly 8% of the total number of housing units and 16% of the Below Market Rate units would carry this preference. These income ranges closely conform to the range of salaries of these two groups.

| TEACHER PREFERENCE SUMMARY | | | |
|---|---|---|---|
| Percentage to Carry Preference | | | 25% |
| AMI | Type | Total Units | Teacher Units |
| 80% AMI | BMR For Sale | 34 | 9 |
| 120% AMI | BMR For Sale | 34 | 9 |
| 120% AMI | Rental | 102 | 26 |
| 150% AMI | BMR For Sale | 48 | 12 |
| Total | | 218 | 56 |
| **Percent of BMR Units** | | | **16%** |
| **Percent of Total Units** | | | **8%** |

Based on past analyses that have been done regarding potential disparate impact claims under fair housing law, it seems likely that the makeup of the eligible employees of these institutions would not result in a disparate impact. Given current housing costs in San Francisco, SFUSD certificated employees and CCSF faculty are unable to rent or buy housing in the City at an affordable rent or purchase price. The

# NARRATIVE & DEVELOPMENT PRINCIPLES

affected institutions should be able to demonstrate that lack of affordable housing has an adverse impact on their ability to recruit and retain faculty and therefore has a negative effect on their ability to carry out their educational missions. Without access to affordable housing it does not seem likely that the situation can be improved, and these units represent an important potential resource to ameliorate this difficulty because it is a rare, large and developable parcel in proximity to CCSF and a number of SFUSD facilities.

We believe these elements can provide a reasonable basis for a preference program that can comply with fair housing law and principles. The exact nature of the preference and its implementation can be developed in consultation with the community and stakeholders as part of the marketing plan for the developments. In addition, some potential funding programs and sources may affect the way the preference is implemented, and those factors can also be incorporated in the management plan. In formulating this proposal , we consulted with the attorney Dave Kroot of Goldfarb and Lipman, who has vast experience with preference issues and fair housing law, and who is representing the SFUSD in discussions with the City about building housing for teachers.

**AFFORDABILITY AND INCOME LEVELS**

| AMI | Type | Subsidy | Units | % | Max Income<br>2 PER HH | Monthly Rent Limit<br>1 BDRM | Target Sales Price<br>1 BDRM | Preference |
|---|---|---|---|---|---|---|---|---|
| 50% AMI | Rental | Internal | 123 | 18.1% | 46,125 | 1,099 | - | - |
| 120% AMI | Rental | Internal | 102 | 15.0% | 110,700 | 2,713 | - | Educators (25%) |
| 80% AMI | For Sale | City | 34 | 5.0% | 73,800 | - | 256,564 | Educators (25%) |
| 120% AMI | For Sale | City | 34 | 5.0% | 110,700 | - | 428,241 | Educators (25%) |
| 150% AMI | For Sale | City | 48 | 7.1% | 138,375 | - | 556,999 | Educators (25%) |
| Market | Rental | N/A | 219 | 32.2% | Unrestricted | 3,542 | - | - |
| Market | For Sale | N/A | 120 | 17.6% | Unrestricted | - | 852,000 | - |
| | | | 680 | 100.0% | Mixed | | | |

Altogether, the programming provides inclusivity and diversity to maintain the fabric of the neighborhood and the City. Balboa Reservoir will be developed as a single integrated development with mixed-income rentals, mixed-income ownership units and curated neighborhood retail. Related has a successful track record of developing mixed-income, mixed-use projects and the economies of scale generated by this hybrid model maximizes the Project's intrinsic value.

## Transportation

*PLEASE REFER TO TRANSPORTATION PART 3, SECTION A*

**Principle 1 – Manage parking availability for on-site residents while managing parking to meet City College enrollment goals and coordinating with City parking policies for the surrounding neighborhoods**

**Principle 2 – Create incentives for and improve the experience of utilizing transportation**

Choices between the Balboa Reservoir site, transit and adjacent neighborhoods

- The project will provide car share parking spaces, parking for bike share and Scoot, all of which will be

# NARRATIVE & DEVELOPMENT PRINCIPLES

located on Lee Street for convenient public access. Electric charging stations will be included in the resident garage.

- Ten lockers will be located within the community room available for public use
- Streets and sidewalks will be designed consistent with all policies referred on RFP page 11 - Development Parameters .
- The project will be providing bike lockers on site. There will be an on-site bike repair shop. Space will be made available at no charge to a local bicycle non-profit to manage the use of the bike repair space for public access, community classes for safe bike riding and a bike share pod.
- Project Sponsor will provide one year membership to Bike Share and/or car share for residents and employees.
- Project Sponsor will work with the Community, City College and SFMTA to develop a strategy for capital improvements to reduce traffic impacts on surround neighborhoods.
- Project Sponsor will work with City College to explore the feasibility of a shuttle. As we have done in past projects, our initial step will be to hire a consultant to explore needs and funding feasibility.
- Project Sponsor will engage a Transportation Consultant to assist in the development of a robust TDM program to encourage transit use and minimize impact of traffic and parking on surrounding streets.

**Principle 3 – Design site access and circulation to minimize the development's congestion impacts, especially on adjacent areas, while also maximizing pedestrian and bicyclist safety**

*PLEASE REFER TO SITE PLAN AND DESIGN NARRATIVE PART 3, SECTION A*

- A full traffic and circulation analysis will be undertaken with the community as part of the CEQA analysis, which will inform the final Development Plan
- Carpooling access will be made available on Lee Street, in coordination with SFM
- Street design will incorporate traffic calming measures on all internal streets

## City College

**Principle 1 – Ensure that development at the Balboa Reservoir site does not negatively impact City College's educational mission and operational needs**

We understand the importance of this development on City College and are sensitive to its concerns regarding both short and long term impacts. We will work closely with CCSF staff to address these concerns to the greatest extent possible. Instead of seeing the two properties somehow in opposition, we see an opportunity to create a dynamic new community that can enhance the life of the Campus. ***The opportunity to collaborate with City College is a very compelling reason for our interest in the project.***

- No development is planned on City College Property
- We are suggesting that if parking for City College is needed, it can be built on City College property with proceeds from the Residual Land payment to the City. Estimated cost is $25,000-$30,000 for above grade spaces or $45,000 to $50,000 for below grade.
- Appropriate Dust monitoring, air quality monitoring and construction management plans will be implemented prior to commencement of construction, under the approval of SFPHD and BAAQMD

# NARRATIVE & DEVELOPMENT PRINCIPLES

- A project website will be established to inform stakeholders of project status and schedule. Work Notices will be mailed to interested parties to keep them fully informed. A 24 hour hotline will be established to respond to community questions and concerns.
- Project Sponsor will appoint a City College liaison who will meet monthly or more frequently, if needed, with City College representatives. In addition to the general contractor, Project Sponsor will have full time, on site representatives throughout the construction process. Upon completion of the buildings, Related Management will appoint a management liaison to coordinate communicates with City College and manage the TDM measures.
- We are proposing to provide 56 units for sale on at a mix of AMI levels with preference to be given to City College and SFUSD teachers
- Please refer to the Site Plan for the location of the proposed child care center. We will work with City College to identify opportunities to participate in this center.
- Project Sponsor has incorporated community serving retail, a community room which will be available to residents, City College and neighbors. These uses have been thoughtfully sited in the Reservoir Square open space on axis with Community College entrance at Lee Street so they will become part of the fabric of the neighborhood and become gathering places that foster connection and learning. The opportunity to collaborate with City College is a very compelling reason for our interest in the project.
- The buildings will be constructed sequentially, allowing for staging of parking use for City College. Project sponsor will carefully coordinate this with City College.

## Public Realm

*PLEASE REFER TO NARRATIVE OVERVIEW – PART 3 AND SITE PLANS*

**Principle 1 – Develop a cohesive public realm**

**Principle 2 – Design the public realm as a useful, safe and welcoming part of daily experience for diverse neighbors of all ages, visitors to the site and City College affiliates.**

**Principle 3 – Incorporate the different needs and hours of activity for diverse users in the area, including members of the City College community**

**Principle 4 – Private open spaces should meet or exceed City regulations. Any publicly accessible open space associated with an individual building should read as part of an overall coordinated pattern of open space**

**Principle 5 – Design a variety of open spaces within the public realm network to create a variety of sensory experiences, incorporating the surrounding natural and/or cultural environment into the siting and designing**

**Principle 6 – Plan and design in coordination with a long-term, sustainable maintenance plan and community-serving programming**

- We have intentfully selected Fletcher Landscape as the designer based on our work with them in community outreach on a project in Potrero and their recently completed South Park design and process

# NARRATIVE & DEVELOPMENT PRINCIPLES

- The proposed plan includes 5.8 acres of open space most of which is available to the community that contains pedestrian and bike paths and will include a community garden
- Greywater and drought tolerant plants will be used throughout
- Project Sponsor will be responsible for the long term maintenance of the open space. Community programming and opportunities for educational and cultural opportunities will be developed as part of the community engagement process. This will be an active engagement with both the neighborhood and City College.
- Project sponsor will reach out to local community members and schools for open space programming ideas

## Urban Design and Neighborhood Character

*PLEASE REFER TO NARRATIVE OVERVIEW – PART 3 AND SITE PLANS*

**Principle 1 – Connect and relate to the surrounding fabric of streets, blocks and open spaces**

**Principle 2 – Harmonize the relationships between existing buildings, streets, transit Corridors and open spaces**

**Principle 3 – Design with and complement the site's natural context**

**Principle 4 – Express neighborhood character, celebrate cultural history and align Neighborhood activities**

- Our proposed plan has been carefully developed to respond to the stated goals. The plan proposes 680 units on 17 acres – 40 units to the acre and respect the edges of the adjacent neighborhoods and access to transit by siting lower heights next to the existing single family homes

## Sustainibility

**Principle 1 – Reduce or eliminate greenhouse gas emissions from new buildings to the greatest extent feasible**

**Principle 2 – Building on the City's robust water efficiency requirements, maximize non-potable water use in buildings and open space**

**Principle 3 – Optimize on-site storm water management to improve water quality, minimize potential for urban flooding and help prevent overflows of the City's combined sewage**

**Principle 4 – Connect all residents, workers and visitors to nature by habitat supportive trees and landscaping**

**Principle 5 – Support a healthy environment by reducing indoor and outdoor air quality impacts. Building design and materials should address the neighborhood micro climate and fog**

**Principle 6 – Achieve the City's Zero Waste goal and a litter free public realm**

**RELATED**, working with our partners, is a champion of environmentally conscious real estate. Whether our development encompasses an entire neighborhood or a single building, we pursue the design, construction, and operation of our properties to reduce their environmental footprint, while enhancing user experience.

# NARRATIVE & DEVELOPMENT PRINCIPLES

We are committed to maximizing to the extent feasible the Six Sustainability Principles outlined in "Balboa Reservoir Development Principles & Parameters".

Since developing one of the nation's first green residential high-rises in 2004 (LEED Gold), Related has developed another 20 LEED Silver, Gold and Platinum properties across a diverse array of asset classes including market rate and affordable housing, luxury to big box retail, hotel and mixed use developments. Related has publically committed every project we develop from the ground up will achieve a minimum of LEED Silver certification. Presently Related has over 30 LEED projects in design and construction including three neighborhood developments. In San Francisco alone, Related has 5 LEED communities under construction or in design totaling more than 1,600 units with an estimated cost of over $1.2 billion.

**SARES REGIS** has completed a number of sustainable communities meeting Green Point Rated, LEED Platinum, Gold and Silver and Energy Star Shell standards. Sares Regis Group property management is committed to implementing and maintaining practices that are socially and environmentally conscious, while operating more efficient, competitive and valuable real estate. A number of the Sares Regis personnel are LEED accredited.

- All our projects include a Sustainability consultant on board at the beginning of the design process. Project Sponsor will seek to meet or exceed the goals in the Principles as we proceed with the design and will examine a district scale energy system, renewable energy opportunities and GHG reduction. Building Life Cycle Impact Reduction will be included in the discussion of opportunities for LEED credits
- Project Sponsor will achieve a minimum LEED Gold standard
- The project will include a greywater system. Project Sponsor will work with SFPDH to maximize the use of non-potable water.
- Article 38, LEED EQ 4.1, 4.2 and 4.3 will be applied in building design.
- No idle zones will be establish on Lee Street
- See previous discussion of electric charging stations
- SASM backing will be applied to the building exterior to prevent rainwater penetration
- Project Sponsor will comply with items (a), (b), (c), (f) and (g) of Principle 6. Pneumatic/vacuum waste systems will be examined during building design.
- Additional Public Benefits
- A childcare facility and youth friendly elements have been incorporated into the initial design proposal. As noted above, these will be discussed with the community and City College
- Ground floor uses will emphasize pedestrian activation through the use of neighborhood serving retail, resident amenities, community facility, childcare, bike repair, and stoops
- A community meeting space for local non-profits and neighborhood parking, and bike repair has been included. The spaces along Lee Street present an opportunity for some "maker" space

# PART 4

## PROJECT FEASIBILITY

## OMITTED FROM THIS DOCUMENT

# PART 5

## IMPLEMENTATION

# COMMUNITY & STAKEHOLDER ENGAGEMENT

The work done by the Balboa Reservoir CAC that culminated in the **Development Principles & Parameters** offers an excellent jumping off point for the community engagement process. That document represents over two years of hard work on the part of many members of the surrounding neighborhoods and, to a large extent, we have incorporated these Principles and Parameters into this development program and proposal.

With this as backdrop, we will engage the community in a clear, transparent process with current and long term opportunities for input and involvement. We will kick the process off at an informal open house to introduce our team, describe the community engagement process, and get to know the neighbors, key players and stakeholders. This event will be the first step in establishing an open line of communication as the process moves forward.

The open house will be followed by what will be the heart of the community engagement process; a series of topical, focused workshops where we will establish a reciprocal relationship of learning from and providing information to neighborhood residents and organizations. We believe it is important that neighbors and developers are working from the same base of information and to ensure that is happening, we will present clear, understandable design graphics.

Potential topics include:

- Opportunities and constraints presented by the site
- Potential transportation demand management measures
- Affordable housing (what it is and who qualifies to live in it)
- Circulation and open space
- Building prototypes
- Neighborhood serving amenities
- The entitlement process

During the period that workshops are underway, we will also be meeting regularly with City College to stay informed regarding their Facilities Master Plan and to collaborate on areas of mutual interest and concern. After these workshops are completed, we will present a refined site plan and program to the community and solicit their feedback in a series of meetings. In addition to having a town hall meeting, we will present the plan to local neighborhood associations and any other interested groups, including City College. We will incorporate the feedback received to the greatest extent possible prior to submitting applications to the Planning Department for project approvals. This process will ensure that the plan presented to the City for processing has benefited from thoughtful, informed community contributions.

As Project Director for Rebuild Potrero, Charmaine Curtis implemented this process for the site planning and programming of a 39-acre site on Potrero Hill. A similar process, designed in collaboration with the master plan architect, resulted in widespread community acceptance and ultimately very little opposition to a 1,600-unit project that represents a major transformation of a large portion of the neighborhood.

Once applications are submitted to the City, we will continue to engage the community and City College

# COMMUNITY & STAKEHOLDER ENGAGEMENT

with regular updates on the status of the entitlement process and schedule meetings as needed. Once the Draft Environmental Impact Report is published, we will hold a series of meetings to present the findings of the study and hear any concerns resulting from the study.

We have preliminarily identified the following stakeholders who we will engage with on a regular basis and ensure that they remain informed about the project and all public meetings.

**Local Residents and Community Organizations**: Westwood Park, Sunnyside, OMI residents, Balboa Reservoir CAC, Balboa Park Station CAC, Ocean Avenue Revitalization Collaborative, Sunnyside Neighborhood Assn, Westwood Park Neighborhood Assn, Tenants of Avalon and Mercy developments

**Businesses**: Ocean Ave Merchants Assn, Outer Mission Merchants & Residents Association

**Educational**: CCSF, Riordan, Lick

**Citywide advocacy groups**: CCHO, SPUR, SFHAC, Communities United for Health & Justice, youth and families.

**Elected Officials**: Planning Commissioners, Norman Yee and other members of BOS

Specific means of outreach and information sharing will include the following:

- Project website
- Participation in community events (project table)
- Radius mailings (newsletter)
- Articles in local newsletters/newspapers
- Email
- Attendance at CAC and neighborhood group meetings
- Tours of affordable housing development

We will assign a community relations manager and provide their contact information on all project communications so that individual community members have a single point of contact to address specific questions and concerns. One on one communications are essential for establishing a base of trust for what will be a long-term relationship through the design, construction and operation of the development.

Through extensive outreach to and collaboration with neighbors and key stakeholders, engaging in a respectful, open dialog, and listening to and responding to concerns, our community engagement process will create a strong base of support and enthusiasm for the project.

**Operations and Maintenance**: Related is a long term property owner committed to sustainability and stewardship. As noted in other parts of the RFP, we are one of the largest developer/ owners of affordable housing in California. Our firm, including the California group, has never had a project convert from affordable to market rate. We rarely sell anything we develop. As an example, The Paramount, was built in 2000 and continues to be owned and operated by Related.

# COMMUNITY & STAKEHOLDER ENGAGEMENT

In keeping with our mission, we manage our own properties including our extensive affordable portfolio. Related's commitment to exceptional service encompasses every detail that makes a residence a home. We employ the utmost rigor in hiring every staff member and hire only those who demonstrate a true passion for their work. Related has implemented a proprietary training program for the staff that empowers them to exceed the residents' expectations. Related demands an excellence and consistency in service that is apparent from the moment a resident first imagines themselves in a Related Rentals apartment and continues throughout the entire residential experience. Our same day service guarantee ensures prompt attention to any request that a resident reports.

Related services include move in coordination to make moving as easy and stress-free as possible. Related will order telecommunications, cable and internet services, and can help find the right moving company. Related can also arrange to have someone wait in the apartment for movers, installers, and deliveries.

We employ rigorous standards for maintenance and operations that reflect the pride of ownership that is the core of our approach to both development and operations. Decisions are made with an eye to long term quality rather than short term economic performance.

# SCHEDULE

As detailed in the Development Schedule below, we believe that the total project duration through delivery and lease up and sellout will be (81) months from execution of an Exclusive Negotiation Agreement (ENA).

| CUM MOS. | CUM YRS. | DATE | MILESTONE | Reference |
|---|---|---|---|---|
| 0 | 0.0 | 8/1/17 | EXECUTE EXCLUSIVE NEGOTIATION AGREEMENT (ENA) WITH SF PUC | N/A |
| 0 | 0.0 | 8/1/17 | Begin Phase 1 of the Exclusive Negotiation Period | ENA Section 2.1 |
| 0.5 | 0.0 | 8/16/17 | Submit Project Schedule two weeks after executing ENA | ENA Section 2.1 |
| 1 | 0.1 | 8/31/17 | Submit PR & Community Outreach Plan to the SF PUC for approval | ENA Section 7.5 |
| 1 | 0.1 | 8/31/17 | File Permit to Enter with SF PUC | ENA Section 7.4 |
| 1 | 0.1 | 8/31/17 | Commence Neighborhood / City College Outreach Meetings | Part 5A of RFP Response |
| 2 | 0.2 | 9/30/17 | Begin Environmental and Geotechnical Testing | Planning Department |
| 6 | 0.5 | 1/28/18 | File Preliminary Project Assessment, Environmental Evaluation and Fiscal Feasibilty Findings with the City and County of San Francisco | Planning Department |
| 7 | 0.6 | 2/27/18 | Obtain SF PUC and Board of Supervisors endorsment of Non-Binding Term Sheet (subject to extensions per ENA) | ENA Section 2.1 |
| 7 | 0.6 | 2/27/18 | Begin Phase 2 of the Exclusive Negotiation Period | ENA Section 2.2 |
| 7.5 | 0.6 | 3/14/18 | Submit updated Project Schedule two weeks after commencement of Phase 2 | ENA Section 2.2 |
| 9 | 0.8 | 4/28/18 | Preliminary Project Assessment Letter and Fiscal Feasibility Findings Approved | Planning Department |
| 10 | 0.8 | 5/28/18 | Start Schematic Design | N/A |
| 10 | 0.8 | 5/28/18 | Submit Entitlement Applications to the City and County of SanFrancisco | Planning Department |
| 13 | 1.1 | 8/26/18 | Notice of Preparation (NOP) circulated and Scoping Meeting held | Planning Department |
| 14 | 1.2 | 9/25/18 | Complete Schematic Design | N/A |
| 19 | 1.6 | 2/22/19 | City Consultant provides Draft EIR for Review and Public Comment | Planning Department |
| 21 | 1.8 | 4/23/19 | Start Construction Documents | N/A |
| 23 | 1.9 | 6/22/19 | City Consultant issues Final EIR | Planning Department |
| 25 | 2.1 | 8/21/19 | Complete Neighborhood / City College Outreach Meetings | Part 5A of RFP Response |
| 25 | 2.1 | 8/21/19 | Planning Commission Certification of Final EIR and Entitlements | Planning Department |
| 27 | 2.3 | 10/20/19 | Obtain SF PUC and Board of Supervisors endorsment of Transaction Documents (subject to extensions per ENA) | ENA Section 2.2 |
| 27 | 2.3 | 10/20/19 | Obtain Board of Supervisors Approval of Entitlements | Planning Department |
| 28 | 2.3 | 11/19/19 | Complete Construction Documents | N/A |
| 30 | 2.5 | 1/18/20 | Construction Financing & Bond Issuance | N/A |
| 30 | 2.5 | 1/18/20 | Commence Construction | N/A |
| 66 | 5.5 | 1/2/23 | COMPLETE CONSTRUCTION (FINAL TCO) | N/A |
| 78 | 6.5 | 12/28/23 | 100% Occupancy for Rentals | N/A |
| 81 | 6.8 | 3/27/24 | Final Sale of Ownership Homes | N/A |

ENA  Entitlement/Community  Design/Construction

# OPERATIONS & MAINTENANCE

Related is a long term property owner committed to sustainability and stewardship. As noted in other parts of the RFP, we are one of the largest developer/owners of affordable housing in California. Our firm, including the California group, has never had a project convert from affordable to market rate. We rarely sell anything we develop. As an example, The Paramount, was built in 2000 and continues to be owned and operated by Related.

In keeping with our mission, we manage our own properties including our extensive affordable portfolio. Related's commitment to exceptional service encompasses every detail that makes a residence a home. We employ the utmost rigor in hiring every staff member and hire only those who demonstrate a true passion for their work. Related has implemented a proprietary training program for the staff that empowers them to exceed the residents' expectations. Related demands an excellence and consistency in service that is apparent from the moment a resident first imagines themselves in a Related Rentals apartment and continues throughout the entire residential experience. Our same day service guarantee ensures prompt attention to any request that a resident reports.

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*We employ rigorous standards for maintenance and operations that reflect the pride of ownership that is the core of our approach to both development and operations. Decisions are made with an eye to long term quality rather than short term economic performance.*

# ENA REVISIONS

## Proposed Modifications to the ENA

1. Section 2.4, paragraph (a), add the following sentence to the end of the paragraph: "In the event the Transactional Documents are challenged under CEQA or other basis, the Project Schedule will include a period of time adequate to ensure the matter can be resolved."
2. Section 2.6, paragraph (a), add the following language to the end of the paragraph: "provided that the SFPUC shall consult in good faith with Developer prior to entering into any such agreements."
3. Section 3, paragraph (b): "Developer's designated negotiating principals are Bill Witte and Susan Smartt."
4. Section 4.2(2) – delete and substitute with the following: "City will apply the Negotiating Fee to the initial City Cost Deposit and will apply the Extension Fees to the purchase price for the Site."
5. Section 8.4(c)(iii) – insert the word "proprietary" after "non-privileged" and before "final".
6. Section 10.1. Delete last sentence and substitute with the following sentence:
7. Section 11.1 – add the following language to the end of the first sentence: "excluding any such Losses arising from the active negligence or willful misconduct of the City or any of the Indemnified Parties."
8. Section 11.2(a) – add the following sentence to the end of the paragraph: "Developer's release hereunder shall not apply to any claims arising from the willful misconduct of the City Agents."
9. Section 12.2 Developer Notices

**GREGORY M. VILKIN**
President, Related California Urban Residential

44 Montgomery Street
Suite 1300
San Francisco, Ca 94105
415-677-9000
greg.vilkin@related.com

With a copy to:

**JENNIFER MCCOOL, ESQUIRE**
Related Companies
60 Columbus Circle
New York, New York 10023
212-801-3478
JMcCool@related.com

# PART 6

## EXECUTION

# EXECUTION

The undersigned, Gregory M. Vilkin, hereby executes the Proposal on behalf of the Development team. Attached hereto are letters from the Co Developers, Sares Regis Group of Northern California, Curtis Development and Tenderloin Neighborhood Development Corp authorizing Related to execute on behalf of the entire team.

**RELATED CALIFORNIA RESIDENTIAL**

By _____

**Gregory M. Vilkin, President**

44 Montgomery Street, Suite 1300
San Francisco, Ca 94104
415-677-5100
greg.vilkin@related.com

Date: _____

**SARES REGIS GROUP OF NORTHERN CALIFORNIA**

**Andrew Hudacek, CFO**

901 Mariners Island Boulevard, Suite 700
San Mateo, California 94404
650-378-2800
AHudacek@srgnc.om

**CURTIS DEVELOPMENT**

**Charmaine Curtis, Principal**

3743 23rd Street
San Francisco, CA 94114
415-609-4996
charmaine@curtis-development.com

**TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION**

**Paul E. Sussman, CFO**

201 Eddy Street
San Francisco, Ca. 94102
415-776-2151
psussman@TNDC.org

# EXECUTION

SARES | REGIS

June 2, 2017

**RE: Balboa Reservoir RFP**

To Who It My Concern:

Greg Vilkin, President of Related California, is hereby authorized to execute the Balboa Reservoir RFP in which Sares Regis Group of Northern California, LLC is a development partner.

Sincerely,

Andrew Hudacek
Chief Investment Officer

**Sares Regis Group of Northern California, LLC**
901 Mariners Island Boulevard, Suite 700, San Mateo, California 94404
T: 650-378-2800 F: 650-570-2233

# EXECUTION

Curtis Development
3743 23rd Street
San Francisco, CA 94114
415-609-4996

June 2, 2017

**RE: Balboa Reservoir RFP**

To Who It My Concern:

Greg Vilkin, President of Related California, is hereby authorized to execute the Balboa Reservoir RFP in which Curtis Development is a development partner.

Sincerely,

Charmaine Curtis
Principal

# EXECUTION

TENDERLOIN NEIGHBORHOOD DEVELOPMENT

June 2, 2017

**RE: Balboa Reservoir RFP**

To Whom It My Concern:

Greg Vilkin, President of Related California, is hereby authorized to execute the Balboa Reservoir RFP in which Tenderloin Neighborhood Development Corporation is a development partner.

Sincerely,

Paul Sussman
Chief Financial Officer
Tenderloin Neighborhood Development Corporation
201 Eddy Street
San Francisco, CA 94102
psussman@tndc.org
415 3058-3945

TENDERLOIN NEIGHBORHOOD DEVELOPMENT CORPORATION
201 EDDY STREET
SAN FRANCISCO
CA 94102
PH: 415.776.2151
FAX: 415.776.3952
INFO@TNDC.ORG
WWW.TNDC.ORG

WESTWOOD PARK

Via Electronic Mail

November 12, 2018

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

Re: Written Comments of Westwood Park Association regarding Scope of EIR for Proposed Balboa Reservoir Project
Case No: 2018-007883ENV
Meeting Date: October 30, 2018
Written Comment Deadline: November 12, 2018

Dear Ms. Poling:

The Westwood Park Association ("WPA") represents the interests of the residents of the Westwood Park Community that was developed 100 years ago in 1918 and directly adjoins the proposed Balboa Reservoir Project ("Project"). Westwood Park is a unique neighborhood that has been designated as a "Residential Character District" under Section 244 of the Planning Code in order to protect its character. Any proposed development for the Balboa Reservoir Site must take into consideration of the "special building forms and natural characteristic of the adjacent Westwood Park Residential Character District".

This letter constitutes the written comments of the WPA regarding the proposed scope of the EIR for the Project. It is WPA's understanding that the purpose of the scoping meeting is to receive public comments on the scope of the EIR for the Project.

**1. Project Description**

The October 10, 2017 Notice of Preparation ("Notice") states that one of the purposes of the EIR is to analyze two alternative Project options: the "Developer's Proposed Option of 1,100 housing units" and the "Additional Housing Option of 1,550 housing units". However, on page 10 of the Notice, the Project Description states that the Developer's Proposed Option will study a range of 800 to 1,300 housing units (a difference of 500 units) and the associated footnote states that the 800 unit proposal may be analyzed as a reduced density alternative. Since this is a Project EIR and not a program EIR, WPA requests that the project to be analyzed in the EIR be revised to be a Project with 1,100 units and three alternatives: a. The Reduced Density Alternative with two variants; b. The Increased Density Alternative with three variants; and, c. The mandatory No Project Alternative. A definitive Project housing unit number will provide the baseline to allow comparison of the impact of the baseline project with 1,100 housing units and the alternatives that range of from 500 to 1,950 additional housing units on our neighborhood.

**2. Alternatives to be Analyzed**

WPA requests that the following Alternatives, in addition to the mandatory No Project Alternative and any other alternatives being considered by the Department be analyzed in the EIR.

**A. *Reduced Density Alternative*:** This alternative will have two variants - a 500 unit variant and a 800 unit variant.

(1) 500 unit Variant with a maximum height of 50': [1] This variant is consistent with the Parameters approved by the Balboa Reservoir Citizens Advisory Committee.

(2) The 800 unit Variant is one suggested in Footnote 10 in the Notice. However, the maximum height limit for the Project should be no more

[1] One of the three developers who responded to the Requests for Proposal was Related Companies that has a maximum height of 50'. In discussion with the Westwood Park Community, Related acknowledged that a 500 unit development is financially feasible.

than 65' and a 40' height maximum height limit for Blocks B, D, G and I. Additionally, Blocks TH1 and TH2 should include a landscaped open space along the west property line.

Both variants would reduce impact on traffic, be compatible with the adjoining neighborhoods and still provide needed housing to the City when compared with the higher density alternative.

**B.** ***Increased Density Alternative:*** This alternative will have three variants – a 1,300 unit variant which is the maximum density of the Developer's Proposed Project and a 1,550 unit variant which is referred to as the Additional Housing Option proposed by the City. WPA also suggests that a cumulative housing development that would include housing for CCSF teachers on the adjacent property owned by CCSF be added so that the EIR will analyze the cumulative impact of the maximum number of housing units being proposed between CCSF and the City. Additionally, all the variants in this Alternative should eliminate the Pedestrian Passage "Paseo" shown on Figures 6 and 7. Creation of this pedestrian passage "Paseo" to connect with San Ramon Way serves no purpose in that the residents residing to the west of the Project have multiple vehicular, pedestrian and bicycle access to Ocean Avenue. See Figure 2. of Notice. The variants that are requested to be analyzed under this Increased Density Alternative are therefore the following:

(1) 1,300 Unit Variant: The upper limit of the study proposed by the Developer.
(2) 1,550 Unit Variant: The City's Additional Housing Option.
(3) The Additional Housing Option plus the 400 housing units proposed by CCSF for teachers on the eastern portion of the CCSF Campus bringing the total number housing units to 1,950 units.[2]

---

[2] This would include construction of housing units or other institutional use on land under the jurisdiction of CCSF that is not subject to the City Planning Code. It is important that the Project EIR include analysis of cumulative projects adjacent to the project site, such as CCSF's potential project for teacher housing, as part of its analysis of various topics, especially traffic and parking impacts.

**C. *The Mandatory No Project Alternative:*** Under the legally required No Project Alternative, the Project Site will remain unchanged. This Alternative will be based on CCSF's use of the Balboa Reservoir Site that was advocated by:

(1) The Academic Senate of CCSF, who unanimously passed a resolution in late 2017 stating that public land should not be used for development; and

(2) The Facilities Committee of CCSF passed a unanimous resolution on November 27, 2017, requesting the "Board of Trustees to re-examine the entire concept of the Balboa Reservoir Project because of the grave and permanent damage that would be done to CCSF and the larger community that surrounds it, especially when there are clear and demonstrable alternatives to such development."

This Alternative would retain the property owned by SFPUC for future public use. In this case, using public property by private real estate developers for profit is not appropriate when this property is adjacent to CCSF that will expand in order to meet the future needs of the City residents.

**3. Transportation/Circulation**

CEQA no longer requires analysis of parking, and mandate the use of vehicular miles travel ("VMT") in lieu of the use of the Level of Service ("LOS") methodology to analysis transportation impacts of a proposed project beginning in 2019. However, parking should be analyzed to provide information to the public. CCSF's students, teachers and staff use the Project Site for off-street parking. Many CCSF Students work full time and/or split shifts, attend classes during hours which they are available and must use their own car in order to get to class on time. Currently, there are 1,007 parking spaces in the Project Site. In addition, there are currently 500 parking spaces on the CCSF owned Eastern portion of the reservoir which will be lost to the Performing Arts Center and/or the proposed 400 units for teachers. Reduction of the number of parking spaces available to CCSF students, staff and teachers must be analyzed.

The Project's impact on public transportation should include its impact on MUNI lines serving CCSF and the nearby areas. We have been informed by

individuals familiar with current traffic problems facing Muni Lines K, 8, 9, 29, and 43, especially at the intersection of the Access Road and Frida Kahlo Way which is adjacent to Archbishop Riordan High School and the intersection of Lee and Ocean Avenues which could be exasperated by this project. (See figure 8 of Notice).

**4. Conclusion**

It is clear that the scope of the Project EIR is inadequate and must be amended in order to fully analyze all of the potentially adverse effects of the project and include all the alternatives and variants discussed above. Thank you for your consideration.

Very truly yours,

WESTWOOD PARK ASSOCIATION

BY _____

Michael Ahrens, President

cc: Anita Theoharis, Director of WPA
Anne Chen, Director of WPA
Joe Koman, Director of WPA
Francine Lofrano, Director of WPA
Jenny Perez, Director of WPA
Ravi Krishnaswamy, Director of WPA
Norman Yee, Supervisor, District 7

DECLARATION

I am a resident of Westwood Park. I live in Westwood Park on the lower segment of Plymouth Avenue, very close to San Ramon. I have lived there for 37 years.

The Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project ("DSEIR") correctly notes the effective roadway width with on street parking at the lower segment of Plymouth is approximately 10 feet wide or less and two way vehicle travel is not feasible on Plymouth. (See DSEIR, page 6-34). However, the DSEIR is totally incorrect when it says as follows: "These instances are rare and this is not an issue under existing conditions due to the low traffic volumes on the segment." 16

The DSEIR also says as follows: "[T]he proposed project is not expected to pose potentially hazardous conditions due to the low traffic volumes" (DSEIR, page 6-35). The DSEIR is totally wrong in their conclusions.

At another place the DSEIR says that the addition of vehicle traffic over San Ramon would increase instances of oncoming traffic on Plymouth, but "drivers would have sufficient opportunities to pull over into available on street parking spaces or driveway curb cuts." [DSEIR, page 6-37]

All of these comments in the DSEIR are without any basis in fact and are incorrect. At the current time there are seldom any parking spaces

16 (cont.)

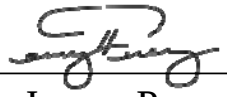
on the lower segment of Plymouth near San Ramon. I have witnessed many times a day, two to seven behind the main car driving up or down the hill, are meeting each other and unable or unwilling to move. Many times, everyday these confrontations turn in road rage. They have hit each other's car, yell profanities, because of the tight squeeze of the road, will hit parked cars. The neighbors have woken up to the anger of the drivers in the morning or at night. It's all day everyday. That is the situation now.

If San Ramon is opened to traffic, 1100 from up to 1500 new units with approximately 1500-4000 people living in the complex(s), there certainly will continue to be no open spaces to park. Moreover, there will be an increase in the violent problems on Plymouth and additional problems with potential road rage, car damages for driving on the street. I disagree with the DSEIR conclusion, that if San Ramon is opened there would be sufficient opportunities to pull over into available on street parking. There are generally no parking spaces available now, and if San Ramon is opened to traffic, there would be alerications for any available parking space that would guaranty no open parking spaces.

The DSEIR concludes that the use of San Ramon as a vehicle street would not create potentially hazardous conditions for people walking, biking, driving or public transit, and this alternative is "less than significant." [DSEIR 6-36]. This is a conclusion that is not based on any factual analysis. I have lived on Plymouth for 37

years, and can testify that opening San Ramon to vehicle traffic from 1100 or 1550 units and from City College would create something close to a war zone on this narrow street. 16 (cont.)

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14 day of September, 2019, at San Francisco, California.



Jenny Perez

DECLARATION

I am a resident of Westwood Park. I live in Westwood Park on the lower segment of Plymouth Avenue, very close to San Ramon. I have lived there for over 40 years.

The Draft Subsequent Environmental Impact Report for the Balboa Reservoir Project ("DSEIR") correctly notes the effective roadway width with on street parking at the lower segment of Plymouth is approximately 10 feet wide or less and two way vehicle travel is not feasible on Plymouth. (See DSEIR, page 6-34). However, the DSEIR is totally incorrect when it says as follows: "These instances are rare and this is not an issue under existing conditions due to the low traffic volumes on the segment." 17

The DSEIR also says as follows: "[T]he proposed project is not expected to pose potentially hazardous conditions due to the low traffic volumes" (DSEIR, page 6-35). The DSEIR is totally wrong in their conclusions.

At another place, the DSEIR says that the addition of vehicle traffic over San Ramon would increase instances of oncoming traffic on Plymouth, but "drivers would have sufficient opportunities to pull over into available on street parking spaces or driveway curb cuts." [DSEIR, page 6-37]

All of these comments in the DSEIR are without any basis in fact and are incorrect. At the current time, there are seldom any parking spaces on the lower segment of Plymouth near San Ramon. I have witnessed many times two cars meeting each other and unable or unwilling to move. Many times these confrontations have come close to resulting in road rage. That is the situation now.

If San Ramon is opened to traffic from up to 1500 new units there certainly will continue to be no open spaces to park. Moreover, there will be an increase in the problems on Plymouth and additional problems with potential road rage and simply driving on the street. I disagree with the DSEIR conclusion in the DSEIR, quoted above, that if San Ramon is opened there would be sufficient opportunities to pull over into available on street parking. There are generally no parking spaces available now, and if San Ramon is opened to traffic, there would be certain fights for any available parking spaces that would guaranty no open parking spaces.

They DSEIR concludes that the use of San Ramon as a vehicle street would not create potentially hazardous conditions for people walking, biking, driving or public transit, and this alternative is "less than significant." [DSEIR 6-36]. This is a conclusion that is not based on any factual analysis. I have lived on Plymouth for over 40 years, and can testify that opening San Ramon to vehicle traffic from 1100 or 1550 units and traffic from City College would create something close to a war zone on this narrow street.

17 (cont.)

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 18th day of September, 2019, at San Francisco, California.

Anne Chen

# Attachment 3

## Non-CEQA Transportation Analysis

KITTELSON & ASSOCIATES
1161 MISSION STREET, OFFICE #563
SAN FRANCISCO, CA 94103
P 415.579.1778

# TECHNICAL MEMORANDUM

| | |
|---|---|
| Date: | August 1, 2019 |
| To: | Reservoir Community Partners, LLC |
| From: | Kittelson & Associates, Inc. |
| Subject: | Balboa Reservoir – Non-CEQA Analysis, Overview and Executive Summary |

## INTRODUCTION

This memorandum summarizes the supplemental transportation analyses for the Balboa Reservoir development (proposed project). The supplemental transportation analyses covers topics not analyzed under California Environmental Quality Act (CEQA) that were identified in the scoping and project development process to support project development efforts and address community concerns. The analysis was conducted for informational purposes and is not intended to identify or develop recommendations for implementation. The following topics were analyzed:

- **Parking supply and demand.** The purpose of this analysis is to present parking supply and occupancy counts, present a methodology and framework for ongoing monitoring and reporting of parking utilization rates, and assess the effect of the proposed development on existing off-street and on-street parking.
- **Vehicle operations.** The objective of the analysis is to evaluate existing and existing plus project corridor operations along Ocean Avenue and Ridgewood Avenue-Frida Kahlo Way and intersection operations at select study intersections to estimate the changes in travel time attributable to the project and to evaluate potential modifications to improve traffic flow and vehicle progression at intersections along Ocean Avenue. Data on existing transit operations is used to inform the evaluation.
- **Shuttle feasibility.** The purpose of this analysis is to assess the feasibility of a shuttle operating between the Balboa Reservoir site, the City College of San Francisco (CCSF) campus, and the Balboa Park BART/Muni station.

The key findings of the parking analysis, operations analysis, and shuttle study are presented in this memorandum. The technical memorandums are included as attachments.

## PARKING ANALYSIS

The key findings of the parking supply and utilization data collection and the parking demand analysis are summarized in this section.

## Off-Street Parking Supply and Utilization

The project site is located west of City College of San Francisco's (CCSF) Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is currently occupied by a 1,007-space surface parking lot ("Lower Lot" or west basin) accessed by two driveways on Frida Kahlo Way. The Lower Lot serves as overflow parking for the CCSF's 1,167-space Upper Lot (or east basin), which is accessed from the same two driveways on Frida Kahlo Way.

Parking inventory and occupancy data was collected at both the Upper and Lower Lots on Thursday, December 7, 2017, Wednesday, January 31, 2018, and Wednesday, April 18, 2018 when CCSF was in session. The peak hourly utilization of both the Lower Lot and Upper Lot was observed to occur between 10 a.m. and 1 p.m. The observed maximum combined occupancy rate of 73% (1,596 cars parked and 578 spaces available) occurred on Wednesday, January 31, 2018 between 11 a.m. and 12 p.m.

The Upper Lot can accommodate the existing combined parking demand (the total demand observed at both the Lower Lot and Upper Lot) during the a.m. and p.m. periods (7 to 9 a.m. and 5 to 7 p.m.) but would not meet the combined parking demand during the weekday midday period (10 a.m. to 12 p.m.). During the weekday midday peak hour of parking demand, assuming parking was available only at the Upper Lot, there would be a shortfall of up to 239 parking spaces.

## Neighborhood (On-Street) Parking Supply and Utilization

On-street parking utilization data were collected by IDAX Data Solutions[1] in the site vicinity on two weekdays in February 2019. Each block face within the neighborhood on-street parking study area was observed three times a day for two days: at 9:00 a.m. (a.m.), 2:00 p.m. (midday), and 8:00 p.m. (p.m.). Days with street cleaning or abnormal parking behavior were avoided. Parking supply data in the form of number of available parking spaces per block were provided by San Francisco Municipal Transportation Agency (SFMTA).

Based on this data, there are a total of 906 parking spaces within the parking study area and between approximately 200 and 300 on-street spaces are available on weekdays during any given time period (a.m., midday, and p.m.). The highest levels of occupancy were generally observed to occur during the weekday p.m. period.

## Parking Demand Analysis

Parking demand was calculated for residential, short-term retail and daycare visitors, and long-term employee parking for both the retail and childcare uses. This parking demand estimation focuses on the midday time period when the retail and childcare are active and existing CCSF parking demand would exceed capacity of the Upper Lot. While adjustments were made to account for the proposed

[1] IDAX Data Solutions is a multimodal data solutions company providing transportation data with an office in San Francisco, CA.

transportation demand management (TDM) plan and affordable housing on site, the estimated project-generated parking demand can be considered conservative and likely overstates demand based on the site context and travel characteristics, transit proximity and quality, and existing and expected travel characteristics.

The Developer's Proposed Option would generate a total midday parking demand for 455 vehicle parking spaces (426 residential, 29 retail and childcare visitor, 18 retail and childcare employee). The Additional Housing Option would generate a total midday parking demand for 631 vehicle parking spaces (602 residential, 29 retail and childcare visitor, 18 retail and childcare employee).

The vehicle parking supply proposed under each development scenario was evaluated against the estimated parking demand generated by the project and the existing CCSF overflow demand. Based on this analysis, the projected residential parking demand can be met on-site with the currently proposed 0.5:1 parking ratio under the Developer's Proposed Option during the midday and overnight periods and the Additional Housing Option during the midday period. There would be a 101 space residential parking space shortfall during the overnight period with the Additional House Option.

The parking demand associated with the retail and child care visitor and employee demand (29 spaces) and CCSF overflow demand (239 spaces) could be met by available on-street parking spaces within the neighborhood parking study area (316 spaces during the midday period, 217 spaces during the overnight period). The analysis of the Developer's Proposed Option does not include the 750-space parking garage that is analyzed in the EIR. Some or all of these parking spaces could be included in the final project to meet projected demand. Alternatively, the parking demand from the retail and daycare visitors and employees and overflow CCSF vehicles could be accommodated by a combination of reducing CCSF parking demand through planned TDM measures and/or a shared parking agreement with the Balboa Reservoir project.

The Balboa Reservoir development intends to monitor and manage its parking efficiently while working to encourage the use of transportation modes other than the single occupancy vehicle. Shared or flexible parking designations between residential, retail, and CCSF uses would help to minimize the total number of parking spaces needed to meet project-generated parking demand and overflow CCSF parking demand resulting from the redevelopment of the Lower Lot. Implementation of TDM measures and a shared parking agreement with CCSF would reduce any secondary effects of parking shortfalls on the neighborhood parking supply.

## OPERATIONS ANALYSIS

Analysis was conducted for existing and existing plus project conditions. Existing plus project conditions reflects the existing transportation network with the inclusion of vehicle trips generated by the Additional Housing Option. For the purposes of a more conservative analysis, the Additional Housing Option was evaluated, as it would generate more vehicle trips and would therefore have a greater effect on corridor delay and intersection operations. The Developer's Proposed Option would generate about 25 percent

fewer vehicle trips and as a result, would be expected to result in less delay compared to the Additional Housing Option.

## Corridor Analysis

The corridor delay analysis considers the change in vehicle delay with the addition of project-generated vehicle trips during the weekday a.m. and p.m. peak hours along the following two corridors:

- Ocean Avenue, from Plymouth Avenue to San Jose Avenue
- Ridgewood Avenue-Frida Kahlo Way, from Ridgewood Avenue/Monterey Boulevard to Frida Kahlo Way/Geneva Avenue/Ocean Avenue

The Additional Housing Option would increase delay along the Ocean Avenue study segment by one second in the eastbound direction during the weekday a.m. peak hour and by two seconds and eight seconds in the eastbound and westbound directions, respectively during the weekday p.m. peak hour.

The Additional Housing Option would increase delay along the Frida Kahlo Way study segment by one second in the northbound and southbound directions during the weekday a.m. peak hour and by three seconds in the southbound direction during the weekday p.m. peak hour.

## Intersection Operations Analysis

A detailed intersection operations analysis was conducted to identify more specifically how operations may change with the addition of project-generated vehicle trips from the Additional Housing Option during the weekday a.m. and p.m. peak hours at the following three study intersections:

- Brighton Avenue/Ocean Avenue
- Lee Avenue/Ocean Avenue
- Frida Kahlo Way/Geneva Avenue/Ocean Avenue

These three study intersections were selected for analysis to address concerns raised by the community regarding operations at these locations.

The analysis considers the delay, queue length, and level of service for each approach and for the intersection overall. Intersection volumes were adjusted to reflect the peak hour and lane utilization factors[2]. Overall, vehicle trips generated by the Additional Housing Option are not anticipated to substantially increase delays at study intersections during the weekday a.m. and p.m. peak hours. The

[2] Peak hour factor is defined as the hourly volume divided by the peak (fifteen) minute flow rate within that same hour. The lane utilization factor indicates the "uniform" use of available lanes. It is the ratio of the average volume per lane to the heaviest volume in one lane.

key findings of the intersection operations analysis comparing existing with existing plus project conditions are summarized in this section.

### *Brighton Avenue/Ocean Avenue*

- There would not be a substantial change to the delay, queue lengths, and level of service with the addition of project-generated vehicle trips.
- With the addition of project trips, the overall intersection delay may be slightly reduced (by less than one second per vehicle and by 1.3 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of trips travelling through the intersection are doing so on the coordinated phase, thereby increasing the efficiency of the signal and reducing average vehicle delay.

### *Lee Avenue/Ocean Avenue*

- With the addition of project-generated vehicle trips, the overall intersection delay is projected to slightly increase (by 2.0 and 4.2 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively).
- The southbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips. The delay is estimated to increase by 11.6 seconds per vehicle during the weekday a.m. and p.m. peak hours. The queue length is estimated to increase by 87 feet during the weekday a.m. peak hour and by 81 feet during the weekday p.m. peak hour. The level of service is estimated to change from LOS C to LOS D during the weekday a.m. and p.m. peak hours.

### *Frida Kahlo Way/Geneva Avenue/Ocean Avenue*

- The overall intersection delay is anticipated to increase by 18.4 seconds per vehicle during the weekday a.m. peak hour and by 37.2 seconds per vehicle during the weekday p.m. peak hour with the addition of project-generated vehicle trips.
- The westbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips during the weekday a.m. and p.m. peak hours. The delay is estimated to increase by 28.1 and 70.5 seconds per vehicle, respectively. The queue length is estimated to increase by 38.6 and 115 feet, respectively. The level of service is estimated to worsen from a LOS E to a LOS F during the weekday p.m. peak hour.

## Potential Intersection Modifications

Intersection modifications can be made to increase safety and capacity, improve vehicle progression, and reduce congestion on the road. The most common strategies include optimizing or modifying signal timing and implementing physical changes or turn movement restrictions at intersections to increase

efficiency of intersection or corridor operations. Potential intersection modifications were described and analyzed in the Operations Analysis technical memorandum. Key findings are presented in this section.

### *Signal Timing Modifications*

One of the major objectives of traffic signal optimization is to increase the capacity of at-grade intersections. For this analysis, at each study intersection, five seconds of green time was reallocated from the north/south approaches to the east/west approaches. In other words, green time on Ocean Avenue was increased by five seconds for each phase while the overall cycle length remained fixed. Increasing green time on Ocean Avenue would:

- Decrease overall intersection delays at Brighton Avenue/Ocean Avenue and Frida Kahlo Way/Geneva Avenue/Ocean Avenue by between 1 and 5 seconds and between 45 and 51 seconds, respectively. However, Synchro may overestimate the change in delay and queue lengths reported at Frida Kahlo Way/Geneva Avenue/Ocean Avenue, which operates at, or near, capacity.
- Increase overall intersection delay at Ocean Avenue/Lee Avenue by between 1 and 5 seconds.
- Reduce delay and queue lengths on the eastbound and westbound approaches and increase delay and queue lengths on the northbound and southbound movements at all study intersections.

Signalized intersections along Ocean Avenue operate as actuated-coordinated signals[3] with maximum recall[4] that operate on a fixed cycle length. Signal timing modifications implemented at these three intersections in isolation may adversely affect vehicle progression and have unintended consequences for operations along the corridor. Any adjustments to signal timing would need to be reviewed and approved by SFMTA.

### *Other Modifications*

In addition to signal timing modifications, other intersection modifications and treatments along the corridor may be implemented to increase efficiency of operations and reduce vehicle delay and queue lengths along the corridor. These include installation of left-turn lanes, installation of right-turn lanes, implementation of turn restrictions, and intersection redesign. These treatments can be costly if

[3] Actuated signals prioritize the through movement of the major street and use sensors to respond to the traffic present at actuated approach, so that the pattern of the signal (the length and order of each phase) depends on the traffic and can be different at every cycle. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

[4] Each phase in a signalized intersection is given a recall mode of either no call, minimum, maximum, or pedestrian. No recall implies that a phase can be skipped if no vehicles are present/detected. Minimum recall indicates that a phase is being called for its minimum green time, independent of a vehicle's presence. Maximum recall specifies that a phase is being called for its maximum green time. Pedestrian recall means that a phase will always service the pedestrian walk and clearance interval times independent of a pedestrian's presence.

additional right-of-way is needed and there may be other tradeoffs to consider, such as potential adverse effects on conditions for bicyclists and pedestrians. Modifications that would require roadway widening, additional right-of-way, rail reconfiguration, or signal relocation would be major infrastructure projects and may not be feasible or appropriate within the context of the corridor.

Planned projects that are intended to improve safety, access, and comfort for people traveling along Ocean Avenue include the Ocean Avenue Safety Project and I-280 Interchange Modifications at Balboa Park Project.

## SHUTTLE STUDY

A shuttle feasibility assessment was conducted to evaluate the potential for shuttle service operating between the Balboa Reservoir Site, CCSF Ocean Avenue campus, and the Balboa Park BART/Muni station. The analysis includes a ridership assessment, service concept, and feasibility analysis. Key findings from the assessment are summarized in this section.

The Balboa Reservoir development is expected to generate up to 2,700 transit trips[6] each day, many to/from the Balboa Park BART/Muni station, approximately 0.6 mile east of the project site. While the total travel demand between these destinations is high, and the shuttle would have convenient stop locations, the shuttle's indirect loop route would have to compete with the high frequency and direct travel of the existing transit service and the flexibility and speed of walking.

The conceptual shuttle route is approximately 2.25 miles long with an estimated peak hour travel time of approximately 31.5 minutes, with variability based on congestion, signal delay, passenger boarding/alighting, final routing, and layover scheduling. The shuttle system route would have stops within the Balboa Reservoir site, on CCSF campus, at City College Terminal, and at the Balboa Park BART/Muni station.

Muni currently offers convenient connections to the Balboa Park BART/Muni station. The K/T Third/Ingleside light rail and Muni bus routes 8, 29, 49, and 91 have stops on Ocean Avenue or the City College Terminal near the project site. Muni route 43 operates on Frida Kahlo Way adjacent to CCSF and on Geneva Avenue to the Balboa Park BART/Muni station. Typical wait times are under five minutes during the weekday a.m. and p.m. peak periods.

The Balboa Reservoir shuttle demand model is calibrated to high shuttle use estimates to serve as a proof of concept. The convenience of a free shuttle was estimated to be more appealing than, and capture the majority of, the BART riders that may otherwise walk, take other transit options, drive alone/carpool, or be dropped off in a taxi or transportation network company vehicle (e.g,. Uber, Lyft). With the shuttle

[6] Source: Balboa Reservoir Transit Assessment Memorandum, June 25, 2019.

operating with at least two vehicles in service, approximately half of the walk trips and the majority of transit, drive alone, and kiss and ride modes would be expected to switch modes and use the shuttle.

However, given that multiple Muni lines serve stops near Balboa Reservoir and CCSF operating on 8-10 minute headways during weekday a.m. and p.m. periods and typical waiting times are under five minutes, the shuttle would have to operate at high frequencies throughout the day to effectively compete with the existing transit service and walking trips. With three shuttle buses in operation, vehicle headways and average waiting time would match that of existing peak hour service. This level of shuttle service is forecast to have an estimated cost of $762,500 to over $1 million per year without considering factors, such as regulatory requirements and operator staffing and scheduling, which would increase costs and may present substantial hurdles to implementation. If a lower frequency and less costly service were provided as an alternative, it would not be competitive with the existing transit and walking alternatives and would see less use. Overall, the shuttle system route would be duplicative with existing transit connection to the Balboa Park BART/Muni station for passengers able to walk to nearby bus and light rail stops. The costs and convenience associated with providing shuttle service should be weighed against alternatives, such as subsidized first mile/last mile taxi or transportation network company rides for those with mobility needs.

## ATTACHMENTS

A. Parking Analysis Technical Memorandum
B. Operations Analysis Technical Memorandum
C. Shuttle Study Technical Memorandum

# ATTACHMENT A: PARKING ANALYSIS TECHNICAL MEMORANDUM

KITTELSON & ASSOCIATES
1161 MISSION STREET, OFFICE #563
SAN FRANCISCO, CA 94103
P 415.579.1778

# TECHNICAL MEMORANDUM

| | |
|---|---|
| Date: | August 1, 2019 |
| To: | Reservoir Community Partners, LLC |
| From: | Kittelson & Associates, Inc. |
| Subject: | Balboa Reservoir – Parking Analysis Memorandum |

This memorandum summarizes the results of a parking study conducted for the Balboa Reservoir development (proposed project). The project site is located west of City College of San Francisco's (CCSF) Ocean Campus, east of the Westwood Park neighborhood, and south of Archbishop Riordan High School. The project site is currently occupied by a 1,007-space surface parking lot ("Lower Lot" or west basin) accessed by two driveways on Frida Kahlo Way. The Lower Lot serves as overflow parking for the CCSF's 1,167-space Upper Lot (or east basin), which is accessed from the same two driveways on Frida Kahlo Way.

The purpose of this analysis is to present parking supply and occupancy counts, present a methodology and framework for ongoing monitoring and reporting of parking utilization rates, and assess the impact of the proposed development on existing off-street and on-street parking under several development scenarios. The memorandum is organized as follows:

- Data collection summary
- Parking demand analysis
- Parking monitoring plan
- Conclusion

## DATA COLLECTION SUMMARY

### Off-Street Parking

Parking inventory and occupancy data was collected at both the Upper and Lower Lots on Thursday, December 7, 2017, Wednesday, January 31, 2018, and Wednesday, April 18, 2018 on a typical non-holiday, non-registration period day when CCSF was in session. Parking data was collected on an hourly basis between 7:00 a.m. and 9:00 p.m. The number of spaces in the Upper and Lower Lots were counted with the use of aerial photography and then verified in the field. Parking occupancy was collected manually by field technicians. The parking lots were divided into areas with a field technician responsible for collecting data in each. Technicians walked the lots every hour, manually counting the number of full and empty stalls in each area. Data was marked by hand in the field and transferred to spreadsheets. The spreadsheet data entries were then checked against the manual entries.

Parking supply and occupancy data are summarized in Exhibit 1 and Exhibit 2. Exhibit 3 illustrates the average utilization from all three dates.

**Exhibit 1: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy**

| Time | Lower Lot (1,007 Spaces) | | | Upper Lot (1,167 Spaces) | | | Combined (2,174 Spaces) | | |
|---|---|---|---|---|---|---|---|---|---|
| | Parked | Available | Utilization | Parked | Available | Utilization | Parked | Available | Utilization |
| **Thursday, December 7, 2017** | | | | | | | | | |
| 7 | 0 | 1007 | 0% | 39 | 1128 | 3% | 39 | 2135 | 2% |
| 8 | 3 | 1004 | 0% | 181 | 986 | 16% | 184 | 1990 | 8% |
| 9 | 11 | 996 | 1% | 614 | 553 | 53% | 625 | 1549 | 29% |
| 10 | 133 | 874 | 13% | 1078 | 89 | 92% | 1211 | 963 | 56% |
| 11 | 235 | 772 | 23% | 1071 | 96 | 92% | 1306 | 868 | 60% |
| 12 | 253 | 754 | 25% | 1083 | 84 | 93% | 1336 | 838 | 61% |
| 13 | 167 | 840 | 17% | 1058 | 109 | 91% | 1225 | 949 | 56% |
| 14 | 101 | 906 | 10% | 813 | 354 | 70% | 914 | 1260 | 42% |
| 15 | 87 | 920 | 9% | 693 | 474 | 59% | 780 | 1394 | 36% |
| 16 | 40 | 967 | 4% | 476 | 691 | 41% | 516 | 1658 | 24% |
| 17 | 26 | 981 | 3% | 361 | 806 | 31% | 387 | 1787 | 18% |
| 18 | 9 | 998 | 1% | 429 | 738 | 37% | 438 | 1736 | 20% |
| 19 | 6 | 1001 | 1% | 537 | 630 | 46% | 543 | 1631 | 25% |
| 20 | 2 | 1005 | 0% | 445 | 722 | 38% | 447 | 1727 | 21% |
| 21 | 1 | 1006 | 0% | 184 | 983 | 16% | 185 | 1989 | 9% |
| **Wednesday, January 31, 2017** | | | | | | | | | |
| 7 | 1 | 1006 | 0% | 79 | 1088 | 7% | 80 | 2094 | 4% |
| 8 | 4 | 1003 | 0% | 298 | 869 | 26% | 302 | 1872 | 14% |
| 9 | 139 | 868 | 14% | 958 | 209 | 82% | 1097 | 1077 | 50% |
| 10 | 407 | 600 | 40% | 1094 | 73 | 94% | 1501 | 673 | 69% |
| 11 | 533 | 474 | 53% | 1063 | 104 | 91% | 1596 | 578 | 73% |
| 12 | 483 | 524 | 48% | 1046 | 121 | 90% | 1529 | 645 | 70% |
| 13 | 297 | 710 | 29% | 963 | 204 | 83% | 1260 | 914 | 58% |
| 14 | 186 | 821 | 18% | 876 | 291 | 75% | 1062 | 1112 | 49% |
| 15 | 135 | 872 | 13% | 726 | 441 | 62% | 861 | 1313 | 40% |
| 16 | 76 | 931 | 8% | 555 | 612 | 48% | 631 | 1543 | 29% |
| 17 | 55 | 952 | 5% | 482 | 685 | 41% | 537 | 1637 | 25% |
| 18 | 17 | 990 | 2% | 621 | 546 | 53% | 638 | 1536 | 29% |
| 19 | 12 | 995 | 1% | 745 | 422 | 64% | 757 | 1417 | 35% |
| 20 | 8 | 999 | 1% | 612 | 555 | 52% | 620 | 1554 | 29% |
| 21 | 4 | 1003 | 0% | 251 | 916 | 22% | 255 | 1919 | 12% |
| **Wednesday, April 18, 2018** | | | | | | | | | |
| 7 | 3 | 1004 | 0% | 56 | 1111 | 5% | 59 | 2115 | 3% |
| 8 | 4 | 1003 | 0% | 265 | 902 | 23% | 269 | 1905 | 12% |
| 9 | 9 | 998 | 1% | 706 | 461 | 60% | 715 | 1459 | 33% |
| 10 | 126 | 881 | 13% | 847 | 320 | 73% | 973 | 1201 | 45% |
| 11 | 238 | 769 | 24% | 1078 | 89 | 92% | 1316 | 858 | 61% |
| 12 | 181 | 826 | 18% | 1009 | 158 | 86% | 1190 | 984 | 55% |
| 13 | 187 | 820 | 19% | 939 | 228 | 80% | 1126 | 1048 | 52% |
| 14 | 85 | 922 | 8% | 792 | 375 | 68% | 877 | 1297 | 40% |
| 15 | 67 | 940 | 7% | 633 | 534 | 54% | 700 | 1474 | 32% |
| 16 | 39 | 968 | 4% | 536 | 631 | 46% | 575 | 1599 | 26% |
| 17 | 22 | 985 | 2% | 449 | 718 | 38% | 471 | 1703 | 22% |
| 18 | 17 | 990 | 2% | 489 | 678 | 42% | 506 | 1668 | 23% |
| 19 | 10 | 997 | 1% | 563 | 604 | 48% | 573 | 1601 | 26% |
| 20 | 5 | 1002 | 0% | 510 | 657 | 44% | 515 | 1659 | 24% |
| 21 | 5 | 1002 | 0% | 141 | 1026 | 12% | 146 | 2028 | 7% |

Sources: Kittelson & Associates, Inc. 2019; Quality Counts, 2017 & 2018.
Note: Parking utilization was rounded.

**Exhibit 2: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy – Thursday, December 7, 2017**

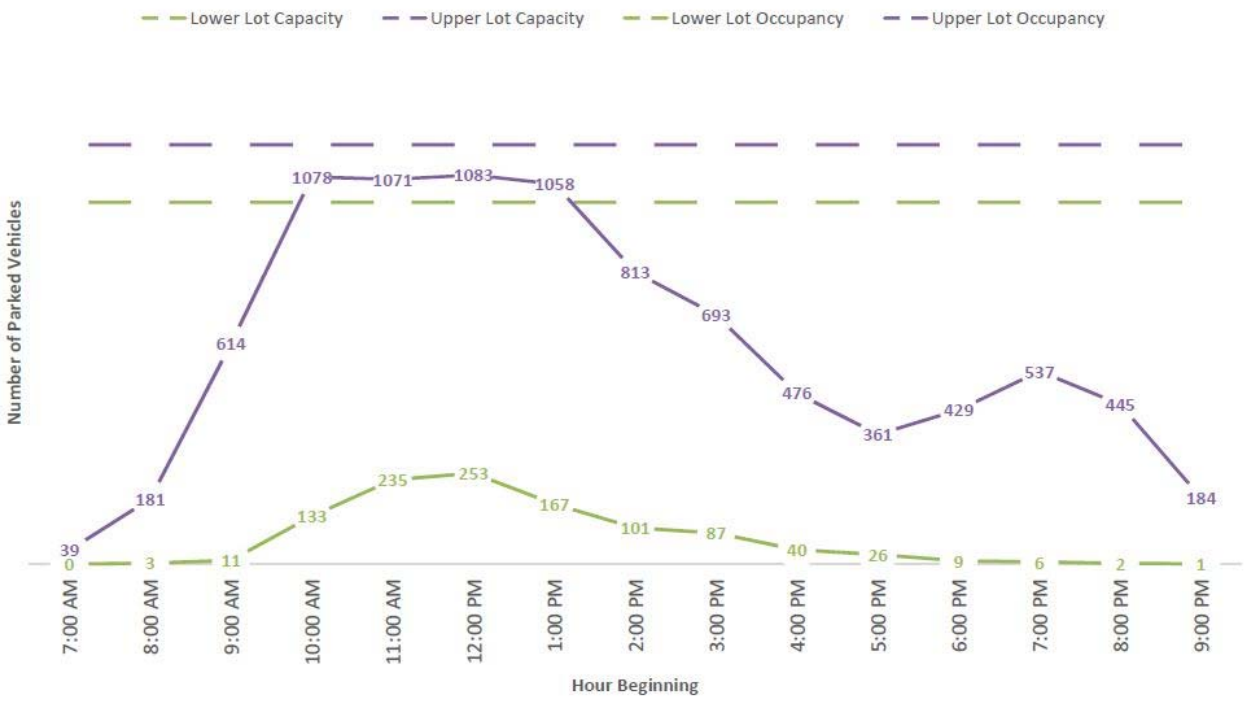



**Exhibit 3: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy – Wednesday, January 31, 2018**

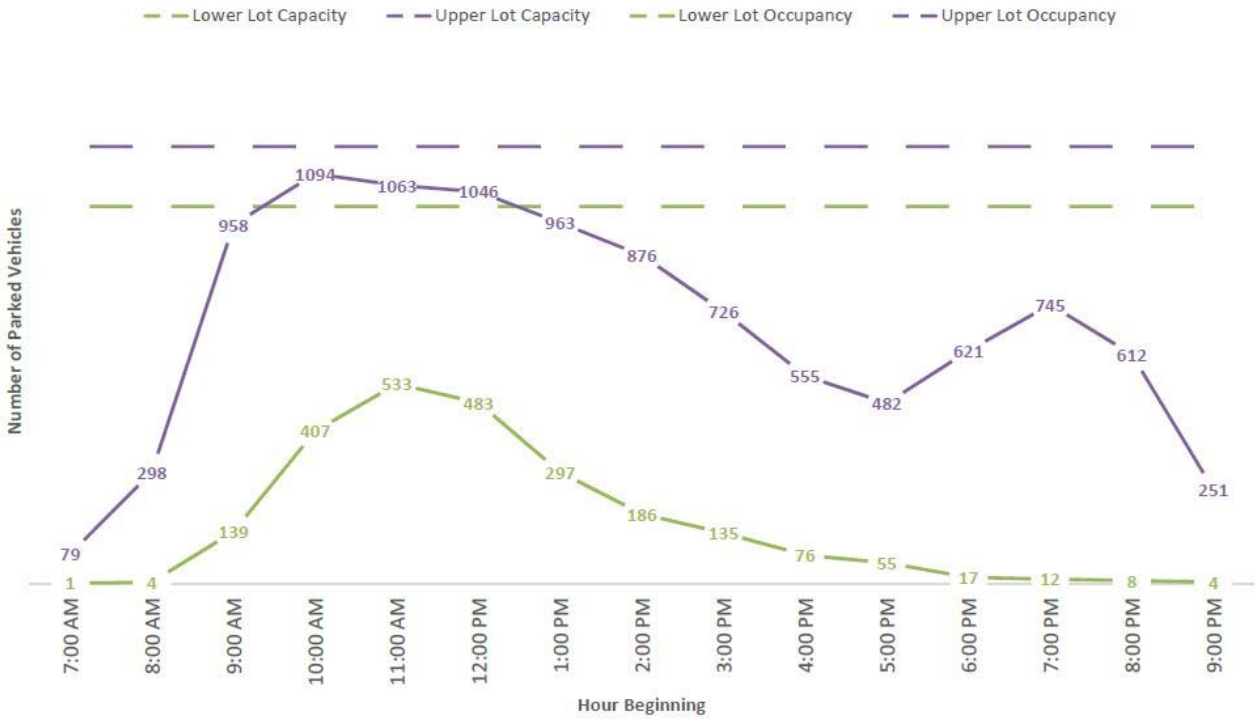
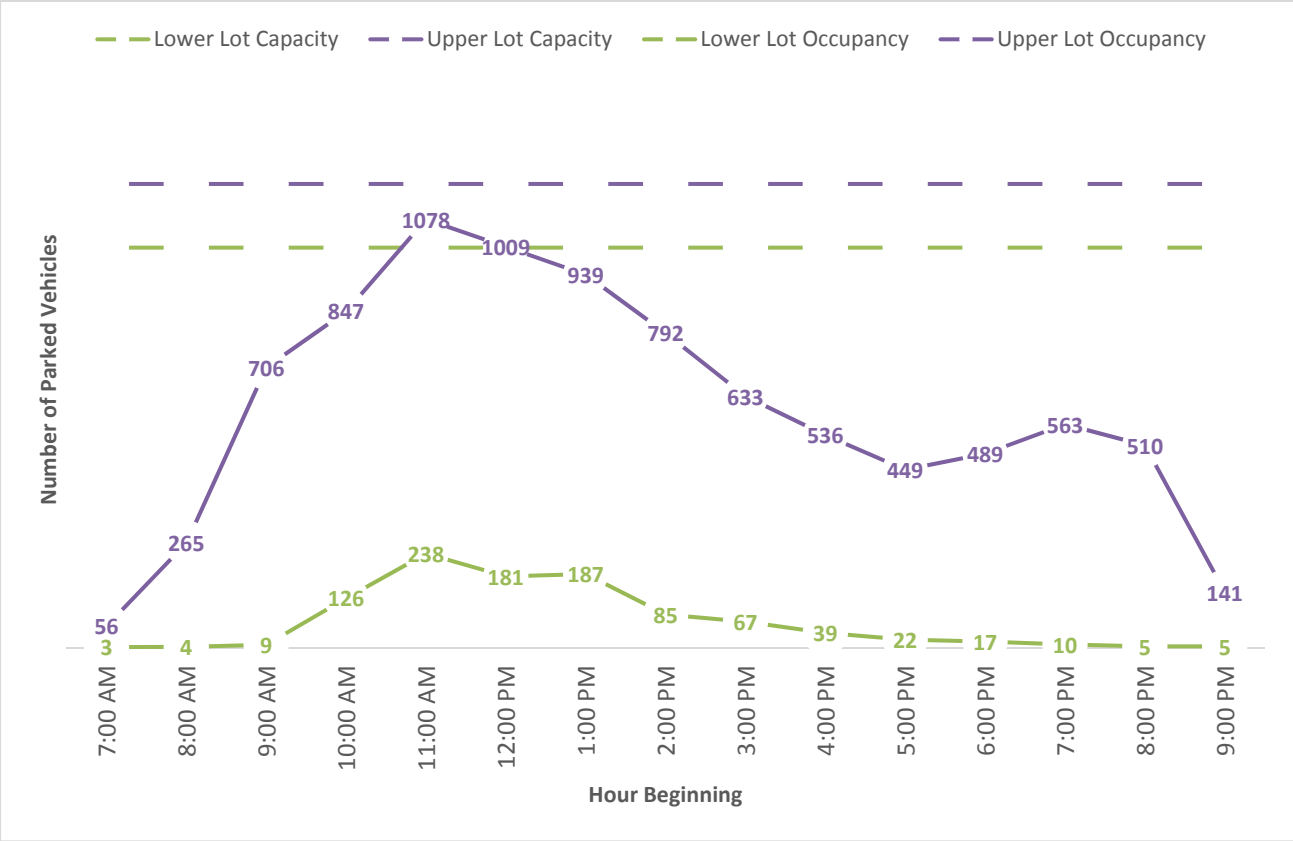


**Exhibit 4: Existing CCSF Upper/Lower Lot Parking Supply and Occupancy – Wednesday, April 18, 2018**




As shown in Exhibit 1 through Exhibit 4, the peak hourly utilization of both the Lower Lot and Upper Lot occurs between 10:00 a.m. and 1:00 p.m. during all three days of observation.

- On Thursday, December 7, 2017, the peak hour of occupancy occurred between 12:00 p.m. and 1:00 p.m. in both the Lower Lot and Upper Lot; at this time, there were 253 cars parked (754 spaces available) in the Lower Lot and 1,083 cars parked (84 spaces available) in the Upper Lot. This represents a utilization rate of 25% in the Lower Lot and 93% in the Upper Lot and a combined occupancy rate of 61%.
- On Wednesday, January 31, 2018, the peak hour of occupancy occurred between 11:00 a.m. and 12:00 p.m. in the Lower Lot and between 10:00 a.m. and 11:00 a.m. in the Upper Lot; during these times, there were 533 cars parked (474 spaces available) in the Lower Lot and 1,094 cars parked (73 spaces available) in the Upper Lot during the peak hours. This represents a utilization rate of 53% in the Lower Lot and 94% in the Upper Lot.
- On Wednesday, April 18, 2018, the peak hour of occupancy occurred between 11:00 a.m. and 12:00 p.m. in both the Lower Lot and Upper Lot; at this time, there were 238 cars parked (769 spaces available) in the Lower Lot and 1,078 cars parked (89 spaces available) in the Upper Lot. This represents a utilization rate of 24% in the Lower Lot and 92% in the Upper Lot and a combined utilization rate of 61%.

- The maximum combined occupancy rate of 73% (1,596 cars parked and 578 spaces available overall) occurred on Wednesday, January 31, 2018 between 11:00 a.m. and 12:00 p.m.

## Neighborhood (On-Street) Parking

On-street parking utilization data were collected by IDAX Data Solutions[1] traffic data collection staff in the site vicinity on weekdays in February 2019 for the block faces shown in Exhibit 5. Each block face was observed three times a day for two days: at 9:00 a.m. (a.m.), 2:00 p.m. (midday), and 8:00 p.m. (p.m.). Days with street cleaning, holidays, events, or other abnormal parking behavior were avoided.

Each observation included the number of parked cars and for each vehicle:

- License plate numbers
- Parking regulation for parking space
- If legally parked
- If parked in a curb cut

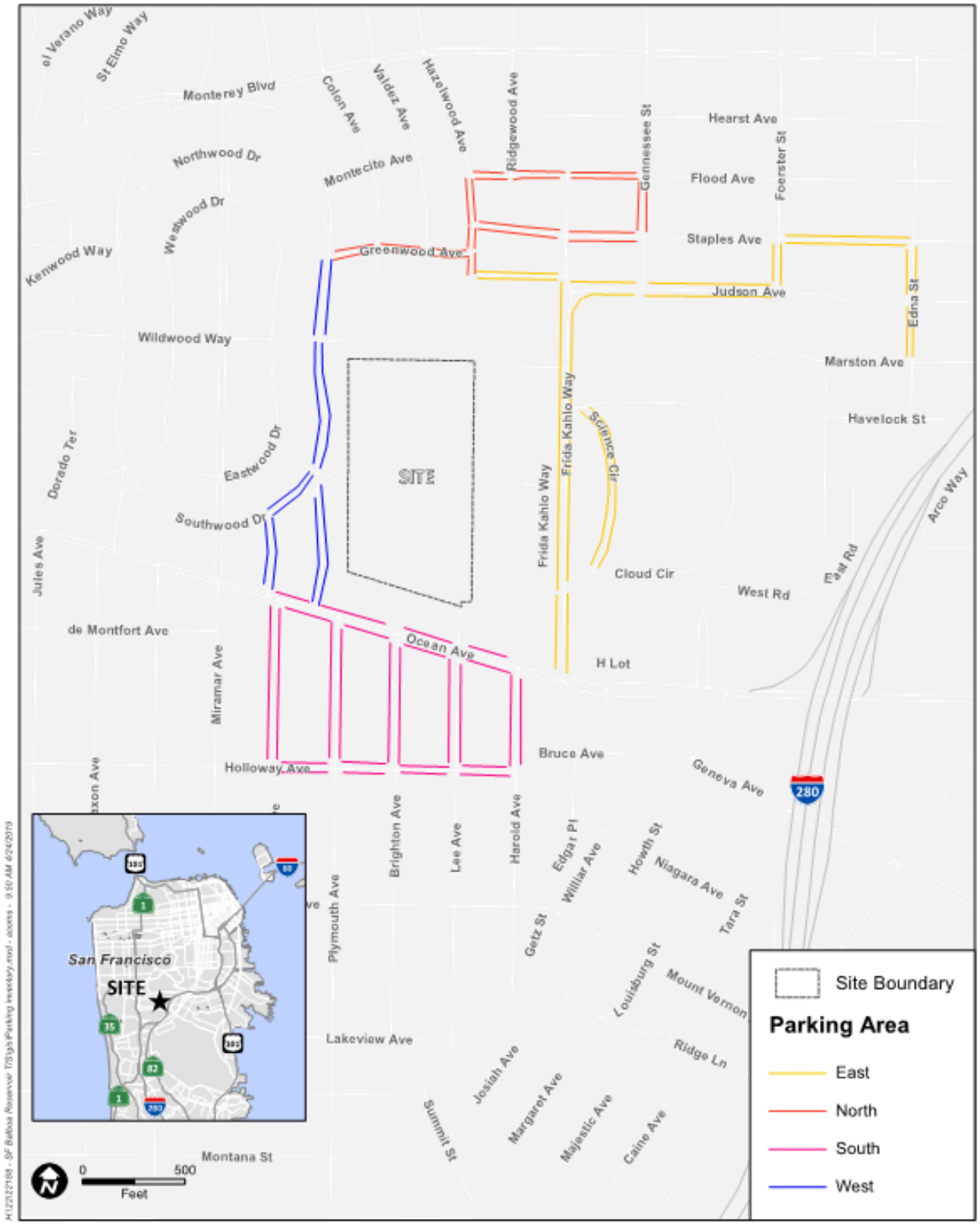
Vehicles parked illegally or across driveways/curb cuts were disregarded as the parking supply consists of only legal parking spaces. While these vehicles constitute parking demand, the spaces these vehicles occupy are not included in the parking supply, so they have no impact on the total available spaces, defined by remaining legal spaces. Each observation period averaged 4.8 illegally parked vehicles and 28.3 vehicles parked in curb cuts, primarily in residential blocks south of Ocean Avenue and north of CCSF.

Parking supply data in the form of number of remaining legal parking spaces per block were provided by San Francisco Municipal Transportation Agency (SFMTA). For blocks where the number of observed legally parked vehicles exceed the SFMTA provided supply, the maximum observed occupancy count was used as the parking supply.

### *Existing Parking Utilization*

The parking utilization and supply data was grouped into four parking areas (north, east, south, and west) shown in Exhibit 5. Percent occupancy and number of available spaces were determined for each observation period for each area as shown in Exhibits 6 and 7. The parking supply and availability by area is presented in Exhibit 8.

[1] IDAX Data Solutions is a multimodal data solutions company providing transportation data with an office in San Francisco, CA.




Source: Kittelson & Associates, Inc., 2019

Case No.2018-007883ENV: Balboa Reservoir Project

**Exhibit 5: Neighborhood (On-Street) Parking Study Area**

**Exhibit 6: Parking Occupancy by Area**

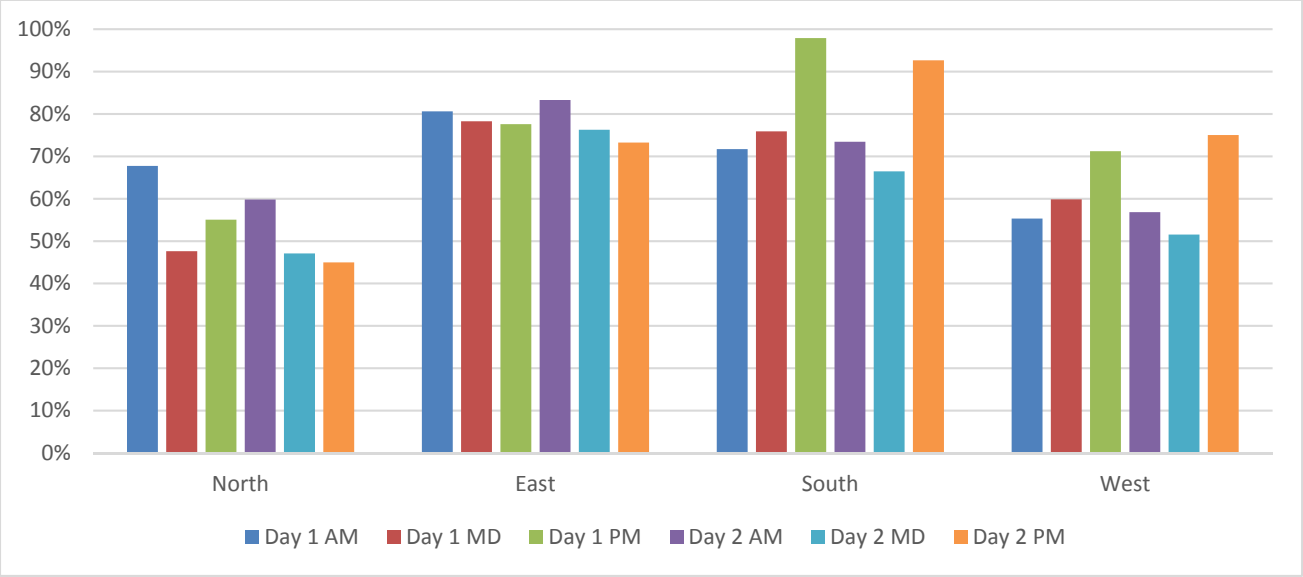



**Exhibit 7: Parking Availability by Area**

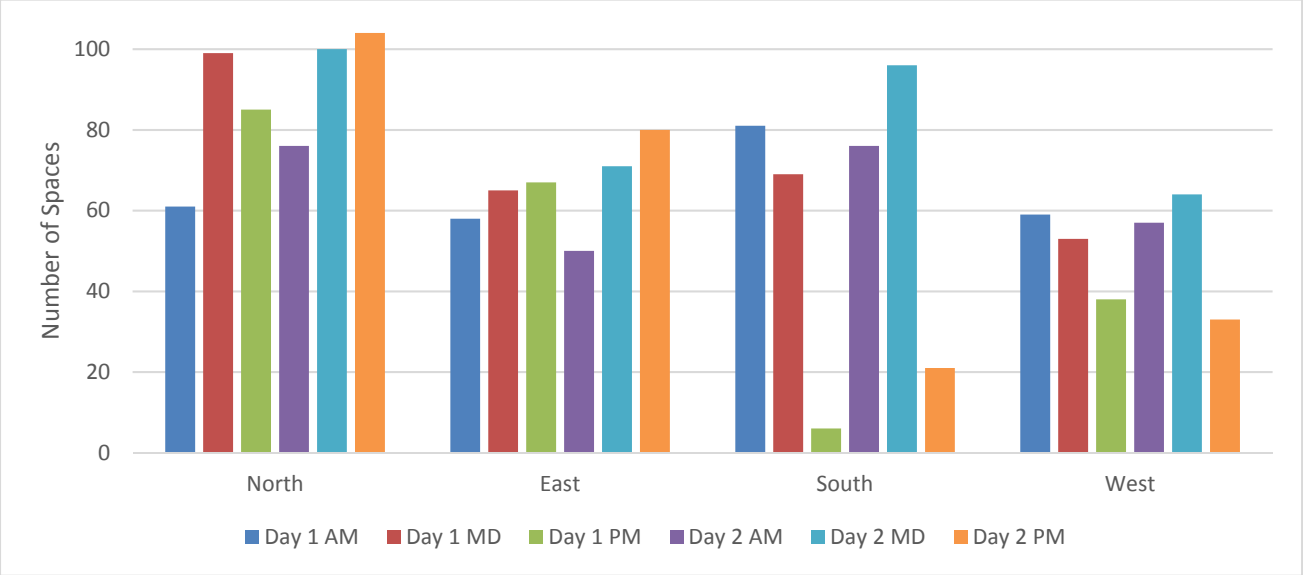



**Exhibit 8: Available Street Parking Spaces by Area and Time Period**

| Parking Area | Supply | Available Street Parking Spaces by Time Period | | | | | | Average |
|---|---|---|---|---|---|---|---|---|
| | | Day 1 AM | Day 1 MD | Day 1 PM | Day 2 AM | Day 2 MD | Day 2 PM | |
| North | 189 | 61 | 99 | 85 | 76 | 100 | 104 | **88** |
| East | 299 | 58 | 65 | 67 | 50 | 71 | 80 | **65** |
| South | 286 | 81 | 69 | 6 | 76 | 96 | 21 | **58** |
| West | 132 | 59 | 53 | 38 | 57 | 64 | 33 | **51** |
| **Total** | **906** | **259** | **286** | **196** | **259** | **331** | **238** | **262** |

Sources: Kittelson & Associates, Inc. 2019; IDAX 2019; SFMTA 2019.
Notes: AM = weekday a.m. (9 a.m.); MD = weekday midday (2 p.m.); PM = weekday p.m. (8 p.m.)
Data presented represents the total available parking spaces by area and time period for each parking area as calculated by subtracting the observed legally parked vehicles from the maximum of the SFMTA parking supply and greatest legally parked vehicle observation.

Exhibit 8 indicates that there are a total of 906 parking spaces within the parking study area and between approximately 200 and 300 on-street spaces are available on streets within the parking study area on weekdays during any given time period. The North and West parking areas have the highest proportion of available street parking with average occupancy of less than 60% (equivalent to 88 and 51 available spaces, respectively). The South area has the highest average occupancy at 80% (equivalent to about 58 available spaces) with the weekday p.m. period approaching 100% utilization. The weekday p.m. period was generally observed to have the highest occupancy.

Parking in the site vicinity is controlled by a combination of the following types of regulation:

- Parking meters
- Residential Permit Parking (RPP): 2-hour time-limited parking between 8:00 a.m. and 6 p.m. weekdays, except with residential permit
- Time Limit: 2-hour time-limited parking without exception
- Unregulated: no apparent parking regulations outside of street sweeping hours

The supply and average number of available parking spaces distributed by parking regulation type is presented in Exhibit 9. As shown in Exhibit 8, over 300 on-street parking spaces are available in the on-street parking study area during the midday period (2 p.m.). As shown in Exhibit 9, the parking demand from overflow CCSF vehicles can be accommodated by the available on-street parking supply, though parking regulations may hinder use.

Exhibits 1 through 4 summarize the parking utilization in the Upper Lot and Lower Lot (project site). Exhibit 10 presents the combined occupancy for the Upper Lot and Lower Lot and assumes that no parking spaces would be provided on the Lower Lot. The number of parked vehicles is calculated as the sum of the number of vehicles parked in the Lower Lot and the number of vehicles parked in the Upper Lot. The available spaces and utilization rate are calculated based on the Upper Lot supply of 1,167 parking spaces assuming the Lower Lot has a parking supply of zero spaces. A utilization rate less than 100% indicates that the Upper Lot could accommodate the existing combined parking demand.

As shown in Exhibit 10, the Upper Lot can accommodate the existing combined parking demand during the a.m. and p.m. periods (7 to 9 a.m. and 5 to 7 p.m.) but would not meet the combined parking demand during the weekday midday period (10 a.m. to 12 p.m.). During the weekday midday peak hour of parking demand there would be a shortfall of up to 239 spaces. A similar analysis in the March 2019 CCSF Ocean Campus TDM Plan and Parking Analysis reported a shortfall of 91 spaces without the Lower Lot. The CCSF Ocean Campus TDM Plan and Parking Analysis was prepared by Fehr & Peers and commissioned by CCSF.

**Exhibit 9: Average Available Street Parking Spaces by Area and Parking Regulation**

| Parking Area | Parking Count Type | Parking Regulation | | | | Total |
|---|---|---|---|---|---|---|
| | | Parking Meters | Residential Parking Permit | Time Limit | Unregulated | |
| North | Supply | 0 | 0 | 70 | 119 | **189** |
| | Available | 0 | 0 | 53 | 35 | **88** |
| East | Supply | 0 | 0 | 45 | 254 | **299** |
| | Available | 0 | 0 | 9 | 56 | **65** |
| South | Supply | 42 | 244 | 0 | 0 | **286** |
| | Available | 16 | 42 | 0 | 0 | **58** |
| West | Supply | 0 | 79 | 0 | 53 | **132** |
| | Available | 0 | 35 | 0 | 16 | **51** |
| **Total** | **Supply** | **42** | **323** | **115** | **426** | **906** |
| | **Available** | **16** | **77** | **62** | **107** | **262** |

Sources: Kittelson & Associates, Inc. 2019; IDAX 2019; SFMTA 2019.
Notes: Data presented represents average available parking spaces by block attributed to the predominate parking regulation for that block.

**Exhibit 10: Existing City College Upper/Lower Lot Parking Occupancy and Upper Lot Supply**

| Time Period | Time (Hour Beginning) | Combined Occupancy[1] | | |
|---|---|---|---|---|
| | | Parked Vehicles | Available Spaces, Upper Lot | % Utilization, Upper Lot |
| Weekday a.m. Peak Period | 7 a.m. | 59 | 1,108 | 5% |
| | 8 a.m. | 252 | 915 | 22% |
| Weekday Midday Peak Period | 10 a.m. | 1,228 | -61 | 105% |
| | 11 a.m. | 1,406 | -239 | 120% |
| | 12 p.m. | 1,352 | -185 | 116% |
| Weekday p.m. Peak Period | 5 p.m. | 465 | 702 | 40% |
| | 6 p.m. | 527 | 640 | 45% |

Sources: Kittelson & Associates, Inc. 2019; Quality Counts, 2017 & 2018.
Notes: Data presented represents the average across three days of data collection: Thursday, December 7, 2017, Wednesday, January 31, 2018, and Wednesday, April 18, 2018.
[1] Parked vehicles calculated as the sum of the number of vehicles parked in both the Lower Lot and Upper Lot. Available spaces and utilization rate calculated based on the Upper Lot supply of 1,167 parking spaces, assuming zero parking spaces provided in the Lower Lot.

The City College of San Francisco March 2019 Facilities Master Plan Final Draft recommends a new West Parking Garage with up to 1,200 spaces to be constructed on the Upper Lot in conjunction with additional buildings. However, the plan states "the size of the structure does not include specific consideration for the potential loss of parking in the lower Balboa Reservoir." The plan also calls for transportation demand management measures to reduce vehicle and parking demand on campus.

## PARKING DEMAND ANALYSIS

The project site is the 17.4-acre parcel located across Frida Kahlo Way from the City College of San Francisco campus and adjacent to a City College parking lot that fronts onto Frida Kahlo Way. The project

site is currently used as an approximately 1,000-space surface parking lot (known as the "Lower Lot") for City College, supplementing the 1,167 vehicle parking spaces in the Upper Lot.

Proposed development scenarios are shown in Exhibit 11 including 0.5:1 residential unit parking ratio. The proposed development, both options, is assumed to be comprised of 40% one-bedroom, 30% two-bedroom, 30% three-bedroom units with 50% of the units being affordable housing. The unit mix is a conservative estimate used for analysis purposes. The actual unit mix may differ.

**Exhibit 11: Proposed Land Use Program**

| Land Use | Unit of measurement | Options | |
|---|---|---|---|
| | | Developer's Proposed Option | Additional Housing Option |
| Residential[1] | Total Dwelling Units | 1,100 | 1,550 |
| | Total Square Feet | 1,283,000 | 1,547,000 |
| General Retail | Gross Square Feet | 7,500 | 7,500 |
| Childcare & Community Room | Gross Square Feet | 10,000 | 10,000 |
| Residential Vehicle Parking[2] | Spaces | Up to 550 | Up to 650 |

Source: Reservoir Community Partners, LLC
[1] Based on information provided by Reservoir Partners LLC, the analysis assumes the following bedroom unit mix: 40% one-bedroom, 30% two-bedroom, 30% three-bedroom units. The unit mix is a conservative estimate used for analysis purposes and the actual unit mix may differ.
[2] Under the Developer's Proposed Option, up to 750 additional public parking spaces are being considered.

Parking demand for the proposed development, both options, was estimated based on the methodology in Appendix G of the *2002 Transportation Impact Analysis Guidelines*[2] (2002 Guidelines) with adjustments to account for the proposed affordable housing and transportation demand management (TDM) measures. The parking demand formulas and parameters from the 2002 Guidelines were used directly to estimate the parking demand associated with the residential units and the retail and daycare space. Affordable housing units were assumed to have a reduced parking demand relative to market rate units to reflect the lower rates of auto ownership, price of unbundled parking, and quality of transit service near the project site.

## Transportation Demand Management

The development will implement transportation demand management (TDM) measures to encourage the use of non-auto modes and reduce vehicle trips. Proposed TDM measures are identified in Exhibit 12, along with the estimated vehicle trip reduction rate associated with implementation.

[2] An update to the 2002 Guidelines was published in February 2019. However, the parking demand methodology presented in the 2019 Guidelines is based on the neighborhood parking rate for non-residential uses only. The 2002 Guidelines methodology was determined to be more appropriate for the proposed development.

**Exhibit 12: TDM Measures and Estimated Vehicle Trip Reduction**

| TDM Measure | Range of Vehicle Trip Reduction Rate | Estimated Vehicle Trip Reduction Rate for Developer's Proposed Option and Additional Housing Option[1] |
|---|---|---|
| Improve Biking/Walking Network | 0% to 2% | 1.0% |
| Provide Bicycle Parking | 0.625% | 0.6% |
| Implement Car Share Program | 5% to 15% | 5.0% |
| Unbundle Parking | 2.6% to 13% | 4.3% |
| Limit On-Site Parking Supply | 5% to 12.5% | 8.8% |
| Improved Design of Development[2] | 3% to 21.3% | 10.7% |
| **TDM Program Total** | | **30.4%** |

Source: California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010.
Notes:
[1] Vehicle trip reduction rate estimated based on the estimated level of adoption and aggressiveness of implementation of a given strategy and account for the implementation of other TDM program elements so as not to overestimate vehicle trip reduction for the overall program.
[2] Design elements include: multimodal wayfinding, real-time information displays, on-site bikeshare, bicycle repair station, showers and lockers, delivery supportive amenities, and tailored transportation marketing.

The range of effectiveness for vehicle trip reductions (VTR) identified for each measure is based on information included in the California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, August 2010 (CAPCOA Report). The quantification methods provided in the CAPCOA Report are based on an extensive literature review and are appropriate for use in this project-level analysis. The estimated vehicle trip reduction rate is based on the anticipated level of adoption and aggressiveness of implementation of a given strategy. Vehicle trip reduction is estimated by applying the vehicle trip reduction rate to the vehicle trips generated by the target user group, which would include residents, employees, and visitors to the site.

As shown in Exhibit 12, the selected TDM measures would reduce vehicle trips generated by the project. Similar to how these treatments would facilitate non-auto trips, these amenities would reduce parking demand. Reduced auto demand reduces parking demand for visitors and employees. Actions such as unbundling parking from residential units and limiting parking supply directly impact residential parking demand. Therefore, the TDM measures were estimated to reduce residential parking demand by 30.4%.

## Project Parking Demand

Parking demand was calculated for residential, short-term retail and daycare visitors, and long-term employee parking for both the retail and childcare uses, as shown in Exhibit 13. This parking demand estimation focuses on the midday time period when the retail and childcare are active and existing CCSF parking demand would exceed capacity of the Upper Lot. While adjustments were made to account for the TDM plan and affordable housing, this parking estimate is conservative and likely overstates demand based on the site context and travel characteristics, transit proximity and quality, and existing and expected travel characteristics. Additionally, this parking analysis reflects 2019 parking costs and regulations; future parking policies may influence parking demand for CCSF and the Balboa Reservior.

**Exhibit 13: Estimated Midday Site Parking Demand with Travel Demand Management**

| Land Use | Project Options | |
|---|---|---|
| | Developer's Proposed Option | Additional Housing Option |
| Residential (Midday 80% of Overnight)[1] | 426 | 602 |
| Retail & Childcare Short-Term | 11 | 11 |
| Retail Employee[2] | 9 | 9 |
| Childcare Employee[3] | 9 | 9 |
| **Total Development Midday Parking Demand** | **455** | **631** |

Notes:
[1] Based on distribution of unit sizes and affordable housing; 20% midday reduction based on page G-2 of 2002 Transportation Analysis Guidelines. Overnight parking demand is 514 vehicles for the Developer's Proposed Option and 724 for the Additional Housing Option.
[2] Daily non-work automobile trips calculated by adjusting Table 6 of the Travel Demand Memorandum trips by Table C-2 values of 2002 Transportation Analysis Guidelines; vehicle occupancy based on SD-3 retail trips per 2002 Transportation Analysis Guidelines.
[3] Number of employees based on Table C-1 of 2002 Transportation Analysis Guidelines; Mode split per Table 4 of Travel Demand Memorandum.

As shown in Exhibit 13, the Developer's Proposed Option would generate a total midday parking demand for 455 vehicle parking spaces (426 residential, 29 retail and childcare visitor, 18 retail and childcare employee). The Additional Housing Option would generate a total midday parking demand for 631 vehicle parking spaces (602 residential, 29 retail and childcare visitor, 18 retail and childcare employee).

The vehicle parking supply proposed under each development scenario was evaluated against the estimated parking demand generated by the project and the existing CCSF overflow demand. The summary results are shown in Exhibit 14.

**Exhibit 14: Total Parking Analysis Summary (0.5:1 Parking Ratio [currently proposed])**

| Time Period | Parking Scenario | Developer's Proposed Option (0.5:1) | | | | Additional Housing Option (0.5:1) | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Supply | | | | Supply | | |
| | | Dem-and | On-Site [1] | Neighbor-hood[2] | Total | Dem-and | On-Site | Neighbor-hood[2] | Total |
| Midday | Residential | 426 | 550 | 0 | 550 | 602 | 650 | 0 | 650 |
| | Public/CCSF[3] | 268 | 0 | 316 | 316 | 268 | 0 | 316 | 316 |
| | Total | 694 | 550 | 316 | 866 | 870 | 650 | 316 | 966 |
| Overnight | Residential | 533 | 550 | 0 | 550 | 751 | 650 | 0 | 650 |
| | Public/CCSF[3] | 0 | 0 | 217 | 217 | 0 | 0 | 217 | 217 |
| | Total | 533 | 550 | 217 | 767 | 751 | 650 | 217 | 867 |

Notes: (0.5:1) denotes a parking ratio of 0.5 residential parking spaces for 1 residential unit; green-shaded cells have excess parking supply while red-shaded cells have parking deficits
[1] Developer's Proposed Option supply does not include the 750-space parking garage that is analyzed in the EIR. Some or all of these parking spaces could be included in the final project to meet projected demand.
[2] Neighborhood supply includes available street parking spaces within the parking study area during the given time period (Midday and Evening/Overnight).
[3] Includes 29 retail and child care visitor and employee demand and 239 overflow CCSF vehicles.

As shown in Exhibit 14, the currently proposed 0.5:1 parking ratio meets residential parking demand under the Developer's Proposed Option during the midday and overnight periods and the Additional

Housing Option during the midday period. There would be a 101 space residential parking space shortfall during the overnight period with the Additional House Option. The parking demand associated with the retail and child care visitor and employee demand (29 spaces) and CCSF overflow demand (239 spaces) could be met by available on-street parking spaces within the study area (316 spaces during the midday period, 217 spaces during the overnight period).

Alternatively, the parking demand from the retail and daycare visitors and employees and overflow CCSF vehicles could be accommodated by a combination of reducing CCSF parking demand through planned TDM measures and/or a shared parking agreement with the Balboa Reservoir project. Additionally, under the Developer's Proposed Option, the supply shown in Exhibit 14 does not include the 750-space parking garage that is analyzed in the EIR. Some or all of these parking spaces could be included in the final project to meet projected demand.

# PARKING MONITORING PLAN

## Goal of the Monitoring Plan

The goal of the monitoring plan is to conduct ongoing monitoring and evaluation of vehicle parking supply and utilization on the Balboa Reservoir project site and nearby City College of San Francisco parking facility. Data will be collected and reviewed to help inform the construction of parking facilities and to determine if parking and transportation demand management strategies are needed.

## Background

The Balboa Reservoir Parking Utilization Study (2017-2018) presented above, is an analysis of the parking conditions on the proposed project site ("Lower Lot") and the adjacent Upper Lot. Data was collected at three time periods when school was in session to gauge when parking utilization would be at its highest levels of the year.

The Parking Utilization Study (2017-2018) was intended to monitor and evaluate parking supply and usage to understand the potential effects of the proposed Balboa Reservoir development on the Lower Lot and the resulting loss of parking on City College of San Francisco staff and students. This initial study will be used to develop the framework and methodology for ongoing monitoring and evaluation of parking supply and utilization on the Balboa Reservoir site and the Upper Lot to guide management of Balboa Reservoir and City College of San Francisco parking facilities. Proposed methodology and implementation of the parking monitoring plan is discussed in the following sections.

# Methodology

### *Balboa Reservoir Parking Utilization Study (2017-2018) Methodology*

For the Balboa Reservoir Parking Utilization Study (2017-2018), parking data was collected on an hourly basis over a 14-hour time period, between 7:00 a.m. and 9:00 p.m. Data was collected on three separate mid-week days (Tuesday, Wednesday, or Thursday) when CCSF was in session. The number of spaces in the Upper and Lower Lots were counted with the use of aerial photography and then verified in the field. Parking occupancy was collected manually by field technicians. The parking lots were divided into areas with a field technician responsible for collecting data in each area. Technicians walked the lots every hour, manually counting the number of full and empty stalls in each area. Data was marked by hand in the field and transferred to spreadsheets. The spreadsheet data entries were then checked against the manual entries. The cost of data collection was $560 for each of the Upper Lot and Lower Lot, or $1,120 total, for each 14-hour observation period.

### *Ongoing Monitoring and Evaluation*

The following methodology for ongoing monitoring is recommended to provide efficient and accurate data collection, to align reported space types with parking management categories, and to make the utilization report simple and accessible to all audiences.

- **Survey Study Area.** Collect data within the Lower Lot and Upper Lot. When construction of the Balboa Reservoir project begins, collect data within the Upper Lot only. After construction of the Balboa Reservoir project, if public parking is provided on the Balboa Reservoir site, collect data at the public parking facility and the Upper Lot.
- **Survey Time Period.** Conduct the survey over a four-week period, during the third, fourth, fifth, and sixth weeks of the fall academic term, alternating weekly between Wednesday and Thursday in order to capture daily variations in class schedules and allow for two surveys on each day to get a broader representation of parking demand. This survey period is intended to be inclusive of the period of peak CCSF enrollment.
- **Survey Duration.** Conduct data collection between the hours of 7 a.m. and 9 p.m. to capture hourly variation and peak periods of parking demand.
- **Parking Space Classification.** Classify vehicle parking spaces into the following categories to align with existing parking types provided by CCSF[3] and the Balboa Reservoir project: student; faculty/staff; Americans with Disabilities Act (ADA); reserved; short-term/metered; public (free); public (paid); and private (residents only). Additional categories that could be considered depending on applicability, include electric vehicle charging spaces and dedicated carpool spaces. The Balboa Reservoir Parking Utilization Study (2017-2018) collected and reported

[3] City College of San Francisco 2019 Facilities Master Plan, March 2019. P. 2-32. https://www.ccsf.edu/en/about-city-college/administration/vcfa/facilities_planning/facilities-master-plan.html, accessed April 5, 2019.

utilization data for each facility but did not classify the parking spaces into categories. This approach made data collection and reporting simple and easy to understand, however, it offers limited utility to match space types with parking management categories and patterns of parking demand.

- **Parking Capacity.** Parking capacity is a measure of the number of parking spaces available within the surveyed locations at the time of the survey. Year-to-year changes in capacity are influenced by the physical addition or removal of parking lots and spaces as well as by changes in the management of individual spaces and lots.
- **Parking Utilization.** The overall parking utilization rate is calculated as the ratio of occupied spaces to the total number of parking spaces in the surveyed lots. The percent utilization reported would be an average of the four survey days. Parking utilization should be reported overall (for both facilities combined), by location (for each individual facility), and by parking space category.
- **Reporting.** The parking utilization study should be conducted on an annual basis and build on prior year's data to allow for a longitudinal/historical evaluation.

## Future Management of Parking Facilities

Balboa Reservoir development intends to manage its parking efficiently while working to encourage the use of transportation modes other than the single occupancy vehicle. These efforts are being pursued concurrently and in partnership with City College of San Francisco, Public Utilities Commission, and the City of San Francisco to address the future parking needs for CCSF Ocean Campus.

City College of San Francisco approved its Facilities Master Plan in March 2019. The document outlines a vision for the future of the campus that directs cars to routes at the perimeter of campus, emphasizes a more pedestrian atmosphere on Frida Kahlo Way, and limits on-campus circulation to ADA and service vehicles. City College of San Francisco is developing a transportation demand management program aimed at actively reducing single occupancy vehicle trips to the campus through strategies including designated carpool and carshare vehicle parking and provision of passenger loading and short-term parking spaces. According to information included in the Facilities Master Plan, the West Parking Structure could replace surface parking in the Upper Lot due to the construction of the Performing Arts Education Center. The structure may include up to 1,200 vehicle parking spaces on six floors. Additional vehicle parking would be provided in the East Surface Parking lot located on the east side of the east campus.

With regular monitoring of parking utilization and careful management, Balboa Reservoir and CCSF can support efficient use of the facilities by implementing transportation demand management measures and parking strategies that could include, but are not limited to:

- **Private parking partnerships**. Shared parking arrangement between Balboa Reservoir and City College of San Francisco.

- **Parking policies**. Implement changes to policies and practices that optimize parking occupancy and turnover, such as adding time limits or paid parking, including variable demand-based pricing.
- **Physical improvements**. Make physical improvements, including sidewalk widening, installation of bike facilities and amenities, and wayfinding to increase use of non-auto modes.
- **Shuttle service**. Provide fixed-route or on-demand shuttle service between the project site and key destinations to increase use of non-auto modes.
- **Valet parking**. Implement centralized valet service, thereby increasing capacity of existing parking facilities by enabling tandem parking.
- **Increase parking supply**. Construct a new garage or expand the existing facility.

## SUMMARY OF FINDINGS

The key findings of the parking supply and utilization data collection and the parking demand analysis are summarized below:

- The peak hourly utilization of both the Lower Lot and Upper Lot occurs between 10 a.m. and 1 p.m. The observed maximum combined occupancy rate of 73% (1,596 cars parked and 578 spaces available) occurred between 11 a.m. and 12 p.m.
- Under existing parking pricing policy, the Upper Lot can accommodate the existing combined parking demand (the total demand observed at both the Lower Lot and Upper Lot) during the a.m. and p.m. periods (7 to 9 a.m. and 5 to 7 p.m.) but would not meet the combined parking demand during the weekday midday period (10 a.m. to 12 p.m.). During the weekday midday peak hour of parking demand, assuming parking was available only at the Upper Lot, there would be a shortfall of up to 239 parking spaces.
- There are a total of 906 parking spaces within the neighborhood on-street parking study area and between approximately 200 and 300 on-street spaces are available on weekdays during any given time period (a.m., midday, and p.m.).
- Projected residential parking demand can be met at a 0.5:1 parking ratio except during the overnight period for the Additional Housing Option, which would have a 101 space shortfall.
- Projected parking demand from the retail and daycare visitors and employees and overflow CCSF vehicles could be accommodated by available on-street parking spaces, reduced Balboa Reservoir and CCSF parking demand through planned TDM measures, and/or a shared parking agreement with the Balboa Reservoir project.
- The Balboa Reservoir development intends to monitor and manage its parking efficiently while working to encourage the use of transportation modes other than the single occupancy vehicle. Shared or flexible parking designations between residential, retail, and CCSF uses would help to minimize the total number of parking spaces needed to meet project-generated parking demand and overflow CCSF parking demand resulting from the redevelopment of the Lower Lot. Implementation of TDM measures and a shared parking agreement with CCSF would reduce the impacts of parking shortfalls on the neighborhood parking supply.

# ATTACHMENT B: OPERATIONS ANALYSIS TECHNICAL MEMORANDUM

KITTELSON & ASSOCIATES

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# TECHNICAL MEMORANDUM

| | |
|---|---|
| Date: | August 1, 2019 |
| To: | Reservoir Community Partners, LLC |
| From: | Kittelson & Associates, Inc. |
| Project: | Balboa Reservoir – Operations Analysis Memorandum |

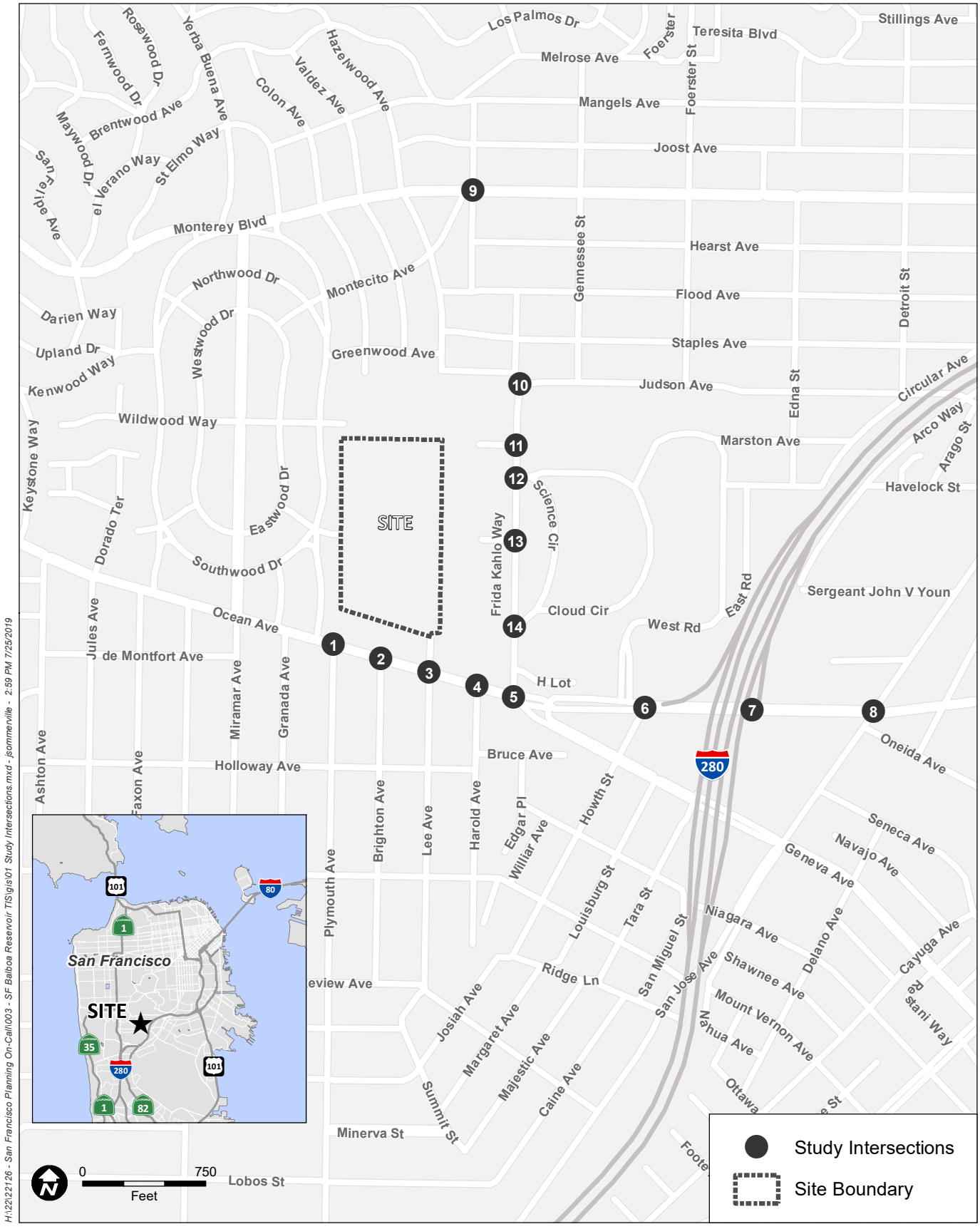
This memorandum summarizes the corridor delay and intersection operations analyses conducted for the Balboa Reservoir development (proposed project). The objective of the analysis is to evaluate existing and existing plus project corridor operations along Ocean Avenue and Ridgewood Avenue-Frida Kahlo Way and intersection operations at select study intersections to estimate the changes in travel time attributable to the project and to evaluate potential modifications to improve traffic flow and vehicle progression at intersections along Ocean Avenue. Data on existing transit operations is used to inform the evaluation. This memorandum is organized as follows:

- Data collection summary
- Analysis methodology
- Corridor delay analysis
- Intersection operations analysis
- Potential intersection modifications
- Summary of findings

## DATA COLLECTION SUMMARY

### Intersection Turning Movement Counts

Weekday a.m. (7 to 9 a.m.) and p.m. (4 to 6 p.m.) period multimodal turning movement counts were collected at 14 locations along Ocean Avenue, Ridgewood Avenue, and Frida Kahlo Way. Turning movement counts were collected on a weekday (Tuesday, Wednesday, or Thursday) when City College of San Francisco was in session. The study intersection locations are shown in Figure 1 and listed in Table 1.

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Source: Kittelson & Associates, Inc., 2019

Balboa Reservoir Project

**Figure 1**
**Study Intersections**

**Table 1: Study Intersections**

| # | Intersection |
|---|---|
| 1 | Plymouth Avenue/Ocean Avenue |
| 2 | Brighton Avenue/Ocean Avenue |
| 3 | Lee Avenue/Ocean Avenue |
| 4 | Harold Avenue/Ocean Avenue |
| 5 | Frida Kahlo Way/Geneva Avenue/Ocean Avenue |
| 6 | I-280 SB Off-Ramp/Ocean Avenue |
| 7 | I-280 NB On-Ramp/Ocean Avenue |
| 8 | San Jose Avenue/Ocean Avenue |
| 9 | Ridgewood Avenue/Monterey Boulevard |
| 10 | Frida Kahlo Way/Judson Avenue |
| 11 | Frida Kahlo Way/City College Upper Reservoir Lot (N) |
| 12 | Frida Kahlo Way/Cloud Circle (N) |
| 13 | Frida Kahlo Way/City College Upper Reservoir Lot (S) |
| 14 | Frida Kahlo Way/Cloud Circle (S) |

## SFMTA General Transit Feed Specification (GTFS) Data

The SFMTA provided General Transit Feed Specification data for two inbound/outbound routes operating on streets adjacent to the project, 29 Sunset and 43 Masonic, for the weekday a.m. and p.m. peak periods (7 to 9 a.m. and 4. to 6 p.m.). SFMTA provided GTFS data for the segment of line 29 on Ocean Avenue between Mission Street/Persia Avenue and Plymouth Avenue and for the segment of line 43 extending from Gennessee Street/Monterey Boulevard to the City College Bookstore for inbound (southbound) operations and from the City College Bookstore to Foerster Street/Monterey Boulevard for outbound (northbound) operations. Historical travel time data was provided for dates between August 27, 2018 and March 8, 2019. Table 2 displays an average of the data for weekday a.m. and p.m. peak periods.

**Table 2: SFMTA Transit Data**

| Transit Line | Study Segment | Transit Travel Time (minutes:seconds) | |
|---|---|---|---|
| | | a.m. | p.m. |
| 29 | Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue | 10:55 | 12:00 |
| | Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue | 9:53 | 10:10 |
| 43 | Gennessee Street/Monterey Boulevard to City College Bookstore | 4:25 | 4:05 |
| | City College Bookstore to Foerster Street/Monterey Boulevard | 4:37 | 4:35 |

Sources: SFMTA, 2019.
Notes: a.m. refers to 7 to 9 a.m. and p.m. refers to 4 to 6 p.m. Travel time is reported in minutes and seconds.

## Transit Travel Time Runs

Supplemental transit time data was collected along study segments via onboard surveys. Transit travel times were collected on Tuesday, April 2, 2019, during the weekday a.m. peak period (7 to 9 a.m.) and the weekday p.m. peak period (4 to 6 p.m.). Two staff boarded each transit vehicle at the route start point and recorded the travel time between each stop and the dwell time at each stop. Data was gathered for the following Muni lines and study segments:

- K/T Third/Ingleside – from Jules Avenue/Ocean Avenue to the Balboa Park BART Station (eastbound) and from San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue (westbound)
- 29 Sunset – from Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue (westbound) and from Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue (eastbound)
- 43 Masonic – from Frida Kahlo Way/CCSF South Entrance to Foerster Street/Monterey Boulevard (northbound) and from Gennessee Street/Monterey Boulevard to Frida Kahlo Way/CCSF South Entrance (southbound)
- 49 Van Ness/Mission – from Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue (eastbound) and from Mission Street/Ocean Avenue to Frida Kahlo Way/CCSF South Entrance (westbound)

Table 3 shows observed transit travel times for each study segment. Multiple travel time runs were conducted on each segment in each direction. The value in the table reflects the average of those runs.

**Table 3: Supplemental Transit Travel Time Runs**

| Transit Line | Transit Route | Transit Travel Time (minutes:seconds) | |
|---|---|---|---|
| | | a.m. | p.m. |
| K | Jules Avenue/Ocean Avenue to Balboa Park BART Station | 3:30 | 8:42 |
| | San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue | 3:28 | 10:03 |
| 29 | Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue | 7:10 | 9:55 |
| | Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue | 8:01 | 12:09 |
| 43 | Frida Kahlo Way/CCSF South Entrance to Foerster Street/Monterey Boulevard | 4:20 | 4:37 |
| | Gennessee Street/Monterey Boulevard to Frida Kahlo Way/CCSF South Entrance | 4:16 | 4:23 |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue | 5:39 | 10:04 |
| | Mission Street/Ocean Avenue to Frida Kahlo Way/CCSF South Entrance | 7:18 | 11:25 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: CCSF stands for Community College of San Francisco. a.m. refers to 7 to 9 a.m. and p.m. refers to 4 to 6 p.m. Travel time is reported in minutes and seconds. Multiple transit runs were recorded, and the value in the table reflects an average of those runs.

The supplemental transit travel time data displayed in Table 3 is relatively consistent with the average historical travel time data for both peak periods on 43 Masonic and the evening peak period on 29 Sunset. While the transit travel time runs collected for 29 Sunset during the weekday a.m. peak hour were within the overall range of historic travel time data provided by SFMTA, they were about 3 minutes less than the average historic travel times reported by SFMTA during the weekday a.m. peak period (7-8 minutes as compared to 10-11 minutes). Variation between the average transit travel times observed on Tuesday, April 2, 2019 and the average of historic transit travel time data collected between August 27, 2018 and March 8, 2019 could be related to differences in the volume of vehicles traveling along the corridor and differences in dwell time and the number of passengers boarding/alighting along the corridor, among other factors. Additionally, the supplemental transit travel time data relies on two to three data points on a single day of observation compared to multiple data points collected over a 193 day period.

## ANALYSIS METHODOLOGY

All corridor delay analyses described in this memorandum were performed using Trafficware's Synchro modeling software. This software helps provide a macroscopic evaluation of traffic conditions. The transportation network, consisting of the study intersections outlined in Table 1, was constructed utilizing San Francisco (SF) Planning Department's *Guidelines for Synchro Intersection LOS Analysis* (2012),

as well as signal timing information provided by the San Francisco Municipal Transportation Agency (SFMTA).

## Corridor Delay Analysis

Corridor delay analysis was conducted along the following two corridors:

- Ocean Avenue, from Plymouth Avenue to San Jose Avenue
- Ridgewood Avenue-Frida Kahlo Way, from Ridgewood Avenue/Monterey Boulevard to Frida Kahlo Way/Geneva Avenue/Ocean Avenue

Synchro summarizes corridor delay for approaches along the arterial and includes through and turning lane groups[1]. The specific performance measure that is documented is total delay along the corridor by direction[2]. This performance measure is used to provide information about existing travel times through the study corridors and evaluate travel time increases associated with vehicle traffic generated by the proposed project options.

## Intersection Operations Analysis

Detailed intersection operations analysis was conducted at the following three locations:

- Brighton Avenue/Ocean Avenue
- Lee Avenue/Ocean Avenue
- Frida Kahlo Way/Geneva Avenue/Ocean Avenue

These three study intersections were selected for analysis to address concerns raised by the community regarding operations at these locations.

Intersection level of service (LOS) analyses were performed in accordance with the procedures stated in the 2000 *Highway Capacity Manual*. Intersection level of service is dependent on control delay[3] and is analogous to letter grades in a school report card, ranging from LOS A to LOS F. Motorists using an intersection that operates at a LOS A experience very little delay and usually do not stop, while those using an intersection that operates at a LOS F will experience long delays typically greater than 80 seconds per vehicle.

[1] The corridor delay is calculated by utilizing weighted volumes for approaches on the arterial. These volumes are not adjusted for the peak hour factor (PHF) or lane utilization factor. Peak hour factor is defined as the hourly volume divided by the peak (fifteen) minute flow rate within that same hour. The lane utilization factor indicates the "uniform" use of available lanes. It is the ratio of the average volume per lane to the heaviest volume in one lane.
[2] Total corridor delay is calculated by summing the control delay and queue delay and is presented in seconds per vehicle.
[3] Control delay is defined to include initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. This variable is measured in seconds per vehicle during a specific time period (for example, the p.m. peak hour).

All queue length analyses were performed in accordance with Synchro methodologies and represent the 95th percentile maximum queue lengths. The 95th percentile queue is the queue length that would not be exceeded 95 percent of the time.

All three signalized intersections operate as actuated-coordinated[4] signals with maximum recall[5] on the coordinated phase. This control type is defined as having the major movements (i.e., Ocean Avenue) as coordinated and set to a maximum recall, while the minor streets (Brighton Avenue, Lee Avenue, and Frida Kahlo Way/Geneva Avenue) are actuated and typically have no recall. The signals also operate on a fixed cycle length, so if there is any unused time in a cycle, it is added to the designated coordinated phases.

## Analysis Scenarios

Analysis was conducted for existing and existing plus project conditions. Existing plus project conditions reflects the existing transportation network with the inclusion of vehicle trips generated by the Additional Housing Option.

The Balboa Reservoir development has two proposed project options:

- Developer's Proposed Option. 1,100 dwelling units, 10,000 square feet of childcare use and 7,500 square feet of retail and is estimated to add 249 vehicle trips and 318 vehicle trips during the a.m. and p.m. peak hours, respectively.
- Additional Housing Option. 1,550 dwelling units, 10,000 square feet of childcare use and 7,500 square feet of retail and is forecasted to add 329 vehicle trips and 423 vehicle trips during the a.m. and p.m. peak hours, respectively.

For the purposes of a more conservative analysis, the Additional Housing Option was evaluated, as it would generate more vehicle trips and would therefore have a greater effect on corridor delay and intersection operations. The Developer's Proposed Option would generate about 25 percent fewer vehicle trips and as a result, would be expected to result in less delay compared to the Additional Housing Option.

[4] Actuated signals prioritize the through movement of the major street and use sensors to respond to the traffic present on the actuated approach, so that the pattern of the signal (the length and order of each phase) depends on the traffic and can be different at every cycle. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

[5] Each phase in a signalized intersection is given a recall mode of either no call, minimum, maximum, or pedestrian. No recall implies that a phase can be skipped if no vehicles are present/detected. Minimum recall indicates that a phase is being called for its minimum green time, independent of a vehicle's presence. Maximum recall specifies that a phase is being called for its maximum green time. Pedestrian recall means that a phase will always service the pedestrian walk and clearance interval times independent of a pedestrian's presence.

## CORRIDOR DELAY ANALYSIS

The corridor delay analysis considers the change in vehicle delay with the addition of project-generated vehicle trips along Ocean Avenue, from Plymouth Avenue to San Jose Avenue, and along Ridgewood and Frida Kahlo Way, from Ridgewood Avenue/Monterey Boulevard to Frida Kahlo Way/Geneva Avenue/Ocean Avenue. Table 4 and Table 5 display the total corridor delay for existing conditions and existing plus project conditions for the weekday a.m. and p.m. peak hours.

**Table 4: Corridor Delay – Ocean Avenue**

| Scenario | Weekday a.m. Peak Hour (seconds/vehicle) | | Weekday p.m. Peak Hour (seconds/vehicle) | |
|---|---|---|---|---|
| | Eastbound | Westbound | Eastbound | Westbound |
| Existing Conditions | 11 | 32 | 13 | 33 |
| Existing Plus Additional Housing Option Conditions | 12 | 32 | 15 | 41 |
| **Project-Related Change** | **+1** | **0** | **+2** | **+8** |

Sources: Kittelson & Associates, Inc. 2019.

**Table 5: Corridor Delay – Frida Kahlo Way**

| Scenario | Weekday a.m. Peak Hour (seconds/vehicle) | | Weekday p.m. Peak Hour (seconds/vehicle) | |
|---|---|---|---|---|
| | Northbound | Southbound | Northbound | Southbound |
| Existing Conditions | 3 | 11 | 4 | 19 |
| Existing Plus Additional Housing Option Conditions | 4 | 12 | 4 | 22 |
| **Project-Related Change** | **+1** | **+1** | **0** | **+3** |

Sources: Kittelson & Associates, Inc. 2019.

As shown in Table 4, the Additional Housing Option would increase delay along the Ocean Avenue study segment by one second in the eastbound direction during the weekday a.m. peak hour and by two seconds and eight seconds in the eastbound and westbound directions, respectively during the weekday p.m. peak hour. As shown in Table 5, the Additional Housing Option would increase delay along the Frida Kahlo Way study segment by one second in the northbound and southbound directions during the weekday a.m. peak hour and by three seconds in the southbound direction during the weekday p.m. peak hour.

## INTERSECTION OPERATIONS ANALYSIS

A detailed intersection operations analysis was conducted to identify more specifically how operations at the three study intersections (Brighton Avenue/Ocean Avenue, Lee Avenue/Ocean Avenue, and Frida Kahlo Way/Geneva Avenue/Ocean Avenue) may change with the addition of project-generated vehicle trips from the Additional Housing Option during the weekday a.m. and p.m. peak hours.

The analysis considers the delay, queue length, and LOS for each approach and for the intersection overall. Intersection volumes were adjusted to reflect the peak hour and lane utilization factors. Based on observations along Ocean Avenue, there were twice as many vehicles in the outside lanes, compared to the center lanes, as to avoid the light rail tracks and to avoid being delayed behind transit. Therefore, a lane utilization factor[6] of 0.75 was applied to eastbound and westbound through movements at each study intersection. Table 6 summarizes the weekday a.m. peak hour results, and Table 7 displays the weekday p.m. peak hour results.

**Table 6: Intersection Operations – Weekday a.m. Peak Hour**

| Intersection/ Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | |
| **Existing Conditions** | | | | | | | | | | | | | |
| Brighton Avenue | 7.9 | 136.0 | A | 6.4 | 374.0 | A | 36.2 | 52.0 | D | 64.4 | 25.0 | E | 9.2 |
| Lee Avenue | 8.6 | 55.0 | A | 16.6 | 263.0 | B | 31.6 | 94.0 | C | 23.6 | 30.0 | C | 14.3 |
| Frida Kahlo Way/Geneva Avenue | 39.0 | 427.0 | D | **136.4** | **485.0** | **F** | 30.4 | 210.0 | C | 21.4 | 87.0 | C | 84.3 |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 7.9 | 136.0 | A | 6.2 | 398.0 | A | 36.2 | 52.0 | D | 64.4 | 25.0 | E | 9.0 |
| Lee Avenue | 8.6 | 55.0 | A | 17.4 | 265.0 | B | 33.4 | 107.0 | C | 35.2 | 117.0 | D | 16.3 |
| Frida Kahlo Way/Geneva Avenue | 51.9 | 487.0 | D | **164.5** | **521.0** | **F** | 31.3 | 218.0 | C | 21.4 | 87.0 | C | 102.7 |
| **Project Change** | | | | | | | | | | | | | |
| Brighton Avenue | - | - | - | -0.2 | +24.0 | - | - | - | - | - | - | - | -0.2 |
| Lee Avenue | - | - | - | +0.8 | +2.0 | - | +1.8 | +13.0 | - | +11.6 | +87.0 | C to D | +2.0 |
| Frida Kahlo Way/Geneva Avenue | +12.9 | +60.0 | - | +28.1 | +36.0 | - | +0.9 | +8.0 | - | - | - | - | +18.4 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = Level of Service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a volume-to-capacity ratio greater than 1.0[7]. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

[6] A lane utilization factor can be applied in Synchro as to indicate a specific distribution across lanes. The factor is estimated by dividing the total approach volume by the number of lanes and the highest lane volume.
[7] According to the *Highway Capacity Manual*, capacity is defined as the maximum flow rate for a roadway under specific geometric, traffic, environmental, and control conditions. When a volume-to-capacity ratio (v/c) is greater than one, then there is typically high delay and long queues.

**Table 7: Intersection Operations – Weekday p.m. Peak Hour**

| Intersection/ Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | |
| **Existing Conditions** | | | | | | | | | | | | | |
| Brighton Avenue | 9.6 | 140.0 | A | **78.2** | **570.0** | **E** | 36.8 | 62.0 | D | 42.5 | 16.0 | D | **45.6** |
| Lee Avenue | 9.4 | 64.0 | A | 18.0 | 314.0 | B | 32.5 | 98.0 | C | 27.7 | 70.0 | C | 15.7 |
| Frida Kahlo Way/Geneva Avenue | 46.9 | 471.0 | D | **75.1** | **393.0** | **E** | 29.6 | 203.0 | C | 23.3 | 141.0 | C | 53.7 |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 9.6 | 142.0 | A | **75.1** | **492.0** | **E** | 36.8 | 62.0 | D | 42.5 | 16.0 | D | **44.3** |
| Lee Avenue | 9.4 | 64.0 | A | 22.2 | 323.0 | C | 35.4 | 130.0 | D | 39.3 | 151.0 | D | 19.9 |
| Frida Kahlo Way/Geneva Avenue | **60.4** | **516.0** | **E** | **145.6** | **508.0** | **F** | 31.9 | 223.0 | C | 23.3 | 141.0 | C | 90.9 |
| **Project Change** | | | | | | | | | | | | | |
| Brighton Avenue | - | +2.0 | - | -3.1 | -78.0 | - | - | - | - | - | - | - | -1.3 |
| Lee Avenue | - | - | - | +4.2 | +9.0 | B to C | +2.9 | +32.0 | C to D | +11.6 | +81.0 | C to D | +4.2 |
| Frida Kahlo Way/Geneva Avenue | +13.5 | +45.0 | D to E | +70.5 | +115.0 | E to F | +2.3 | +20.0 | - | - | - | - | 37.2 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = Level of Service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a volume-to-capacity ratio greater than 1.0. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

## Brighton Avenue/Ocean Avenue

The intersection of Brighton Avenue/Ocean Avenue is a four-legged, offset, signalized intersection. The eastbound and westbound approaches have two through lanes each, where the inside lanes serve transit buses and light rail and general vehicles. Left-turns onto Brighton Avenue are permitted for these approaches. The northbound and southbound approaches consist of one lane in each direction that serves through, right, and left-turn movements.

Traffic signals along Ocean Avenue, west of Geneva Avenue, are coordinated to provide east-west progression during the weekday a.m. and p.m. peak periods. Traffic signal control at Brighton Avenue/Ocean Avenue operates with three phases. The cycle length during both peak periods is 80 seconds. Phases on Ocean Avenue are always being called to their maximum green time, whereas any green time not utilized on Brighton Avenue is added to the through movements on Ocean Avenue. Brighton Avenue operates with split phasing, with southbound movements following northbound movements

As shown in Table 6 and Table 7, there would not be a substantial change to the delay, queue lengths, and level of service for all approaches at the intersection of Brighton Avenue/Ocean Avenue with the addition of project-generated vehicle trips. The following is a summary of the analysis results:

- The westbound approach would operate above capacity, with a volume-to-capacity ratio greater than 1, during the weekday p.m. peak hour for existing and existing plus project conditions.
- With the addition of project trips, the overall intersection delay may be slightly reduced (by less than one second per vehicle and by 1.3 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of trips travelling through the intersection are doing so on the coordinated phase, thereby increasing the efficiency of the signal and reducing average vehicle delay.
- The westbound approach is projected to experience the greatest amounts of change with the buildout of the Additional Housing Option.
    - With the project, delays on this approach may be slightly reduced (by 0.2 and 3.1 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of intersection traffic is on the coordinated phase.
    - With the project, the queue length may increase slightly (by 24 feet) during the weekday a.m. peak hour and decrease slightly (by 78 feet) during the weekday p.m. peak hour. This decrease is due to better utilization of the coordinated phase.
    - The level of service is estimated to remain the same during the weekday a.m. and p.m. peak hours.
- The project would not add trips to Brighton Avenue and the delay, queue length, and level of service on the northbound and southbound approaches are forecast to remain the same during the weekday a.m. and p.m. peak periods.

## Lee Avenue/Ocean Avenue

The intersection of Lee Avenue/Ocean Avenue is a four-legged signalized intersection. The eastbound and westbound approaches have two through lanes each, where the inside lanes serve transit and vehicles. Left-turns onto Lee Avenue are prohibited for these approaches. The northbound and southbound approaches consist of one lane in each direction that serves through, right, and left-turn movements. Lee Avenue is anticipated to be an access route to the project, and to accommodate additional traffic entering and exiting the project, Lee Avenue will be restriped to include an additional lane on the southbound approach. Therefore, for the purposes of this memorandum, the southbound approach was analyzed using a different lane configuration than what is existing. The lane configuration analyzed for existing and existing plus project conditions is comprised of a southbound left-turn lane and a southbound through/right-turn lane.

Traffic signals along Ocean Avenue, west of Geneva Avenue, are coordinated to provide east-west progression during the weekday a.m. and p.m. peak periods. Traffic signal control at Lee Avenue operates with two phases. The cycle length during both peak periods is 80 seconds. Phases on Ocean Avenue are

always being called to their maximum green time, whereas any green time not utilized on Lee Avenue is added to through movements on Ocean Avenue. For pedestrians utilizing the eastbound and westbound crosswalks, there is a four second leading pedestrian interval. This means that pedestrians are given a head start when entering an intersection before vehicles are given a green indication.

The data in Table 6 and Table 7 summarizes the quantitative measures for the quality of traffic at the intersection. The following outlines the results of the intersection operations analysis comparing existing traffic conditions and existing plus project traffic conditions:

- With the addition of project-generated vehicle trips, the overall intersection delay may slightly increase (by 2.0 and 4.2 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively).
- The southbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips.
    - The delay is estimated to increase by 11.6 seconds per vehicle during the weekday a.m. and p.m. peak hours.
    - The queue length is estimated to increase by 87 feet during the weekday a.m. peak hour and by 81 feet during the weekday p.m. peak hour.
    - The level of service is estimated to change from LOS C to LOS D during the weekday a.m. and p.m. peak hours.
- There would be a slight increase in delay on the northbound approach (1.8 and 2.9 seconds during the weekday a.m. and p.m. peak hours, respectively) with the addition of project-generated vehicle trips. Queue lengths would increase by less than two vehicle lengths.
- There would be a slight increase in delay on the westbound approach (0.8 and 4.2 seconds during the weekday a.m. and p.m. peak hours, respectively) with the addition of project-generated vehicle trips. Queue lengths would increase by less than one vehicle length.
- The eastbound approach is projected to experience little to no change in delay, queues, or level of service during the weekday a.m. and p.m. peak hours with the addition of project-generated vehicle trips.

## Frida Kahlo Way/Geneva Avenue/Ocean Avenue

The intersection of Frida Kahlo Way/Geneva Avenue/Ocean Avenue is a four-legged signalized intersection. The eastbound approach has one left-turn lane, one through lane, and a through/right-turn lane. The westbound approach has two through lanes and one through/right-turn lane. The northbound approach has one left-turn lane and one shared left/right-turn lane. The southbound approach has one right-turn lane, one through lane, and one through/left-turn lane. Both general vehicles and transit vehicles utilize the eastbound left-turn lane and westbound inside through lane.

Traffic signals along Ocean Avenue, west of Geneva Avenue, are coordinated to provide east-west progression during the weekday a.m. and p.m. peak periods. The cycle length during both peak periods is 80 seconds. Northbound/southbound approaches and eastbound/westbound approaches run

concurrently. Left-turning movements on the eastbound approach and the westbound approach are protected and are given a left-turn green arrow.

Referencing the data outlined in Table 6 and Table 7 project generated trips are predicted to result in changes to delay, queues, and level of service at Frida Kahlo Way/Geneva Avenue/Ocean Avenue. The following describes the changes between existing conditions and existing plus project conditions:

- The eastbound approach is estimated to operate over capacity with the addition of project-generated trips during the weekday p.m. peak hour. The westbound approach is estimated to operate over capacity during the weekday a.m. and p.m. peak hours for existing and existing plus project conditions.
- The overall intersection delay is anticipated to increase by 18.4 seconds per vehicle during the weekday a.m. peak hour and by 37.2 seconds per vehicle during the weekday p.m. peak hour with the addition of project-generated vehicle trips.
- The addition of project-generated vehicle trips is forecast to result in changes to delay and queue length on the eastbound approach during the weekday a.m. and p.m. peak hours, as follows:
    - The delay is estimated to increase by 12.9 and 13.5 seconds per vehicle, respectively.
    - The queue length is estimated to increase by 60 and 45 feet, respectively.
- The addition of project-generated vehicle trips is forecast result in changes to delay, queue length, and level of service on the westbound approach during the weekday a.m. and p.m. peak hour, as follows:
    - The delay is estimated to increase by 28.1 and 70.5 seconds per vehicle, respectively.
    - The queue length is estimated to increase by 38.6 and 115 feet, respectively.
    - The level of service is estimated to worsen from a LOS E to a LOS F during the weekday p.m. peak hour.
- The addition of project-generated vehicle trips are estimated to result in minimal changes to the delay, queue length on the northbound and southbound approaches during the weekday a.m. and p.m. peak hours.

## Corridor Travel Times

To assess the effect of project-generated vehicle traffic on transit travel time on Muni lines K/T, 29, 43 and 49, the total change in delay across the three intersections for various movements is presented in Table 8.

**Table 8: Transit Travel Time Changes**

| Transit Line | Transit Route | Ocean Avenue Corridor Transit Travel Time (minutes:seconds) | | | | | |
|---|---|---|---|---|---|---|---|
| | | Existing Conditions | | Project-Related Change | | Existing Plus Project Conditions | |
| | | a.m. | p.m. | a.m. | p.m. | a.m. | p.m. |
| K | Jules Avenue/Ocean Avenue to Balboa Park BART Station | 3:30 | 8:42 | 0:29 | 1:12 | 3:59 | 9:54 |
| | San Jose Avenue/Geneva Avenue to Dorado Terrace/Ocean Avenue | 3:28 | 10:03 | 0:13 | 0:14 | 3:41 | 10:17 |
| 29 | Mission Street/Persia Avenue to Plymouth Avenue/Ocean Avenue | 10:55 | 12:00 | 0:29 | 1:12 | 11:24 | 13:12 |
| | Plymouth Avenue/Ocean Avenue to Mission Street/Persia Avenue | 9:53 | 10:10 | 0:13 | 0:14 | 10:06 | 10:23 |
| 43 | Gennessee Street/Monterey Boulevard to City College Bookstore | 4:25 | 4:05 | - | - | 4:25 | 4:05 |
| | City College Bookstore to Foerster Street/Monterey Boulevard | 4:37 | 4:35 | 0:01 | 0:05 | 4:38 | 4:40 |
| 49 | Frida Kahlo Way/CCSF South Entrance to Mission Street/Persia Avenue | 5:39 | 10:04 | 0:01 | 0:05 | 5:40 | 10:09 |
| | Mission Street/Ocean Avenue to Frida Kahlo Way/CCSF South Entrance | 7:18 | 11:25 | 0:01 | 0:05 | 7:19 | 11:30 |

Sources: SFMTA, 2019 (Existing Conditions). Kittelson & Associates, Inc. 2019 (Project-Related Change).
Notes: Delay is measured in seconds per vehicle. Transit times are presented in minutes and seconds. "-" indicates data not available.

As shown in Table 8, project-related change in transit travel time could not be calculated for the 43 Gennessee Street/Monterey Boulevard to City College Bookstore study segment as no study intersections are located along that segment. The greatest project-related increase in transit travel times of 29 seconds and 1 minute 12 seconds are estimated to affect the westbound operations for Muni lines K and 29 during the weekday a.m. and p.m. peak hours, respectively. This refined and detailed analysis considers the effect of imbalanced lane utilization along Ocean Avenue. As a result, the analysis results presented herein may differ from those presented within the corridor delay analysis and transit assessment memorandums.

## POTENTIAL INTERSECTION MODIFICATIONS

Intersection modifications can be made to increase safety and capacity, improve vehicle progression, and reduce congestion on the road. The most common strategies include optimizing or modifying signal timing and implementing physical changes or turn movement restrictions at intersections to increase efficiency of intersection or corridor operations. This section presents a discussion and quantitative analysis of potential signal timing modifications and a discussion and qualitative assessment of other potential modifications.

### Signal Timing Modifications

One of the major objectives of traffic signal optimization is to increase the capacity of at-grade intersections. This section discusses increasing green time on Ocean Avenue and evaluates the potential of this modification to reduce vehicle delay at study intersections along Ocean Avenue. For this analysis, at each study intersection, five seconds of green time was reallocated from the north/south approaches to the east/west approaches. In other words, green time on Ocean Avenue was increased by five seconds for each phase while the overall cycle length remained fixed. Table 9 and Table 10 summarize the delay, queue length, and level of service for each approach comparing existing plus project conditions and existing plus project conditions with the green time modifications for weekday a.m. and p.m. peak hours.

As shown in Table 9 and Table 10, the green time extension would reduce delay on eastbound and westbound movements and increase delay on northbound and southbound movements at study intersections along Ocean Avenue. Increasing, or reallocating, green time to Ocean Avenue would result in longer wait times for people crossing Ocean Avenue.

**Table 9: Intersection Operations – Weekday a.m. Peak Hour with Green Time Reallocation to Ocean Avenue**

| Intersection/Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | Delay | Queue | LOS | |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 7.9 | 136.0 | A | 6.2 | 398.0 | A | 36.2 | 52.0 | D | 64.4 | 25.0 | E | 9.0 |
| Lee Avenue | 8.6 | 55.0 | A | 17.4 | 265.0 | B | 33.4 | 107.0 | C | 35.2 | 117.0 | D | 16.3 |
| Frida Kahlo Way/Geneva Avenue | 51.9 | 487.0 | D | **164.5** | **521.0** | **F** | 31.3 | 218.0 | C | 21.4 | 87.0 | C | 102.7 |
| **Existing Plus Additional Housing Option with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | 6.5 | 80.0 | A | 5.1 | 44.0 | A | 37.6 | 67.0 | D | 73.8 | 25.0 | E | 8.1 |
| Lee Avenue | 5.4 | 54.0 | A | 15.6 | 301.0 | B | 42.3 | 129.0 | D | 68.0 | 150.0 | E | 17.4 |
| Frida Kahlo Way/Geneva Avenue | 32.2 | 426.0 | C | **73.7** | **390.0** | **E** | 54.9 | 280.0 | D | 25.9 | 95.0 | C | 51.6 |
| **Change with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | -1.4 | -56.0 | - | -1.1 | -354.0 | - | +1.4 | +15.0 | - | +9.4 | - | - | -0.9 |
| Lee Avenue | -3.2 | -1.0 | - | -1.8 | +36.0 | - | +8.9 | +22.0 | C to D | +32.8 | +33.0 | D to E | +1.1 |
| Frida Kahlo Way/Geneva Avenue | -19.7 | -61.0 | D to C | -90.8 | -131.0 | F to E | +23.6 | +62.0 | C to D | +4.5 | +8.0 | - | -51.1 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = level of service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a v/c>1.0. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

**Table 10: Intersection Operations – Weekday p.m. Peak Hour with Green Time Reallocation to Ocean Avenue**

| Intersection/ Scenario | Eastbound | | | Westbound | | | Northbound | | | Southbound | | | Int. Delay |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Delay** | **Queue** | **LOS** | **Delay** | **Queue** | **LOS** | **Delay** | **Queue** | **LOS** | **Delay** | **Queue** | **LOS** | |
| **Existing Plus Additional Housing Option** | | | | | | | | | | | | | |
| Brighton Avenue | 9.6 | 142.0 | A | **75.1** | **492.0** | **E** | 36.8 | 62.0 | D | 42.5 | 16.0 | D | **44.3** |
| Lee Avenue | 9.4 | 64.0 | A | 22.2 | 323.0 | C | 35.4 | 130.0 | D | 39.3 | 151.0 | D | 19.9 |
| Frida Kahlo Way/Geneva Avenue | **60.4** | **516.0** | **E** | **145.6** | **508.0** | **F** | 31.9 | 223.0 | C | 23.3 | 141.0 | C | 90.9 |
| **Existing Plus Additional Housing Option with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | 8.5 | 115.0 | A | **66.4** | **542.0** | **E** | 38.2 | 85.0 | D | 42.5 | 16.0 | D | **39.5** |
| Lee Avenue | 5.9 | 58.0 | A | 20.2 | 368.0 | C | 56.9 | 175.0 | E | **90.3** | **184.0** | **F** | 24.1 |
| Frida Kahlo Way/Geneva Avenue | 33.2 | 442.0 | C | **63.3** | **362.0** | **E** | 28.7 | 288.0 | E | 28.9 | 155.0 | C | 45.7 |
| **Change with Green Time Reallocation to Ocean Avenue** | | | | | | | | | | | | | |
| Brighton Avenue | -1.1 | -27.0 | - | -8.7 | +50.0 | - | +1.4 | +23.0 | - | - | - | - | -4.8 |
| Lee Avenue | -3.5 | -6.0 | - | -2.0 | +45.0 | - | +21.5 | +45.0 | D to E | +51.0 | +33.0 | D to F | +4.2 |
| Frida Kahlo Way/Geneva Avenue | -27.2 | -74.0 | E to C | -82.3 | -146.0 | F to E | -3.2 | +65.0 | C to E | +5.6 | +14.0 | - | -45.2 |

Sources: Kittelson & Associates, Inc. 2019.
Notes: LOS = level of service. Int. = Intersection. Approach delay is measured in average seconds delay experienced per vehicle on the approach during the specified time period. Intersection delay is the average total vehicle delay of all movements through an intersection during the specified time period. Queue length is measured in feet and represents the queue for through or left-turn lane movements on each approach. Analysis results presented in **bold** represents an approach exceeding capacity, with a v/c>1.0. Synchro may overestimate the delay and queue lengths reported at intersections or approaches operating at, or near, capacity.

The following section describes the changes between existing plus project conditions with and without the signal timing adjustment at each study intersection:

- Brighton Avenue/Ocean Avenue
    - The overall average intersection delay would decrease by 0.9 seconds per vehicle during the weekday a.m. peak hour and by 4.8 seconds per vehicle during the weekday p.m. peak hour, with the green time adjustment.
    - The greatest reductions in delay and queue lengths are estimated to occur on the westbound movements on Ocean Avenue. During the weekday a.m. peak hour, the delay is estimated to decrease by 1.1 seconds per vehicle, while the queue length is estimated to decrease by 354 feet, with the green time adjustment. During the weekday p.m. peak hour, the delay is estimated to decrease by 8.7 seconds per vehicle, though the queue length is estimated to increase by 50 feet, with the green time adjustment.
- Lee Avenue/Ocean Avenue
    - The overall average intersection delay is projected to increase by 1.1 seconds per vehicle during the weekday a.m. peak hour and by 4.2 seconds per vehicle during the weekday p.m. peak hour, with the green time adjustment.
    - During the weekday a.m. peak hour, the delay on the southbound approach is estimated to increase by 32.8 seconds per vehicle, the queue length is estimated to increase by 33 feet, and the level of service is estimated to worsen from a LOS D to LOS E, with the adjustment to the green time. During the weekday p.m. peak hour, the delay is estimated to increase by 51 seconds per vehicle, the queue length is estimated to increase by 33 feet, and the level of service is estimated to worsen from a LOS D to LOS F, with the green time adjustment.
    - The delay on the eastbound approach is estimated to decrease by 3.2 and 3.5 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively, with the adjustment to the green time.
- Frida Kahlo Way/Geneva Avenue/Ocean Avenue
    - During the weekday a.m. and p.m. peak periods, the delays on the eastbound and westbound movements are anticipated to decrease with the green time adjustment.
    - The overall average intersection delay is forecast to decrease by 45.2 seconds per vehicle during the weekday a.m. peak hour and by 51.1 seconds per vehicle during the weekday p.m. peak hour, with the green time adjustment. Synchro may overestimate delay and queue lengths reported at intersections and approaches operating at, or near, capacity.
    - With the addition of the green time adjustment, the westbound approach is anticipated to experience the greatest changes. During the weekday a.m. peak hour, the delay would decrease by 90.8 seconds per vehicle, the queue length would decrease by 131 feet, and the level of service would improve from LOS F to LOS E. During the weekday p.m. peak hour, the delay would decrease by 82.3 seconds per vehicle, the queue

length would decrease by 146 feet, and the level of service would improve from LOS F to LOS E.

Overall, the intersection delay is anticipated to decrease at Brighton Avenue/Ocean Avenue (by between 1 and 5 seconds) and Frida Kahlo Way/Geneva Avenue/Ocean Avenue (by between 45 and 51 seconds)[8] and is anticipated to increase at Ocean Avenue/Lee Avenue (by between 1 and 5 seconds) with the green time adjustments. Generally, the reallocation of green time to Ocean Avenue would reduce delay and queues on the eastbound and westbound approaches and increase delay and queue lengths on the northbound and southbound movements.

As previously discussed, signalized intersections along Ocean Avenue operate as actuated-coordinated signals with maximum recall[9] that operate on a fixed cycle length. Signal timing modifications implemented at these three intersections in isolation may adversely affect vehicle progression and have unintended consequences for operations along the corridor. Any adjustments to signal timing would need to be reviewed and approved by SFMTA.

## Other Modifications

In addition to signal timing modifications, other intersection modifications and treatments along the corridor may be implemented to increase efficiency of operations and reduce vehicle delay and queue lengths along the corridor. The following types of modifications may be considered:

- **Install left-turn lanes**. Left-turn lanes remove stopped or slow-moving left-turning motor vehicles from the stream of through traffic and reduce the potential for rear-end crashes at intersections. The safety and capacity benefits of left-turn lanes apply to all vehicular traffic, motorized as well as non-motorized. However, left-turn lanes add to the pedestrian crossing distance and pedestrian crossing time. The additional street width needed for left-turn lanes may require land taking or removal of on-street parking. These treatments can be costly if additional right-of-way is needed. Intersection reconfiguration that would require roadway widening or additional right-of-way may not be feasible or appropriate within the context of the corridor.
- **Install right-turn lanes.** Right turn lanes are used to remove decelerating right-turning motor vehicles from the traffic stream, and also to provide an additional lane for the storage of right-turning motor vehicles. Where the right-turn volume is heavy, this removal of the turning motor vehicle from the traffic stream can also reduce a primary cause of rear-end crashes at

[8] Synchro may overestimate delay and queue lengths reported at intersections and approaches operating at, or near, capacity.
[9] Actuated signals prioritize the through movement of the major street and use sensors to respond to the traffic present at actuated approach, so that the pattern of the signal (the length and order of each phase) depends on the traffic and can be different at every cycle. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

intersections. The safety and capacity benefits of right-turn lanes apply to all vehicular traffic, motorized as well as non-motorized. However, right-turn lanes add to the pedestrian crossing distance and pedestrian crossing time. The additional street width needed for right-turn lanes may require land taking or removal of on-street parking. These treatments can be costly if additional right-of-way is needed. Intersection reconfiguration that would require roadway widening or additional right-of-way may not be feasible or appropriate within the context of the corridor.

- **Implement turn restrictions**. Left turns take a large amount of space and signal time and right turns can be problematic for transit and through vehicle operations in the right lane. Prohibiting turns and shifting turn volume to intersections where they can be best accommodated – with signal phases and turn lanes – can improve general traffic and transit performance, and walking and bicycling safety at the same time. On two-way streets, left-turn restrictions can substantially increase the capacity of general traffic lanes.
- **Redesign intersections**. Unconventional intersection designs can be used to increase the capacity of intersections at high volume locations. Examples of unconventional designs include median U-turns, jug handles, superstreets, quadrant roadway intersections, continuous flow intersections, and synchronized-split phasing intersections. In these designs, one or more traffic movements are prohibited and re-routed at the intersection, so that fewer signal phases are needed at the intersection signal, thereby increasing the capacity of the intersection. These designs typically require extra land space and re-routed traffic movements often need to go through the intersection multiple times, which limits travel time and congestion reduction benefits. Other examples of unconventional designs include tandem intersections with separate left-turn phases and intersections with dynamic use of exit lanes for left-turns. These designs can increase the utilization of the intersection cross-section without removing or re-routing turning movements. These designs are not intuitive for drivers and can be challenging to navigate. Intersection reconfiguration that would require roadway widening, additional right-of-way, rail reconfiguration, or signal relocation would be major infrastructure projects and may not be feasible or appropriate within the context of the corridor.

Other planned projects that are intended to enhance safety and may reduce vehicle delay along the corridor include the Ocean Avenue Safety Project[10] and the I-280 Interchange Modifications at Balboa Park Project[11].

The Ocean Avenue Safety Project is aimed at improving safety, accessibility, and comfort for people traveling on Ocean Avenue and Geneva Avenue between Ocean Avenue/Geneva Avenue/Frida Kahlo Way and San Jose Avenue. The goals of this project are to develop of a set of near-term improvements, cost-effective measures that can be installed quickly (near-term project construction planned for

[10] SFMTA, Ocean Avenue Safety Project website, https://www.sfmta.com/projects/ocean-avenue-safety-project
[11] SFCTA, I-280 Interchange Modifications at Balboa Park Project website, https://www.sfcta.org/I-280-interchange-modifications-balboa-park-project

Summer 2020) to improve safety on Ocean Avenue and to create a long-term vision for the Ocean Avenue corridor that can be coordinated with other on-going projects or a future Muni re-rail project.

The I-280 Interchange Modifications at Balboa Park Project is aimed at reducing multimodal conflicts at the I-280 freeway ramps while maintaining vehicle operations in the area, providing safe, accessible, and convenient connections, and developing cost-effective solutions that can be implemented within the next decade. The recommended modifications include I-280/Geneva Avenue northbound on-ramp closure and southbound I-280/Ocean Avenue off-ramp realignment and construction of a new signalized intersection.

City College of San Francisco Facilities Master Plan[12] identifies several recommendations that would enhance transportation in the area, including developing site improvements to provide direct access between transit stops and campus gateways and coordinating efforts to support local "Transit First" policies, encourage use of non-auto modes, and implement transportation demand management measures to reduce driving to the campus.

## SUMMARY OF FINDINGS

For the purposes of a more conservative analysis, the Additional Housing Option was evaluated, as it would generate more vehicle trips and would have a greater effect on corridor delay and intersection operations. The Developer's Proposed Option would generate about 25 percent fewer vehicle trips and as a result, would be expected to result in less delay compared to the Additional Housing Option.

### Corridor Delay Analysis

Overall, vehicle trips generated by the Additional Housing Option are not anticipated to substantially increase delays along Ocean Avenue and Ridgewood Avenue/Frida Kahlo Way during the weekday a.m. and p.m. peak hours. The results of the corridor delay analysis comparing existing with existing plus project conditions are summarized in this section.

#### *Ocean Avenue*

- Under existing and existing plus project conditions, vehicles travelling westbound experience greater delay compared to vehicles travelling eastbound, during the weekday a.m. and p.m. peak hours. Specifically, westbound vehicles experience 32 and 33 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, while eastbound vehicles experience 11 and 13 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, respectively.
- Vehicle trips generated by the Additional Housing Option increase the delay by one second per vehicle for eastbound movements, while westbound movements experience no change in delay

[12] City College of San Francisco, City College Facilities Master Plan, approved by the Board of Trustees in March 2019, https://www.ccsf.edu/en/about-city-college/administration/vcfa/facilities_planning/facilities-master-plan.html

during the weekday a.m. peak hour. Vehicle trips generated by the Additional Housing Option increase the delay by two seconds per vehicle for eastbound movements and eight seconds per vehicle for westbound movements during the weekday p.m. peak hour.

### *Ridgewood Avenue-Frida Kahlo Way*

- Under existing and existing plus project conditions, vehicles travelling southbound experience greater delay compared to vehicles travelling northbound, during the weekday a.m. and p.m. peak hours. Specifically, southbound movements endure 11 and 19 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, while northbound movements experience 3 and 4 seconds of delay per vehicle during the weekday a.m. and p.m. peak hours, respectively.
- Vehicle trips generated by the Additional Housing Option increase the delay by one second per vehicle for northbound and southbound movements during the weekday a.m. peak hour. Vehicle trips generated by the Additional Housing Option do not affect the delay for northbound movements, though southbound movements experience and increase in delay by three seconds per vehicle during the weekday p.m. peak hour.

## Intersection Operations Analysis

Overall, vehicle trips generated by the Additional Housing Option are not anticipated to substantially increase delays at study intersections during the weekday a.m. and p.m. peak hours. The results of the intersection operations analysis comparing existing with existing plus project conditions are summarized in this section.

### *Brighton Avenue/Ocean Avenue*

- There would not be a substantial change to the delay, queue lengths, and level of service with the addition of project-generated vehicle trips.
- With the addition of project trips, the overall intersection delay may be slightly reduced (by less than one second per vehicle and by 1.3 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of trips travelling through the intersection are doing so on the coordinated phase, thereby increasing the efficiency of the signal and reducing average vehicle delay.
- The westbound approach is projected to experience the greatest amounts of change with the addition of project-generated vehicle trips:
    - Delays on this approach may be slightly reduced (by 0.2 and 3.1 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively), as a larger proportion of intersection traffic is on the coordinated phase.
    - Queue length may increase slightly (by 24 feet) during the weekday a.m. peak hour and decrease slightly (by 78 feet) during the weekday p.m. peak hour. This decrease is due to better utilization of the coordinated phase.

- The level of service is estimated to remain the same during the weekday a.m. and p.m. peak hours.

### *Lee Avenue/Ocean Avenue*

- With the addition of project-generated vehicle trips, the overall intersection delay is projected to slightly increase (by 2.0 and 4.2 seconds per vehicle during the weekday a.m. and p.m. peak hours, respectively).
- The southbound approach is projected to experience the greatest change in delay, queues, and level of service with the addition of project-generated vehicle trips.
  - The delay is estimated to increase by 11.6 seconds per vehicle during the weekday a.m. and p.m. peak hours.
  - The queue length is estimated to increase by 87 feet during the weekday a.m. peak hour and by 81 feet during the weekday p.m. peak hour.
  - The level of service is estimated to change from LOS C to LOS D during the weekday a.m. and p.m. peak hours.

### *Frida Kahlo Way/Geneva Avenue/Ocean Avenue*

- The overall intersection delay is anticipated to increase by 18.4 seconds per vehicle during the weekday a.m. peak hour and by 37.2 seconds per vehicle during the weekday p.m. peak hour with the addition of project-generated vehicle trips.
- The addition of project-generated vehicle trips is forecast to result in changes to delay and queue length on the eastbound approach during the weekday a.m. and p.m. peak hours, as follows:
  - The delay is estimated to increase by 12.9 and 13.5 seconds per vehicle, respectively.
  - The queue length is estimated to increase by 60 and 45 feet, respectively.
- The addition of project-generated vehicle trips is forecast to result in changes to delay, queue length, and level of service on the westbound approach during the weekday a.m. and p.m. peak hour, as follows:
  - The delay is estimated to increase by 28.1 and 70.5 seconds per vehicle, respectively.
  - The queue length is estimated to increase by 38.6 and 115 feet, respectively.
  - The level of service is estimated to worsen from a LOS E to a LOS F during the weekday p.m. peak hour.

## Corridor Transit Travel Times

Overall, vehicle trips generated by the Additional Housing Option are anticipated to increase transit travel times by a maximum of 1 minute 12 seconds on Muni lines K and 29 in the eastbound direction during the weekday p.m. peak hour. The addition of project-generated vehicle trips is projected to increase delays by a maximum of 15 seconds for other lines/directions.

## Signal Timing Modifications

Reallocating five seconds of green time from north/south phases to east/west phases on Ocean Avenue would have the following effect on study intersections during the weekday a.m. and p.m. peak hours:

- Decrease overall intersection delays at Brighton Avenue/Ocean Avenue and Frida Kahlo Way/Geneva Avenue/Ocean Avenue by between 1 and 5 seconds and between 45 and 51 seconds, respectively. However, Synchro may overestimate the change in delay and queue lengths reported at Frida Kahlo Way/Geneva Avenue/Ocean Avenue, which operates at, or near, capacity.
- Increase overall intersection delays at Ocean Avenue/Lee Avenue by between 1 and 5 seconds.
- Generally, signal timing modifications would reduce delay and queues on the eastbound and westbound approaches and increase delay and queue lengths on the northbound and southbound movements.

Signalized intersections along Ocean Avenue operate as actuated-coordinated signals with maximum recall[13] that operate on a fixed cycle length. Signal timing modifications implemented at these three intersections in isolation may adversely affect vehicle progression and have unintended consequences for operations along the corridor. Any adjustments to signal timing would need to be reviewed and approved by SFMTA.

## Other Modifications

In addition to signal timing modifications, other intersection modifications and treatments along the corridor may be implemented to increase efficiency of operations and reduce vehicle delay and queue lengths along the corridor. These include installation of left-turn lanes, installation of right-turn lanes, implementation of turn restrictions, and intersection redesign. These treatments can be costly if additional right-of-way is needed and there may be other tradeoffs to consider, such as potential adverse effects on conditions for bicyclists and pedestrians. Intersection reconfiguration that would require roadway widening, additional right-of-way, rail reconfiguration, or signal relocation would be major infrastructure projects and may not be feasible or appropriate within the context of the corridor.

Planned projects that are intended to improve safety, access, and comfort for people traveling along Ocean Avenue include the Ocean Avenue Safety Project and I-280 Interchange Modifications at Balboa Park Project.

[13] Actuated signals with maximum recall prioritize the through movement of the major street and use sensors to respond to the traffic present at actuated approach. Sensors report to the signal computer and green is provided for those actuated lanes only when traffic is present and only until the traffic has vacated those lanes or the maximum time set for that phase has been reached.

# ATTACHMENT C: SHUTTLE STUDY TECHNICAL MEMORANDUM

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# TECHNICAL MEMORANDUM

Date: August 1, 2019

To: Reservoir Community Partners, LLC

From: Kittelson & Associates, Inc.

Subject: Balboa Reservoir – Shuttle Study Memorandum

Kittelson & Associates, Inc. (Kittelson) has prepared this memorandum to present the results of a shuttle assessment analysis for the proposed Balboa Reservoir project (Case No. 2018-007883ENV) in San Francisco, California. The purpose of this analysis is to assess the feasibility of a shuttle operating between the Balboa Reservoir site, the City College of San Francisco (CCSF) campus, and the Balboa Park BART/Muni station. The memorandum is organized as follows:

- Ridership Assessment
- Service Concept
- Feasibility Analysis
- Conclusion

## EXECUTIVE SUMMARY

The Balboa Reservoir development is expected to generate up to 2,700 transit trips[1] each day, many to/from the Balboa Park BART/Muni station, approximately 0.6 miles east of the project site. While a direct shuttle connecting the site to transit hubs and CCSF would potentially attract a high ridership, the shuttle must operate at high frequencies to effectively compete with the existing transit service and walking trips. A free, high-frequency shuttle service is forecast to be well-utilized with an estimated cost well over $750,000 per year. If a lower frequency and less costly service were provided as an alternative, it would not be competitive with the existing transit and walking alternatives and would see less use.

## RIDERSHIP ASSESSMENT

The proposed Balboa Reservoir development is well served by existing transit, as documented by the April 19, 2019 *Transit Assessment Memorandum*, which projects a 38% transit mode share for project-generated trips and up to 2,700 daily transit trips. Existing transit routes and stops are presented in Figure 1.

[1] Source: Balboa Reservoir Transit Assessment Memorandum, January 14, 2019

Source: Kittelson & Associates, Inc., 2019

Case No.2018-007883ENV: Balboa Reservoir Project

**Figure 1**
**Existing Transit Service**

A shuttle service to connect the Balboa Reservoir development with the City College Terminal, the Balboa Park BART/Muni Station, and CCSF is under consideration. While the total travel demand between these destinations is high, the forecast shuttle demand would take into consideration walking times versus shuttle wait and travel times when considering the desirability of shuttle use. This ridership choice is based heavily on the quality of proposed shuttle service, which is described in greater detail in the next section. This shuttle analysis assumes the shuttle service would be more appealing than existing transit service when the travel times are similar.

## Existing Transit Service

Muni currently offers convenient connections to the Balboa Park BART/Muni station as shown in Figure 1. The K Ingleside light rail and Muni bus routes 8, 29, 49, and 91 have stops on Ocean Avenue or the City College Terminal near the project site. Muni route 43 operates on Frida Kahlo Way adjacent to CCSF and on Geneva Avenue to the Balboa Park BART/Muni station. Each line operates on 8- to 10-minute headways during daytime periods and 15- to 20- minute headways after 7 p.m[2]. Given that multiple lines serve most nearby stops, typical waiting times are under five minutes during the weekday a.m. and p.m. peak periods. The shuttle system route would be duplicative with existing transit connection to the Balboa Park BART/Muni station for passengers able to walk to nearby bus and light rail stops.

## Walking Travel Time

The Balboa Park BART/Muni station is approximately 0.6 mile from the Balboa Reservoir development, a trip of 14 minutes at a typical walking pace of 4 feet per second[3]. A similar walking trip to the City College Terminal and the adjacent K Ingleside light rail is less than 0.3 miles, or about a 6 minute walk. To be appealing to passengers, the shuttle must offer time savings and convenience on par or better than these walking trips.

Kittelson prepared a spreadsheet model to estimate weekday a.m. and p.m. peak hour shuttle demand between the four shuttle stops based on walking versus shuttle waiting time plus travel time. This iterative process, illustrated in Exhibit 1, results in the needed number and size of shuttles to serve the corresponding demand.

[2] Source: San Francisco Municipal Transit Agency, 2019. *https://www.sfmta.com/getting-around/muni/routes-stops*

[3] This walking pace is similar to estimated walk times from Google Maps.

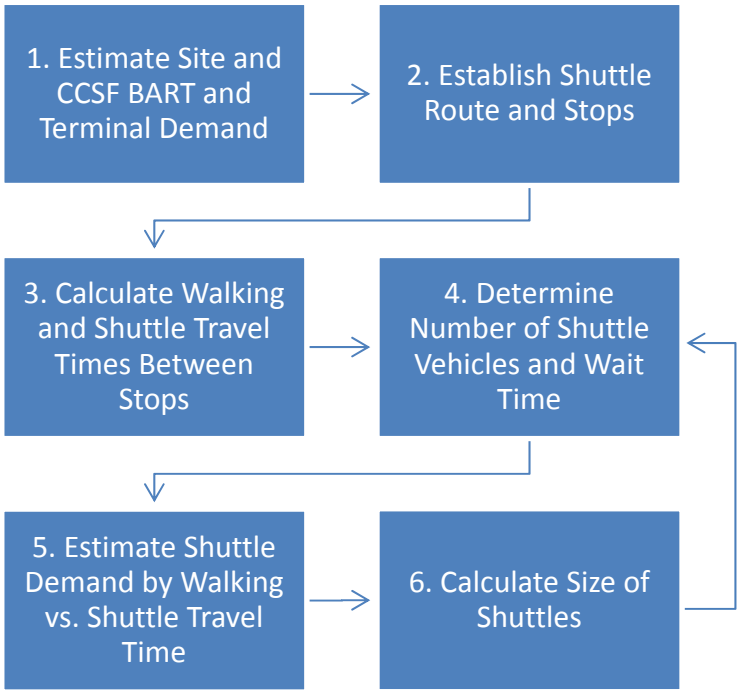


**Exhibit 1 Peak Hour Shuttle Demand Estimation Process**

The steps in the spreadsheet model are as follows:

1. **Estimate Site and CCSF BART and Terminal Demand**[4]
    a. Peak hour transit demand between the project site and the Balboa Park BART/Muni Station and the City College Terminal were calculated from the *Transit Assessment Memorandum*
    b. CCSF demand to/from BART was calculated from:
        i. Estimate of the percentage of peak hour Balboa Park BART/Muni station riders to/from CCSF
        ii. Estimate of CCSF students and faculty using BART during peak hours
    c. CCSF demand to/from the City College Terminal was assumed to equal the CCSF demand to/from BART
2. **Establish Shuttle Route and Stops**
    a. Stops established at Balboa Reservoir, City College Terminal, Balboa Park BART/Muni Station, and CCSF
3. **Calculate Walking and Shuttle Travel Times Between Stops**

[4] CCSF transit ridership data is not available. In lieu of specific CCSF transit ridership data, BART Station Survey data and CCSF enrollment data were used as they represent the best/most relevant data available for this analysis. The analysis relies on informed assumptions regarding mode share to determine CCSF transit ridership. Actual CCSF transit ridership may vary. However, it is expected to be within a reasonable range of the assumed ridership and would not substantially affect the analysis.

   a. Walking time between stops calculated by distance and intersection crossings
   b. Shuttle travel times estimated from distance, route, and Google Maps peak hour travel time estimates

4. **Determine Number of Shuttle Vehicles and Wait Time**
   a. Total shuttle route travel time determines the number of trips per hour per shuttle
   b. Number of shuttles determines headway (time between shuttles at a given stop)
   c. Average wait time is one-half the headway
5. **Estimate Shuttle Demand by Walking vs. Shuttle Travel Time**
   a. Calculate ratio of shuttle waiting plus travel time and walking travel time between each stop
   b. Assign proportion of demand between each stop pair to the shuttle: if the shuttle is comparable to walking, shuttle usage is high; if the shuttle travel time is several times that of walking, shuttle usage is low.
6. **Calculate Size of Shuttles**
   a. Determine the size of shuttles needed to serve the maximum number of riders on any link of the shuttle route.

Step 5 includes estimating the proportion of trips between stops that would use the shuttle. As the number of shuttles operating the peak hour increase, the headway and associated average wait time decrease, which increase the attractiveness of the shuttle compared to walking, increasing projected ridership. Kittelson developed a shuttle demand model informed by BART mode access research shown in Table 1 and Exhibit 2. Walking travel times compared to shuttle travel times determine the proportion of total demand uses the shuttle for each stop pair.

**Table 1 Balboa Park BART Station Access Mode from Home to BART**

| Station | Walk | Bicycle | Bus, Train, or Other Transit | Motorcycle / Motorized Scooter | Drive Alone / Carpool | Drop Off / Taxi / Other |
|---|---|---|---|---|---|---|
| Balboa Park | 56% | 6% | 13% | 0% | 6% | 20% |

Sources: 2015 BART Station Profile Study
Notes: Drop Off/Taxi/Other category does not include TNCs given the data is from 2015, before TNCs were available.

Per the 2015 Station Profile Study, 56% of current Balboa Park riders walk to the station, with a median walking distance of 0.52 miles. Additionally, 13% of existing Balboa Park BART Station riders use transit (median distance of 1.15 miles) and 20% are dropped off; likely due to a lack of vehicle parking at the station, there are only 6% drive alone/carpool trips to the station. Combining the Balboa Park BART Station specific data in Table 1 with the general distance-based data in Exhibit 2, walking is expected to comprise about 30% of the 0.6-mile trips between the Balboa Reservoir development and the Balboa Park BART Station, depending on the frequency of the shuttle. The Balboa Reservoir shuttle demand model is calibrated to high shuttle use estimates to serve as a proof of concept. The convenience of a free shuttle was estimated to be more appealing than and capture the majority of the BART riders that may otherwise walk, take other transit options, drive alone/carpool, or be dropped off in a taxi or TNC. Given the Balboa Reservoir development is proposed to include limited, unbundled parking; residents

are expected to have low rates of auto ownership; and given that the Balboa Park BART Station does not include station parking, driving the 0.6 miles to the station is expected to be particularly unappealing compared to the distribution of travel mode shown in Table 1 and Exhibit 2.

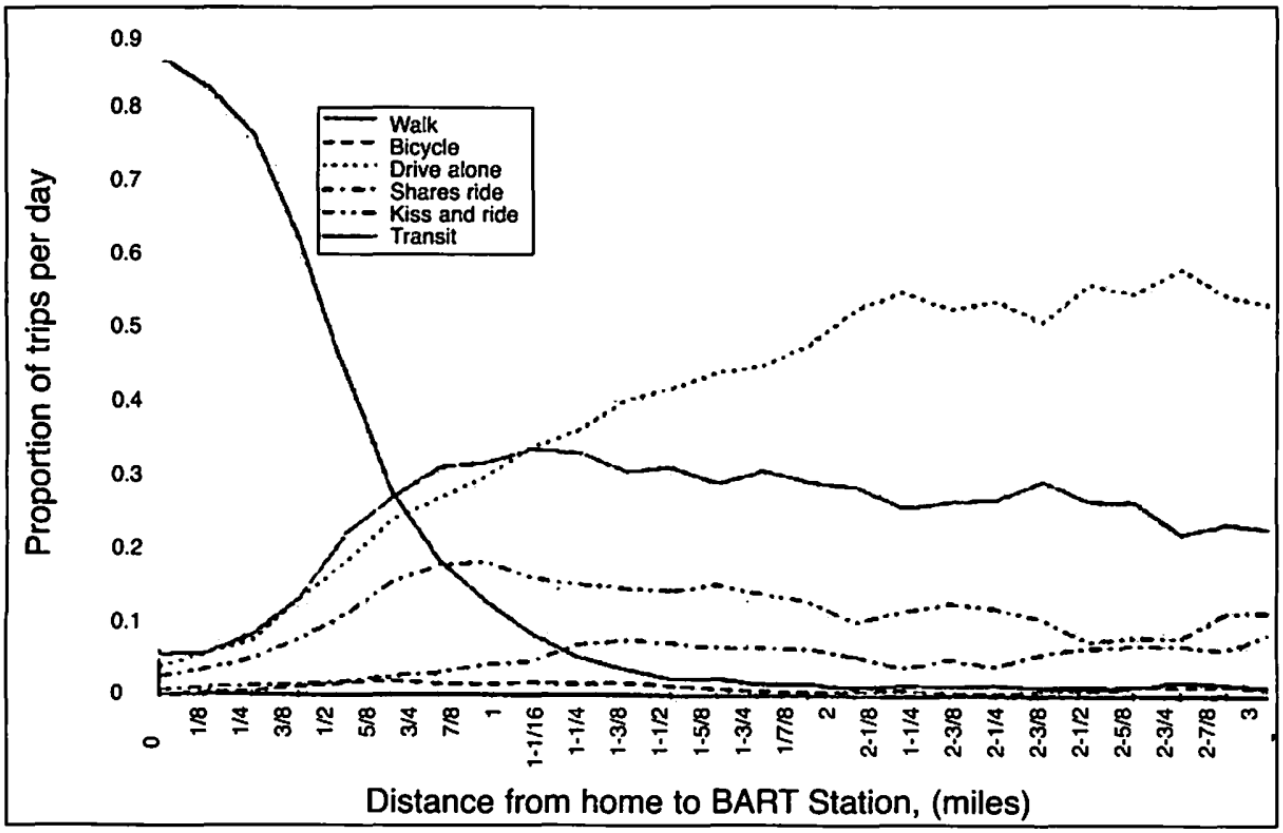


**Exhibit 2 Distribution of Travel Mode to BART Stations by Distance**[5]

The model is flexible to be responsive to a range of projections and assumptions and can be used as tool to forecast a range of demand scenarios. Key assumptions include the shuttle would be free for Balboa Reservoir residents and visitors and CCSF students, staff, and faculty and the shuttle would use Muni bus stops. An example of the model results is shown in Table 2 for the one-way site trips to the Balboa Park BART/Muni station. Table 2 presents the results of the shuttle model for one to four shuttles operating in the peak hour.

[5] Source: Cervero, R. *Walk-and-Ride: Factors Influencing Pedestrian Access to Transit, 2001.*

**Table 2: Weekday Peak Hour Ridership Estimate: Site to BART**

| Shuttle Operations | | | | | Average Walking Time (minutes) | Average Transit Time (minutes)[1] | Percent Use Shuttle |
|---|---|---|---|---|---|---|---|
| Number of Shuttles | Headway (minutes) | Average Wait Time (minutes) | Travel Time (minutes) | Average Total Shuttle Time (minutes) | | | |
| 1 | 31.5 | 15.8 | 7.5 | 23.3 | 14 | 15 | 53% |
| 2 | 15.8 | 7.9 | | 15.4 | | | 73% |
| 3 | 10.5 | 5.3 | | 12.8 | | | 82% |
| 4 | 7.9 | 3.9 | | 11.4 | | | 87% |

Sources: Kittelson & Associates, Inc. 2019; Google Maps 2019.
Notes: [1] Consists of typical walking time, average wait time, and transit travel time.
All times rounded to nearest tenth.

As shown in Table 2, for this 0.6-mile walking route, the average walking time and transit travel time are approximately equal to the average total shuttle time (average wait plus travel time) when two shuttles are operating. With the shuttle in operation, approximately half of the walk trips and the majority of transit, drive alone, and kiss and ride modes shown in Exhibit 2 would be expected to switch modes and use the shuttle. The shuttle use is estimated to range from 53 to 87 percent of BART riders traveling to/from Balboa Reservoir and CCSF.

Table 3 demonstrates the shuttle vehicles can be smaller when more shuttles are in operation, even as total demand increases. The forecast shuttle ridership roughly doubles as service improves from one to four shuttles in peak hour operation.

**Table 3: Weekday Peak Hour Ridership Estimate and Shuttle Needs**

| | | Peak Hour Ridership | | | |
|---|---|---|---|---|---|
| Number of Shuttles | Headway (minutes) | AM | PM | Peak Passenger Load | Shuttle Vehicle |
| 1 | 31.5 | 142 | 87 | 41 | 40-Foot Bus |
| 2 | 15.8 | 236 | 169 | 35 | 35-Foot Bus |
| 3 | 10.5 | 281 | 203 | 27 | Cutaway Minibus |
| 4 | 7.9 | 304 | 222 | 22 | Cutaway Minibus |

Sources: Kittelson & Associates, Inc. 2019; BART 2019; CCSF 2019.
Notes: AM = weekday a.m.; PM = weekday p.m.

# SERVICE CONCEPT

## Shuttle Route

The conceptual shuttle route and stop location concept is presented in Figure 2. This route would operate in one direction, clockwise, to allow loading/unloading on the most convenient side of the street at each stop to minimize the need for street crossings. The route is approximately 2.25 miles long with an estimated peak hour one-way travel time of approximately 20 minutes, not including loading/unloading and dwell time.

Source: Kittelson & Associates, Inc., 2019

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**Figure 2**
**Proposed Shuttle Service**

This concept represents one potential route and additional analysis would be needed in later stages of the shuttle planning process to further refine the alignment and ensure feasibility, including stops and facilities to serve shuttle vehicles within and outside of the Balboa Reservoir site.

## Shuttle Stops

The proposed stops are:

- Balboa Reservoir: one or two stops pending final street layout and locations suitable for shuttle stops
- City College Terminal: served by the existing Muni bus stop on Frida Kahlo Way, or via the alternate Lee Avenue route to the Ocean Avenue Muni bus stop.
- Balboa Park BART/Muni Station: the assumed stop is at the Ocean Avenue Muni bus stop but could be served alternatively or in addition at the Geneva Avenue Muni bus stop. The Geneva Avenue Muni bus stop location is currently constrained and shuttle of this stop may not be feasible. An alternative stop location would need to be found.
- CCSF: the assumed stop is a central and convenient location on Cloud Circle.

Shuttle buses loading and unloading passengers in Muni bus stops at Balboa Park BART/Muni Station and near the City College Terminal is essential to the feasibility of the service. This access would require SFMTA approval. SFMTA regulations would not currently permit shuttle service at these bus stops.

## Service Headways

The proposed route is expected to be approximately 31.5 minutes long during peak hours, with variability based on congestion, signal delay, passenger boarding/alighting, final stops/routing, layover scheduling, and the site circulation network. The associated headways based on the number of shuttles in operation and the corresponding vehicle needs are shown in Table 3.

Vehicle dwell times while loading/unloading vary by ridership and vehicle type, such as if two-door boarding is feasible. For this analysis, dwell time was assumed to be 30 seconds for the City College Terminal, CCSF stops, and the Balboa Park BART/Muni station stop, and 10 minutes at the site to account for up to two stops, a timepoint, and a 10 minute layover once per hour. Shuttle dwell times in this study are intended to be conservative and are estimated based on several factors specific to the shuttle service including time points and/or coordination with BART arrival and potential higher proportion of riders needing assistance.

## Hours of Operation

Hourly demand projections are beyond the scope of this study. Midday and evening shuttle demand is expected to be less than peak hour demand for the primarily residential Balboa Reservoir development while CCSF demand is forecast to respond to class schedule, remaining steady throughout much of the

weekday. Suggested initial service span for scheduled service is 6 a.m. to 8 p.m. on weekdays and 10 a.m. to 6 p.m. on weekends. More shuttles should be in operation during the weekday a.m. and p.m. peaks and during midday. The shuttles can run either on a fixed schedule (where buses may wait to keep on schedule) or run continuously.

During periods of lower demand, such as early morning, late evening, and weekends, the shuttle can be run as demand responsive service instead of fixed route/schedule. This would require a request and dispatching mechanism. Alternatively, a reduced schedule could be provided to serve CCSF night classes or late-night BART train arrivals. As is typical with transit service, the shuttle's initial hours, schedule, and frequency should be revised based on actual ridership needs.

### Vehicle Requirements

As shown in Table 3, vehicle capacity varies with the number of vehicles in operation. A fleet of three accessible "cutaway" minibuses with 24-28 passenger capacity would be optimal for high-frequency peak hour service and flexible off-peak service.

## SHUTTLE COST ANALYSIS

Shuttle costs primarily comprise of two main elements:

- Shuttle vehicles (rolling stock)
- Operational costs
    - Driver's wages and benefits
    - Insurance
    - Vehicle maintenance
    - Fuel

"Cutaway" minibuses cost between $42,000 and $58,000[6] and have an average lifespan of 5.6 years[7]. Operational costs for shuttles operating in San Mateo county indicate typical shuttle operations costs of $60 to $80 per hour. The weekday peak period shuttles typically cost between $150,000 and $200,000 annually[8]. Based on San Francisco Consumer Price Index data, there has been an annual average escalation of about three percent over the last nine years. This escalation would be expected to continue in the future.

The shuttle concept analyzed in this memorandum assumes three "cutaway" minibus shuttles operating during weekday a.m. and p.m. peak period with reduced service during off peak and weekend periods. This analysis assumes a weekday service of five hours with three buses, eight hours with two buses, and two hours

[6] Source: Colorado Department of Transportation, *Overview of Transit Vehicles*

[7] Source: Federal Transit Administration, *Useful Life of Buses and Vans, 2007*

[8] Source: San Mateo County Transportation Authority, *San Mateo County Shuttle Inventory and Analysis*, 2010. San Mateo County data assumed to be similar to San Francisco.

with one bus. Weekend service is assumed to be nine hours with one bus in operation. Based on this operational profile, low and high estimates of the vehicle and operational costs of the shuttle concept is shown in Table 4.

**Table 4: Shuttle Concept Estimated Annual Costs (2019 $)[9]**

| Estimate | Number of Vehicles | Annualized Vehicle Costs[1] | Weekday Service Shuttle-Hours[2] | Weekend Service Shuttle-Hours[2] | Annual Operations Cost[3] | Total Annual Cost |
|---|---|---|---|---|---|---|
| Low | 3 | $22,500 | 33 | 9 | $740,000 | $762,500 |
| High | | $31,000 | | | $980,000 | $1,011,00 |

Sources: Kittelson & Associates, Inc. 2019; CODOT, FTA 2007, San Mateo CTA, 2010
Notes:
[1] Based on three shuttle vehicles to be replaced every 5.6 years.
[2] Sum of number of hours each shuttle is assumed to operate
[3] Annual hours of shuttle service times hourly operational cost; escalated to 2019 costs and rounded.

The vehicle and operations costs can be reduced by owning and operating fewer vehicles and/or reducing service hours, which in turn would reduce the usefulness and appeal of the shuttle and result in fewer riders, as shown in Table 3.

## ADDITIONAL CONSIDERATIONS

This feasibility analysis focuses on the attractiveness and potential ridership of a potential shuttle based on various levels of service. The feasibility analysis does not consider regulatory, facility, or operational concerns, such as:

- Shuttle operator labor requirements
- Operator rest facility locations
- Balboa Reservoir shuttle stop locations or supporting amenities
- SFMTA regulatory provisions and permitting requirements
- Muni bus stop operations and feasibility of shared bus zones
- Operator staffing and scheduling
- Dispatch and operations management
- Shuttle maintenance facilities and staffing

These items require further study and are likely to increase the cost of shuttle operations.

[9] Year 2010 costs escalated by 29% based on San Francisco CPI growth per Bureau of Labor Statistics, to reflect Year 2019 costs.

# CONCLUSION

The high level of transit ridership forecast for Balboa Reservoir residents, employees, and visitors and CCSF students, staff, and faculty indicate a high frequency shuttle service with buses every nine minutes may be well utilized during peak periods to reduce travel time, provide convenience, enhance mobility particularly for seniors and people with disabilities, and/or increase personal security/sense of safety. The shuttle provides an opportunity for collaboration between Balboa Reservoir and CCSF for mutual benefit as approximately 40 percent of peak hour demand is associated with CCSF.

However, the Balboa Reservoir site and CCSF are within walking distance of high frequency transit with service to/from the Balboa Park BART/Muni station. The costs associated with operating a shuttle must be weighed against alternatives, such as subsidized first mile/last mile taxi or TNC rides for those with mobility needs. While the shuttle, as presented, would connect several destinations, the shuttle's indirect one-way loop route would have to compete with the high frequency and direct travel of the existing transit service and the flexibility and speed of walking. With three shuttle buses in operation, vehicle headways and average waiting time would match that of existing peak hour service. However, with one operating shuttle, off-peak periods would have headways of up to 31.5 minutes, making taking the shuttle slower than walking or using existing transit. Given the estimated cost of high-quality service of $762,500 to over $1 million per year (see Table 4), the shuttle concept would not be competitive with existing transit service and walking at a reasonable level of service. Additional considerations, including regulatory requirements and operator staffing and scheduling would increase costs and may present substantial hurdles to implementation.

# Attachment 4

## Travel Demand Workbook

**Trips by Mode**
Based on Static Export of Sf Planning Workbook on 11/30/18
Daycare mode share based on Summary of all modes
Note: AM Average Passenger Rate is same as PM
AM and PM Based on AM/PM Ratios from ITE Trip Gen

Total AVO is based on weighted average of AVO for the weight of each land use

| | Daily | Weekday a.m. Peak Hour | | | | Weekday p.m. Peak Hour | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Mode** | **Total** | **Retail** | **Daycare** | **Residential** | **Total** | **Retail** | **Daycare** | **Residential** | **Total** |
| **Developer's Proposed Option** | | | | | | | | | |
| Auto | 4,245 | 42 | 48 | 254 | 344 | 55 | 49 | 334 | 437 |
| Taxi / TNC | 361 | 1 | 4 | 22 | 27 | 1 | 4 | 29 | 34 |
| Transit | 1,989 | 12 | 22 | 120 | 153 | 16 | 22 | 157 | 195 |
| Walk | 3,984 | 21 | 39 | 215 | 275 | 28 | 39 | 283 | 349 |
| Bike | 406 | 1 | 4 | 24 | 29 | 1 | 4 | 32 | 37 |
| **Total Person-Trips** | 10,985 | 77 | 116 | 635 | 828 | 101 | 117 | 834 | 1,052 |
| ***Total Vehicle-Person Trips*** | 4,606 | 43 | 52 | 276 | 371 | 56 | 53 | 363 | 471 |
| **Average Vehicle Occupancy** | **1.56** | **1.87** | **1.87** | **1.52** | **1.60** | **1.87** | **1.87** | **1.52** | **1.59** |
| **Unadjusted TNC Vehicle Trips** | **216** | **1** | **2** | **13** | **16** | **1** | **2** | **18** | **21** |
| **TNC Vehicle Trips** | **216.00** | **2** | **4** | **26** | **32** | **2** | **4** | **36** | **42** |
| **Updated Vehicle Trips** | **3,168** | **24** | **30** | **195** | **249** | **31** | **30** | **257** | **318** |
| ***Vehicle Trips*** | ***2,952*** | ***23*** | ***28*** | ***182*** | ***232*** | ***30*** | ***28*** | ***239*** | ***297*** |
| **Additional Housing Option** | | | | | | | | | |
| | **Daily** | **AM** | | | | **PM** | | | |
| **Mode** | **Total** | **Retail** | **Daycare** | **Residential** | **Total** | **Retail** | **Daycare** | **Residential** | **Total** |
| Auto | 5,781 | 42 | 48 | 358 | 448 | 55 | 49 | 470 | 574 |
| Taxi / TNC | 495 | 1 | 4 | 31 | 36 | 1 | 4 | 41 | 46 |
| Transit | 2,713 | 12 | 22 | 169 | 202 | 16 | 22 | 221 | 259 |
| Walk | 5,284 | 21 | 39 | 303 | 363 | 28 | 39 | 398 | 465 |
| Bike | 552 | 1 | 4 | 34 | 39 | 1 | 4 | 45 | 50 |
| **Total Person-Trips** | 14,825 | 77 | 116 | 895 | 1,088 | 101 | 117 | 1,176 | 1,394 |
| ***Total Vehicle-Person Trips*** | 6,276 | 43 | 52 | 389 | 484 | 56 | 53 | 511 | 620 |
| **Average Vehicle Occupancy** | **1.51** | **1.87** | **1.87** | **1.52** | **1.58** | **1.87** | **1.87** | **1.52** | **1.57** |
| **Unadjusted TNC Vehicle Trips** | **297** | **1** | **2** | **19** | **22** | **1** | **2** | **25** | **28** |
| **TNC Vehicle Trips** | **297.00** | **2** | **4** | **38** | **44** | **2** | **4** | **50** | **56** |
| **Adjusted Vehicle Trips** | **4,442** | **24** | **30** | **275** | **329** | **31** | **30** | **362** | **423** |
| **Vehicle Trips** | **4,144** | **23** | **28** | **256** | **307** | **30** | **28** | **337** | **394** |

| Overall Mode Split for Developer's Proposed Option PM Peak Period | | | |
|---|---|---|---|
| **Mode** | **Residential** | **Retail** | **Daycare** |
| Auto Person Trips | 40% | 54% | 42% |
| Taxi TNC Person Trips | 4% | 1% | 3% |
| Public Transit | 19% | 16% | 19% |
| Walk | 34% | 28% | 33% |
| Bike | 4% | 1% | 4% |
| **Total** | **100%** | **100%** | **100%** |

| Overall Mode Split for Developer's Proposed Option PM Peak Period | | |
|---|---|---|
| **Mode** | **Share** | **Percent** |
| Auto Person | 389 | 42% |
| Taxi TNC Person Trips | 30 | 3% |
| Public Transit | 173 | 19% |
| Walk | 310 | 33% |
| Bike | 33 | 4% |
| **Total** | **935** | **100%** |

**Trips by Land Use**

From Static Worksheets PM Residential and Retail 11-30

Note: Peak Hour Trips from Trips By Mode Worksheet

Assumption AM Trip Rate is based on the ratio of total AM to total PM for each land use

Assumption AM Peak Hour In/Out Ratios is based on the inverse of the PM Peak Hour In/Out Ratios

TNC Vehicle Trips are doubled

| Land Use | Daily | Weekday a.m. Peak Hour | | | Weekday p.m. Peak Hour | | |
|---|---|---|---|---|---|---|---|
| | | In | Out | Total | In | Out | Total |
| **Developer's Proposed Option** | | | | | | | |
| Residential | 9,386 | 148 | 486 | 635 | 639 | 195 | 834 |
| Retail | 1,123 | 47 | 30 | 77 | 39 | 62 | 101 |
| DayCare | 476 | 61 | 56 | 117 | 57 | 61 | 118 |
| **Total Person-Trips** | **10,985** | **256** | **573** | **829** | **735** | **318** | **1,053** |
| **Additional Housing Option** | | | | | | | |
| Residential | 13,226 | 209 | 685 | 895 | 901 | 275 | 1,176 |
| Retail | 1,123 | 47 | 30 | 77 | 39 | 62 | 101 |
| DayCare | 476 | 61 | 56 | 117 | 57 | 61 | 118 |
| **Total Person-Trips** | **14,825** | **317** | **772** | **1,089** | **997** | **398** | **1,395** |

| Mode | Residential | | | Retail | | |
|---|---|---|---|---|---|---|
| | Out | In | Total | Out | In | Total |
| Auto Person Trips | 7.1 | 98.8 | 105.9 | 1.9 | 3.7 | 5.6 |
| | 126.6 | 237.5 | 364.1 | 28.0 | 21.4 | 49.4 |
| Taxi / TNC Person Trips (unadjusted | 11.7 | 29.5 | 41.2 | 0.6 | 0.5 | 1.0 |
| Taxi / TNC Person Trips Adjusted | 46.0 | 46.0 | 92.1 | 1.0 | 1.0 | 2.0 |
| Transit Person Trips | 7.0 | 131.8 | 138.8 | 6.5 | 0.8 | 7.3 |
| | 18.9 | 63.8 | 82.7 | 7.0 | 1.6 | 8.6 |
| **Total** | **171.2** | **561.5** | **732.7** | **44.0** | **27.9** | **71.9** |
| **Person Trip Split** | **23%** | **77%** | **100%** | **61%** | **39%** | **100%** |
| **Total Auto Person Trips** | **180** | **382** | **562** | **31** | **26** | **57** |
| **Total Auto Vehicle Trips** | **114** | **243** | **358** | **17** | **14** | **30** |
| **TNC / Auto Person Trip Split** | **32%** | **68%** | **100%** | **54%** | **46%** | **100%** |

Note: TNC Person trips are adjusted in this table to account for the addition of an outbound vehicle trip for all inbound TNC trips

| ITE Trip Generation Handbook Reference | Land Use Code | Land Use | Weekday PM Peak Hour | Weekday AM Peak hour | AM to PM Ratio |
|---|---|---|---|---|---|
| General Urban Suburban pg. 228-229 | 565 | Daycare | 11.82 | 11.73 | 0.992 |
| Multi-Use Urban pg. 72 | 221 | Mid Rise Residential | 2.08 | 1.9 | 0.913 |
| Multi Use Urban pg. 285 to 286 | 231 | Mid Rise Residential with Ground Floor Retail | 0.46 | 0.35 | 0.761 |

| Option | Total Am to PM Ratio |
|---|---|
| **Developer's Proposed Option** | 78.68% |
| **Additional Housing Option** | 78.05% |

| Proportion of Person Trips in Daycare Land Use - Additional | Proportion of Person Trips in Daycare Land Use - Developer |
|---|---|
| 8.48% | 11.22% |

Vehicle Trips using in/out splits

| Land Use | Daily | Weekday a.m. Peak Hour | | | Weekday p.m. Peak Hour | | |
|---|---|---|---|---|---|---|---|
| | | In | Out | Total | In | Out | Total |
| **Developer's Proposed Option** | | | | | | | |
| Residential | 2,842 | 62 | 133 | 195 | 175 | 82 | 257 |
| Retail | 192 | 13 | 11 | 24 | 14 | 17 | 31 |
| Daycare | 134 | 16 | 14 | 30 | 14 | 16 | 30 |
| **Total Vehicle Trips** | **3,168** | **92** | **157** | **249** | **203** | **115** | **318** |
| **Additional Housing Option** | | | | | | | |
| Residential | 4,116 | 88 | 187 | 275 | 246 | 116 | 362 |
| Retail | 192 | 13 | 11 | 24 | 14 | 17 | 31 |
| Daycare | 134 | 16 | 14 | 30 | 14 | 16 | 30 |
| **Total Vehicle Trips** | **4,442** | **117** | **212** | **329** | **274** | **149** | **423** |

| Daycare In/Out Splits Using 2002 Guidelines | | | |
|---|---|---|---|
| Trip Type | In | Out | Total |
| Person Trips | 48.0% | 52.0% | 100.0% |
| Vehicle Trips | 47.6% | 52.4% | 100.0% |

## TNC Trips

| | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|
| | In | Out | Total | In | Out | Total |
| **Current TNC Trips** | | | | | | |
| Developer's Proposed | 5 | 11 | 16 | 14 | 6 | 20 |
| Additional Housing | 6 | 16 | 22 | 20 | 8 | 28 |
| **Updated TNC Trips** | | | | | | |
| Developer's Proposed | 16 | 16 | 32 | 20 | 20 | 40 |
| Additional Housing | 22 | 22 | 44 | 28 | 28 | 56 |
| Difference Developers Proposed | 11 | 5 | 16 | 6 | 14 | 20 |
| Additional Housing Difference | 16 | 6 | 22 | 8 | 20 | 28 |

Note: Peak Hour Trips from Trips By Mode Worksheet

| Land Use | Size (Square Feet) | Turnover Rate | Delivery/Service Vehicle Trips | | |
|---|---|---|---|---|---|
| | | | Daily | Average Hour | Peak Hour |
| **Person Trips** | | | | | |
| Residential | 1,283,000 | 0.03 | 38.5 | 1.8 | 2.2 |
| Retail | 7,500 | 0.22 | 1.7 | 0.1 | 0.1 |
| Daycare Center | 10,000 | 0.1 | 1.0 | 0.0 | 0.1 |
| ***Total*** | ***1,300,500*** | **-** | ***41.1*** | ***1.9*** | ***2.4*** |
| **Additional Housing Option** | | | | | |
| Residential | 1,547,000 | 0.03 | 46.4 | 2.1 | 2.7 |
| Retail | 7,500 | 0.22 | 1.7 | 0.1 | 0.1 |
| Daycare Center | 10,000 | 0.10 | 1.0 | 0.0 | 0.1 |
| ***Total*** | ***1,564,500*** | - | ***49.1*** | ***2.3*** | ***2.8*** |

Bedroom Mix

| Option | SF | Units | 1 Bedroom Units | 2 Bedroom Units | 3 Bedroom Units | Total Bedrooms | Average SF per Unit |
|---|---|---|---|---|---|---|---|
| Developer's Proposed Option | 1,283,000 | 1,100 | 440 | 330 | 330 | 2,945 | 1,166 |
| Additional Housing Option | 1,547,000 | 1,550 | 620 | 465 | 465 | 2,090 | 1,166 |

Assumption is being made that the size of each unit for the Additional Housing Option is the same as the Developer's Proposed Option

| Bedroom Mix for Both Options | |
|---|---|
| Bedroom Type | Percent |
| 1 Bedroom | 40% |
| 2 Bedroom | 30% |
| 3 Bedroom | 30% |

**Passenger Loading**

| Step Description | Weekday a.m. Peak Hour | | | | Weekday p.m. Peak Hour | | | |
|---|---|---|---|---|---|---|---|---|
| **Land Use** | **Daycare** | **Retail** | **Residential** | **Total** | **Daycare** | **Retail** | **Residential** | **Total** |
| **Additional Housing Option** | | | | | | | | |
| Person Trips | 117 | 77 | 895 | 1,089 | 118 | 101 | 1,176 | 1,395 |
| Loading Percentage | 3.0% | 3.0% | 7.2% | - | 3.0% | 3.0% | 7.2% | - |
| Passenger Loading Trips | 3.5 | 2.3 | 64.4 | 70.2 | 3.5 | 3.0 | 84.6 | 91.2 |
| Average Stop Duration (Minutes) | 3.5 | 2.3 | 64.4 | 70.2 | 3.5 | 3.0 | 84.6 | 91.2 |
| Peak Hour Spaces of Passenger Loading Demand | 0.06 | 0.04 | 1.07 | 1.17 | 0.06 | 0.05 | 1.41 | 1.52 |
| **Peak Hour Spaces of Passenger Loading Demand (Rounded)** | **1.0** | **1.0** | **2.0** | **4.0** | **1.0** | **1.0** | **2.0** | **4.0** |
| **Developer's Proposed Option** | | | | | | | | |
| Person Trips | 117 | 77 | 635 | 829 | 118 | 101 | 834 | 1,054 |
| Loading Percentage | 3.0% | 3.0% | 7.2% | - | 3.0% | 3.0% | 7.2% | - |
| Passenger Loading Trips | 3.5 | 2.3 | 45.7 | 51.5 | 3.5 | 3.0 | 60.1 | 66.7 |
| Average Stop Duration (Minutes) | 3.5 | 2.3 | 45.7 | 51.5 | 3.5 | 3.0 | 60.1 | 66.7 |
| Peak Hour Spaces of Passenger Loading Demand | 0.06 | 0.04 | 0.76 | 0.86 | 0.06 | 0.05 | 1.00 | 1.11 |
| **Peak Hour Spaces of Passenger Loading Demand (Rounded)** | **1.0** | **1.0** | **1.0** | **3.0** | **1.0** | **1.0** | **2.0** | **4.0** |

**Trip Generation Rates**

Note: Peak Hour Trips from Trips By Mode Worksheet

AM rates use the ratio of the PM to AM ratio of each land use from ITE Trip Generation Manual 10th edition

| Land Use | Period | Average | Unit |
|---|---|---|---|
| Residential | Daily | 4.5 | Per Bedroom |
| | PM Peak | 0.4 | |
| | AM Peak | 0.3 | |
| Retail - General | Daily | 150 | Per 1k sq ft of land use |
| | PM Peak | 13.5 | |
| | AM Peak | 10.3 | |
| Daycare | Daily | 47.6 | Per 1k sq ft of land use |
| | PM Peak | 11.8 | |
| | AM Peak | 11.7 | |

**Daycare Trips**

Assumption: ITE Trip rate is same as person-trips

Note: Peak Hour Trips from Trips By Mode Worksheet

| PM Daycare Trips | | |
|---|---|---|
| **Method** | **ITE Trip Gen** | **Students / sqft** |
| Square Feet | 10.00 | 10000.00 |
| ITE Trip PM Trip Generation Rate | 11.82 | |
| Students per sqft | | 88.00 |
| Student Estimate | | 113.64 |
| Driving Mode Share | | 0.70 |
| Student-based Trips | | 79.55 |
| Staff per Student | | 0.20 |
| Staff Total | | 22.73 |
| Retail Auto Share | | 0.40 |
| Staff Based Trips | | 9.09 |
| **PM Trips** | **118.20** | **88.64** |

| Daily Daycare Trips | |
|---|---|
| **Method** | **ITE Trip Gen** |
| Sqft (1000) | 10.00 |
| ITE Trip PM Trip Generation Rate | 47.62 |
| **Daily** | **476.20** |

**All distribution sheets From Static Export of SF Guidelines Workbook on 11-30**
Daycare trip distribution based on summary of PM Peak Period trip distribution
Retail trip distribution for Additional Housing Option is identical to Developer's Proposed Option for PM peak period and daily.

AM Distibution is assumed to be same as PM for all land uses. In and Out is assumed to be inversed

| Origin/Destination | Developer's Proposed Option | | Additional Housing Option | |
|---|---|---|---|---|
| | Weekday AM Peak Hour | Weekday PM Peak Hour | Weekday AM Peak Hour | Weekday PM Peak Hour |
| Downtown/Northbeach | 11% | 11% | 11% | 11% |
| SoMa | 2% | 2% | 2% | 2% |
| Marina/Western Market | 12% | 12% | 12% | 12% |
| Mission/Potrero | 10% | 10% | 10% | 10% |
| Outer Mission/Hills | 14% | 14% | 13% | 13% |
| Bayshore | 4% | 4% | 4% | 4% |
| Richmond | 1% | 1% | 1% | 1% |
| Sunset | 24% | 24% | 25% | 25% |
| Islands | 0% | 0% | 0% | 0% |
| South Bay | 16% | 16% | 11% | 11% |
| East Bay | 6% | 6% | 6% | 6% |
| North Bay | 0% | 0% | 0% | 0% |
| **Total** | **100%** | **100%** | **96%** | **96%** |

| Option | Total Am to PM Ratio |
|---|---|
| **Developer's Proposed Option** | 78.68% |
| **Additional Housing Option** | 78.05% |

**Distribution of Retail Trips for Developer's Proposed Option in PM Peak Period**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | PM Work Trips | 0.00 | 0.14 | 0.11 | 1.28 | 0.06 | 0.00 | 0.00 | 0.14 | 0.00 | 0.20 | 0.00 | 0.00 | **1.93** | 1.42 | 0.00 | 0.07 | 0.96 | 0.10 | 0.17 | 0.00 | 0.08 | 0.00 | 0.90 | 0.00 | 0.00 | **3.70** |
| | PM Non-Work Trips | 0.00 | 0.00 | 1.50 | 1.84 | 9.73 | 3.93 | 1.01 | 4.14 | 0.00 | 3.17 | 1.93 | 0.74 | **28.00** | 0.21 | 0.15 | 1.42 | 1.42 | 4.71 | 0.18 | 1.14 | 6.78 | 0.00 | 3.90 | 0.93 | 0.52 | **21.36** |
| Taxi / TNC Person Trips | PM Work Trips | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.04** | 0.03 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | **0.07** |
| | PM Non-Work Trips | 0.00 | 0.00 | 0.03 | 0.03 | 0.18 | 0.07 | 0.02 | 0.08 | 0.00 | 0.06 | 0.04 | 0.01 | **0.52** | 0.00 | 0.00 | 0.03 | 0.03 | 0.09 | 0.00 | 0.02 | 0.12 | 0.00 | 0.07 | 0.02 | 0.01 | **0.39** |
| Transit Person Trips | PM Work Trips | 1.55 | 0.00 | 0.00 | 4.90 | 0.00 | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **6.54** | 0.14 | 0.00 | 0.00 | 0.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.57 | 0.00 | 0.00 | **0.76** |
| | PM Non-Work Trips | 0.80 | 0.11 | 0.09 | 3.46 | 1.15 | 0.00 | 0.00 | 0.06 | 0.00 | 0.65 | 0.63 | 0.00 | **6.95** | 0.11 | 0.00 | 0.53 | 0.23 | 0.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **1.65** |
| Auto VehicleTrips* | PM Work Trips | 0.00 | 0.14 | 0.05 | 1.28 | 0.03 | 0.00 | 0.00 | 0.14 | 0.00 | 0.12 | 0.00 | 0.00 | **1.77** | 1.38 | 0.00 | 0.07 | 0.96 | 0.08 | 0.17 | 0.00 | 0.08 | 0.00 | 0.85 | 0.00 | 0.00 | **3.59** |
| | PM Non-Work Trips | 0.00 | 0.00 | 0.81 | 0.74 | 4.55 | 2.22 | 0.53 | 1.61 | 0.00 | 1.38 | 0.87 | 0.45 | **13.17** | 0.07 | 0.07 | 0.65 | 0.79 | 2.54 | 0.18 | 0.72 | 2.89 | 0.00 | 2.17 | 0.27 | 0.38 | **10.73** |
| Taxi / TNC Vehicle Trips* | PM Work Trips | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.02** | 0.02 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | **0.04** |
| | | 0.00 | 0.00 | 0.02 | 0.02 | 0.11 | 0.04 | 0.01 | 0.05 | 0.00 | 0.03 | 0.02 | 0.01 | **0.31** | 0.00 | 0.00 | 0.02 | 0.02 | 0.05 | 0.00 | 0.01 | 0.07 | 0.00 | 0.04 | 0.01 | 0.01 | **0.24** |
| **Total Trips** | | **2.35** | **0.25** | **1.73** | *11.53* | **11.13** | **4.09** | **1.03** | **4.42** | **0.00** | **4.09** | **2.59** | **0.76** | **43.97** | **1.90** | **0.15** | **2.05** | **2.70** | **5.69** | **0.35** | **1.16** | **6.99** | **0.00** | **5.45** | **0.95** | **0.53** | **27.92** |
| **In and Out Total Trips** | | 4.25 | 0.40 | 3.77 | 14.24 | 16.82 | 4.45 | 2.19 | 11.41 | 0.00 | 9.53 | 3.54 | 1.29 | **71.89** | | | | | | | | | | | | | |
| Percent | | **6%** | **1%** | **5%** | **20%** | **23%** | **6%** | **3%** | **16%** | **0%** | **13%** | **5%** | **2%** | | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.874** | | | | | | | | | | | | | 1.749007055 |

**Distribution of Residential Trips for Developer's Proposed Option in PM Peak Period**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | PM Work Trips | 4.47 | 0.00 | 0.23 | 0.33 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **5.04** | 14.06 | 4.18 | 2.97 | 2.14 | 0.35 | 2.96 | 0.00 | 10.46 | 0.51 | 17.90 | 14.59 | 0.00 | **70.14** |
| | PM Non-Work Trips | 4.70 | 0.44 | 19.70 | 10.88 | 8.07 | 3.15 | 1.06 | 22.49 | 0.00 | 19.32 | 0.00 | 0.00 | **89.81** | 13.49 | 0.35 | 13.91 | 17.32 | 36.86 | 7.14 | 1.26 | 69.57 | 0.00 | 7.96 | 0.00 | 0.71 | **168.58** |
| Taxi / TNC Person Trips | PM Work Trips | 0.39 | 0.00 | 0.02 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.44** | 1.23 | 0.37 | 0.26 | 0.19 | 0.03 | 0.26 | 0.00 | 0.92 | 0.04 | 1.57 | 1.28 | 0.00 | **6.15** |
| | PM Non-Work Trips | 0.41 | 0.04 | 1.73 | 0.95 | 0.71 | 0.28 | 0.09 | 1.97 | 0.00 | 1.69 | 0.00 | 0.00 | **7.88** | 1.18 | 0.03 | 1.22 | 1.52 | 3.23 | 0.63 | 0.11 | 6.10 | 0.00 | 0.70 | 0.00 | 0.06 | **14.79** |
| Transit Person Trips | PM Work Trips | 4.95 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **4.95** | 46.11 | 6.18 | 5.95 | 0.00 | 0.92 | 4.59 | 15.86 | 0.92 | 0.00 | 0.00 | 13.00 | 0.00 | **93.53** |
| | PM Non-Work Trips | 2.11 | 4.95 | 1.84 | 0.00 | 4.49 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **13.40** | 14.30 | 3.21 | 3.14 | 0.00 | 10.72 | 0.00 | 2.57 | 3.83 | 0.00 | 5.40 | 2.11 | 0.00 | **45.29** |
| Auto VehicleTrips* | PM Work Trips | 4.47 | 0.00 | 0.12 | 0.33 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **4.92** | 13.25 | 3.19 | 2.86 | 2.14 | 0.18 | 2.96 | 0.00 | 10.46 | 0.51 | 17.90 | 14.59 | 0.00 | **68.04** |
| | PM Non-Work Trips | 3.34 | 0.44 | 17.76 | 10.11 | 7.68 | 1.71 | 1.06 | 12.93 | 0.00 | 10.47 | 0.00 | 0.00 | **65.50** | 4.55 | 0.35 | 7.11 | 8.29 | 19.23 | 3.21 | 1.09 | 32.13 | 0.00 | 6.54 | 0.00 | 0.36 | **82.86** |
| Taxi / TNC Vehicle Trips* | PM Work Trips | 0.23 | 0.00 | 0.01 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.26** | 0.74 | 0.22 | 0.16 | 0.11 | 0.02 | 0.16 | 0.00 | 0.55 | 0.03 | 0.94 | 0.77 | 0.00 | **3.68** |
| | PM Non-Work Trips | 0.25 | 0.02 | 1.03 | 0.57 | 0.42 | 0.17 | 0.06 | 1.18 | 0.00 | 1.01 | 0.00 | 0.00 | **4.72** | 0.71 | 0.02 | 0.73 | 0.91 | 1.94 | 0.38 | 0.07 | 3.65 | 0.00 | 0.42 | 0.00 | 0.04 | **8.85** |
| **Total Trips** | | **17.04** | **5.44** | **23.53** | *12.19* | **13.27** | **3.43** | **1.16** | **24.47** | **0.00** | **21.01** | **0.00** | **0.00** | **121.52** | **90.39** | **14.31** | **27.45** | **21.17** | **52.12** | **15.58** | **19.81** | **91.80** | **0.55** | **33.54** | **30.98** | **0.77** | **398.47** |
| **In and Out Total Trips** | | 107.42 | 19.75 | 50.97 | 33.36 | 65.39 | 19.01 | 20.96 | 116.26 | 0.55 | 54.55 | 30.98 | 0.77 | **519.99** | | | | | | | | | | | | | |
| Percent | | **21%** | **4%** | **10%** | **6%** | **13%** | **4%** | **4%** | **22%** | **0%** | **10%** | **6%** | **0%** | | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.519** | | | | | | | | | | | | | |

**Note: Daycare trip distribution based on summary of PM Peak Period trip distribution**

**Distribution of Day Care Trips for Developer's Proposed Option in PM Peak Period**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 0.38 | 0.01 | 0.03 | 0.14 | 0.01 | 0.00 | 0.00 | 0.01 | 0.00 | 0.02 | 0.00 | 0.00 | 0.59 | 1.31 | 0.35 | 0.26 | 0.26 | 0.04 | 0.27 | 0.00 | 0.89 | 0.04 | 1.59 | 1.24 | 0.00 | 6.26 |
| | Daily Non-Work Trips | 0.40 | 0.04 | 1.80 | 1.08 | 1.51 | 0.60 | 0.18 | 2.26 | 0.00 | 1.91 | 0.16 | 0.06 | 9.98 | 1.16 | 0.04 | 1.30 | 1.59 | 3.52 | 0.62 | 0.20 | 6.47 | 0.00 | 1.00 | 0.08 | 0.10 | 16.10 |
| Taxi / TNC Person Trips | Daily Work Trips | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.11 | 0.03 | 0.02 | 0.02 | 0.00 | 0.02 | 0.00 | 0.08 | 0.00 | 0.13 | 0.11 | 0.00 | 0.53 |
| | Daily Non-Work Trips | 0.03 | 0.00 | 0.15 | 0.08 | 0.08 | 0.03 | 0.01 | 0.17 | 0.00 | 0.15 | 0.00 | 0.00 | 0.71 | 0.10 | 0.00 | 0.11 | 0.13 | 0.28 | 0.05 | 0.01 | 0.53 | 0.00 | 0.07 | 0.00 | 0.01 | 1.29 |
| Transit Person Trips | Daily Work Trips | 0.55 | 0.00 | 0.00 | 0.42 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.97 | 3.92 | 0.52 | 0.50 | 0.00 | 0.08 | 0.39 | 1.34 | 0.08 | 0.00 | 0.05 | 1.10 | 0.00 | 7.99 |
| | Daily Non-Work Trips | 0.25 | 0.43 | 0.16 | 0.29 | 0.48 | 0.00 | 0.00 | 0.01 | 0.00 | 0.06 | 0.05 | 0.00 | 1.72 | 1.22 | 0.27 | 0.31 | 0.02 | 0.98 | 0.00 | 0.22 | 0.32 | 0.00 | 0.46 | 0.18 | 0.00 | 3.98 |
| Auto VehicleTrips* | Daily Work Trips | 0.38 | 0.01 | 0.01 | 0.14 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.01 | 0.00 | 0.00 | 0.57 | 1.24 | 0.27 | 0.25 | 0.26 | 0.02 | 0.27 | 0.00 | 0.89 | 0.04 | 1.59 | 1.24 | 0.00 | 6.07 |
| | Daily Non-Work Trips | 0.28 | 0.04 | 1.57 | 0.92 | 1.04 | 0.33 | 0.14 | 1.23 | 0.00 | 1.00 | 0.07 | 0.04 | 6.67 | 0.39 | 0.04 | 0.66 | 0.77 | 1.84 | 0.29 | 0.15 | 2.97 | 0.00 | 0.74 | 0.02 | 0.06 | 7.93 |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.02 | 0.06 | 0.02 | 0.01 | 0.01 | 0.00 | 0.01 | 0.00 | 0.05 | 0.00 | 0.08 | 0.06 | 0.00 | 0.32 |
| | Daily Non-Work Trips | 0.02 | 0.00 | 0.09 | 0.05 | 0.05 | 0.02 | 0.01 | 0.10 | 0.00 | 0.09 | 0.00 | 0.00 | 0.43 | 0.06 | 0.00 | 0.06 | 0.08 | 0.17 | 0.03 | 0.01 | 0.32 | 0.00 | 0.04 | 0.00 | 0.00 | 0.77 |
| **Total Trips** | | **0.70** | **0.05** | **1.68** | **1.11** | **1.08** | **0.35** | **0.14** | **1.35** | **0.00** | **1.10** | **0.08** | **0.04** | **7.68** | **1.76** | **0.33** | **0.98** | **1.12** | **2.04** | **0.60** | **0.16** | **4.22** | **0.05** | **2.45** | **1.32** | **0.07** | **15.09** |
| **In and Out Total Trips** | | 2.46 | 0.38 | 2.66 | 2.23 | 3.12 | 0.95 | 0.30 | 5.57 | 0.05 | 3.55 | 1.40 | 0.11 | **22.77** | | | | | | | | | | | | | |
| Percent | | **1%** | **0%** | **1%** | **1%** | **1%** | **0%** | **0%** | **2%** | **0%** | **1%** | **1%** | **0%** | | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.559** | | | | | | | | | | | | | |

**Distribution of Residential Trips for Developer's Proposed Option- Daily**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | PM Work Trips | 54.26 | 8.94 | 41.01 | 26.74 | 42.91 | 29.06 | 25.43 | 26.31 | 0.00 | 76.56 | 58.61 | 4.56 | **394.39** | 47.64 | 11.41 | 41.33 | 13.99 | 31.95 | 26.20 | 23.23 | 28.43 | 0.83 | 94.09 | 44.88 | 7.05 | **371.03** |
| | PM Non-Work Trips | 61.42 | 28.90 | 363.18 | 94.33 | 190.60 | 12.83 | 122.14 | 376.79 | 0.00 | 157.93 | 38.18 | 25.65 | **1471.97** | 76.17 | 23.02 | 355.12 | 147.11 | 207.92 | 14.89 | 112.15 | 365.81 | 0.00 | 163.02 | 19.75 | ### | **1515.21** |
| Taxi / TNC Person Trips | PM Work Trips | 4.76 | 0.78 | 3.60 | 2.35 | 3.76 | 2.55 | 2.23 | 2.31 | 0.00 | 6.72 | 5.14 | 0.40 | **34.60** | 4.18 | 1.00 | 3.63 | 1.23 | 2.80 | 2.30 | 2.04 | 2.49 | 0.07 | 8.25 | 3.94 | 0.62 | **32.55** |
| | PM Non-Work Trips | 5.39 | 2.53 | 31.86 | 8.27 | 16.72 | 1.13 | 10.71 | 33.05 | 0.00 | 13.85 | 3.35 | 2.25 | **129.12** | 6.68 | 2.02 | 31.15 | 12.90 | 18.24 | 1.31 | 9.84 | 32.09 | 0.00 | 14.30 | 1.73 | 2.65 | **132.91** |
| Transit Person Trips | PM Work Trips | 178.97 | 130.56 | 49.72 | 22.23 | 30.88 | 4.07 | 13.86 | 10.10 | 0.00 | 43.67 | 67.18 | 0.00 | **551.24** | 160.80 | 109.34 | 15.28 | 21.45 | 31.56 | 4.07 | 14.85 | 7.10 | 0.00 | 44.70 | 75.41 | 0.00 | **484.55** |
| | PM Non-Work Trips | 85.00 | 21.18 | 58.91 | 16.11 | 121.25 | 2.81 | 6.18 | 35.52 | 0.00 | 20.99 | 5.04 | 0.00 | **372.99** | 58.41 | 8.22 | 71.91 | 106.43 | 35.13 | 3.68 | 12.97 | 38.13 | 0.00 | 18.26 | 6.22 | 0.00 | **359.36** |
| Auto VehicleTrips* | PM Work Trips | 48.26 | 7.33 | 35.18 | 25.14 | 42.01 | 29.06 | 24.53 | 25.73 | 0.00 | 71.58 | 54.96 | 4.56 | **368.34** | 41.31 | 9.27 | 35.06 | 13.99 | 31.66 | 26.20 | 23.23 | 27.88 | 0.83 | 82.70 | 41.08 | 7.05 | **340.26** |
| | PM Non-Work Trips | 39.43 | 23.94 | 196.38 | 59.53 | 125.60 | 6.86 | 76.41 | 191.67 | 0.00 | 85.85 | 28.46 | 16.64 | **850.76** | 47.45 | 14.12 | 187.86 | 75.05 | 147.55 | 7.75 | 74.00 | 193.90 | 0.00 | 97.26 | 19.08 | ### | **888.55** |
| Taxi / TNC Vehicle Trips* | PM Work Trips | 2.85 | 0.47 | 2.15 | 1.40 | 2.25 | 1.53 | 1.34 | 1.38 | 0.00 | 4.02 | 3.08 | 0.24 | **20.72** | 2.50 | 0.60 | 2.17 | 0.73 | 1.68 | 1.38 | 1.22 | 1.49 | 0.04 | 4.94 | 2.36 | 0.37 | **19.49** |
| | PM Non-Work Trips | 3.23 | 1.52 | 19.08 | 4.95 | 10.01 | 0.67 | 6.42 | 19.79 | 0.00 | 8.30 | 2.01 | 1.35 | **77.32** | 4.00 | 1.21 | 18.65 | 7.73 | 10.92 | 0.78 | 5.89 | 19.21 | 0.00 | 8.56 | 1.04 | 1.59 | **79.59** |
| **Total Trips** | | **93.77** | **33.26** | **252.80** | **91.03** | **179.88** | **38.11** | **108.69** | **238.57** | **0.00** | **169.75** | **88.50** | **22.78** | **1317.14** | **95.26** | **25.20** | **243.75** | **97.50** | **191.81** | **36.11** | **104.35** | **242.49** | **0.88** | **193.47** | **63.55** | **###** | **1327.88** |
| **In and Out Total Trips** | | 189.03 | 58.45 | 496.55 | 188.53 | 371.69 | 74.22 | 213.04 | 481.06 | 0.88 | 363.22 | 152.05 | 56.30 | **2645.02** | | | | | | | | | | | | | |
| Percent | | **7%** | **2%** | **19%** | **7%** | **14%** | **3%** | **8%** | **18%** | **0%** | **14%** | **6%** | **2%** | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.543** | | | | | | | | | | | | | 1.53501736 |

**Distribution of Resdential Trips for Additional Housing Option - Daily**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 119.98 | 18.09 | 86.08 | 38.75 | 71.36 | 35.79 | 46.50 | 32.98 | 0.00 | 113.73 | 71.59 | 8.98 | **643.83** | 110.43 | 26.62 | 91.18 | 19.55 | 58.23 | 32.10 | 24.11 | 35.06 | 0.86 | 115.32 | 58.64 | ### | **585.64** |
| | Daily Non-Work Trips | 117.57 | 34.38 | 485.28 | 126.59 | 232.39 | 126.51 | 151.15 | 404.80 | 0.00 | 202.56 | 47.13 | 34.44 | **1962.79** | 138.57 | 45.12 | 503.77 | 206.55 | 255.50 | 99.15 | 153.56 | 398.69 | 0.00 | 210.36 | 44.64 | ### | **2095.48** |
| Taxi / TNC Person Trips | Daily Work Trips | 10.52 | 1.59 | 7.55 | 3.40 | 6.26 | 3.14 | 4.08 | 2.89 | 0.00 | 9.98 | 6.28 | 0.79 | **56.48** | 9.69 | 2.33 | 8.00 | 1.71 | 5.11 | 2.82 | 2.11 | 3.08 | 0.08 | 10.12 | 5.14 | 1.19 | **51.37** |
| | Daily Non-Work Trips | 10.31 | 3.02 | 42.57 | 11.10 | 20.39 | 11.10 | 13.26 | 35.51 | 0.00 | 17.77 | 4.13 | 3.02 | **172.17** | 12.16 | 3.96 | 44.19 | 18.12 | 22.41 | 8.70 | 13.47 | 34.97 | 0.00 | 18.45 | 3.92 | 3.47 | **183.81** |
| Transit Person Trips | Daily Work Trips | 230.67 | 112.23 | 59.29 | 44.85 | 26.03 | 3.11 | 13.57 | 24.58 | 0.00 | 72.33 | 108.28 | 0.00 | **694.94** | 204.01 | 95.85 | 23.39 | 16.40 | 24.68 | 3.11 | 11.36 | 13.10 | 0.00 | 73.64 | 83.94 | 0.00 | **549.50** |
| | Daily Non-Work Trips | 207.17 | 37.01 | 141.70 | 40.70 | 110.89 | 2.69 | 32.58 | 30.80 | 0.00 | 22.75 | 24.00 | 0.00 | **650.31** | 129.43 | 22.59 | 169.82 | 113.52 | 35.49 | 21.98 | 34.34 | 38.77 | 0.00 | 17.33 | 13.46 | 0.00 | **596.71** |
| Auto VehicleTrips* | Daily Work Trips | 97.37 | 15.29 | 67.73 | 36.30 | 69.91 | 35.79 | 45.56 | 32.05 | 0.00 | 103.37 | 67.81 | 8.98 | **580.16** | 88.24 | 23.34 | 74.87 | 19.18 | 57.40 | 32.10 | 24.11 | 33.34 | 0.86 | 100.27 | 54.69 | ### | **521.97** |
| | Daily Non-Work Trips | 80.22 | 27.70 | 282.84 | 82.28 | 146.58 | 62.07 | 102.14 | 209.02 | 0.00 | 115.94 | 35.16 | 22.87 | **1166.83** | 88.30 | 31.96 | 293.02 | 111.93 | 178.16 | 61.20 | 110.33 | 216.13 | 0.00 | 134.22 | 34.23 | ### | **1290.90** |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 6.30 | 0.95 | 4.52 | 2.04 | 3.75 | 1.88 | 2.44 | 1.73 | 0.00 | 5.97 | 3.76 | 0.47 | **33.82** | 5.80 | 1.40 | 4.79 | 1.03 | 3.06 | 1.69 | 1.27 | 1.84 | 0.05 | 6.06 | 3.08 | 0.71 | **30.76** |
| | Daily Non-Work Trips | 6.18 | 1.81 | 25.49 | 6.65 | 12.21 | 6.64 | 7.94 | 21.26 | 0.00 | 10.64 | 2.48 | 1.81 | **103.10** | 7.28 | 2.37 | 26.46 | 10.85 | 13.42 | 5.21 | 8.07 | 20.94 | 0.00 | 11.05 | 2.34 | 2.08 | **110.07** |
| **Total Trips** | | **190.07** | **45.75** | **380.59** | **127.26** | **232.44** | **106.39** | **158.09** | **264.07** | **0.00** | **235.92** | **109.21** | **34.13** | **1883.91** | **189.62** | **59.08** | **399.14** | **142.99** | **252.05** | **100.19** | **143.77** | **272.25** | **0.91** | **251.60** | **94.34** | **###** | **1953.70** |
| **In and Out Total Trips** | | 379.69 | 104.82 | 779.73 | 270.25 | 484.49 | 206.58 | 301.86 | 536.32 | 0.91 | 487.52 | 203.55 | 81.89 | **3837.61** | | | | | | | | | | | | | |
| Percent | | **10%** | **3%** | **20%** | **7%** | **13%** | **5%** | **8%** | **14%** | **0%** | **13%** | **5%** | **2%** | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.499** | | | | | | | | | | | | |

**Distribution of Retail Trips - Daily**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 0.80 | 0.50 | 1.90 | 2.30 | 0.90 | 0.80 | 1.00 | 2.90 | 0.00 | 2.30 | 0.50 | 1.00 | **15.00** | 1.80 | 1.10 | 3.50 | 2.90 | 1.40 | 0.60 | 1.00 | 2.70 | - | 3.80 | 0.50 | 0.90 | **20.00** |
| | Daily Non-Work Trips | 3.40 | 2.30 | 8.40 | 9.80 | 31.60 | 4.20 | 10.50 | 38.90 | - | 16.70 | 5.00 | 2.20 | **133.00** | 2.70 | 1.80 | 8.50 | 6.10 | 33.10 | 2.30 | 11.30 | 37.20 | - | 17.10 | 4.80 | 1.80 | **127.00** |
| Taxi / TNC Person Trips | Daily Work Trips | 0.00 | 0.00 | 0.10 | 0.10 | 0.00 | 0.00 | 0.10 | 0.20 | 0.00 | 0.10 | 0.00 | 0.10 | **1.00** | 0.10 | 0.10 | 0.20 | 0.20 | 0.10 | 0.00 | 0.10 | 0.10 | - | 0.20 | 0.00 | 0.00 | **1.00** |
| | Daily Non-Work Trips | 0.20 | 0.10 | 0.40 | 0.50 | 1.70 | 0.20 | 0.60 | 2.10 | - | 0.90 | 0.30 | 0.10 | **7.00** | 0.10 | 0.10 | 0.50 | 0.30 | 1.80 | 0.10 | 0.60 | 2.00 | - | 0.90 | 0.30 | 0.10 | **7.00** |
| Transit Person Trips | Daily Work Trips | 3.00 | 1.20 | 1.60 | 5.50 | 0.10 | 0.10 | - | 0.40 | - | 0.60 | 0.10 | - | **13.00** | 2.30 | 1.60 | 3.50 | 2.60 | 3.70 | 0.10 | 0.20 | - | - | 1.00 | 2.70 | - | **18.00** |
| | Daily Non-Work Trips | 5.60 | 0.60 | 6.90 | 8.10 | 9.60 | 1.00 | 1.40 | 5.50 | - | 2.60 | 5.70 | 1.20 | **48.00** | 7.30 | - | 11.50 | 5.10 | 11.90 | 1.60 | 1.30 | 5.10 | - | 4.20 | 5.90 | 0.30 | **54.00** |
| Auto VehicleTrips* | Daily Work Trips | 0.60 | 0.50 | 1.40 | 1.90 | 0.80 | 0.80 | 1.00 | 1.90 | 0.00 | 2.00 | 0.50 | 0.70 | **12.00** | 1.50 | 0.90 | 2.60 | 2.20 | 1.10 | 0.50 | 1.00 | 1.90 | - | 3.40 | 0.50 | 0.70 | **16.00** |
| | Daily Non-Work Trips | 2.60 | 1.30 | 5.10 | 5.30 | 18.80 | 2.60 | 6.70 | 19.00 | - | 9.80 | 2.80 | 1.40 | **75.00** | 1.10 | 1.00 | 5.50 | 3.70 | 18.40 | 1.20 | 6.80 | 18.70 | - | 9.90 | 2.40 | 1.30 | **70.00** |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 0.00 | 0.00 | 0.10 | 0.10 | 0.00 | 0.00 | 0.00 | 0.10 | 0.00 | 0.10 | 0.00 | 0.00 | **0.00** | 0.10 | 0.00 | 0.10 | 0.10 | 0.00 | 0.00 | 0.00 | 0.10 | - | 0.10 | 0.00 | 0.00 | **1.00** |
| | Daily Non-Work Trips | 0.10 | 0.10 | 0.30 | 0.30 | 1.00 | 0.10 | 0.30 | 1.20 | - | 0.50 | 0.20 | 0.10 | **4.00** | 0.10 | 0.10 | 0.30 | 0.20 | 1.10 | 0.10 | 0.40 | 1.20 | - | 0.50 | 0.20 | 0.10 | **4.00** |
| **Total Trips** | | **3.30** | **1.90** | **6.90** | **7.60** | **20.60** | **3.50** | **8.00** | **22.20** | **0.00** | **12.40** | **3.50** | **2.20** | **91.00** | **2.80** | **2.00** | **8.50** | **6.20** | **20.60** | **1.80** | **8.20** | **21.90** | **0.00** | **13.90** | **3.10** | **2.10** | **91.00** |
| **In and Out Total Trips** | | 6.10 | 3.90 | 15.40 | 13.80 | 41.20 | 5.30 | 16.20 | 44.10 | 0.00 | 26.30 | 6.60 | 4.30 | **182.00** | | | | | | | | | | | | | |
| Percent | | **8%** | **5%** | **21%** | **19%** | **57%** | **7%** | **23%** | **61%** | **0%** | **37%** | **9%** | **6%** | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.709** | | | | | | | | | | | | |

**Distribution of Resdential Trips for Additional Housing Option in PM Peak Period**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 6.30 | 0.00 | 0.33 | 0.47 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 7.10 | 19.82 | 5.89 | 4.19 | 3.02 | 0.50 | 4.18 | 0.00 | 14.74 | 0.72 | 25.23 | 20.55 | 0.00 | **98.83** |
| | Daily Non-Work Trips | 6.62 | 0.62 | 27.76 | 15.32 | 11.37 | 4.44 | 1.50 | 31.69 | 0.00 | 27.22 | 0.00 | 0.00 | 126.55 | 19.01 | 0.49 | 19.60 | 24.41 | 51.94 | 10.07 | 1.78 | 98.03 | 0.00 | 11.22 | 0.00 | 1.00 | **237.55** |
| Taxi / TNC Person Trips | Daily Work Trips | 0.55 | 0.00 | 0.03 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.62 | 1.74 | 0.52 | 0.37 | 0.27 | 0.04 | 0.37 | 0.00 | 1.29 | 0.06 | 2.21 | 1.80 | 0.00 | **8.67** |
| | Daily Non-Work Trips | 0.58 | 0.05 | 2.44 | 1.34 | 1.00 | 0.39 | 0.13 | 2.78 | 0.00 | 2.39 | 0.00 | 0.00 | 11.10 | 1.67 | 0.04 | 1.72 | 2.14 | 4.56 | 0.88 | 0.16 | 8.60 | 0.00 | 0.98 | 0.00 | 0.09 | **20.84** |
| Transit Person Trips | Daily Work Trips | 6.98 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.98 | 64.98 | 8.70 | 8.38 | 0.00 | 1.30 | 6.47 | 22.35 | 1.30 | 0.00 | 0.00 | 18.32 | 0.00 | **131.79** |
| | Daily Non-Work Trips | 2.97 | 6.98 | 2.59 | 0.00 | 6.33 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 18.88 | 20.16 | 4.52 | 4.42 | 0.00 | 15.11 | 0.00 | 3.63 | 5.39 | 0.00 | 7.61 | 2.97 | 0.00 | **63.81** |
| Auto VehicleTrips* | Daily Work Trips | 6.30 | 0.00 | 0.16 | 0.47 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.93 | 18.67 | 4.50 | 4.02 | 3.02 | 0.25 | 4.18 | 0.00 | 14.74 | 0.72 | 25.23 | 20.55 | 0.00 | **95.88** |
| | Daily Non-Work Trips | 4.70 | 0.62 | 25.03 | 14.25 | 10.82 | 2.41 | 1.50 | 18.22 | 0.00 | 14.75 | 0.00 | 0.00 | 92.30 | 6.42 | 0.49 | 10.02 | 11.68 | 27.10 | 4.52 | 1.54 | 45.28 | 0.00 | 9.21 | 0.00 | 0.50 | **116.76** |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 0.33 | 0.00 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.37 | 1.04 | 0.31 | 0.22 | 0.16 | 0.03 | 0.22 | 0.00 | 0.77 | 0.04 | 1.33 | 1.08 | 0.00 | **5.19** |
| | Daily Non-Work Trips | 0.35 | 0.03 | 1.46 | 0.80 | 0.60 | 0.23 | 0.08 | 1.66 | 0.00 | 1.43 | 0.00 | 0.00 | 6.65 | 1.00 | 0.03 | 1.03 | 1.28 | 2.73 | 0.53 | 0.09 | 5.15 | 0.00 | 0.59 | 0.00 | 0.05 | **12.48** |
| **Total Trips** | | **11.68** | **0.66** | **26.67** | **15.55** | **11.41** | **2.65** | **1.58** | **19.89** | **0.00** | **16.18** | **0.00** | **0.00** | **106.25** | **27.12** | **5.33** | **15.29** | **16.14** | **30.10** | **9.45** | **1.63** | **65.95** | **0.75** | **36.35** | **21.63** | **0.55** | **230.30** |
| **In and Out Total Trips** | | 38.80 | 5.98 | 41.96 | 31.69 | 41.51 | 12.09 | 3.21 | 85.83 | 0.75 | 52.53 | 21.63 | 0.55 | **336.56** | | | | | | | | | | | | | |
| Percent | | **12%** | **2%** | **12%** | **9%** | **12%** | **4%** | **1%** | **26%** | **0%** | **16%** | **6%** | **0%** | | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.519** | | | | | | | | | | | | | |

**Summary of Distribution of Trips for Additional Housing Option in PM Peak Period -w/ Daycare**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 6.83 | 0.15 | 0.47 | 1.89 | 0.07 | 0.00 | 0.00 | 0.15 | 0.00 | 0.21 | 0.00 | 0.00 | **9.78** | 23.02 | 6.38 | 4.62 | 4.31 | 0.65 | 4.71 | 0.00 | 16.07 | 0.78 | 28.32 | 22.28 | 0.00 | **111.14** |
| | Daily Non-Work Trips | 7.18 | 0.68 | 31.72 | 18.61 | 22.87 | 9.08 | 2.72 | 38.84 | 0.00 | 32.95 | 2.09 | 0.80 | **167.53** | 20.83 | 0.70 | 22.79 | 28.00 | 61.41 | 11.11 | 3.16 | 113.62 | 0.00 | 16.38 | 1.01 | 1.65 | **280.65** |
| Taxi / TNC Person Trips | Daily Work Trips | 0.60 | 0.00 | 0.03 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.71** | 1.91 | 0.56 | 0.40 | 0.31 | 0.05 | 0.40 | 0.00 | 1.40 | 0.07 | 2.42 | 1.95 | 0.00 | **9.47** |
| | Daily Non-Work Trips | 0.63 | 0.06 | 2.67 | 1.49 | 1.28 | 0.50 | 0.16 | 3.10 | 0.00 | 2.65 | 0.04 | 0.01 | **12.59** | 1.81 | 0.05 | 1.89 | 2.35 | 5.03 | 0.96 | 0.19 | 9.46 | 0.00 | 1.14 | 0.02 | 0.11 | **23.01** |
| Transit Person Trips | Daily Work Trips | 9.25 | 0.00 | 0.00 | 5.31 | 0.00 | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **14.66** | 70.58 | 9.43 | 9.08 | 0.06 | 1.41 | 7.01 | 24.23 | 1.41 | 0.00 | 0.62 | 19.86 | 0.00 | **143.69** |
| | Daily Non-Work Trips | 4.09 | 7.68 | 2.91 | 3.75 | 8.11 | 0.00 | 0.00 | 0.06 | 0.00 | 0.71 | 0.68 | 0.00 | **28.00** | 21.96 | 4.90 | 5.36 | 0.25 | 17.23 | 0.00 | 3.93 | 5.84 | 0.00 | 8.25 | 3.22 | 0.00 | **70.96** |
| Auto VehicleTrips* | Daily Work Trips | 6.83 | 0.15 | 0.24 | 1.89 | 0.03 | 0.00 | 0.00 | 0.15 | 0.00 | 0.13 | 0.00 | 0.00 | **9.43** | 21.74 | 4.88 | 4.44 | 4.31 | 0.36 | 4.71 | 0.00 | 16.07 | 0.78 | 28.27 | 22.28 | 0.00 | **107.82** |
| | Daily Non-Work Trips | 5.10 | 0.68 | 28.01 | 16.25 | 16.66 | 5.03 | 2.20 | 21.50 | 0.00 | 17.48 | 0.94 | 0.49 | **114.34** | 7.04 | 0.61 | 11.57 | 13.52 | 32.13 | 5.10 | 2.45 | 52.21 | 0.00 | 12.34 | 0.29 | 0.96 | **138.20** |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 0.36 | 0.00 | 0.02 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.43** | 1.15 | 0.34 | 0.24 | 0.18 | 0.03 | 0.24 | 0.00 | 0.84 | 0.04 | 1.45 | 1.17 | 0.00 | **5.67** |
| | Daily Non-Work Trips | 0.38 | 0.04 | 1.60 | 0.89 | 0.76 | 0.30 | 0.10 | 1.85 | 0.00 | 1.59 | 0.02 | 0.01 | **7.54** | 1.08 | 0.03 | 1.13 | 1.41 | 3.01 | 0.58 | 0.11 | 5.66 | 0.00 | 0.69 | 0.01 | 0.06 | **13.78** |
| **SubTotal** | | **28.58** | **8.58** | **37.81** | *31.12* | **32.33** | **9.67** | **2.88** | **42.16** | **0.00** | **36.52** | **2.81** | **0.82** | **233.27** | **140.12** | **22.02** | **44.14** | **35.27** | **85.78** | **24.19** | **31.51** | **147.80** | **0.84** | **57.13** | **48.35** | **1.76** | **638.92** |
| **Percent** | | **12%** | **4%** | **16%** | **13%** | **14%** | **4%** | **1%** | **18%** | **0%** | **16%** | **1%** | **0%** | | **22%** | **3%** | **7%** | **6%** | **13%** | **4%** | **5%** | **23%** | **0%** | **9%** | **8%** | **0%** | **100%** |
| **In and Out Total** | | 168.69 | 30.60 | 81.95 | *66.40* | 118.11 | 33.86 | 34.39 | 189.96 | 0.84 | 93.66 | 51.16 | 2.58 | 872.19 | | | | | | | | | | | | | |
| **Percent** | | **19%** | **4%** | **9%** | **8%** | **14%** | **4%** | **4%** | **22%** | **0%** | **11%** | **6%** | **0%** | 100% | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.548** | | | | | | | | | | | | | |
| | | **12.66** | **0.87** | **29.87** | **19.08** | **17.46** | **5.33** | **2.30** | **23.51** | **0.00** | **19.20** | **0.96** | **0.50** | **131.73** | **31.00** | **5.85** | **17.38** | **19.42** | **35.53** | **10.62** | **2.56** | **74.79** | **0.82** | **42.74** | **23.75** | **1.02** | **265.48** |
| | | **10%** | **1%** | **23%** | **14%** | **13%** | **4%** | **2%** | **18%** | **0%** | **15%** | **1%** | **0%** | **100%** | **12%** | **2%** | **7%** | **7%** | **13%** | **4%** | **1%** | **28%** | **0%** | **16%** | **9%** | **0%** | **100%** |
| | | 43.66 | 6.72 | 47.24 | *38.51* | 52.99 | 15.95 | 4.86 | 98.30 | 0.82 | 61.94 | 24.71 | 1.52 | 397.21 | | | | | | | | | | | | | |
| | | **11%** | **2%** | **12%** | **10%** | **13%** | **4%** | **1%** | **25%** | **0%** | **16%** | **6%** | **0%** | **100%** | | | | | | | | | | | | | |

**Summary of Trip Distribution for Developer's Proposed Option in PM Peak Period - w/o Daycare**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 4.47 | 0.14 | 0.34 | 1.61 | 0.06 | 0.00 | 0.00 | 0.14 | 0.00 | 0.20 | 0.00 | 0.00 | **6.96** | 15.48 | 4.18 | 3.04 | 3.10 | 0.46 | 3.13 | 0.00 | 10.55 | 0.51 | 18.80 | 14.59 | 0.00 | **73.83** |
| | Daily Non-Work Trips | 4.70 | 0.44 | 21.20 | 12.72 | 17.80 | 7.09 | 2.07 | 26.63 | 0.00 | 22.49 | 1.93 | 0.74 | **117.81** | 13.70 | 0.50 | 15.33 | 18.74 | 41.57 | 7.32 | 2.40 | 76.35 | 0.00 | 11.86 | 0.93 | 1.23 | **189.94** |
| Taxi / TNC Person Trips | Daily Work Trips | 0.39 | 0.00 | 0.02 | 0.05 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.48** | 1.26 | 0.37 | 0.26 | 0.21 | 0.03 | 0.26 | 0.00 | 0.92 | 0.04 | 1.59 | 1.28 | 0.00 | **6.22** |
| | Daily Non-Work Trips | 0.41 | 0.04 | 1.76 | 0.99 | 0.89 | 0.35 | 0.11 | 2.05 | 0.00 | 1.75 | 0.04 | 0.01 | **8.39** | 1.19 | 0.03 | 1.25 | 1.55 | 3.32 | 0.63 | 0.13 | 6.23 | 0.00 | 0.77 | 0.02 | 0.07 | **15.18** |
| Transit Person Trips | Daily Work Trips | 6.51 | 0.00 | 0.00 | 4.90 | 0.00 | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **11.49** | 46.25 | 6.18 | 5.95 | 0.05 | 0.92 | 4.59 | 15.86 | 0.92 | 0.00 | 0.57 | 13.00 | 0.00 | **94.29** |
| | Daily Non-Work Trips | 2.91 | 5.06 | 1.93 | 3.46 | 5.64 | 0.00 | 0.00 | 0.06 | 0.00 | 0.65 | 0.63 | 0.00 | **20.35** | 14.41 | 3.21 | 3.66 | 0.23 | 11.51 | 0.00 | 2.57 | 3.83 | 0.00 | 5.40 | 2.11 | 0.00 | **46.93** |
| Auto VehicleTrips* | Daily Work Trips | 4.47 | 0.14 | 0.17 | 1.61 | 0.03 | 0.00 | 0.00 | 0.14 | 0.00 | 0.12 | 0.00 | 0.00 | **6.69** | 14.63 | 3.19 | 2.93 | 3.10 | 0.26 | 3.13 | 0.00 | 10.55 | 0.51 | 18.75 | 14.59 | 0.00 | **71.63** |
| | Daily Non-Work Trips | 3.34 | 0.44 | 18.57 | 10.86 | 12.23 | 3.94 | 1.60 | 14.55 | 0.00 | 11.84 | 0.87 | 0.45 | **78.68** | 4.63 | 0.42 | 7.76 | 9.08 | 21.77 | 3.39 | 1.81 | 35.02 | 0.00 | 8.71 | 0.27 | 0.74 | **93.59** |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 0.23 | 0.00 | 0.01 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | **0.29** | 0.75 | 0.22 | 0.16 | 0.12 | 0.02 | 0.16 | 0.00 | 0.55 | 0.03 | 0.95 | 0.77 | 0.00 | **3.72** |
| | Daily Non-Work Trips | 0.25 | 0.02 | 1.05 | 0.59 | 0.53 | 0.21 | 0.07 | 1.23 | 0.00 | 1.05 | 0.02 | 0.01 | **5.03** | 0.71 | 0.02 | 0.75 | 0.93 | 1.99 | 0.38 | 0.08 | 3.73 | 0.00 | 0.46 | 0.01 | 0.04 | **9.09** |
| **Total** | | **8.29** | **0.61** | **19.81** | **13.09** | **12.79** | **4.14** | **1.66** | **15.91** | **0.00** | **13.02** | **0.89** | **0.46** | **90.68** | **20.73** | **3.85** | **11.59** | **13.23** | **24.04** | **7.05** | **1.89** | **49.85** | **0.54** | **28.87** | **15.63** | **0.78** | **178.04** |
| | | **9%** | **1%** | **22%** | **14%** | **14%** | **5%** | **2%** | **18%** | **0%** | **14%** | **1%** | **1%** | | **12%** | **2%** | **7%** | **7%** | **14%** | **4%** | **1%** | **28%** | **0%** | **16%** | **9%** | **0%** | **100%** |
| **In and Out Total** | | 29.01 | 4.46 | 31.40 | 26.32 | 36.83 | 11.20 | 3.55 | 65.76 | 0.54 | 41.89 | 16.51 | 1.24 | **268.72** | | | | | | | | | | | | | |
| Percent | | **11%** | **2%** | **12%** | **10%** | **14%** | **4%** | **1%** | **24%** | **0%** | **16%** | **6%** | **0%** | 100% | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.559** | | | | | | | | | | | | | |

**Summary of Trip Distribution for Developer's Proposed Option in PM Peak Period - With Daycare**

| | | Outbound | | | | | | | | | | | | | Inbound | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Mode | | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total | Downtown / NorthBeach | SoMa | Marina/ Western Market | Mission/ Potrero | Outer Mission/ Hills | Bayshore | Richmond | Sunset | Islands | South Bay | East Bay | North Bay | Total |
| Auto Person Trips | Daily Work Trips | 4.74 | 0.15 | 0.36 | 1.71 | 0.07 | 0.00 | 0.00 | 0.15 | 0.00 | 0.21 | 0.00 | 0.00 | 7.38 | 16.41 | 4.43 | 3.23 | 3.29 | 0.48 | 3.32 | 0.00 | 11.18 | 0.54 | 19.93 | 15.46 | 0.00 | 78.26 |
| | Daily Non-Work Trips | 4.98 | 0.47 | 22.48 | 13.48 | 18.87 | 7.51 | 2.20 | 28.23 | 0.00 | 23.84 | 2.04 | 0.79 | 124.88 | 14.52 | 0.53 | 16.25 | 19.87 | 44.07 | 7.76 | 2.54 | 80.94 | 0.00 | 12.57 | 0.98 | 1.31 | 201.33 |
| Taxi / TNC Person Trips | Daily Work Trips | 0.42 | 0.00 | 0.02 | 0.06 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.51 | 1.34 | 0.39 | 0.28 | 0.22 | 0.03 | 0.28 | 0.00 | 0.97 | 0.05 | 1.68 | 1.36 | 0.00 | 6.59 |
| | Daily Non-Work Trips | 0.44 | 0.04 | 1.86 | 1.05 | 0.94 | 0.37 | 0.12 | 2.17 | 0.00 | 1.86 | 0.04 | 0.01 | 8.90 | 1.26 | 0.04 | 1.32 | 1.64 | 3.52 | 0.67 | 0.14 | 6.60 | 0.00 | 0.82 | 0.02 | 0.08 | 16.09 |
| Transit Person Trips | Daily Work Trips | 6.90 | 0.00 | 0.00 | 5.19 | 0.00 | 0.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 12.18 | 49.02 | 6.55 | 6.30 | 0.06 | 0.98 | 4.87 | 16.81 | 0.98 | 0.00 | 0.60 | 13.78 | 0.00 | 99.95 |
| | Daily Non-Work Trips | 3.09 | 5.37 | 2.04 | 3.67 | 5.98 | 0.00 | 0.00 | 0.06 | 0.00 | 0.69 | 0.67 | 0.00 | 21.57 | 15.27 | 3.40 | 3.88 | 0.24 | 12.20 | 0.00 | 2.73 | 4.05 | 0.00 | 5.73 | 2.24 | 0.00 | 49.75 |
| Auto VehicleTrips* | Daily Work Trips | 4.74 | 0.15 | 0.18 | 1.71 | 0.03 | 0.00 | 0.00 | 0.15 | 0.00 | 0.13 | 0.00 | 0.00 | 7.09 | 15.51 | 3.38 | 3.10 | 3.29 | 0.28 | 3.32 | 0.00 | 11.18 | 0.54 | 19.88 | 15.46 | 0.00 | 75.93 |
| | Daily Non-Work Trips | 3.54 | 0.47 | 19.69 | 11.51 | 12.97 | 4.17 | 1.69 | 15.42 | 0.00 | 12.55 | 0.92 | 0.48 | 83.40 | 4.91 | 0.45 | 8.23 | 9.62 | 23.08 | 3.59 | 1.92 | 37.12 | 0.00 | 9.23 | 0.28 | 0.78 | 99.21 |
| Taxi / TNC Vehicle Trips* | Daily Work Trips | 0.25 | 0.00 | 0.01 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.30 | 0.80 | 0.23 | 0.17 | 0.13 | 0.02 | 0.17 | 0.00 | 0.58 | 0.03 | 1.01 | 0.81 | 0.00 | 3.95 |
| | Daily Non-Work Trips | 0.26 | 0.02 | 1.11 | 0.63 | 0.56 | 0.22 | 0.07 | 1.30 | 0.00 | 1.11 | 0.02 | 0.01 | 5.33 | 0.75 | 0.02 | 0.79 | 0.98 | 2.11 | 0.40 | 0.08 | 3.95 | 0.00 | 0.49 | 0.01 | 0.05 | 9.64 |
| **Total** | | **20.56** | **6.03** | **26.77** | *25.15* | **25.86** | **7.97** | **2.32** | **30.62** | **0.00** | **26.60** | **2.75** | **0.80** | **175.42** | **97.82** | **15.33** | **31.26** | **25.31** | **61.28** | **16.89** | **22.23** | **104.72** | **0.59** | **41.33** | **33.84** | **1.38** | **451.98** |
| | | **12%** | **3%** | **15%** | **14%** | **15%** | **5%** | **1%** | **17%** | **0%** | **15%** | **2%** | **0%** | | **22%** | **3%** | **7%** | **6%** | **14%** | **4%** | **5%** | **23%** | **0%** | **9%** | **7%** | **0%** | |
| **In and Out Total** | | 118.38 | 21.36 | 58.03 | 50.46 | 87.14 | 24.87 | 24.54 | 135.34 | 0.59 | 67.93 | 36.59 | 2.18 | **627.39** | | | | | | | | | | | | | |
| Percent | | **19%** | **3%** | **9%** | **8%** | **14%** | **4%** | **4%** | **22%** | **0%** | **25%** | **14%** | **1%** | | | | | | | | | | | | | | |
| **AVO** | | | | | | | | | | | | | | **1.559** | | | | | | | | | | | | | |

# Attachment 5

## SFMTA Transit Delay Analysis Memorandum

**London Breed**, Mayor

**Cheryl Brinkman**, Chairman
**Malcolm Heinicke**, Vice Chairman
**Gwyneth Borden**, Director
**Lee Hsu**, Director
**Cristina Rubke**, Director
**Art Torres**, Director

**Edward D. Reiskin**, Director of Transportation

# MEMORANDUM

**DATE:** **July 20, 2018**

**TO:** **Wade Wietgrefe, Principal Environmental Planner, Planning Department**

**FROM:** **Sarah Jones, Planning Director, SFMTA**
**Sean Kennedy, Acting Deputy Director Transit, Ops Support, SFMTA**

**RE:** **Transit Delay Analysis**

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As part of the Transportation Impact Analysis (TIA) Update process, the Planning Department and the San Francisco Municipal Transportation Agency (SFMTA) have discussed the need to define a set of options for analyzing transit delay, either within the CEQA framework or outside of it. More recently, SFMTA staff have met on multiple occasions to more thoroughly discuss the potential benefits/costs of continuing to analyze transit delay under CEQA, as well as potential modifications to the thresholds of significance.

Research suggests that transit ridership is inversely related to transit travel time, with elasticity values ranging from -.3 to -.7[1]. This relationship is consistent with recent SFMTA experience – for example, following the introduction of the 5L Fulton Limited (since renamed 5R Fulton Rapid) service in 2013, average peak period travel time along the full route dropped by 9% while ridership increased 17%. While overall Muni ridership is remaining steady, this is due to the increased ridership on the lines with major service improvements. Lines without service improvements have seen a decline in ridership and generally lower levels of satisfaction with service. Therefore, it is reasonable to conclude that a secondary impact of transit delay is mode shift away from transit, with some share going towards private vehicles and ride hail services. This mode shift and the increased Vehicle Miles Traveled (VMT) supports the need to analyze, identify, and mitigate transit delay impacts.

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[1] TCRP Report 118- Bus Rapid Transit Practitioner's Guide (2007), Page 3-19:
http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_118.pdf

Transit Capacity and Quality of Service Manual, 3rd Edition (2013), Page 5-97
http://www.trb.org/Main/Blurbs/169437.aspx



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## Significance Threshold

The current significance threshold used in San Francisco for transit delay is "half a headway" – that is, if a transit line would be delayed by a length of time greater than or equal to one-half of that line's scheduled frequency, there is a significant impact. This threshold does not align with SFMTA's assessment of the occurrence of a substantial adverse impacts.

City Charter Section 8A.103 includes an 85% on-time performance (OTP) service standard for Muni, with vehicles arriving more than four minutes beyond a published schedule time point considered late. Consistent with this adopted measure of effectiveness, transit delays of four minutes or more contribute to a decline in OTP and should be considered an indicator of a potential significant impact, regardless of the scheduled headway. If a delay greater than or equal to four minutes or one-half headway, whichever is less, that is attributable to the proposed project is identified, this delay should be evaluated for significance on the basis of the type of route affected.

This approach acknowledges that a reduction in OTP could result in might not result in substantial physical impacts on the environment through increased VMT if, for example, the service affected has a frequency with headways of 20-30 minutes and low ridership.

## Types of Transit Delay for Analysis

We have concluded that there is an important distinction in types of "transit delay" that result from land use development or street redesign projects:

- Delays on a transit line or lines that result from changing conditions across multiple city blocks, e.g. substantial increase in traffic congestion at multiple intersections where transit operates resulting from growth associated with an area plan, a large-scale development project or a major streetscape project.

- Localized impacts on transit movements that result from specific project design elements (e.g. a driveway location that causes on-street traffic queues to delay buses).

Recognizing that these two types of impacts result from different scales of projects, and that it would be problematic to try and capture both types of impacts under a single analysis, we request that the TIA Guidelines address transit delay impact analysis as follows:

1. For area plans and large-scale development projects (e.g., Central SoMa Plan, Pier 70 Project) we request that the Guidelines call for system-level transit delay analysis. This

analysis is necessary for SFMTA's planning and programming purposes, and to support use of mitigation measures such as transit-only lanes or other measures to protect or prioritize transit within and around plan areas and large development sites.

2. For site-specific projects, focus on the analysis of impacts on transit movements that would be affected by project-related activities. We request that an impact on transit operations be included in the CEQA checklist. While this concern is now being considered in the context of processes like SDAT, recognizing it within the checklist would provide more certainty that projects must do all feasible to minimize impacts to transit movement. We expect that significant impacts would be avoided through project redesign, or would be mitigable through measures such as loading dock management.

**SFMTA Projects**

We recognize that the requested analysis and thresholds would apply to all types of projects, including SFMTA projects that might affect transit, such as bicycle lanes. The possibility of effects on transit is a major consideration in the project design process, and any such proposal would be uncommon and should be flagged for the Planning Department on submittal. We would like to avoid, to the extent possible, any need for further analysis of potential CEQA-significant impacts to transit during the Planning Department's environmental review process for SFMTA projects. We suggest that the Planning Department work with the SFMTA's Environmental Review Team to determine information submittal needs when a proposed active transportation project might affect a transit route.