BALBOA RESERVOIR COMMUNITY ADVISORY COMMITTEE
CITY & COUNTY OF SAN FRANCISCO

DOCUMENTS RECEIVED FROM PUBLIC DURING 12/12/16 REGULAR MEETING

AND

EMAILS RECEIVED FROM PUBLIC VIA BRCAC@SFGOV.ORG

Period: 11/15/16 – 12/12/16

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Period: 11/15/16 – 12/12/16

Wong, Phillip (ECN)

From: Aaron Goodman [redacted]
Sent: Monday, November 14, 2016 9:23 PM
To: Boomer, Roberta (MTA); CAC; MTABoard
Subject: SFMTA - Item 11 Commuter Shuttle Mid-Year Status Report and Hub Study
Attachments: BART_SYSTEMS_LINKS_LOOPS_MUNI_HSR_CALTRAINS_FUTURE_MAPPING.jpg; Muni_map_2015.jpg

SFMTA Board of Directors;

Nov. 15th SFMTA meeting // **Item #11 - Regarding the Proposed Commuter Shuttle Program and suggested "solutions"**

There is a distinct problem with the proposed routes as shown in the proposal and that is the impact on existing transit access (by SF MUNI Bus systems) and the congestion that is occurring currently, and will occur due to future development pressures in these areas. Lyft and Uber already cause additional transit impacts on the shuttle systems, and existing Muni BUS routes citywide, and the commuter shuttle services do not significantly reduce or eliminate the need to invest heavily in mass-transit solutions citywide that will garner more solutions in population growth.

I suggest looking back in the SPUR documents on transportation, where a key map was produced on mass-transit systems and possible solutions.

The proposal shown in figure 4 ignores directly the impacts of the Balboa Park station existing conditions and traffic and the future Geneva Harney proposed BRT and eventual LRV possible links. By allowing bus shuttle stops at this intersection without grade-separation of the muni lines, or bus systems, the traffic conditions will only worsen during commute hours. This has been noted at Glen Park station, where again today a Genentech Shuttle, Bauer Limosine Bus, and Google Bus all approached and parked and turned at the Glen Park Station, blocking traffic and prohibiting safe and simple access for the Muni bus (public transit) in favor of a tiered system of transit. The other concern is that 19th Ave has not been approached in terms of major construction projects at (Parkmerced) and future projects for (SFSU-CSU) which will increase vehicular, and construction vehicle access to these sites, and cause more delays and congestion with additional bus systems if instigated simultaneously as these build outs.

Having a shuttle system proposal for "special" additional and "existing" system competitive commuter bus transit systems should NOT take the place of simple loops and links and extensions of our existing muni light rail vehicle right-of-way routes. Nor should it take funding away from prior proposed transit corrective proposals that should take precedence in financial initial spending.

Geneva Harney to BVHP which can serve as a M-Line or J-Line or even a T-line loop and link in the system. With the recent Bayshore Multi-Modal Hub presentation that looked at Brisbane and produced (4) alternatives, which NONE showed promise early on to link over the freeway initially and directly bring commuters east-west from the BVHP shipyards to Balboa Park Station, with a stop at Caltrains and the HSR route we are ignoring the future needs and boxing ourselves into a corner design wise, without a real out for the Shuttle Bus Systems that could be designed into the BVHP area as a loop with a transfer point at the Caltrains/Bayshore station and Brisbane developments. Bayshore Blvd. and Geneva Harney area already clotted near the Schlage Lock Factory, and San Bruno Ave. where "casino" bus and shuttle bus systems block up the 8x and 9R daily along San Bruno Ave. without documenting the impacts. (Even with the proposed San Bruno Ave changes upcoming

the impacts on the bus systems is at a break point with upcoming construction at Schlage, and Sunnydale, and congestion at the Silver/San Bruno and Bayshore to Oakdale and SFGH areas of Potrero. More significant transit upgrades must occur so that a trip to SFGH does not take over an hour from the southern D10 district points.

L-Taraval back up Sloat Blvd. to West Portal, or a direct connection out to Daly City and John Daly Blvd. up to a revitalized and air-right developed intersection at the Daly City BART station, possibly moving it westward and north of the intersection to provide new development and improved access as a platform decking of the freeway to increase pedestrian routes, and bike routes to the station while grade-separating the traffic to a below grade system while keeping muni at or above grade.

The mid-year status report and initial indications of HUBs for commuter shuttle bus systems ignores enforcement, and the need to document the already negative impacts members of the public have shown in the bus systems and how they ignore the mass-transit right-of way, drop-zones, and blocking of routes.There needs to be a more assured review of the existing impacts, and resolve by the SFMTA and CAC to thoroughly investigate the impacts, and invest in solutions up front that solve mass-transit connectivity and links in systems that are more readily implemented sooner vs. a shuttle hub system.

Please do consider the maps shown as insufficient in terms of analysis especially the Balboa Park Station area which cannot absorb a shuttle bus platform unless integrated into a new station masterplan and deck level designated for bus entry and direct exit onto the freeway systems. It may be more feasible to look at a future shuttle CCSF link along the west side of the highway if integrated into the parking and access to campus along Alemany over to SFSU, or at Balboa Park Station and Daly City BART stations if integrated into a larger revamp of both stations by BART.

Until than the shuttle system will not solve or relieve the impacts on SF Muni vehicles as viewed by a passenger/rider and neighbor who sees the impacts of these shuttle commuter systems in the daily riding of public transit. Attached is a more basic SF transit map the other showing what should be looked at in terms of system mapping and improved connectivity and line extensions, links, loops, and overlaps to really ring the city quickly and efficiently.

The F-Line Ft. Funston to the Presidio, out Geary with BART, and linking north to south along Sunset Blvd. need to ring the city, along with the D10 and D11 and D7 growth due to construction and development occurring it is becoming more prudent to shift gears and get the mass-transit systems moving faster than BRT, or Commuter Shuttles. With every development and suggested move (SOTA downtown to the tech-hub) the initial Castro Shuttle will quickly be over-ridden by essential need to improve band-width, speed, capacity, and connectivity. We need to start thinking sooner on these changes and not dilly-dally on the commuter hubs, which should be improved and paid for by the tech-industry to NOT impact mass-transit, and instead be a solid investment in OUR collective mass-transit systems.

Sincerely

Aaron Goodman D11 Resident / Public Transit Rider


San Francisco Transit Map
Muni Metro
Muni Rapid
10 minutes or less
Every 10-20 minutes
Every 20-30 minutes
Express
Historic Streetcar
Cable Car
BART/Caltrain
Presidio Shuttle
Line Terminals
One way
Two way
Tunnel
Underground
Accessible Muni/Rapid Stops
Non-Accessible Muni/Rapid Stops
Point of Interest
Hospital
Library
School
Market St. Elevator
N
Presidio
Golden Gate
Alcatraz Island
Yerba Buena Island
Map design by Darryl Wiggins and Jay Primus

Wong, Phillip (ECN)

From: [redacted]
Sent: Tuesday, November 15, 2016 9:03 AM
To: Lisa Spinali
Cc: BRCAC (ECN); Westwood Park Association; Maria Picar; Brigitte Davila; Robert Muehlbauer; Rebecca Lee; Christine Godinez; Howard Chung; Jonathan Winston; Yee, Norman (BOS); Low, Jen (BOS); Martin, Michael (ECN); Lesk, Emily (ECN); Shaw, Jeremy (CPC); Rich, Ken (ECN); Russell, Rosanna (PUC); Carlin, Michael (PUC); Hood, Donna (PUC); Tracy Zhu; Wendy Aragon; Jennifer Clary; Board of Supervisors, (BOS); SNA Brick; Jennifer Heggie; Ellen Wall; Bob Byrne; Ray Kutz; Monica Collins; Rita Evans; Steve Martinpinto; Chris Coghlan; Amy O'Hair; Ken Hollenbeck; Linda Judge; Anita Theoharis; Caryl Ito; MP Klier; Adrienne GO; Kishan Balgobin; Tim Emert; Francine Lofrano; Laura Frey; Wpa Balboa. Reservoir; Ronald Gerhard; Marian Lam; Linda Da Silva; Madeline Mueller; Muriel Parenteau; Lenny Carlson; Chris Hanson; Save CCSF Coalition; Susan Lamb; Steve Bruckman; John Rizzo; Alex Randolph; Susan Lopez; Harry Bernstein; [redacted]
Subject: Re: 11/14/2016 BRCAC meeting re: unanswered questions

Hi Lisa,

Following the outline of :Unaddressed Flaws in the BR Reservoir Project" here are the questions/themes that have remained unaddressed:

1. Conceptual framework: public land for the public good:
    1. Discussion of best use of public land--how is public land best used for the public purpose (relative importance of housing vs. education needs of community).
    2. Does the Development Parameter of 33% legally-defined Affordable Housing (up to 120% BMI) comply with the spirit of Surplus Public Lands for Housing laws?
    3. Is 33% affordable housing actually a disguise for the transfer of public land to private interests?
2. CEQA considerations:
    1. Contrary to fundamental CEQA principles, why is the surrounding community/existing setting being called on to adjust to the new project instead of the other way around?
    2. From the 2006 Balboa Park Station Initial Study forward, 425-500 housing units for the Reservoir has been proposed. What and where is the documentation/evidence:
        1. that housing would be best use?
        2. that 425-500 units would be appropriate for the site?
3. Parking vs. TDM;

Not a question. Just a request that people gain a true understanding of what TDM does and doesn't do.

All--

I apologize for "Unaddressed Flaws" being hard to read. However I ask all neighborhood and CCSF stakeholders to try wade through it. I hope you agree that I have brought up valid points.

Please don't let DAPL/Standing Rock happen here (on a much lower scale).

--aj

From: Lisa Spinali [redacted]
To: Alvin Ja [redacted]
Cc: BRCAC (ECN) <brcac@sfgov.org>; Westwood Park Association <board@westwoodpark.com>; Maria Picar [redacted]; Brigitte Davila
Sent: Tuesday, November 15, 2016 8:00 AM
Subject: Re: 11/14/2016 BRCAC meeting re: unanswered questions

1.

Alvin,
Thank you for your ongoing, active participation in the process. If you could so kindly list your top five questions succinctly that would help us greatly. I am having a very hard time deciphering your question from what you have provided. Thank you very much,
Lisa

On Tue, Nov 15, 2016 at 12:15 AM, <ajahjah@att.net> wrote:

> BRCAC, City Team, PUC, PUC CAC, BOS--
>
> "Unanswered questions" was one of the major themes of tonight's CAC meeting. One of the CAC members said that the "unanswered questions" may have been answered in the City Team's Matrix responses which are on the website..
>
> Unfortunately, many questions that had been raised during the public engagement process were NOT answered in the Matrices. That is why I had submitted the following 9/9/2016 "UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT."
>
> I ask all CAC members to read this summary of unaddressed flaws. You be the judge: Have these alleged flaws been subject of discussion at CAC meetings, much less being addressed?
>
> Finally, I ask all of you to understand the true meaning of TDM. Folks still seem to think that the TDM Report will provide an all-encompassing and unbiased way of resolving traffic and parking problems. IT WILL NOT.
>
> TDM, as applied to the Balboa Reservoir, according to SF County Transportation Authority/SFMTA contract specifications, is very simple:
> 1. Reduce car usage **by City College staff, faculty, students** and **by neighborhood residents** (by making parking more difficult and expensive, and by encouraging use of walking, biking and public transit);
> 2. Control spillover parking caused by new BR residents and by lost student parking by instituting Residential Permit Parking in affected neighborhoods.
> 3. According to the TDM point-count system for RFP: the less parking that an RFP provides, the higher the TDM point award for the developer will be. This will result in BR residents--instead of parking with the Reservoir-- parking in the surrounding neighborhoods instead.
>
> The "solution" to the parking and transportation problems created by the BR Project has already been preordained. The "solution" is one-sided TDM.
>
> --aj

----- Forwarded Message -----
From: [redacted]
To: BRCAC (ECN)

Sent: Saturday, September 10, 2016 12:26 AM
Subject: UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT

BR CAC, City Team, PUC, PUC CAC--

UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT (9/9/2016)

I have been fairly conscientious in pointing out flaws in the City Team's Principles & Parameters over the course of the past 1-1/2 year. I have submitted my critiques based on research and documentation. The City Team has sidestepped my critiques. My submissions have been ignored and the concerns raised have not been addressed.

Here is a digest of my critiques from my submissions that have remained unaddressed by the City Team.

CONCEPTUAL FRAMEWORK: PUBLIC LAND FOR THE PUBLIC GOOD

1. Public land should be used for the public good.
2. Affordable housing for homeless, low-income and moderate-income people contributes to the public good.
3. The California State Surplus Land Statute and the City's Surplus City Property/Public Lands Ordinance were set up to help address housing targeted for homeless, low-income and moderate-income people.
4. The intent of both State and City laws were not meant to subsidize high-cost housing.
5. As defined by law, "Affordable Housing" covers moderate-income housing going up to 120% Area Median Income only.
6. Balboa Reservoir Project only requires that 33% of the BR housing to be legally-defined "Affordable Housing." The remaining 67% of housing falls outside the bounds of the original intent of State and City targets of Affordable Housing--as defined by law--for low-income and moderate-income people.
7. The result of this 33% Affordable Housing/67% non-Affordable Housing ratio is that public land will be transferred to private interests and higher income owners in the guise of "Affordable Housing."
8. Using 33% "Affordable Housing" to subsidize the 67% high-cost housing is contrary to the intent of the original legislation.

CEQA CONSIDERATIONS

1. CEQA requires public agencies to avoid or mitigate significant adverse environmental impacts caused by a project.
2. City College is a critical public service that serves the entire Bay Area. CCSF is the central economic, educational and cultural feature of the Reservoir vicinity. However the Balboa Reservoir Project has failed to acknowledge CCSF's primacy.
3. Housing on Balboa Reservoir is a component of the Balboa Park Station General Plan, based on an Initial Study conducted in 2006, referenced in the BPS Final EIR.

4. The proposal of 425-500 units in the Reservoir was arbitrary. There was no documentation, evidence, or argumentation presented to support the proposal for 425-500 units in the 2006 BPS Initial Study/BPS Final EIR/BPS Area General Plan.
5. The BPS Area General Plan, Final EIR/Initial Study determined that, on the BPS Program-Level, that there would be no significant impact to school facilities.
6. The BR Project's 2014 AECOM Study incorrectly extended the Program-Level determination of non-significance to the Balboa Reservoir Project's Plan-Level. This caused the BR Project to ignore adverse impacts that the Project will have on City College and neighboring schools.
7. The City Team has refused to acknowledge the reality that the use of the Reservoir for student parking is an existing public benefit. It is a benefit that helps provide access to quality education.
8. Instead, the Balboa Park Station Area Plan mischaracterizes the Reservoir as simply being an "unpleasant void in the neighborhood " despite the reality that it serves an important and needed public purpose for students.
9. The Balboa Reservoir Project can be characterized as constituting an eviction of an important Bay Area-wide public service--City College. A public good is being eliminated for the benefit of private developer interests.
10. The City Team operates on the unfounded assumption that housing on the Reservoir is of higher importance than the importance of City College to the community.
11. The City Team shifts the burden of mitigation of impending adverse impacts of the Project onto the surrounding neighborhoods and CCSF stakeholders. It addresses the BR Project's adverse impacts by calling for the impactees to bear the burden by practicing TDM and requesting Residential Permit Parking.
12. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. It's cheaper to keep it as-is.
13. Eviction of CCSF from western Reservoir will harm student access to education.
14. The State Surplus Property Statute (Govt Code 54220) targets use of housing for those of "low" or "moderate" income (up to 120% of Area AMI). It was under this concept that San Francisco's Public Lands for Housing Program was originally formulated. The idea was for surplus public property to be used for the public good to create Affordable Housing (120% AMI).
15. "Affordable Housing" is legally defined as up to 120% AMI (Administrative Code 23.A.4) The Principles & Parameters only requires 33% to be legally-defined Affordable Housing.
16. In reality 67% will be unaffordable housing. Although the City Team presents the Project as market-rate housing subsidizing affordable housing, this is an inversion of reality. In reality, the 33% affordable housing is cover for the reality that this transfer of public property will benefit private interests at the expense of the public. The reality is that the 33% "affordable housing" will be subsidizing private interests.

PUC LAND USE POLICY

1. PUC's Land Use Framework policy allows sale only if: *"Use of the land sold will not result in creating a nuisance."*

PARKING vs. TDM

1. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. If construction cost is the consideration, then the best option is to leave the western Reservoir as-is.
2. TDM is the third component of the City's Transportation Sustainability Program. TDM requires new developments to provide on-site amenities that prioritize sustainable alternatives to driving.
3. The Balboa Reservoir Project will not exist in isolation from the surrounding neighborhoods. The TDM outcomes within the boundaries of the Project itself will probably be highly successful. However,

BR Project's internal TDM success will come at the expense of the surrounding neighborhoods when BR residents park their privately-owned vehicles and drive their privately-owned vehicles outside the Resrvoir Project's own boundaries.

4. FROM EARLIER SUBMISSION TO CAC REGARDING TDM:

- Most importantly: TDM Study is not a comprehensive and unbiased assessment of parking and circulation issues in the Reservoir vicinity; and it was never meant to be a comprehensive study. The scope/parameters of Nelson-Nygaard's study were very specific according to SFCTA documentation:

o *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.*

o *PROJECT DESCRIPTION AND BENEFITS*

The Balboa Area Transportation Demand Study will develop clear strategies for reducing single-occupant vehicle trips and outline a coordinated framework for future TDM programs and policies between CCSF, the Balboa Reservoir project, and the City of San Francisco. Potential TDM activities will produce a wide-range of benefits to individuals and the transportation system as a whole, from reducing traffic congestion, vehicle emissions, and fuel consumption to supporting physical activity and enhancing safety. Additionally, TDM activities will make existing transportation investments perform better, extending the life of existing infrastructure and improving the outcomes for new transportation investments.

o ***TDM Program**: proposing TDM solutions unique to the area comprising CCSF Ocean campus, Balboa Reservoir and neighborhoodsas consistent with emerging TDM policy.*

Bottom-line: TDM solutions, by definition and intent, exclude parking. Within TDM parameters, the issue of parking is given significance only via the TDM solution of making parking "more difficult and expensive." That's why the elimination of student parking is ignored. That's why the City Team promotes 0.5 parking spaces per residential unit.

- Fatuous TDM arguments:

o "Parking Produces Traffic Congestion--Every parking space is a magnet for cars" and "If you build it.....they will come."

▪ In earlier submissions I had written:

As I have pointed out in another e-mail, there are 3 main traffic magnets in our area: schools, freeway entrance/exits, and the BP Station transit hub. If reduction of car traffic in the area is the goal, these magnets need to removed. Obviously, this is neither an appropriate nor realistic solution.

BP Station and freeway entrance/exits are part of transportation infrastructure. However CCSF is different. CCSF is not transportation infrastructure. People are not just passing through on the way to someplace else. CCSF is a destination in and of itself.

Rather than parking producing congestion, it's the existence of a desired destination that induces traffic. Parking is but a means to accommodate those who want to get to the desired destination.

Case-in-point: When school is not in session, there are very few cars in the Reservoir parking lot and there's very little traffic on Phelan. This demonstrates the falsehood of the "parking produces traffic congestion" premise.

Bottom line: Parking, in and of itself, does not promote congestion. Rather, congestion is the product of people trying to get to a desired destination. Student

access to education, which includes driving and parking, should not be subordinate to the Balboa Reservoir Project.

- "Spillover [parking] from City College"

o Both Sunnyside Neighborhood Assn and Westwood Park Assn have made clear that the neighborhood supports CCSF and its students. The Nelson-Nygaard Study calls for preventing "spillover from City College" by making parking for them difficult via RPP and enforcement. Rather than making parking difficult for students, the neighbors have called for the Balboa Reservoir Project to provide adequate on-site parking for student needs.

Bottom line: Instead of shifting the burden of mitigation for the elimination of student parking by the TDM solution of "reducing single-occupant trips by college staff, faculty, students, and neighborhood residents", the Reservoir Project needs to take responsibility for replacing lost student parking.

--Alvin Ja

--
.....
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  - ***TDM Program**: proposing TDM solutions unique to the area comprising CCSF Ocean campus, Balboa Reservoir and neighborhoods as consistent with emerging TDM policy.*

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  Bottom line: Parking, in and of itself, does not promote congestion. Rather, congestion is the product of people trying to get to a desired destination. Student access to education, which includes driving and parking, should not be subordinate to the Balboa Reservoir Project.

- "Spillover [parking] from City College"
  - Both Sunnyside Neighborhood Assn and Westwood Park Assn have made clear that the neighborhood supports CCSF and its students. The Nelson-Nygaard Study calls for preventing "spillover from City College" by making parking for them difficult via RPP and enforcement. Rather than making parking difficult for students, the neighbors have called for the Balboa Reservoir Project to provide adequate on-site parking for student needs.

  Bottom line: Instead of shifting the burden of mitigation for the elimination of student parking by the TDM solution of "reducing single-occupant trips by college staff, faculty, students, and neighborhood residents", the Reservoir Project needs to take responsibility for replacing lost student parking.

--aj

Wong, Phillip (ECN)

From: [redacted]
Sent: Wednesday, November 16, 2016 12:58 PM
To: BRCAC (ECN); Wong, Phillip (ECN); Hood, Donna (PUC); Board of Supervisors, (BOS); Tracy Zhu; Wendy Aragon; Jennifer Clary; Yee, Norman (BOS); Low, Jen (BOS); Linda Da Silva; Steve Bruckman; Ambrose, Noreen (CAT); Cityattorney, (CAT)
Cc: Linda M. Judge; Kishan Balgobin; Mandy Tom; [redacted]; Sheila Hawthorne; Kate Favetti; Kathy Beitiks; [redacted]; Francine Lofrano; Anita Theoharis; Ravi Krishnaswamy; Tim Emert; Laura Frey; MP Klier; Thomas Day; Caryl Ito; Jennifer Heggie; SNA Brick; Adrienne GO; Ray Kutz; Bob Byrne; Rita Evans; Monica Collins; Ellen Wall; Steve Martinpinto; Chris Coghlan; Amy O'Hair; Ken Hollenbeck; CCHO--fernando; PODER; Chris Hanson; Harry Bernstein; Madeline Mueller; Lenny Carlson; Karen Saginor; Mandy Liang; Westwood Park Association; Susan Lamb; Cynthia Dewar; R. Mandelman; Thea Selby; Amy Bacharach; Steve Ngo; John Rizzo; Brigitte Davila; Bouchra Simmons; Alex Randolph; Lisa Spinali
Subject: RFQ and PUC's Land Use Framework
Attachments: LANDuseFramework.pdf

BR CAC, City Team, PUC CAC, PUC, BOS:

At Monday's 11/14/2016 Balboa CAC meeting, I commented on the Reservoir RFQ.

I brought to your attention that the RFQ's section on "Applicable Land Use Policies" did not reference PUC's own "Land Use Framework" policy (attached for your convenience).

At the same meeting, among the themes of public comment was the City Team's failure to address community concerns and that input was only incorporated if such input conformed with the City's pre-determined outcome.

Evidence that this has been the case is the fact that I had brought up the PUC Land Use Framework back in February. The concerns/issues brought up in the following 2/24/2016 submission were never responded to by the City Team:

BR CAC, PUC, BOS, Land Use Committee:

The Mayor's Office of Economic & Workforce Development and the Planning Department have presented the Balboa Reservoir Project essentially as a done-deed/fait accompli to the community.

Other than minor revisions to Principles & Parameters, OEWD/Planning has consistently and repeatedly failed to address community concerns regarding big-picture impacts on the existing conditions and setting that surround the PUC Reservoir site.

Here is a big-picture perspective on Balboa Reservoir that I urge you to consider:

1. The Public Land for Housing Program's goal is affordable housing

2. PUC requires fair market return for sale of its properties

3. The above two concepts are in contradiction, such that 100% affordable housing is not feasible.

4. The result is that the Reservoir Project predominantly promotes unaffordable housing: 67% unaffordable, in order to allow for 33% affordable [as defined by law to mean up to 120% BMI] .

5. Even the affordable housing will not be permanently affordable. The affordability will last only as long as the housing's "useful life." After the end of the "useful life" of affordable housing, such property will be owned free and clear of affordability restrictions. (This is per 2015 Proposition K language.)

6. The sale of Balboa Reservoir will result in a short-term cash gain for PUC; it will result in a long-term permanent loss of a large public property; it will result in a tremendous long-term bonanza for private interests.

7. OEWD/Planning has presented the Reservoir Project to the community pretty much as a done-deal.

8. CEQA requires assessment of a project's impact on existing conditions and "Public Services " The AECOM Study and the OEWD/Planning Principles & Parameters have failed to properly assess, or to propose realistic mitigation measures for the BR Project's significant impact on City College.

9. Before Mayor's Office can make it a done-deal, the Project will have to be facilitated by the PUC Commissioners (5 members) who would have to vote to declare the Reservoir to be surplus property.

10. PUC has a Land Use Framework to which it should adhere.

11. PUC should be asked to disallow sale of Reservoir as surplus in accordance with its own land use policy. See below:

Balboa Reservoir in context of PUC's Land Use Framework

The 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. PUC's Land Use Framework's economic criterion requires that the sale of Balboa Reservoir "must achieve fair market value compensation for the benefit of ratepayers." Because of this condition, 100% affordable housing will be unfeasible.

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 [OEWD/Planning's Principles & Parameters state a goal of 50/50%, but this target is unlikely to be reached. If this 50/50 target is reached, the outcome would be about 250 affordable units, and 250 unaffordable units. Would even this 50/50 ratio justify ceding public property in perpetuity to private interests?].

OTHER LAND USE FRAMEWORK CRITERIA

The PUC Land Use document states:

> *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.*

Sale of Balboa Reservoir fails to fulfill Condition 2 of "Economic Criteria." Selling off Balboa Reservoir will not result in saving operational/management costs for Water Enterprise.

Instead of selling off the Reservoir to private developers, retaining this large tract of land constitutes "money [public assets] in the bank" for PUC and citizenry.

The Land Use document also 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 as envisioned by OEWD/Planning 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 (practically and probably the only) ingress/egress to the Reservoir Housing project will be Phelan Avenue, the 500 unit Balboa Reservoir Project will result in creating a substantial traffic and parking nuisance [The word "nuisance" understates the problem].

The Balboa Reservoir Project as set forth in the OEWD/Planning Principles & Parameters fail 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."

Submitted by:
Alvin Ja
District 7 resident

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

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.

<u>ECONOMIC CRITERIA: Land, or easements, may be acquired or exchanged when</u>:

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.

<u>ENVIRONMENTAL CRITERIA: Land may be acquired when</u>:

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.

Wong, Phillip (ECN)

From: [redacted]
Sent: Thursday, November 17, 2016 9:42 AM
To: [redacted]BRCAC (ECN); Wong, Phillip (ECN); Hood, Donna (PUC); Board of Supervisors, (BOS); Tracy Zhu; Wendy Aragon; Jennifer Clary; Yee, Norman (BOS); Low, Jen (BOS); Linda Da Silva; Steve Bruckman; Ambrose, Noreen (CAT); Cityattorney, (CAT)
Cc: Linda M. Judge; Kishan Balgobin; Mandy Tom; [redacted] Sheila Hawthorne; Kate Favetti; Kathy Beitiks; [redacted]; Francine Lofrano; Anita Theoharis; Ravi Krishnaswamy; Tim Emert; Laura Frey; MP Klier; Thomas Day; Caryl Ito; Jennifer Heggie; SNA Brick; Adrienne GO; Ray Kutz; Bob Byrne; Rita Evans; Monica Collins; Ellen Wall; Steve Martinpinto; Chris Coghlan; Amy O'Hair; Ken Hollenbeck; CCHO--fernando; PODER; Chris Hanson; Harry Bernstein; Madeline Mueller; Lenny Carlson; Karen Saginor; Mandy Liang; Westwood Park Association; Susan Lamb; Cynthia Dewar; R. Mandelman; Thea Selby; Amy Bacharach; Steve Ngo; John Rizzo; Brigitte Davila; Bouchra Simmons; Alex Randolph; Lisa Spinali; Save CCSF Coalition; Allan Fisher; Vicki Legion; Leslie Simon
Subject: RFQ for Balboa Reservoir

BRCAC, City Team, PUC, PUC CAC, BOS:

The RFQ for Balboa Reservoir was issued on November 10, 2016.

I present problems with the RFQ as follows:

Section 1. Project Context
This section misrepresents the historical context. It states: "The idea of building new housing at the Balboa Reservoir has been discussed for several decades." This section misrepresents the historical context by failing to mention the fact that housing in the Reservoir , which would have transferred public property to private interests, had been rejected several times by popular vote on Propositions regarding Balboa Reservoir.

Section 3.2 Transportation
This section references a 3/17/2015 AECOM Transportation Analysis. Included in the scope of the AECOM Contract CS-229C was "Parking analysis for the Project (supply, demand, and Parking Code requirements."

In accordance with the Task 2 scope, the AECOM Transportation Analyst had, in an objective manner, proposed documenting on-street parking demand in the surrounding neighborhood, but was rebuffed by the City Team. The AECOM Transportation Analyst was told that off-site parking analysis was not necessary, and was told not worry about off-site impacts (from a Sunshine Ordinance release of an email between the AECOM analyst and a City planner):

- *"Comment [JS4]: We'd recommend just looking at the parking lots* [Balboa Reservoir lots—aj]*. --- Off-site parking analysis is nice to have. But really we want to focus the effort on what will drive the on-site design and what kind of trips that design will generate – rather than worry about off-site impacts and mitigations at this stage in the game. --- Jeff, please call me if you'd like to discuss and we can finish this up this week".*

What this suggests is that the AECOM parking analysis was , by direction of the City Team, biased.

Section 4. Applicable Land Use Policies
The RFQ's section on "Applicable Land Use Policies" fails to include the PUC's own policy of "Framework for Land Management and Use."
Similarly, Exhibit D to the RFQ "Relevant Policies, Standards, and Resources" fails to include PUC's own Land Use Framework.
The PUC's own website states:

> 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.

For the RFQ to fail to use the Land Use Framework "to advance the analytical and decision-making process surrounding the administration of real estate assets" violates PUC's obligations to the public.

6. Development Parameters
This section misrepresents the roles and relationships between the community and the City Team.

This section states: "Staff created initial drafts of the Development Parameters based on this [series of community meetings and surveys in 2015] community feedback, as well as on staff's professional understanding…" This statement turns the actual roles of community and City staff on its head. Those referenced early meetings made clear that parking and circulation impacts were of the highest priority to the community. The initial drafts of the Development Parameters, continuing all the way through to the final Development Parameters failed to reflect this priority. The Development Parameters, except for minor details, were the products of the City Team; not the community.

It was because of the failure of the Development Parameters to truly reflect public input that a Preamble from the CAC was annexed to the finalized Development Parameters. It was only because the City Team-authored Development Parameters failed to address community concerns adequately that the CAC needed to add the Preamble. This Preamble /Cover Letter expressed the community's priorities regarding traffic and parking, importance of City College, affordable housing that were not reflected in the Development Parameters.

An example of the inadequacy of the Development Parameters regarding City College:

The Preamble which reflects community sentiment states:

> *City College: The community cares deeply about City College's long-term health and growth. We are especially concerned that the Balboa Reservoir development will displace a surface parking lot currently utilized by City College students. It will be critical for the Balboa Reservoir developer to work with City College to address parking needs by identifying alternative parking and transportation solutions that do not compromise students' ability to access their education.*

Yet despite repeated and consistent public input reflective of this sentiment, this was never incorporated into the City Team's Development Parameters. The City Team's "Relationship with City College" Development Parameters only deal with construction phase impacts and not overall impacts on CCSF.

The Preamble/Cover Letter reflects community sentiment. The Development Parameters, contrary to the RFQ's representation that the Parameters are based on community input, primarily reflect City staff's positions.

11. Evaluation Criteria
The scoring criteria for Development Concept contains 4 sections:

- Consistency with community's [misrepresentation of source] Development Parameters:
  - 10 points
- Exceeds community's [actually City Team's] Development Parameters:
  - 5 points
- Addresses housing crisis

    - 10 points
- General economic feasibility
    - 5 points

This scoring scheme fails to give any weight whatsoever to the community priorities contained in the Preamble / Cover Letter. And since these priorities are not addressed in the Development Parameters, the result will be that the Project will continue to ride roughshod over the community.

The RFQ is deficient. The defective RFQ is a product of a sham public engagement process.

Submitted by:
Alvin Ja

Wong, Phillip (ECN)

From: [redacted]
Sent: Saturday, November 19, 2016 2:15 PM
To: Linda Da Silva; Marian Lam; Ronald Gerhard; Susan Lamb; Brigitte Davila; John Rizzo; Alex Randolph; R. Mandelman; Thea Selby; Bouchra Simmons; Amy Bacharach; Steve Ngo; Steve Bruckman; Shaw, Linda (MYR); Cynthia Dewar; Amy Frater; Phil Newsom; Gary Moon; CCSF Facilities Master Plan
Cc: Madeline Mueller; Chris Hanson; Muriel Parenteau; Harry Bernstein; Save CCSF Coalition; Mandy Liang; Connie Staff; Lenny Carlson; Steven Brown; Tim Killikelly; Alisa Messer; Vicki Legion; Leslie Simon; Allan Fisher; SNA Brick; Ellen Wall; Jennifer Heggie; Ray Kutz; Rita Evans; Bob Byrne; Monica Collins; Ellen Walls; Chris Coghlan; Wpa Balboa. Reservoir; Westwood Park Association; Linda Judge; MP Klier; Laura Frey; Caryl Ito; Tim Emert; Kishan Balgobin; Kate Favetti; BRCAC (ECN); [redacted]
Subject: City Agency input on FMP

Deputy Vice Chancellor Da Silva & Facilities Committee, Administration, BOT:

I just saw the City Team's input to SFCCD regarding the FMP. As I said the other day, the City Team is treating CCSF and its stakeholders like chumps. They have been repeatedly told of the broad community's support for CCSF and the need to preserve student access. However, City Team's response quoted below confirms that they have absolutely no concern for the importance of the school's educational mission and student access. The City Team has only the tunnel vision of advocating the simple-minded solution of making parking more difficult and expensive and promoting biking, walking and transit. This passage shows absolutely no consideration for student needs:

> *2. Before proposing parking facilities based on an assumed parking demand, it is recommended and standard practice to first consider policy, program and pricing measures that reduce demand for parking and optimize existing parking resources at the campus. Without such measures (commonly referred to as Transportation Demand Management, or "TDM"), CCSF risks excessive capital expenditures that could be allocated to elsewhere, such as classrooms or other expenditures that directly support educational goals. CCSF has stated that it anticipates that existing parking will be replaced at approximately a 1:1 ratio; however, at $50,000 to $80,000 per space, the cost of the parking structures required for this proposal would be enormous, and likely infeasible from both a design and financial perspective. The City urges CCSF to move forward with campus plans and consider a suite of parking management and TDM measures that, for a fraction of the cost, can reduce parking demand, congestion and the visual impact of parking structures (see comment #3).*

SFCCD needs to be strong in its demand for the Project to fully mitigate the adverse impact of removal of student parking on student attendance and enrollment.

I submitted the following to Facilities Committee and BOT on 11/17/2016. Please run with it!

--Alvin Ja

> *PGC, Facilities Committee, BOT, Administration:*
>
> *FMP is on agenda today. The FMP includes building parking structures on SFCCD property. This will incur tremendous building costs with hard-to-come-by money.*

Instead of the school bearing the costs of replacement parking, the Reservoir Project needs to be held responsible.

The Balboa Reservoir Project should be held responsible for full mitigation of adverse impacts of eviction of CCSF student parking by:

1. *either providing replacement student parking on the PUC site, or*
2. *bear all costs for replacement parking built on SFCCD property.*

This would be in line with CEQA requirements for mitigation of adverse impacts on public/educational services.

--aj 11/17/2016

Wong, Phillip (ECN)

From: [redacted]
Sent: Monday, November 21, 2016 12:45 AM
To: BRCAC (ECN)
Subject: Fw: Balboa Reservoir Project
Attachments: 2016-9-12 CAC-- UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT.pdf

Hi Phillip,

I had submitted the following to PUC in September, but did not copy it BR CAC.

Please distribute this to BR CAC and City Team and enter it into the BR Project record.
.
Thanks and Happy Thanksgiving!

aj

Sent: Friday, September 30, 2016 4:41 PM
Subject: 8/9/2016 PUC meeting: Annual Real Estate Report

PUC, PUC CAC, SFCCD, BOT, BOS:

From PUC Annual Real Estate Report:

Other Key Initiatives Balboa Reservoir Project

The SFPUC, in conjunction with the Mayor's Office of Work Force and Economic Development (OEWD) and the San Francisco Planning Department continues to work towards fulfilling the City's mission of providing affordable housing through its Public Land for Housing Program. To that end, the SFPUC team has been participating for months in frequent discussions with OEWD and Planning that sometimes include the CAO, and San Francisco Community College District senior staff and consultants. In addition, one or more SFPUC team members regularly attend the Balboa Reservoir Community Advisory Committee (CAC) meetings, as well as other stakeholder meetings.

Originally constructed in 1957, the Balboa Reservoir has never been used for its original water storage purpose and has no connections to the local or regional water system. Following a property exchange with City College in 2012, the original reservoir site was reconfigured into western and eastern portions. City College now owns the eastern portion. The SFPUC owns the western portion of the site. City College uses the SFPUC property for student parking under the terms of a revocable no-fee permit.

The Balboa Reservoir CAC is discussing numerous issues related to this potential project, including: housing, transportation, urban design and City College-related issues. OEWD hopes to continue to build consensus with stakeholders and issue in the upcoming months both a Request for Qualifications for a developer partner and a Request for Proposal seeking designs for the proposed project.

****

****

With BR CAC members' vote to express satisfaction with the Development Parameters at the September CAC meeting, the City Team has jumped its first procedural hurdle of gaining the community's approval (even though, as I perceive it, the CAC vote did not reflect the true sentiments of our broad community).

Upcoming hurdles for City Team before the private developer forces win out:

- gain SFCCD acquiescence despite City College's and other schools' CEQA leverage as adversely impacted public services;
- PUC Commission approval
- Board of Supervisors approval

I feel that the City Team has been able to prevail so far because they have been able to frame the BR Project as being an Affordable Housing effort. In order to win the PR battle (and expose the actual substance of BR Project) I think we need to re-frame the essence and reality of the BR Project:

- BR Project constitutes the transfer of a large publicly-owned asset to private developers;
- 33% legally-defined Affordable Housing/67% high-cost housing split means that taxpayers/rate-payers/public will be actually subsidizing private developer interests. Additionally, the excuse of "cross-subsidizing" "Affordable Housing" will probably allow the developer buy the land at less than the true market value.
- current use of Reservoir is an actual public benefit that provides student access to education. It's not just an underutilized "unpleasant void in the neighborhood." Eviction of CCSF from the western Reservoir would constitute a severe and unacceptable harm to the public.
- The Balboa Park Station Area Plan states: "*POLICY 1.3.2 Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods.*"
    - There has never been any discussion about what constitutes "greatest benefit." The City/Mayor simply declared by fiat that it would be used for housing (without requiring compliance with the intent of State and City Public Lands laws regarding legally-defined Affordable Housing).
    - It can be legitimately argued that using the west basin for educational purposes would be the "greatest benefit."

Attached for your convenience is an earlier submission, "Unaddressed Flaws in Balboa Reservoir Project"

Submitted by:
Alvin Ja
Sunnyside resident/ ratepayer

UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT (9/9/2016)

I have been fairly conscientious in pointing out flaws in the City Team's Principles & Parameters over the course of the past 1-1/2 year. I have submitted my critiques based on research and documentation.

The City Team has sidestepped my critiques. My submissions have been ignored and the concerns raised have not been addressed.

Here is a digest of my critiques from my submissions that have remained unaddressed by the City Team.

CONCEPTUAL FRAMEWORK: PUBLIC LAND FOR THE PUBLIC GOOD

1. Public land should be used for the public good.
2. Affordable housing for homeless, low-income and moderate-income people contributes to the public good.
3. The California State Surplus Land Statute and the City's Surplus City Property/Public Lands Ordinance were set up to help address housing targeted for homeless, low-income and moderate-income people.
4. The intent of both State and City laws were not meant to subsidize high-cost housing.
5. As defined by law, "Affordable Housing" covers moderate-income housing going up to 120% Area Median Income only.
6. Balboa Reservoir Project only requires that 33% of the BR housing to be legally-defined "Affordable Housing." The remaining 67% of housing falls outside the bounds of the original intent of State and City targets of Affordable Housing--as defined by law--for low-income, and moderate-income people.
7. The result of this 33% Affordable Housing/67% non-Affordable Housing ratio is that public land will be transferred to private interests/higher income owners in the guise of "Affordable Housing."
8. Using 33% "Affordable Housing" to subsidize the 67% high-cost housing is contrary to the intent of the original legislation.

CEQA CONSIDERATIONS

1. CEQA requires public agencies to avoid or mitigate significant adverse environmental impacts caused by a project.
2. City College is a critical public service that serves the entire Bay Area. CCSF is the central economic, educational and cultural feature of the Reservoir vicinity. However the Balboa Reservoir Project has failed to acknowledge CCSF's primacy.
3. Housing on Balboa Reservoir is a component of the Balboa Park Station Area Plan, based on an Initial Study conducted in 2006, referenced in the BPS Final EIR.
4. The proposal of 425-500 units in the Reservoir was arbitrary. There was no documentation, evidence, or argumentation presented to support the proposal for 425-500 units in the 2006 BPS Initial Study/BPS Final EIR/BPS Area Plan.

5. The BPS Area Plan, Final EIR/Initial Study determined that, on the BPS Program-Level, that there would be no significant impact to school facilities.
6. The BR Project's 2014 AECOM Study incorrectly extended the Program-Level determination of non-significance to the Balboa Reservoir Project's Plan-Level. This has caused the BR Project to ignore adverse impacts that the Project will have on City College and neighboring schools.
7. The City Team has refused to acknowledge the reality that the use of the Reservoir for student parking is an existing public benefit. It is a benefit that helps provide access to quality education.
8. Instead, the Balboa Park Station Area Plan mischaracterizes the Reservoir as simply being an "unpleasant void in the neighborhood " despite the reality that it serves an important and needed public purpose for students.
9. The Balboa Reservoir Project can be characterized as constituting an **eviction of an important Bay Area-wide public service**--City College. A public good is being eliminated for the benefit of private developer interests.
10. The City Team operates on the unfounded assumption that housing on the Reservoir is of higher importance than the importance of City College to the community.

- The City Team shifts the burden of mitigation of impending adverse impacts of the Project onto the surrounding neighborhoods and CCSF stakeholders. It addresses the BR Project's adverse impacts by calling for the impactees to bear the burden by practicing TDM ("*reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents")* and requesting Residential Permit Parking.

11. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. It's cheaper to keep it as-is.
12. Eviction of CCSF from western Reservoir will harm student access to education.
13. The State Surplus Property Statute (Govt Code 54220) targets use of housing for those of "low" or "moderate" income (up to 120% of Area AMI). It was under this concept that San Francisco's Public Lands for Housing Program was originally formulated. The idea was for surplus public property to be used for the public good to create Affordable Housing (120% AMI).
14. "Affordable Housing" is legally defined as up to 120% AMI (Administrative Code 23.A.4) The Principles & Parameters only requires 33% to be legally-defined Affordable Housing.
15. In reality 67% will be unaffordable housing. Although the City Team presents the Project as market-rate housing subsidizing affordable housing, this is an inversion of reality. In reality, the 33% affordable housing is cover for the reality that this transfer of public property will benefit private interests at the expense of the public. The reality is that the 33% "affordable housing" will be subsidizing private interests.

PUC LAND USE POLICY

1. PUC's Land Use Framework policy allows sale only if: "*Use of the land sold will not result in creating a nuisance."*

PARKING vs. TDM

1. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. If construction cost is the consideration, then the best option is to leave the western Reservoir as-is.
2. TDM is the third component of the City's Transportation Sustainability Program. TDM requires new developments to provide on-site amenities that prioritize sustainable alternatives to driving.
3. The Balboa Reservoir Project will not exist in isolation from the surrounding neighborhoods. The TDM outcomes within the boundaries of the Project itself will probably be highly successful. However, BR Project's internal TDM success will come at the expense of the surrounding neighborhoods when BR residents park their privately-owned vehicles and drive their privately-owned vehicles outside the Resrvoir Project's own boundaries.
4. FROM EARLIER SUBMISSION TO CAC REGARDING TDM:

- Most importantly: TDM Study is not a comprehensive and unbiased assessment of parking and circulation issues in the Reservoir vicinity; and it was never meant to be a comprehensive study. The scope/parameters of Nelson-Nygaard's study were very specific according to SFCTA documentation:
  - *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.*
  - ***PROJECT DESCRIPTION AND BENEFITS***

    The Balboa Area Transportation Demand Study will develop clear strategies for reducing single-occupant vehicle trips and outline a coordinated framework for future TDM programs and policies between CCSF, the Balboa Reservoir project, and the City of San Francisco. Potential TDM activities will produce a wide-range of benefits to individuals and the transportation system as a whole, from reducing traffic congestion, vehicle emissions, and fuel consumption to supporting physical activity and enhancing safety. Additionally, TDM activities will make existing transportation investments perform better, extending the life of existing infrastructure and improving the outcomes for new transportation investments.

  - ***TDM Program**: proposing TDM solutions unique to the area comprising CCSF Ocean campus, Balboa Reservoir and neighborhoodsas consistent with emerging TDM policy.*

Bottom-line: TDM solutions, by definition and intent, exclude parking. Within TDM parameters, the issue of parking is given significance only via the TDM solution of making parking "more difficult and expensive." That's why the elimination of student parking is ignored. That's why the City Team promotes 0.5 parking spaces per residential unit.

- Fatuous TDM arguments:

- "Parking Produces Traffic Congestion--Every parking space is a magnet for cars" and "If you build it.....they will come."
- In earlier submissions I had written:

  As I have pointed out in another e-mail, there are 3 main traffic magnets in our area: schools, freeway entrance/exits, and the BP Station transit hub. If reduction of car traffic in the area is the goal, these magnets need to removed. Obviously, this is neither an appropriate nor realistic solution.

  BP Station and freeway entrance/exits are part of transportation infrastructure. However CCSF is different. CCSF is not transportation infrastructure. People are not just passing through on the way to someplace else. CCSF is a destination in and of itself.

  Rather than parking producing congestion, it's the existence of a desired destination that induces traffic. Parking is but a means to accommodate those who want to get to the desired destination.

  Case-in-point: When school is not in session, there are very few cars in the Reservoir parking lot and there's very little traffic on Phelan. This demonstrates the falsehood of the "parking produces traffic congestion" premise.

  Bottom line: Parking, in and of itself, does not promote congestion. Rather, congestion is the product of people trying to get to a desired destination. Student access to education, which includes driving and parking, should not be subordinate to the Balboa Reservoir Project.

- "Spillover [parking] from City College"
- Both Sunnyside Neighborhood Assn and Westwood Park Assn have made clear that the neighborhood supports CCSF and its students. The Nelson-Nygaard Study calls for preventing "spillover from City College" by making parking for them difficult via RPP and enforcement. Rather than making parking difficult for students, the neighbors have called for the Balboa Reservoir Project to provide adequate on-site parking for student needs.

  Bottom line: Instead of shifting the burden of mitigation for the elimination of student parking by the TDM solution of "reducing single-occupant trips by college staff, faculty, students, and neighborhood residents", the Reservoir Project needs to take responsibility for replacing lost student parking.

--aj

Wong, Phillip (ECN)

From: [redacted]
Sent: Sunday, December 04, 2016 2:48 PM
To: BalResCACChair@gmail.com; mahrens@sheppardmullin.com; Maria Picar; bd@brigittedavila.com; rmuehlbauer@live.com; hnchung@yahoo.com; tsaiweilee@hotmail.com; cgodinez@lwhs.org; jon.winston.brcac@outlook.com; BRCAC (ECN); SNA Brick; Rita Evans; Bob Byrne; Monica Collins; Ellen Wall; Jennifer Heggie; Ray Kutz; Steve Martinpinto; Chris Coghlan; Amy O'Hair; Ken Hollenbeck; Wpa Balboa. Reservoir; Linda Judge; Kate Favetti; MP Klier; Caryl Ito; Anita Theoharis; Kishan Balgobin; Tim Emert; Laura Frey; Adrienne GO; Francine Lofrano; Linda Da Silva; Marian Lam; Steve Bruckman; CCSF Facilities Master Plan; Cynthia Dewar; Susan Lamb; Ronald Gerhard; Save CCSF Coalition; Tim Killikelly; Alisa Messer; CFT; Vicki Legion; Madeline Mueller; Steven Brown; Lenny Carlson; Muriel Parenteau; Bouchra Simmons; Mandy Liang; Connie Staff; Chris Hanson; Harry Bernstein; [redacted]; PODER; CCHO--fernando; R. Mandelman; Thea Selby; Amy Bacharach; Steve Ngo; John Rizzo; Brigitte Davila; Alex Randolph
Subject: Towards an understanding of TDM as applied to Reservoir Project and vicinity

A plain language explanation of TDM is provided here: [Guest Editorial: TDM is a Roadmap for Sustainable Transportation | Streetsblog San Francisco]

[redacted]

Guest Editorial: TDM is a Roadmap for Sustainable Transportation | Streetsb...

The TDM strategy to reduce auto usage by shifting people to alternative means of transportation is fine as a general concept.

However, the application of TDM to the specifics of the Balboa Reservoir vicinity has major problems:

1. The Development Parameters barely, if at all, acknowledge the importance of the existing student parking for student access to educational services offered by City College. Although the

Parameters talk about the Project's relationship to City College, the Development Parameters fails to acknowledge the primacy of CCSF for the Reservoir vicinity specifically, and for the Bay Area in general. It assumes that housing (and though promoted as affordable housing. it will be 67% NOT Affordable [as defined by law]!) is more important than City College.

2. The standard for success of the Reservoir Project's TDM will only be measured by "trips generated" from within the boundaries of the Reservoir Project itself. Whatever happens outside of the the boundaries of the Project in Sunnyside, Westwood Park, Ingleside, CCSF, Riordan, Lick Wilmerding will not be accounted for by the Project's TDM requirements and measures. In other words, if Reservoir residents park and drive outside of the PUC Reservoir Project's own boundaries, no trips will have been generated by the Reservoir Project. This shifting of parking and traffic impacts to Ingleside, Westwood Park, Sunnyside, and CCSF will not be considered to be the Reservoir Project's problem. The affected existing neighborhoods and CCSF stakeholders will be expected to make their own adjustments to accommodate the new project: CCSF stakeholders, Sunnyside/Ingleside/Westwood Park neighbors should just learn to walk, bike, use public transit. Sunnyside should just institute Residential Permit Parking;..... affected neighbors can call MTA/ 311 to ticket/tow blocked driveways,..... whatever.....it's not the Reservoir Project's problem.....Let the existing stakeholders eat cake!
3. The City Team hired Nelson-Nygaard to make a TDM presentation to the BR CAC to make a case that TDM would be a solution to the area's parking and transportation problems. However, the TDM presentation was replete with fatuous generalities that failed to address the specific characteristics of the Reservoir vicinity. Other than generalities, the City Team and Nelson-Nygaard has failed to provide evidence and documentation that a TDM "solution" will be able to successfully mitigate the Reservoir Project's adverse effects on City College attendance and enrollment and the neighborhoods. Fatuous TDM PR and wishful thinking will not be adequate solutions to the Reservoir Project's adverse impact to CCSF student enrollment and attendance.
4. City College's Facilities Master Plan has proposed several parking structures to be built on SFCCD property. Instead of SFCCD carrying the burden of paying to replace lost student parking, the Balboa Reservoir Project needs to take responsibility to fully mitigate its adverse impact on student access to educational services. The Reservoir Project needs to be held financially responsible for paying for replacement parking caused by its eviction of CCSF student parking from the western Reservoir. According CEQA principles, the Reservoir Project has mitigation responsibilities for adverse impacts on the existing setting and on public/educational services.

--aj 12/4/2016

Friday, December 2, 2016 5 Comments

Guest Editorial: TDM is a Roadmap for Sustainable Transportation

by Tom Radulovich and Nicole Ferrara

Transportation Demand Management can help balance modes in a more sustainable way. Photo: Streetsblog

Monday at 1:30, he Land Use and Transportation Committee of the San Francisco Board of Supervisors will consider a Transporta ion Demand Management (TDM) ordinance that will require projects larger than 10 dwelling units or 10,000 square feet to adopt stronger measures to reduce auto trips.

The new TDM proposal represents a step forward. However, it will have greater impact on the livability of San Francisco if it includes four key changes:

- Close he parking loophole. The Planning Code permits both non-accessory and accessory parking in buildings throughout the city, and non-accessory parking (lots and garages) as a stand-alone use. Since all parking spaces generate auto trips, exemp ing non-accessory parking grea ly undermines he TDM program's effectiveness.
- Link building TDM goals to neighborhood goals. In many neighborhoods, here is already no room for more auto traffic. As the City takes necessary steps to improve walking, cycling, and transit, the road space available for private cars will decrease. For neighborhoods like Downtown, SoMa, and Hayes Valley where streets are already congested and lots of new development is permitted, the TDM ordinance as curren ly proposed won't prevent traffic gridlock. Trip-reduc ion targets for developments must be based on current and future neighborhood roadway capacity and transportation goals, not on a rate derived from past developments.
- Strengthen pro-walking strategies. The City's menu of TDM options includes just one point for any and all walking improvements, and should include more points and options to encourage this most basic form of transportation.
- Eliminate Parking requirements. Research affirms hat reducing parking is the most potent TDM tool. The City should do away wi h minimum parking requirements, particularly in Neighborhood Commercial districts and transit corridors.

Strengthening this ordinance will help San Francisco build on a history of effec ive TDM measures.

For example, in the 1980s, the Downtown Plan limited parking in new buildings, and required large office buildings to provide benefits like transit passes, carpooling, and trip planning for workers. In the last decade, neighborhood plans eliminated parking requirements in certain transit-rich areas of he city, and he City expanded its bicycle network. This is cri ical not just because parking is directly linked wi h driving, but also because a parking spot can cost $80,000 or more to build, making SF less affordable to live in and taking up space that otherwise could have been used for housing.

The bad news is he City continues to undermine TDM goals, with street designs hat compromise on the safety of people walking and biking, maintaining minimum parking requirements for buildings in most of the city. The City also allows buses and trains to sit stuck in traffic and it subsidizes public parking. This has to stop.

By adopting stronger changes, the City's TDM program can help make San Francisco a safer, healthier, greener, and more equitable city.

Tom Radulovich is executive director of Livable City and Nicole Ferrara is executive director of Walk San Francisco. Livable City has successfully advocated for reduced parking requirements in several neighborhoods, secured off-street bicycle parking in new buildings, and 'unbundled' parking from the sale or lease of new units. Walk San Francisco works for street designs that make walking attractive, interesting, inviting and safe.

streets are built so wide, and the circle would be complete. ”

– roymeo

In response to "Today's Headlines"

70 comments · 1 week ago

Today's Headlines

29 comments · 5 days ago

Incoming Director Simon Talks About Her Vision for BART

46 comments · 1 week ago

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Wong, Phillip (ECN)

From:	[redacted]
Sent:	Monday, December 05, 2016 4:22 AM
To:	Hood, Donna (PUC); Board of Supervisors, (BOS); Secretary, Commissions (CPC)
Cc:	Russell, Rosanna (PUC); Shaw, Linda (MYR); Tracy Zhu; Wendy Aragon; Yee, Norman (BOS); Low, Jen (BOS); BRCAC (ECN)
Subject:	TDM as applied to Balboa Reservoir Project and vicinity
Attachments:	2016-12-4 TOWARDS AN UNDERSTANDING OF TDM AS APPLIED TO THE RESERVOIR PROJECT AND VICINITY.pdf

PUC Commission, Board of Supervisors, Planning Commission:

Please accept the attached submission into the record regarding the Balboa Reservoir Project. Although the Balboa Reservoir Project has not come before you on your agendas yet, please begin to familiarize yourself with some of the issues involved. The Project has entered the RFQ/RFP stage.

Thank you,
Alvin Ja
[redacted]

TOWARDS AN UNDERSTANDING OF TDM AS APPLIED TO THE RESERVOIR PROJECT AND VICINITY (12/4/2016)

A plain language explanation of TDM is provided here: [Guest Editorial: TDM is a Roadmap for Sustainable Transportation | Streetsblog San Francisco]

Guest Editorial: TDM is a Roadmap for Sustainable Transportation | Streetsb...

The TDM strategy to reduce auto usage by shifting people to alternative means of transportation is fine as a general concept.

However, the application of TDM to the specifics of the Balboa Reservoir vicinity has major problems:

1. The Development Parameters barely, if at all, acknowledge the importance of the existing student parking for student access to educational services offered by City College. Although the Parameters talk about the Project's relationship to City College, the Development Parameters fails to acknowledge the primacy of CCSF for the Reservoir vicinity specifically, and for the Bay Area in general. It implicitly assumes that:
    a) Housing is more important than City College (and although promoted and inaccurately framed as an affordable housing effort, Reservoir housing will in reality be 67% NOT-Affordable [as defined by law] !.....Furthermore, affordability is only required to last as long as the "useful lives of the buildings." What a loophole!);
    b) Reduction of automobile usage is more important than student access to education at CCSF.
2. The standard for success of the Reservoir Project's TDM will only be measured by "trips generated" from **within the boundaries of the Reservoir Project itself**. Whatever spillover effects that happens outside of the boundaries of the Reservoir Project proper--in Sunnyside, Westwood Park, Ingleside, CCSF, Riordan, Lick Wilmerding-- will not be accounted for by the Project's TDM requirements and measurements.

In other words, if Reservoir residents originate their car trips in the surrounding neighborhoods by parking and driving outside of the PUC Reservoir Project's own boundaries, no trips will have been generated by the Reservoir Project. The spillover impacts of parking and traffic to Ingleside, Westwood Park, Sunnyside, and CCSF will not be considered to be the Reservoir Project's problem. The affected existing neighborhoods and CCSF stakeholders will be expected to make their own adjustments to

accommodate the spillover from the new project: *CCSF stakeholders, Sunnyside/Ingleside/Westwood Park neighbors should just modify their behavior--learn to walk, bike, use public transit…. Sunnyside residents should just ask MTA to institute Residential Permit Parking;..... Affected neighbors can call MTA/ 311 to ticket/tow blocked driveways,..... Whatever the case, it's not the Reservoir Project's problem……Let the existing stakeholders eat cake!*

3. The City Team hired Nelson-Nygaard to make a TDM presentation to the BR CAC to make a case that TDM would be a solution to the area's parking and transportation problems. However, the TDM presentation was replete with fatuous generalities that failed to address the specific characteristics of the Reservoir vicinity. Other than generalities, the City Team and Nelson-Nygaard has failed to provide evidence and documentation that a TDM "solution" will be able to successfully mitigate the Reservoir Project's adverse effects on City College attendance and enrollment and on the neighborhoods. Fatuous TDM PR and wishful thinking will not be adequate solutions to the Reservoir Project's adverse impact to CCSF student enrollment and attendance.
4. City College's Facilities Master Plan has proposed several parking structures to be built on SFCCD property. Instead of SFCCD carrying the burden of paying to replace lost student parking, the Balboa Reservoir Project needs to take responsibility to fully mitigate its adverse impact on student access to educational services. The Reservoir Project needs to be held financially responsible for paying for replacement parking caused by its eviction of CCSF student parking from the western Reservoir. According CEQA principles, the Reservoir Project has mitigation responsibilities for adverse impacts on the existing setting and on public/educational services.

Submitted by:
Alvin Ja 12/4/2016

Wong, Phillip (ECN)

From: Frank Noto [redacted]
Sent: Wednesday, December 07, 2016 4:00 PM
To: BRCAC (ECN)
Subject: Balboa Reservoir housing

I am writing regarding plans for the 17-acre parking lot at Balboa Reservoir. This is a great opportunity to help address our housing affordability crisis, and it should not be squandered. This is a logical place to build lots of transit-oriented housing, combining permanently affordable, middle-class and market rate homes.

We should certainly embrace the opportunity for greater density and heights at this location. With good project design and setbacks along main thoroughfares, building graceful, inviting housing that enhances the neighborhood's livability is quite feasible. As you know, any attempt to reduce heights limits to 65 feet will only make it harder to maximize affordability. The more density = the more housing = the more funding to create additional BMR homes.

This is a great location for additional density, first because it doesn't displace any current residents. I don't need to tell you why this is a location that easily accommodates density – near BART, MUNI Metro light rail, and City College -- and where car parking can be easily minimized. And let's use the money saved by minimizing parking to build more BMR housing, including some for faculty/staff, and improve open space and other community amenities.

A little more height and well-designed ground-floor spaces would benefit far more people than what's being proposed today. I will be very disappointed if we cannot build at least 1,200 new homes. I hope you will not allow us to lose this opportunity.

Frank Noto

Wong, Phillip (ECN)

From: [redacted]
Sent: Saturday, December 10, 2016 8:47 PM
To: BRCAC (ECN); BalResCACChair@gmail.com; Michael Ahrens; Maria Picar; Brigitte Davila; Robert Muehlbauer; Howard Chung; Rebecca Lee; Christine Godinez; Jonathan Winston; Martin, Michael (ECN); Rich, Ken (ECN); Lesk, Emily (ECN); Rahaim, John (CPC); Shaw, Jeremy (CPC); Carlin, Michael (PUC); Russell, Rosanna (PUC); Tracy Zhu; Wendy Aragon; Keith Tanner; [redacted] Richards, Dennis (CPC); [redacted]; Johnson, Christine (CPC); Koppel, Joel (CPC); Melgar, Myrna (CPC); [redacted]m; Secretary, Commissions (CPC); Board of Supervisors, (BOS); Shaw, Linda (MYR); Cityattorney, (CAT); Ambrose, Noreen (CAT)
Cc: Yee, Norman (BOS); Low, Jen (BOS); SNA Brick; Rita Evans; Bob Byrne; Ellen Wall; Ray Kutz; Jennifer Heggie; Steve Martinpinto; Chris Coghlan; Amy O'Hair; Ken Hollenbeck; Wpa Balboa. Reservoir; Linda Judge; MP Klier; Caryl Ito; Anita Theoharis; Adrienne GO; Laura Frey; Francine Lofrano; Tim Emert; Kishan Balgobin; Kate Favetti; CCHO--fernando; PODER; Save CCSF Coalition; Linda Da Silva; Marian Lam; Ronald Gerhard; Ted Aranas; Jay Field; Becky Perelli; Erika Delacorte; Madeline Mueller; Muriel Parenteau; Suzanne Pugh; Steven Brown; Lenny Carlson; Vicki Legion; Athena Steff; Joe R. Jah; James Rogers; Jeffrey Kelly; Bouchra Simmons; Rebeca Chavez; Alex Randolph; John Rizzo; R. Mandelman; Chris Hanson; Harry Bernstein; Steve Bruckman; Mandy Liang; Frederick Teti; [redacted] Tim Killikelly; Alisa Messer; Monica Collins
Subject: updated UNADDRESSED FLAWS

BR CAC, City Team, PUC, PUC CAC, BPS CAC, Planning Commission, BOS, BOT, City Attorney:

Attached is the updated version of "Unaddressed Flaws in Balboa Reservoir Project."

I request that "Unaddressed Flaws in Balboa Reservoir Project" be included as a dissenting opinion in the CAC's Report to Board of Supervisors. It is important that this dissenting opinion be presented to the BOS because the public engagement process has been dominated by the City Team to the substantive exclusion of dissenting voices. The Development Parameters reflect the City Team's perspective rather than the community's.

This updated critique adds material to reveal flaws contained in the RFQ:

1. RFQ makes no reference to the PUC's Land Use Framework
2. The fraudulent meaning of "affordable in perpetuity"

Finally, I have also added an additional factor that has not been given due consideration. The Balboa Park Station Area Plan's Objective 1.4 and Policy 1.3.2 [sic] says: "*Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods.*" A full discussion and analysis of what constitutes "greatest benefit" has never been conducted.

The issues raised in "Unaddressed Flaws" have been repeatedly presented to the City Team and the BR CAC over the course of the past two years. However, in the City Team's rush to judgment to move the Balboa Reservoir Project forward, the City Team has consistently avoided dealing with these issues and concerns.

The Commissions and BOS need to carefully examine the validity of the City Team's work. The Commissions and BOS should not blindly rubber-stamp a Reservoir Project based on faulty assumptions and premises.

Submitted by:

Alvin Ja

Wong, Phillip (ECN)

From: [redacted]
Sent: Saturday, December 10, 2016 8:52 PM
To: BRCAC (ECN); BalResCACChair@gmail.com; Michael Ahrens; Maria Picar; Brigitte Davila; Robert Muehlbauer; Howard Chung; Rebecca Lee; Christine Godinez; Jonathan Winston; Martin, Michael (ECN); Rich, Ken (ECN); Lesk, Emily (ECN); Rahaim, John (CPC); Shaw, Jeremy (CPC); Carlin, Michael (PUC); Russell, Rosanna (PUC); Tracy Zhu; Wendy Aragon; Keith Tanner; [redacted] Richards, Dennis (CPC); [redacted]; Johnson, Christine (CPC); Koppel, Joel (CPC); Melgar, Myrna (CPC); mooreurban@aol.com; Secretary, Commissions (CPC); Board of Supervisors, (BOS); Shaw, Linda (MYR); Cityattorney, (CAT); Ambrose, Noreen (CAT)
Cc: Yee, Norman (BOS); Low, Jen (BOS); SNA Brick; Rita Evans; Bob Byrne; Ellen Wall; Ray Kutz; Jennifer Heggie; Steve Martinpinto; Chris Coghlan; Amy O'Hair; Ken Hollenbeck; Wpa Balboa. Reservoir; Linda Judge; MP Klier; Caryl Ito; Anita Theoharis; Adrienne GO; Laura Frey; Francine Lofrano; Tim Emert; Kishan Balgobin; Kate Favetti; CCHO-- fernando; PODER; Save CCSF Coalition; Linda Da Silva; Marian Lam; Ronald Gerhard; Ted Aranas; Jay Field; Becky Perelli; Erika Delacorte; Madeline Mueller; Muriel Parenteau; Suzanne Pugh; Steven Brown; Lenny Carlson; Vicki Legion; Athena Steff; Joe R. Jah; James Rogers; Jeffrey Kelly; Bouchra Simmons; Rebeca Chavez; Alex Randolph; John Rizzo; R. Mandelman; Chris Hanson; Harry Bernstein; Steve Bruckman; Mandy Liang; Frederick Teti; [redacted]; Tim Killikelly; Alisa Messer; Monica Collins
Subject: WITH ATTACHMENT: Re: updated UNADDRESSED FLAWS
Attachments: 2016-9-12 CAC-- UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT.pdf

Whoops, here's attachment that was left out. Sorry!

From: "ajahjah@att.net" <ajahjah@att.net>
To: BRCAC (ECN) <brcac@sfgov.org>; "BalResCACChair@gmail.com" <BalResCACChair@gmail.com>; Michael Ahrens <mahrens@sheppardmullin.com>; Maria Picar
Sent: Saturday, December 10, 2016 8:47 PM
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Finally, I have also added an additional factor that has not been given due consideration. The Balboa Park Station Area Plan's Objective 1.4 and Policy 1.3.2 [sic] says: "*Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods.*" A full discussion and analysis of what constitutes "greatest benefit" has never been conducted.

The issues raised in "Unaddressed Flaws" have been repeatedly presented to the City Team and the BR CAC over the course of the past two years. However, in the City Team's rush to judgment to move the Balboa Reservoir Project forward, the City Team has consistently avoided dealing with these issues and concerns.

The Commissions and BOS need to carefully examine the validity of the City Team's work. The Commissions and BOS should not blindly rubber-stamp a Reservoir Project based on faulty assumptions and premises.

Submitted by:

Alvin Ja

UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT (9/9/2016)

I have been fairly conscientious in pointing out flaws in the City Team's Principles & Parameters over the course of the past 1-1/2 year. I have submitted my critiques based on research and documentation.

The City Team has sidestepped my critiques. My submissions have been ignored and the concerns raised have not been addressed.

Here is a digest of my critiques from my submissions that have remained unaddressed by the City Team.

CONCEPTUAL FRAMEWORK: PUBLIC LAND FOR THE PUBLIC GOOD

1. Public land should be used for the public good.
2. Affordable housing for homeless, low-income and moderate-income people contributes to the public good.
3. The California State Surplus Land Statute and the City's Surplus City Property/Public Lands Ordinance were set up to help address housing targeted for homeless, low-income and moderate-income people.
4. The intent of both State and City laws were not meant to subsidize high-cost housing.
5. As defined by law, "Affordable Housing" covers moderate-income housing going up to 120% Area Median Income only.
6. Balboa Reservoir Project only requires that 33% of the BR housing to be legally-defined "Affordable Housing." The remaining 67% of housing falls outside the bounds of the original intent of State and City targets of Affordable Housing--as defined by law--for low-income, and moderate-income people.
7. The result of this 33% Affordable Housing/67% non-Affordable Housing ratio is that public land will be transferred to private interests/higher income owners in the guise of "Affordable Housing."
8. Using 33% "Affordable Housing" to subsidize the 67% high-cost housing is contrary to the intent of the original legislation.
9. Distorted meaning of "in perpetuity": Affordable units are supposedly going to be deed-restricted "in perpetuity." Yet, contrary to the normal meaning of "in perpetuity", the City/RFQ defines it as follows: "The project's affordable housing units must remain affordable in perpetuity (i.e. throughout the useful lives of the buildings in which those units are located), ..." What this really means is that after 50-75 years, or even sooner--depending on how the developer defines "useful life"-- even the 33% Affordable will no longer be in existence. The entire Reservoir property will be owned free and clear by private interests with no requirements for affordability: It's the pot at the end of the rainbow for private interests that have a long-term perspectives.
10. Best use of PUC Reservoir:

    The Balboa Park Station Area Plan states: *"POLICY 1.3.2 Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods."*

- There has never been any discussion about what constitutes "greatest benefit." The City/Mayor simply declared by fiat that it would be used for housing (without requiring compliance with the intent of State and City Public Lands laws regarding legally-defined Affordable Housing).
- It can be legitimately argued that **using the west basin for educational purposes would be the "greatest benefit."**

CEQA CONSIDERATIONS

1. CEQA requires public agencies to avoid or mitigate significant adverse environmental impacts caused by a project.
2. City College is a critical public service that serves the entire Bay Area. CCSF is the central economic, educational and cultural feature of the Reservoir vicinity. However the Balboa Reservoir Project has failed to acknowledge CCSF's primacy.
3. Housing on Balboa Reservoir is a component of the Balboa Park Station Area Plan, based on an Initial Study conducted in 2006, referenced in the BPS Final EIR.
4. The proposal of 425-500 units in the Reservoir was arbitrary. There was no documentation, evidence, or argumentation presented to support the proposal for 425-500 units in the 2006 BPS Initial Study/BPS Final EIR/BPS Area Plan.
5. The BPS Area Plan, Final EIR/Initial Study determined that, on the BPS Program-Level, that there would be no significant impact to school facilities.
6. The BR Project's 2014 AECOM Study incorrectly extended the Program-Level determination of non-significance to the Balboa Reservoir Project's Plan-Level. This has caused the BR Project to ignore adverse impacts that the Project will have on City College and neighboring schools.
7. The City Team has refused to acknowledge the reality that the use of the Reservoir for student parking is an existing public benefit. It is a benefit that helps provide access to quality education.
8. Instead, the Balboa Park Station Area Plan mischaracterizes the Reservoir as simply being an "unpleasant void in the neighborhood " despite the reality that it serves an important and needed public purpose for students.
9. The Balboa Reservoir Project can be characterized as constituting an **eviction of an important Bay Area-wide public service**--City College. A public good is being eliminated for the benefit of private developer interests.
10. The City Team operates on the unfounded assumption that housing on the Reservoir is of higher importance than the importance of City College to the community.

- The City Team shifts the burden of mitigation of impending adverse impacts of the Project onto the surrounding neighborhoods and CCSF stakeholders. It addresses the BR Project's adverse impacts by calling for the impactees to bear the burden by practicing TDM ("*reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents")* and requesting Residential Permit Parking.

11. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. It's cheaper to keep it as-is.

12. Eviction of CCSF from western Reservoir will harm student access to education.
13. The State Surplus Property Statute (Govt Code 54220) targets use of housing for those of "low" or "moderate" income (up to 120% of Area AMI). It was under this concept that San Francisco's Public Lands for Housing Program was originally formulated. The idea was for surplus public property to be used for the public good to create Affordable Housing (120% AMI).
14. "Affordable Housing" is legally defined as up to 120% AMI (Administrative Code 23.A.4) The Principles & Parameters only requires 33% to be legally-defined Affordable Housing.
15. In reality 67% will be unaffordable housing. Although the City Team presents the Project as market-rate housing subsidizing affordable housing, this is an inversion of reality. In reality, the 33% affordable housing is cover for the reality that this transfer of public property will benefit private interests at the expense of the public. The reality is that the 33% "affordable housing" will be subsidizing private interests.

PUC LAND USE POLICY

1. PUC's Land Use Framework policy allows sale only if: *"Use of the land sold will not result in creating a nuisance."*

PARKING vs. TDM

1. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. If construction cost is the consideration, then the best option is to leave the western Reservoir as-is.
2. TDM is the third component of the City's Transportation Sustainability Program. TDM requires new developments to provide on-site amenities that prioritize sustainable alternatives to driving.
3. The Balboa Reservoir Project will not exist in isolation from the surrounding neighborhoods. The TDM outcomes within the boundaries of the Project itself will probably be highly successful. However, BR Project's internal TDM success will come at the expense of the surrounding neighborhoods when BR residents park their privately-owned vehicles and drive their privately-owned vehicles outside the Resrvoir Project's own boundaries.
4. FROM EARLIER SUBMISSION TO CAC REGARDING TDM:

- Most importantly: TDM Study is not a comprehensive and unbiased assessment of parking and circulation issues in the Reservoir vicinity; and it was never meant to be a comprehensive study. The scope/parameters of Nelson-Nygaard's study were very specific according to SFCTA documentation:
  - *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.*

PROJECT DESCRIPTION AND BENEFITS

The Balboa Area Transportation Demand Study will develop clear strategies for reducing single-occupant vehicle trips and outline a coordinated framework for future TDM programs and policies between CCSF, the Balboa Reservoir project, and the City of San Francisco. Potential TDM activities will produce a wide-range of benefits to individuals and the transportation system as a whole, from reducing traffic congestion, vehicle emissions, and fuel consumption to supporting physical activity and enhancing safety. Additionally, TDM activities will make existing transportation investments perform better, extending the life of existing infrastructure and improving the outcomes for new transportation investments.

- ***TDM Program**: proposing TDM solutions unique to the area comprising CCSF Ocean campus, Balboa Reservoir and neighborhoodsas consistent with emerging TDM policy.*

Bottom-line: TDM solutions, by definition and intent, exclude parking. Within TDM parameters, the issue of parking is given significance only via the TDM solution of making parking "more difficult and expensive." That's why the elimination of student parking is ignored. That's why the City Team promotes 0.5 parking spaces per residential unit.

- Fatuous TDM arguments:
- "Parking Produces Traffic Congestion--Every parking space is a magnet for cars" and "If you build it.....they will come."
- In earlier submissions I had written:

As I have pointed out in another e-mail, there are 3 main traffic magnets in our area: schools, freeway entrance/exits, and the BP Station transit hub. If reduction of car traffic in the area is the goal, these magnets need to removed. Obviously, this is neither an appropriate nor realistic solution.

BP Station and freeway entrance/exits are part of transportation infrastructure. However CCSF is different. CCSF is not transportation infrastructure. People are not just passing through on the way to someplace else. CCSF is a destination in and of itself.

Rather than parking producing congestion, it's the existence of a desired destination that induces traffic. Parking is but a means to accommodate those who want to get to the desired destination.

Case-in-point: When school is not in session, there are very few cars in the Reservoir parking lot and there's very little traffic on Phelan. This demonstrates the falsehood of the "parking produces traffic congestion" premise.

Bottom line: Parking, in and of itself, does not promote congestion. Rather, congestion is the product of people trying to get to a desired destination. Student access to education, which includes driving and parking, should not be subordinate to the Balboa Reservoir Project.

- "Spillover [parking] from City College"
  - Both Sunnyside Neighborhood Assn and Westwood Park Assn have made clear that the neighborhood supports CCSF and its students. The Nelson-Nygaard Study calls for preventing "spillover from City College" by making parking for them difficult via RPP and enforcement. Rather than making parking difficult for students, the neighbors have called for the Balboa Reservoir Project to provide adequate on-site parking for student needs.

Bottom line: Instead of shifting the burden of mitigation for the elimination of student parking by the TDM solution of "reducing single-occupant trips by college staff, faculty, students, and neighborhood residents", the Reservoir Project needs to take responsibility for replacing lost student parking.

--aj

Wong, Phillip (ECN)

From: [redacted]
Sent: Saturday, December 10, 2016 9:07 PM
To: BRCAC (ECN); BalResCACChair@gmail.com; Michael Ahrens; Maria Picar; Brigitte Davila; Robert Muehlbauer; Howard Chung; Rebecca Lee; Christine Godinez; Jonathan Winston; Martin, Michael (ECN); Rich, Ken (ECN); Lesk, Emily (ECN); Rahaim, John (CPC); Shaw, Jeremy (CPC); Carlin, Michael (PUC); Russell, Rosanna (PUC); Tracy Zhu; Wendy Aragon; Keith Tanner [redacted] Richards, Dennis (CPC); [redacted]; Johnson, Christine (CPC); Koppel, Joel (CPC); Melgar, Myrna (CPC); mooreurban@aol.com; Secretary, Commissions (CPC); Board of Supervisors, (BOS); Shaw, Linda (MYR); Cityattorney, (CAT); Ambrose, Noreen (CAT)
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Subject: MESSED UP AGAIN!: correct attachment for updated UNADDRESSED FLAWS is here
Attachments: 2016-12-10 final version-- UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT.pdf

I attached the older version of the attachment instead of the updated version.

Sorry for the mess-up.

This time I'll get it right with this attachment. The correct attachment talks about the RFQ.

From: "ajahjah@att.net" <ajahjah@att.net>
To: BRCAC (ECN) <brcac@sfgov.org>; "BalResCACChair@gmail.com" <BalResCACChair@gmail.com>; Michael Ahrens <mahrens@sheppardmullin.com>; Maria Picar
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Submitted by:

Alvin Ja

UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT (revised for RFQ , 12/10/2016)

The Balboa Reservoir Project has been presented to the community essentially as a done-deal. It has been justified by referencing the Balboa Park Station Area Plan and the Public Land for Housing Program.

However, there has been no fact or evidence-based analysis of the assumptions and premises involved in the Reservoir Project's so-called affordable housing. The Project has been framed as an affordable housing effort; it has also been framed as providing affordable housing "in perpetuity." Yet when deeper analysis is made, only 33% of the housing on public land will be legally-defined Affordable Housing. When you read the fine print, "in perpetuity" only means "for the useful life of the buildings."

Objective 1.4 of the Balboa Park Station Area Plan called for using the Reservoir for the "best benefit of the neighborhood, the city, and the region as a whole." Yet the Balboa Reservoir Project has failed to assess the relative harms and benefits of the proposed housing development versus the educational needs of the city and the Bay Area. As envisioned, the Reservoir Project will harm City College of San Francisco which serves the broadest public interest and benefit to the entire Bay Area.

During the course of the public engagement process, much input has been provided to the City Team regarding flaws in the Reservoir Project. However, fundamental questions and concerns regarding the validity of the Project have not been addressed.

Here is an updated digest of critiques have remained unaddressed by the City Team.

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10. Best use of PUC Reservoir:

    Under Objective 1.4 of the Balboa Park Station Area Plan, Policy 1.3.2 [sic] states *"POLICY 1.3.2 Develop the west basin of the reservoir* [for] *the greatest benefit of the city as a whole as well as for the surrounding neighborhoods."*

    - There has never been any discussion about what constitutes "greatest benefit." The City/Mayor simply declared by fiat that it would be used for housing (without mandating compliance with the intent of State and City Public Lands laws regarding legally-defined Affordable Housing).
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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."*

PARKING vs. TDM

1. The City Team argues that it is too expensive to build parking. If the Reservoir were to be left as-is to provide student access to education, there would be no need to build new parking. If construction cost is the consideration, then the best option is to leave the western Reservoir as-is.
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  - *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.*
  - ***PROJECT DESCRIPTION AND BENEFITS***

    The Balboa Area Transportation Demand Study will develop clear strategies for reducing single-occupant vehicle trips and outline a coordinated framework for future TDM programs and policies between CCSF, the Balboa Reservoir project, and the City of San Francisco. Potential TDM activities will produce a wide-range of benefits to individuals and the transportation system as a whole, from reducing traffic congestion, vehicle emissions, and fuel consumption to supporting physical activity and enhancing safety. Additionally, TDM activities will make existing transportation investments perform better, extending the life of existing infrastructure and improving the outcomes for new transportation investments.

  - ***TDM Program**: proposing TDM solutions unique to the area comprising CCSF Ocean campus, Balboa Reservoir and neighborhoods as consistent with emerging TDM policy.*

    Bottom-line: TDM solutions, by definition and intent, exclude parking. Within TDM parameters, the issue of parking is given significance only via the TDM solution of making parking "more difficult and expensive." That's why the elimination of student parking is ignored. That's why the City Team promotes 0.5 parking spaces per residential unit.

- Fatuous TDM arguments:
  - "Parking Produces Traffic Congestion--Every parking space is a magnet for cars" and "If you build it.....they will come."
    - In earlier submissions I had written:

As I have pointed out in another e-mail, there are 3 main traffic magnets in our area: schools, freeway entrance/exits, and the BP Station transit hub. If reduction of car traffic in the area is the goal, these magnets need to removed. Obviously, this is neither an appropriate nor realistic solution.

BP Station and freeway entrance/exits are part of transportation infrastructure. However CCSF is different. CCSF is not transportation infrastructure. People are not just passing through on the way to someplace else. CCSF is a destination in and of itself.

Rather than parking producing congestion, it's the existence of a desired destination that induces traffic. Parking is but a means to accommodate those who want to get to the desired destination.

Case-in-point: When school is not in session, there are very few cars in the Reservoir parking lot and there's very little traffic on Phelan. This demonstrates the falsehood of the "parking produces traffic congestion" premise.

Bottom line: Parking, in and of itself, does not promote congestion. Rather, congestion is the product of people trying to get to a desired destination. Student access to education, which includes driving and parking, should not be subordinate to the Balboa Reservoir Project.

- "Spillover [parking] from City College"
  - Both Sunnyside Neighborhood Assn and Westwood Park Assn have made clear that the neighborhood supports CCSF and its students. The Nelson-Nygaard Study calls for preventing "spillover from City College" by making parking for them difficult via RPP and enforcement. Rather than making parking difficult for students, the neighbors have called for the Balboa Reservoir Project to provide adequate on-site parking for student needs.

Bottom line: Instead of shifting the burden of mitigation for the elimination of student parking by the TDM solution of "reducing single-occupant trips by college staff, faculty, students, and neighborhood residents", the Reservoir Project needs to take responsibility for replacing lost student parking.

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