DOCUMENTS RECEIVED FROM PUBLIC DURING 6/15/17 REGULAR MEETING

AND

EMAILS RECEIVED FROM PUBLIC VIA BRCAC@SFGOV.ORG

Period: 3/14/17 – 6/15/17
[NO DOCUMENTS RECEIVED]
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I found it key that only one scheme thought about 2 mil to contribute towards the project or idea generation... But what seems to be the missing link is CCSF and how and in what ways they will design this corner and the southern side to eastern side of their site to improve pedestrian and bike connectivity to and over the freeway overpass. A seperate design, a high-line route? Maybe a student shuttle tram? Like a cable car from the mid block on phelan down to Bart?

Lots of ideas can come from this key is to hold the agencies and developers to the premise of solving the missing link....

Ag d11

Sent from my iPhone
Option 1 - the 1st one, as it was visually balanced, well thought out in the graphics and level of detail on the street-scape landscape areas, and could be actually more density wise, vertically since they did a good street layout... enjoyed seeing the angled streets (non-gridded) The images were good, the housing showing solar panels and green roofs and spaces excellent. Heights could be increased even to give more play in the scheme, and images, (*Note: The plans should be sim. between all developers as it was deceptive which ones in opt 2 and 3 were solid buildings or shown with white roofs etc. (**Personally liked this one the best architecturally, urban planning, landscape, and visually)

Option 2 - was too (2) split neighborhoods in concept, and the town-house sections should have more open space carved out in exchange for verticality, same with their blocks which were too massive in plan and needed breeze-ways, or other translucent materials and openings along with height changes to make it more playfull. This scheme should be revised similar to option 1 to get more into the physical heights and shapes and materials of the buildings to provide a better conversation between option 1 and 2... This one had interesting idea with bridges and water, but needs to develop this further, and make a more bold landscape element (lake?) or water body ,that has housing around or water working in and out of areas and courtyards as bio-retention element... They may do better by shifting the housing townhomes westward more, and increasing the park and open-spaces between or around the sites to make the water element a more whole central feature?

Option 3 was most dense # of units, but too resembled parkmerced's paseo's and layout, without the garden spaces done by T. Church... too much shadow, and bulk to the buildings and townhouses shown were like after-thoughts on the design attached to larger buildings... The central green-space seemed ordinary (rectangle) and needed some revision to improve street scale dimensions, and possible better arrangement of streets and green space... (non-lineal) with beaux arts concept... This proposal needed the most work, as it was still to bulky, ignoring of the impacts (childcare on a heavy used street sounds like back-ups) might want to relocate it to the green space redesign...

I would want to see each presentation with drawings done similar (roofs shown white) so figure ground is accurately represented to the public...
Or equal effort at discussion on how they see the future transit improvements helping the developments connectivity to Balboa Station to be done with infrastructural coordination with CCSF BART MUNI etc...

Just some initial feedback on the ideas... overall was excellent in the efforts by planning and city agencies to hold the meeting and get feedback...

ag D11
SFCTA Commissioners, SFCTA CAC, Deputy Director Crabbe:

I will be unable to attend your 6/13/2017 meeting. I offer Written Comment instead:

AGENDA ITEM 2: CITIZENS ADVISORY COMMITTEE REPORT
I made oral public comment on the Nelson-Nygaard Balboa Area TDM Report at the 5/24/2017 CAC meeting.

In reviewing the minutes of that meeting, I find that the main points of my oral comment have not been correctly presented.

The main points of my oral comment had been to show that the TDM Framework would result in harming "communities of concern" by reducing their access to education:

- Present a proper context with which to evaluate the Balboa Area TDM Framework. I believe that I emphasized clearly that Balboa Area TDM Framework had to be viewed in the context of it being a response to how the Balboa Reservoir Project would affect the existing conditions and settings in the Reservoir area; and that elimination of student parking by the Reservoir Project would harm attendance and enrollment.
- Due to enforcement of the 2-3 minute time limit, I was unable to complete one of my points. I had wanted to say to the CAC that, with my 33 years of first-hand experience as a MUNI employee, any future MUNI real-world service improvements in the Balboa TDM plan would fall far short of providing the reliability that would be needed to make students, staff, and faculty (who place highest priority on Travel Time and Arrival on Time according to the City College Transportation Survey) jump on board MUNI instead.

The CAC minutes refers to a letter submitted to the CAC. The submission had been addressed to SFCTA Board, in addition to the CAC. I had asked SFCTA Staff to distribute it to both bodies. This is the letter, along with the "TDM Non Sequitur" attachment:

SFCTA, SFCTA CAC:

It is important to remember the context for the creation of the Balboa Park Area TDM Framework Study.

The BP Area TDM Framework Study was the consequence of concerns expressed by the community regarding the adverse impact that the Balboa Reservoir Project would have on the existing setting and conditions in the immediate area of the Reservoir.

People in the community had been left to believe that the TDM Study would be an objective all-around examination of parking/transportation issues in the area. The City Team failed to enlighten the community that

IDENTIFYING TRANSPORTATION NEEDS FOR BALBOA PARK AREA

The Nelson-Nygaard TDM Report reports on existing conditions. Using a variety of resource materials and data, the Report, in the main, accurately describes the existing conditions.

This section of the Report correctly identifies “limited roadway space, transit infrastructure, and financial resources” as problems. Yet despite the obvious fact that the elimination of student parking and new Reservoir residents will increase demand placed on limited transportation resources, the Balboa Reservoir Project Team proposes no amelioration for adverse impacts other than TDM.

The TDM Plan/solution is not a logical outcome of an objective analysis of fact, evidence and common sense. The proposed TDM Plan is a pre-ordained, ideologically-driven solution. It is based on hope, wishful thinking and generalities; not on fact and evidence.

The 4/13/2016 TDM presentation to the Reservoir CAC followed the “logic” of the non sequitur.

The TDM Report’s shortcomings are significant. Here is an attempt to point out such shortcomings and their negative implications and consequences.

LAND USE

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- The Report’s characterizes CCSF as only being a provider of “publicly-accessible sports facilities.” This characterization undermines and ignores CCSF’s primary importance as a critical provider of educational services to the broader Bay Area community.

  It leads to minimizing the need for the Reservoir Project to mitigate its adverse impacts on CCSF enrollment and attendance.

  The Report itself admits that the “information presented herein ... essentially “sets the stage” for what TDM strategies and supporting measures will be considered... “

MY CONCLUSION: The Land Use section of the Report sets the stage to downplay adverse impacts to CCSF’s educational mission.

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“Multimodal conditions” is fancy jargon for various modes of transportation. The four modes of transportation examined in the Report are walking, biking, public transit, and driving.
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![Modal split graph]

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- That the Ocean Campus is a major generator of traffic is an indisputable truth. However no context is provided regarding this truth. Without providing context, the implication is that people who drive to CCSF harm society.

What is the unstated appropriate context? The appropriate context is that the people who drive are going to a destination to learn, teach and support the educational needs of society.
The Balboa Reservoir has utterly failed to weigh the trade-offs involved between the educational needs and housing needs of the community.

More importantly, although this is an existing conditions report, the Report fails to mention the future trip generation that the Reservoir Project itself will add to the TDM Study Area.

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“the survey findings also assessed peak utilization rates. They indicated that, during the midday period, five off-street parking lots at CCSF Ocean Campus experience peak utilization that are above the average peak parking demand. For example, the survey findings indicated that Res. 1 and Lots A, H, S, U all experience peak parking occupancies between 98% and 100%. Therefore, on any given day, the majority of employee-only lots and the student lot (Res. 1) are completely full during the midday period. The weekday peak parking utilization for Res. 2 Lot was 9%.”

The policy of TDM had already been fixed, prior to, and regardless of the evidence contained in the surveys that were conducted subsequent to the TDM policy decision.

THE TDM NON SEQUITUR

The City Team, instead of formulating the Development Parameters based on evidence and data, had a priori concluded that TDM is the solution to adverse impacts that would be generated by new Reservoir residents and by the eviction of student parking.

TDM is a legitimate part of an overall Transportation Sustainability Program for the City as a whole. However, TDM as applied to the proposed Balboa Reservoir Project is not a suitable or realistic solution. TDM in the context of Balboa Reservoir will not be able to solve the problem of student access to education created by the Development Parameters. Nor will TDM measures be able to meaningfully solve transportation and parking problems generated by the Project.

Based on the survey results, TDM is a non sequitur:

CCSF TRANSPORTATION SURVEY

The most telling question in the CCSF Transportation Survey was: “When choosing how you typically travel to/from CCSF Ocean Campus, what are you most concerned about?”

The question listed the valid concerns of cost, distance, travel time, arriving on time, and comfort/safety of trip for CCSF stakeholders.
“Travel time” and “Arrival on time” were overwhelmingly most important concerns (90% and 73.2% respectively).

Most of us want to be “green” and support the idea and practice of walking, biking and public transit. However the response to “What would encourage you to use other transportation modes? (select all that apply)” is grounded in the real-world needs of CCSF stakeholders.

Overwhelmingly, the most important consideration for respondents was “reducing travel time.” That efficient use of time is important should not be surprising to the City Team.

The CCSF Ocean Campus Transportation Survey results just confirm common sense. The survey confirms the common sense input that ordinary citizens have been trying to communicate to the Mayor’s Office and Planning Department to little effect—because the City Team’s “sustainable” Transportation Demand Management (TDM) “solution” had been pre-ordained in contradiction and opposition to the real world lives of CCSF and neighborhood stakeholders.

TDM is the City Team’s solution for transportation and parking problems that will be generated by the Balboa Reservoir Project. According to Planning Department’s Transportation Sustainability Program, “TDM is the “Shift” component of the Transportation Sustainability Program. A series of development focused TDM measures incentivize on-site amenities intended to provide sustainable alternatives to driving – or “shifting” people’s usual practice of driving alone in their cars – by providing residents, business tenants, and visitors with sustainable alternative travel options.”

However, instead of just applying TDM measures to the beneficiaries (“residents, business tenants, and visitors”) of the Balboa Reservoir Project, the City Team has shifted the brunt of the application of TDM to the pre-existing stakeholders of CCSF, Riordan, Sunnyside Elementary, St. Finn Barr, Lick Wilmerding, and the Ingleside, Westwood Park and Sunnyside neighborhoods.

No matter how the City Team tries to convince the public that its TDM Study will be comprehensive in nature, the fact remains that TDM is self-defined within its own parameters. The Reservoir Project’s TDM solution is straightforwardly documented: “The Planning Department and SFMTA are proposing a Transportation Demand Management (TDM) study in coordination with CCSF Ocean Campus to reduce single-occupant vehicle trips by college staff, faculty, students, and neighborhood residents.”

One of the components of the City’s Transportation Sustainability Program is “Shift.” The idea is to shift car drivers onto other more sustainable modes of transportation. However, in the Balboa Reservoir context, “shift” has another more important meaning.

The different and more important real-world meaning of “shift” is: shifting the burden of mitigation of CEQA-related adverse impacts onto school stakeholders and neighborhood residents. This is unacceptable.

COMMUNITY SURVEY (Dept of Environment)

The section on the Community Survey conducted by the Dept of Environment highlighted two survey questions. The two questions pertained to the Existing Mode Split and to “Willingness to Try Different Modes of Transportation.”

The main concept of TDM is to get car drivers to walk, bike and take public transit. However the Nelson-Nygaard Report failed to show survey results for a critical question that would show the likelihood of
respondents changing mode of travel. The Report does not show the survey results for Question #9--
What is most important to you when you choose how you get to work?

Although the Report fails to provide survey results for this question, I bet it would be similar to the
results for the CCSF Survey: that ‘Travel Time’ would be one of the most important. I would also guess
that ‘Reliability’ would also be close to the top. If my guess about responses to this question is right,
how effective would the Balboa Reservoir Project’s TDM measures be able to resolve Travel Time and
Reliability concerns?

- Since the data for Question 9 of the survey has not been presented in the Nelson-Nygaard
  Report, I will venture this unsubstantiated (but probably correct) conclusion:

The TDM objective of shifting substantial numbers of car drivers onto public transit and biking will be
unsuccessful because of the real-world importance of Travel Time, Reliability, and Convenience for
people leading busy lives.......and who are not privileged to be members of the leisure class.

--aj 1/3/2017, updated 5/23/17
TDM was actually the pre-ordained "solution" to the adverse traffic and parking impacts of the new Reservoir Project on the Reservoir neighborhood. That replacement parking was never considered as a possibility within the TDM Framework was never clearly communicated to the community.

Instead of just being presented as a general overall plan to "encourage sustainable travel choices and reduce...auto trips and traffic congestion in the Balboa Area," it is imperative that the TDM Study be seen in the context of the Balboa Reservoir Project's adverse impact on the neighborhood and especially on its adverse impact on student attendance and enrollment.

TDM is not a true solution to the eviction of student parking that would discourage student attendance and enrollment. TDM as a solution to the eviction of student parking is not grounded on fact or evidence; in reality, the TDM "solution" to the elimination of student parking and the addition of 1,000+ new Balboa Reservoir residents is merely based on hope and wishful thinking.

Submitted by:
Alvin Ja

Sunnyside resident, 39 years
City College lifelong learning student 40+ years
Municipal Railway Operator, Inspector, Instructor, 33 years (retired) most of which was working out of MUNI Metro's Green Division at Balboa Park, 425 Geneva Ave.
I'm a lifelong Bay Area resident and lived in SF for 5 years. I just moved to Belmont in part because of the high price of city housing. I hope to move back soon.

Please build the version of the plan that adds the most housing units. There is no more pressing need than the production of more housing in the Bay Area.

Since 2010 we've added 2.3 million residents in California and only 400,000 new housing units. As a predictable result, prices have gone through the roof. I'm a small business owner and high rents make it difficult to hire and grow my business since labor costs are so high. Google just admitted it's much easier for them to hire in Seattle because housing is so expensive here. Housing prices are hurting our businesses. More housing would help lower rents and add customers, helping our businesses stay afloat.

We've seen that building new housing can decrease rents. Last year SF built 5000 new units, a record, and rents and owner move-in evictions both declined. We should keep those trends moving in the right direction by continuing to build more housing.

Building lots of apartments near transit is smart policy. It's great for the environment, since it's easy for people to commute and Balboa Park has great public transit options. Parking may be a concern but I think it's far outweighed by the need of people to have a place to live where they don't have to pay 50% of their salary in rent. If tough parking forces people to circle the block a few times so be it. If it gets them to use public transit more, or ride sharing services, we all win because there are fewer cars on the road.

Thanks,
Kevin

--
--
Kevin Burke
925.271.7005 | kev.inburke.com
dear committee,

We were at part of the meeting for the Balboa Reservoir development meeting today. As neighbors, one of our priorities is to see a better walk score in the neighborhood, meaning a mix of residential and commercial units so that many activities can be accomplished without a car, and to promote community and businesses for people to gather. We were disappointed to find little commercial space in the plans. Is this due to zoning and is it something that can be changed?

Thank you,

Simone & Mac
Chair Peskin, Vice Chair Tang, Commissioner Yee, SFCTA Commissioners:

The Balboa Reservoir Area TDM Framework Report will be up for your consideration at your 6/13/2017 SFCTA meeting.

It is important to remember the context for the creation of the Balboa Park Area TDM Framework Study.

The BP Area TDM Framework Study was the consequence of concerns expressed by the community regarding the adverse impact that the Balboa Reservoir Project would have on the existing setting and conditions in the immediate area of the Reservoir.

People in the community had been left to believe that the TDM Study would be an objective all-around examination of parking/transportation issues in the area. The City Team failed to enlighten the community that TDM was actually the pre-ordained "solution" to the adverse traffic and parking impacts of the new Reservoir Project on the Reservoir neighborhood. That replacement parking was never considered as an option within the TDM Framework was never clearly communicated to the community.

The Balboa Reservoir Area TDM single-mindedly prioritizes "sustainability" over the educational needs of the broad Bay Area community. Other than lip-service, the Reservoir Area TDM Framework ignores the real-world needs of CCSF stakeholders and the neighborhoods that would be adversely affected by the elimination/eviction of student parking.

The TDM plan talks about improvements to MUNI that would facilitate more students using MUNI instead of driving. I worked at MUNI as Operator, Inspector, Dispatcher, Instructor for 33 years. I know first-hand about MUNI's reliability problems. To present proffered future improvements to MUNI as part of the TDM solution is less than honest. City Charter requires that MUNI achieve these reliability standards:

- 85% on-time performance
- 98.5% of scheduled service

These reliability goals have never been achieved in the past 15 years. For the City Team/Balboa Reservoir Project to expect MUNI to improve enough to mitigate Reservoir Project's adverse impact on the existing
setting demonstrates an extremely faulty grasp of the real world. The TDM plan for the Balboa Reservoir Area is based, not on evidence or fact, but on wishful thinking. The actual survey of CCSF shows that the main factors in determining mode of travel are Travel Time and Arrival On Time. Will the real-world MUNI improvements be able to resolve these two important factors in making people change their mode of travel?

Instead of just being presented as a general overall plan to "encourage sustainable travel choices and reduce...auto trips and traffic congestion in the Balboa Area," it is imperative that the TDM Study be seen in the context of the Balboa Reservoir Project's adverse impact on the neighborhood and especially on its adverse impact on student attendance and enrollment.

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  The TDM objective of shifting substantial numbers of car drivers onto public transit and biking will be unsuccessful because of the real-world importance of Travel Time, Reliability, and Convenience for people leading busy lives.......and who are not privileged to be members of the leisure class.

--aj  1/3/2017, updated 5/23/17
It really make sense to Include Lee road extension to Ocean Ave. for the proposed development at Balboa reservoir!
Not only benefits development, but takes expected more traffic from city college and surrounding neighborhoods!
It must be a Priority!....to make it work!

Sent from AOL Mobile Mail
Just keeping the "ideas" juices flowing saw the master planner for CCSF yesterday and talked a bit prior to the BPSCAC meeting

All ideas keep in flux as u never know how the concept can eventually flow

Sent from my iPhone

> On May 24, 2017, at 5:55 PM, Shanahan, Thomas (ECN) <thomas.shanahan@sfgov.org> wrote:
> Hi Aaron,
> Thank you for the email. Your email from 5/16 has also been received.
> They will be shared with the members of the CAC and be made a part of the public record.
> Best regards,
> Tom
> --
> Tom Shanahan
> Project Assistant, Office of Economic and Workforce Development City
> Hall, Room 448, SF, CA, 94102-4653
> Office: (415) 554-7027
> Website: http://OEWD.org/Development
>
> -----Original Message-----
> From: Aaron Goodman
> Sent: Monday, May 22, 2017 7:49 AM
> To: Susan Lamb Shaw, Jeremy (CPC)
> <jeremy.shaw@sfgov.org>; BRCAC (ECN) <brcac@sfgov.org>
> Subject: CCSF Concept idea for getting to balboa park Bart and removal of existing overpass
> of existing overpass -- MVRDV transforms 1970s highway into "plant village" in Seoul
> https://www.dezeen.com/2017/05/22/mvrdv-seoullo-7017-conversion-overpass
> ss-highway-road-park-garden-high-line-seoul-south-korea/?utm_medium=em
Sent from my iPhone
Please enter this into the official Reservoir Project record for EIR consideration and review.

Thanks,
aj

----- Forwarded Message ----- 
From: Alvin Ja [REDACTED]  
Sent: Tuesday, May 23, 2017 10:20 AM  
Subject: Critique of Nelson-Nygaard BP Area TDM Study

SFCTA, SFCTA CAC:

It is important to remember the context for the creation of the Balboa Park Area TDM Framework Study.

The BP Area TDM Framework Study was the consequence of concerns expressed by the community regarding the adverse impact that the Balboa Reservoir Project would have on the existing setting and conditions in the immediate area of the Reservoir.

People in the community had been left to believe that the TDM Study would be an objective all-around examination of parking/ transportation issues in the area. The City Team failed to enlighten the community that TDM was actually the pre-ordained "solution" to the adverse traffic and parking impacts of the new Reservoir Project on the Reservoir neighborhood. That replacement parking was never considered as a possibility within the TDM Framework was never clearly communicated to the community.

Instead of just being presented as a general overall plan to "encourage sustainable travel choices and reduce...auto trips and traffic congestion in the Balboa Area," it is imperative that the TDM Study be seen in the context of the Balboa Reservoir Project's adverse impact on the neighborhood and especially on its adverse impact on student attendance and enrollment.

TDM is not a true solution to the eviction of student parking that would discourage student attendance and enrollment. TDM as a solution to the eviction of student parking is not grounded on fact or evidence; in reality, the TDM "solution" to the elimination of student parking and the addition of 1,000+ new Balboa Reservoir residents is merely based on hope and wishful thinking.

Submitted by:
Alvin Ja

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City College lifelong learning student 40+ years
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IDENTIFYING TRANSPORTATION NEEDS FOR BALBOA PARK AREA

The Nelson-Nygaard TDM Report reports on existing conditions. Using a variety of resource materials and data, the Report, in the main, accurately describes the existing conditions.

This section of the Report correctly identifies “limited roadway space, transit infrastructure, and financial resources” as problems. Yet despite the obvious fact that the elimination of student parking and new Reservoir residents will increase demand placed on limited transportation resources, the Balboa Reservoir Project Team proposes no amelioration for adverse impacts other than TDM.

The TDM Plan/solution is not a logical outcome of an objective analysis of fact, evidence and common sense. The proposed TDM Plan is a pre-ordained, ideologically-driven solution. It is based on hope, wishful thinking and generalities; not on fact and evidence.

The 4/13/2016 TDM presentation to the Reservoir CAC followed the “logic” of the non sequitur.

The TDM Report’s shortcomings are significant. Here is an attempt to point out such shortcomings and their negative implications and consequences.

LAND USE

The Report’s very first paragraph in the “Land Use” section describes City College in one sentence: “The CCSF Ocean Campus, zoned as public space, is located at the center of the study area and provides publically-accessible sports facilities.”

- The Report’s characterizes CCSF as only being a provider of “publicly-accessible sports facilities.” This characterization undermines and ignores CCSF’s primary importance as a critical provider of educational services to the broader Bay Area community.

  It leads to minimizing the need for the Reservoir Project to mitigate its adverse impacts on CCSF enrollment and attendance.

  The Report itself admits that the “information presented herein ...essentially “sets the stage” for what TDM strategies and supporting measures will be considered... “

MY CONCLUSION: The Land Use section of the Report sets the stage to downplay adverse impacts to CCSF’s educational mission.

MULTIMODAL CONDITIONS

“Multimodal conditions” is fancy jargon for various modes of transportation. The four modes of transportation examined in the Report are walking, biking, public transit, and driving.
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Sensible use of the data contained in the TDM Report requires an understanding of the order of magnitude of the various modes:
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After providing a picture of the general traffic patterns for the Balboa Park Area, the Report continues on to address “CCSF Ocean Campus Vehicle Trip Generation.” The Report accurately states that the Ocean Campus “is a major generator of person and auto traffic in the Balboa Area.”

That the Ocean Campus is a major generator of traffic is an indisputable truth. However no context is provided regarding this truth. Without providing context, the implication is that people who drive to CCSF harm society.

What is the unstated appropriate context? The appropriate context is that the people who drive are going to a destination to learn, teach and support the educational needs of society.
The Balboa Reservoir has utterly failed to weigh the trade-offs involved between the educational needs and housing needs of the community.

More importantly, although this is an existing conditions report, the Report fails to mention the future trip generation that the Reservoir Project itself will add to the TDM Study Area.

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“the survey findings also assessed peak utilization rates. They indicated that, during the midday period, five off-street parking lots at CCSF Ocean Campus experience peak utilization that are above the average peak parking demand. For example, the survey findings indicated that Res. 1 and Lots A, H, S, U all experience peak parking occupancies between 98% and 100%. Therefore, on any given day, the majority of employee-only lots and the student lot (Res. 1) are completely full during the midday period. The weekday peak parking utilization for Res. 2 Lot was 9%.”

The policy of TDM had already been fixed, prior to, and regardless of the evidence contained in the surveys that were conducted subsequent to the TDM policy decision.

THE TDM NON SEQUITUR

The City Team, instead of formulating the Development Parameters based on evidence and data, had a priori concluded that TDM is the solution to adverse impacts that would be generated by new Reservoir residents and by the eviction of student parking.

TDM is a legitimate part of an overall Transportation Sustainability Program for the City as a whole. However, TDM as applied to the proposed Balboa Reservoir Project is not a suitable or realistic solution. TDM in the context of Balboa Reservoir will not be able to solve the problem of student access to education created by the Development Parameters. Nor will TDM measures be able to meaningfully solve transportation and parking problems generated by the Project.

Based on the survey results, TDM is a non sequitur:

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The most telling question in the CCSF Transportation Survey was: “When choosing how you typically travel to/from CCSF Ocean Campus, what are you most concerned about?”

The question listed the valid concerns of cost, distance, travel time, arriving on time, and comfort/safety of trip for CCSF stakeholders.
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Overwhelmingly, the most important consideration for respondents was “reducing travel time.” That efficient use of time is important should not be surprising to the City Team.

The CCSF Ocean Campus Transportation Survey results just confirm common sense. The survey confirms the common sense input that ordinary citizens have been trying to communicate to the Mayor’s Office and Planning Department to little effect—because the City Team’s “sustainable” Transportation Demand Management (TDM) “solution” had been pre-ordained in contradiction and opposition to the real world lives of CCSF and neighborhood stakeholders.

TDM is the City Team’s solution for transportation and parking problems that will be generated by the Balboa Reservoir Project. According to Planning Department’s Transportation Sustainability Program, “TDM is the “Shift” component of the Transportation Sustainability Program. A series of development focused TDM measures incentivize on-site amenities intended to provide sustainable alternatives to driving – or “shifting” people’s usual practice of driving alone in their cars – by providing residents, business tenants, and visitors with sustainable alternative travel options.”

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One of the components of the City’s Transportation Sustainability Program is “Shift.” The idea is to shift car drivers onto other more sustainable modes of transportation. However, in the Balboa Reservoir context, “shift” has another more important meaning.

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--aj  1/3/2017, updated 5/23/17
WITH ATTACHMENT

Aaron, BPS CAC:

Nelson-Nygaard's Balboa Park Area TDM Study is on your agenda for tonight's meeting.

I have attached a written comment for BPSCAC.

Please distribute the attached "TDM Non Sequitur" to all CAC members.

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people leading busy lives........and who are not privileged to be members of the leisure class.

--aj 1/3/2017, updated 5/23/17
FYI Tom, for recording with the next batch of public comment to the CAC

From: Sunnyside Neighborhood Association
Sent: Monday, May 15, 2017 7:34 AM
To: Lesk, Emily (ECN); Shaw, Jeremy (CPC); Lisa Spinali; Steve Martinpinto
Subject: BRP Sunnyside survey results

Hi Emily,

Good to have met you on Saturday.

Here is a brief tally of the results of our one-page survey. Nothing surprising, only that those living closest care most about traffic and parking issues, and that open space was third overall.

--Amy

--

Amy O'Hair, Secretary
Sunnyside Neighborhood Association

http://SunnysideAssociation.org
Balboa Reservoir Project survey: local residents’ top concerns

- Survey taken by Sunnyside Neighborhood Association
- At public meetings, April 24 and May 13, 2017
- 56 total respondents
- See page 4 of this document for full one-page survey

Summary: Participants identified their streets where they lived and then ranked top three concerns about the Balboa Reservoir Project development, with room to write in further comments. Overall the top concern was Traffic Congestion, followed by Parking Issues and Impacts, with Open Space/Park Space coming third. This result was more pronounced among those living closest to the Project site. Results from those living further from the site did not reveal a clear consensus on concerns, and were spread much more evenly across the choices.

A. Top three concerns, all respondents:

B. Top three concerns, respondents living closer to BRP(†); the same choices as the greater group, but the preference is more clearly marked:
C. Top three concerns, respondents living farther from BRP(‡); preferences don’t clearly emerge from this group; note smaller sample size.

D. Written comments, edited slightly.

1. Comments/concerns from those living closer to BRP (†).
   - "Improve traffic along Phelan/Foerster/Judson."
   - “Parking and traffic are bad now, with CCSF’s enrollment down. If it increases, how will congestion be mitigated?”
   - "Transit and bicycle access."
   - "Affordable housing over traffic concerns."
   - "More/better public transportation."
   - "Want to do our fair share to accommodate housing growth in SF."
   - "Parking and congestion on Judson already a problem."
   - “Traffic on Phelan could get worse, and I drive it almost every day.”
   - “Traffic is already severely impacted, given increased traffic on Ocean due to construction the past 5 years. We need solutions that aren’t just getting people out of their cars.”
   - “Mitigating CCSF’s parking requirements, including Performing Arts Center and new residential parking. Additional traffic mitigation for Ocean and Phelan.”
   - "Public transit impact - Balboa Bart/Muni access needs to be thought out."
   - "The lack of parking for this project."
   - “I think there needs to be access to the Westwood Park neighborhood at least for emergency fire access.”
   - "Concerned about filling our streets with congestion."
   - "Park open space first."
   - "City College already a tough place to get through."
   - "We will lose child-friendliness of the neighborhood if it becomes too polluted and congested."
   - "We can adjust to changes in parking and traffic, but we can’t ever get back any open space."
2. Comments/concerns from respondents living farther from BRP (‡).

- "New housing gets built and it connects with other neighborhoods."
- "How about senior housing?"
- “Most important to me is public transportation.”
- "What happens to all the current parking slots?"
- "Effect on Monterey and surrounding streets."
- "Concerned about traffic and parking. Really want some open space where family and pets can visit."
- "Disruption during construction."
- “Density and its impacts, esp. gridlock on Geneva/Ocean and Phelan.”
- “The combined impacts of this and the Performing Arts Center.”
- "Preservation of views and character of the neighborhood."
- "Opportunity to make this an informal and spectacular community center."
- “Traffic concerns are real – during school year and peak periods traffic backups can be up to 10 minutes to move 3-4 blocks.”
- “Why would the City sell off water storage source?"
- "Quality architecture; variety of open spaces; kids play area; dog run; open space for recreation."
- "Ocean Ave developments have limited character and are expensive."
- "Lower Detroit St parking will be impacted."
- "I have five adult professional children none of whom can afford to buy a house in SF."
- "Density without any plan for transportation, Muni service, or parking."
- "Parking already bad -- free city College tuition may increase enrollment and parking issues."
- "I want to be sure there is housing that is affordable for all."

Notes

† Living closer to Balboa Reservoir Project defined as including those living south of Hearst Ave and west of Detroit Street, and those living on Gennessee or Foerster Streets, streets that funnel traffic into and out of CCSF area.

‡ Living farther from BRP defined as those living north of Flood Ave or east of Edna Street and not on Gennessee or Foerster.
Balboa Reservoir Project: Sunnyside Resident Survey

Conducted by Sunnyside Neighborhood Association, at May 13, 2017, special meeting

The Balboa Reservoir Project is a development that will be built on the land now used for City College parking, located between Sunnyside, Ocean Avenue, Phelan Ave, and Westwood Park. This development, estimated to be completed in the 2020s, will impact Sunnyside in various ways. After hearing some information about the Balboa Reservoir Project today, SNA wants to know what your top concerns are.

1. Please circle your street:

<table>
<thead>
<tr>
<th>Acadia</th>
<th>Baden</th>
<th>Congo</th>
<th>Detroit</th>
<th>Edna</th>
<th>Flood</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foerster</td>
<td>Gennesse</td>
<td>Havelock</td>
<td>Hearst</td>
<td>Joost</td>
<td>Judson</td>
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<tr>
<td>Mangels</td>
<td>Marston</td>
<td>Melrose</td>
<td>Monterey</td>
<td>Ridgewood</td>
<td>Staples</td>
</tr>
<tr>
<td>Phelan</td>
<td>Other (please write your street):</td>
<td></td>
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</tbody>
</table>

2. As a Sunnyside resident, please rank your top three concerns about the outcome of the development. Please write “1” your top concern – “2” next to your second most important concern – “3” next to your third most important:

______The height of the buildings in final plan.
______Parking issues and impacts on Sunnyside streets resulting from the development.
______Open space/park space – total contiguous (all in one chunk) park size in final plan.
______The type of housing built – student, studio, one-bedroom, two-BR, and/or three-BR.
______The market price of the housing – affordable, middle-class, and/or market-rate.
______Traffic congestion in our neighborhood resulting from the development.

3. Please tell us more about your top concern regarding the Balboa Reservoir Project:

______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________

4. Optional:
Name__________________________Address__________________________
Email __________________________

4
Shanahan, Thomas (ECN)

From: Shaw, Jeremy (CPC)
Sent: Tuesday, May 16, 2017 11:23 AM
To: Sunnyside Neighborhood Association; Lesk, Emily (ECN); Lisa Spinali
Cc: BRCAC (ECN)
Subject: RE: an additional BRP comment

Thanks Amy.

We will make sure this is recorded with the other survey.

Jeremy

From: Sunnyside Neighborhood Association
Sent: Tuesday, May 16, 2017 7:33 AM
To: Lesk, Emily (ECN); Shaw, Jeremy (CPC); Lisa Spinali
Subject: an additional BRP comment

Hi Emily, Jeremy, and Lisa --

A belated survey came through my mailbox, included extended comments, from someone who lives near the site:

"The parking area is used for so much more than cars. Currently, a variety of formal and informal groups, including motorcycle safety classes, marching bands practice, new motorists, youth and adult bicyclists, dog walkers, runners/walkers, hobbyists controlling remote models. To categorize it as merely a parking lot is inaccurate and removes it from its importance to the surrounding community."

I think this is a cogent comment.

-Amy

--

Amy O'Hair, Secretary
Sunnyside Neighborhood Association
http://SunnysideAssociation.org
Thought this link worth sending to the design team based on the more conservative images we sent on the concept of a "woodlake garden" idea or modern "hoff" concept.

This one mimics the hills around, so for SF's 48 hills would be an ideal layout and place-making project.

Would and could integrate nicely into the PAEC's building (landscape rooftop as well...)

A. Goodman D11

Mr. Shanahan,

Attached is my Written Comment on Balboa Reservoir. It is entitled "Unaddressed Flaws in Balboa Reservoir Project."

--Alvin Ja
UNADDRESSED FLAWS IN BALBOA RESERVOIR PROJECT (updated 3-18-2017)

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.

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 are willing to make a short-term sacrifice in exchange for a long-term bonanza.**

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).
- 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.

   o 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. The RFQ’s section on Applicable Land Use Policies makes no reference to the PUC’s own “Framework for Land Use and Management.”

2. From the PUC website: By adoption of the Framework, the Commission is seeking to advance the analytical and decision-making process surrounding the administration of real estate assets under the SFPUC’s exclusive jurisdiction.

3. PUC’S Land Use Framework policy allows sale only if: “Use of the land sold will not result in creating a nuisance.”

4. Even though the PUC Land Use Framework was formulated to focus on “Land Management Guidance for...Disposition of SFPUC Lands,” The City Team has dismissed the importance of this policy document: “It is not necessary, or feasible, for an RFQ to name all of the City policies and
Importantly, Staff misstated the essence of the question. The real question was whether or not the intended disposition of the PUC Reservoir property complies with PUC’s policy on “Disposition of SFPUC Lands”; the question was not whether the Land Use Framework policy is “named.”

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 Reservoir 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 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/exit, 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/exit 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
Shanahan, Thomas (ECN)

From: Aaron Goodman
Sent: Thursday, April 13, 2017 7:26 AM
To: Susan Lamb
Cc: BRCAC (ECN); Tim Chan
Subject: Bike bridge ideas and how they can link areas and provide innovative solutions to transit and urban access issues

Worth reading in terms of access to Bart from CCSFVPARKINGCCSF and balboa reservoir site

Think of one crossing south side of CCSF direct over highway and into bart station entry area

It’s not impossible and can provide dynamic design. For CCSF with parking and housing connected on east side.....

Ag d11


Sent from my iPhone
Shanahan, Thomas (ECN)

From: Aaron Goodman
Sent: Wednesday, April 12, 2017 10:32 AM
To: Walton, Kim (MTA); BRCAC (ECN)
Subject: Article to share with BRCAC and BPSCAC on issues of construction and traffic

For info.


Sent from my iPhone
Update from Keith for your assist new person from tonight!

Sent from my iPhone

Begin forwarded message:

From: "Tanner, Keith" <Keith.Tanner@sfmta.com>
Date: March 13, 2017 at 5:28:21 PM PDT
Subject: FW: Balboa Upper Yard Community Meeting March 25th, 2017

To those following news of the Balboa Park Station CAC:

Please note that we will be holding a March meeting, and you can expect to receive a meeting invitation shortly with date and time details.

In the meantime, I wanted to pass along a notice to this community planning meeting, the first large public meeting for the Balboa Park Upper Yard development, for March 25th.

From: Balboa Park Mission Housing [mailto:balboapark@missionhousing.org]
Sent: Monday, March 13, 2017 9:10 AM
Subject: Balboa Upper Yard Community Meeting March 25th, 2017

Dear Friends and Neighbors,

Please come share your thoughts and ideas for the Balboa Park Upper Yard development by attending the community planning meeting that will be held on March 25th at Balboa High School. See the attached flyer (English, Cantonese, Spanish and Tagalog versions) for additional information.

Please feel free to distribute the flyer amongst community members.

Aditi Mahmud
Project Manager
Mission Housing Development Corporation
balboapark@missionhousing.org
我們重視你的聲音，
請於 3/25/17
10 時到以下地點出席公聽會，
支持在 Balboa Park Upper Yard，
興建 100% 可負擔房。

Balboa High School
1000 Cayuga Ave, Room 152
綠色房間
Ipahayag ang inyong tinig ukol sa 100% ABOT-KAYANG PABAHAY sa Balboa Park Upper Yard

Sabado, Marso 25th, 2017
10:00 am – 12:00 pm

Balboa High School
1000 Cayuga Ave, Room 152 (Luntiang Silid)

balboapark@missionhousing.org
415-864-6432

Libreng pagkain at inumin
Lend your voice to the conversation about building **100% Affordable Housing** at the Balboa Park Upper Yard

**FIRST PUBLIC MEETING – YOUR VOICE MATTERS!**

Saturday, March 25th, 2017
10:00 am – 12:00 pm

Balboa High School
1000 Cayuga Ave, Room 152 (Green Room)

For more info contact
Scott Falcone or Aditi Mahmud
balboapark@missionhousing.org
415-864-6432

**Complimentary food and refreshments**

**MISSION HOUSING DEVELOPMENT CORPORATION**

**RELATED**

Mayor’s Office of Housing Community Development Division
PRIMERA REUNIÓN PÚBLICA – SU VOZ IMPORTA!

Preste su voz a la conversación sobre la construcción de vivienda 100% asequible en Balboa Park Upper Yard

Sabado, Marzo 25, 2017
10:00 am – 12:00 pm

Balboa High School
1000 Cayuga Ave, Room 152 (Cuarto Verde)

Para información adicional llamar a:
Marcía Contreras
Directora de Servicios al Residente
415-864-6432

Refrescos y bocadillos estarán disponible

MISSION HOUSING DEVELOPMENT CORPORATION

Mayor's Office of Housing Community Development Division