

AFT 2121 Public Comment for Balboa Reservoir Project DSEIR
September 17, 2019

Whereas, the SF Public Utilities Commission, in close cooperation with various San Francisco agencies, is proceeding with plans to build a private housing development on public land currently owned by the SF Public Utilities Commission (the “Balboa Reservoir Project”); and,

Whereas, the proposed Balboa Reservoir Project is located on the section of the Balboa Reservoir that City College of San Francisco (“CCSF”) has improved and leased from the PUC since 1946; and

Whereas, public land is a sacred trust that should not be sold, but rather kept in public hands for public good, and

Whereas, the proposed Balboa Reservoir Project will provide 1100-1550 units of mostly market rate housing which in no way meets the growing need in San Francisco for affordable housing; and

Whereas, the proposed Balboa Reservoir Project will create congestion, transit delays, other environmental problems; and

Whereas, construction of Balboa Reservoir Project could delay or prevent completion of the CCSF Performing Arts and Education Center (the “PAEC”) approved by voters in 2001 and 2005 bond measures; and,

Whereas, the proposed Balboa Reservoir Project DSEIR minimize the impact of the Balboa Reservoir Project on CCSF and the community, thereby supporting private luxury housing development; and

Whereas, at the January 9, 2018 SF County Transit Authority meeting (where the TDM was passed) Malia Cohen says, "I believe that Avalon Bay will create a lot of problems for us, those of us that have relationships in labor. Many times they have come here, our labor partners have come raising concerns that they haven't hired union labor to do the job." ; and

Whereas, any project built in San Francisco, especially one on public land, should be mandated to use local union labor; and

Whereas, the comment period hearing for written public comment period closes on

September 23, 2019 at 5:00 pm; and

Whereas, all submitted comments and the responses are published in a RTC (Responses to Comment) document that becomes part of the final record; be it

Resolved, AFT 2121 Delegate Assembly encourages all its members and the broader community to submit their own written comments to the SF Planning Commission; and

Be it Finally Resolved, AFT 2121 Delegate Assembly direct the President to submit the following Public Comment to the SF Planning Commission in accordance with their procedures and copy the CCSF Board of Trustees, the SFLC, and any other relevant parties.

AFT 2121 PUBLIC COMMENT ON THE DRAFT SEIR OF THE BALBOA RESERVOIR PROJECT

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

The DRAFT SEIR is inadequate because it fails to consider the option of building 100% affordable housing The Draft SEIR states the need to "DEVELOP THE RESERVOIRS IN A MANNER THAT WILL BEST BENEFIT THE NEIGHBORHOOD, THE CITY, AND THE REGION AS A WHOLE".

San Francisco is woefully behind in creation of affordable housing, and yet, this Draft SEIR does not consider the option of dedicating this publicly owned property to 100% affordable housing. Nor does it even consider its own PEIR (Balboa Park Station Area Plan https://generalplan.sfplanning.org/Balboa_Park_Station.htm) which states that when offering public land for development, first consideration should be given to the development of housing affordable to individuals or families making less than 120 percent of the area median income.

One of the greatest obstacles to building affordable housing is the price of land. In San Francisco this obstacle is even more formidable than in other areas of the country. The City of San Francisco should not sell this public land to a private developer that will build mostly market rate housing.

The DSEIR accepts the unexamined premise that creating market rate housing in conjunction with some affordable housing is the only path forward. It does not explore the possibility of funding units which are 100% affordable.

The DRAFT SEIR is inadequate because it fails to consider the possibility of using this public land to build dedicated educator housing

Since approval of the PEIR, the City of San Francisco has identified an urgent need for housing dedicated to educators. The lower Balboa Reservoir is surrounded by schools whose teachers and students would be able to walk to work/school if they lived there. The DSEIR needs to examine this alternative.

The DRAFT SEIR is inadequate because it fails to consider the impact of market-rate units in working-class neighborhoods

The Draft SEIR does not consider the impacts of the project on the nearby working-class neighborhoods of Ingleside and The Excelsior. The development of mostly market rate units puts the residents at risk of displacement due to gentrification. A development solely devoted to affordable housing would better blend with these working class neighborhoods.

The DRAFT SEIR is inadequate because it fails to consider the impact of the zoning change The proposed zoning change from P (Public) to Reservoir Special Use District constitutes a qualitative change of land use from PUBLIC to PRIVATE with no analysis of the impact this would have. The change is justified by the fiction of offering “affordable housing” when, in reality, most of the units will be market-rate housing.

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

The DRAFT SEIR is inadequate because it fails to consider the impact of monetary costs incurred to CCSF The proposed Reservoir development has already cost the college money due to the major re-design of the original PAEC (Performing Arts Education Center).

The DRAFT SEIR is inadequate because it fails to consider secondary environmental impacts The significant secondary environmental impacts of potential new CCSF parking construction replacing spaces eliminated by the project must be addressed.